

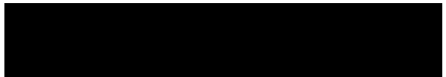


Historic England

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00209/FULMAJ
Our Ref: 220630

Contact: Helen Hawkins



12th April 2024

Dear Ms Williams,

TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023

Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development)

Recommend Amendment of Archaeological Desk Based Assessment

Thank you for your consultation received on 09th April 2024.

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice in accordance with the National Planning Policy Framework and GLAAS Charter.

An archaeological desk-based assessment has been submitted with the planning application (Waterman 2024). The desk-based assessment does not meet CIFA or GLAAS standards and should be revised in order to meet these standards. Historic maps pre-dating 1893 are discussed but not illustrated-illustrations of early maps should be included as standard and an extract from the Roman map of London produced by MOLA should also be included within City DBAs. There is no discussion of the expected depths of impact from the current or any previous buildings on the site-details of the depth and extent of the current basement should be provided. The discussion of expected impact from the new development is also weak. No plans or sections of the new development have been included and there has been no attempt to illustrate where new impact is likely to be located outside areas of current impact. Despite being requested by GLAAS when contacted to confirm a search radius for the site, no consideration of impacts from any proposed public realm, landscaping and drainage/service works has been provided.

Until the information outlined above has been provided in the DBA, I cannot make an informed decision on likely requirements for archaeological conditions for the site.

Further information on archaeology and planning in Greater London is available on the Historic England website

This response relates solely to archaeological issues.

Yours sincerely

Helen Hawkins

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



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Your ref:
My ref: 24/02336/OBS

Please reply to: Nikki Mitchell
Tel No: 07866037846
Email: southplanningteam@westminster.gov.uk

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

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

23 April 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/02336/OBS **Application Date:**
Date Received: 09.04.2024 **Date Amended:** 09.04.2024

Plan Nos: Email from City of London dated 9 April 2024

Address: Tenter House, 45 Moorfields, City Of London, London

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Yours faithfully


Deirdra Armsby
Director of Town Planning & Building Control

Note:

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.





Memo

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

From District Surveyors Office
Environment Department

Telephone

Email

Date 18 April 2024

Our Ref DS/FS24/0021

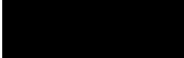
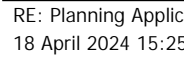
Your Ref PT_AW/24/00209/FULMAJ

Subject Tenter House 45 Moorfields London EC2Y 9AE

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

The District Surveyors Office has reviewed the fire statement and has no comments.

The proposal is considered to comply with policies D5 and D12.

From: 
To: 
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Date: 18 April 2024 15:25:28
Attachments: [image001.png](#)
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

Application No: 24/00209/FULMAJ

Site address: Tenter House 45 Moorfields London EC2Y 9AE

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Thank you for your consultation.

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

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

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

a) No preparatory works (including removal of roof top plant enclosures; roof top plant rooms; rear conservatory; signage; main reception (including glass cladding); stone cladding panels; rear extension to loading bay; and removal of the railings to the terrace) shall take place until a detailed design and method statement (in consultation with London Underground) for such works has been submitted to and approved in writing by the local planning authority which:

- provides details on all existing structures;
- provides details on the use of tall plant / scaffolding;
- accommodates the location of the existing London Underground

- structures;
- demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to our railway, property or structures;
 - accommodates ground movement arising from the demolition thereof.
- b) No demolition (other than preparatory works covered by part (a) of this condition) shall take place until a detailed design and method statement (in consultation with London Underground) for demolition has been submitted to and approved in writing by the local planning authority which:
- provides details on all existing structures;
 - provides details on the use of tall plant /scaffolding;
 - accommodates the location of the existing London Underground structures;
 - demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
 - accommodates ground movement arising from the demolition thereof.
- c) No works (other than demolition) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:
- provides details on all proposed structures;
 - provides details on the use of tall plant/scaffolding;
 - accommodates the location of the existing London Underground structures;
 - demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
 - demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
 - accommodate ground movement arising from the construction thereof;
 - and
 - mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

Reason: To ensure that the development does not impact on existing London Underground

transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

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

Kind regards,

Tom Li

Safeguarding Engineer (LU+DLR) | Infrastructure Protection
5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN



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

From: [REDACTED]

Sent: 09 April 2024 09:34

To: Location Enquiries [REDACTED]

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to [REDACTED]

Kind Regards

Planning Administration

On behalf of

Amy Williams

Environment Department

City of London

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<https://portal.cityoflondon.gov.uk/>
tel: 020 7556 2200 www.cityoflondon.gov.uk

-----Original Message-----
From: Yvonne Vignall
Sent: Thursday, April 23, 2025 3:58:28 PM
To: Andy Williams
Cc: Tames Lee
Subject: 2402025-FULMAJ - Tanner House 45 Moorfields

Hi Andy,
The proposed waste and storage collection facilities indicated on Drawing No. and P1019 Rev A and TR010 Rev A, comply with our requirements and are adequate for the proposal. Therefore, this division will not raise any objection to this application.

Thanks

Yvonne

-----Original Message-----
From: Yvonne Vignall
Sent: Thursday, April 23, 2025 8:11 AM
To: Tames Lee
Subject: Planning Application Consultation: 24 02025-FULMAJ

Dear Sir/Madam,
Please see attached consultation for Tanner House 45 Moorfields London EC2Y 0AE.
Reply with your comments to: FULMAJ@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Andy Williams
Environmental Department
City of London



PLNComments@cityoflondon.gov.uk

19 April 2024
Crossrail Ref: CRL-IP-3150

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

Dear Amy Williams,

24/00209/FULMAJ : Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

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

Thank you for your letter dated 09 April 2024, requesting the views of TfL on the above application. I confirm that this application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction. If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, please apply the following conditions on the Notice of Permission:

Elizabeth line condition for foundation design and settlement

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

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

Elizabeth line Informative - transmitted groundbourne noise & vibration

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

If you require any further information, please contact:

CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....
Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk
.....

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

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

From: [REDACTED]
To: [REDACTED]
Subject: RE: [EXTERNAL] Planning Application Consultation: 24/00209/FULMAJ [SG37222]
Date: 19 April 2024 16:01:13
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37222

Dear Sir/Madam

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

However, please be aware that this response applies specifically to the above consultation and only reflects the position of NATS (that is responsible for the management of en route air traffic) based on the information supplied at the time of this application. This letter does not provide any indication of the position of any other party, whether they be an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

If any changes are proposed to the information supplied to NATS in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee NERL requires that it be further consulted on any such changes prior to any planning permission or any consent being granted.

Yours faithfully

2TAM

NATS Safeguarding

[REDACTED]
4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Public

From: [REDACTED]
Sent: Tuesday, April 9, 2024 9:36 AM
To: NATS Safeguarding <[REDACTED]>
Subject: [EXTERNAL] Planning Application Consultation: 24/00209/FULMAJ

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Dear Sir/Madam

Please see attached consultation for Tenter House 45 Moorfields London EC2Y 9AE .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

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NATS means NATS (En Route) plc (company number: 4129273), NATS (Services) Ltd (company number 4129270), NATSNAV Ltd (company number: 4164590) or NATS Ltd (company number 3155567) or NATS Holdings Ltd (company number 4138218). All companies are registered in England and their registered office is at 4000 Parkway, Whiteley, Fareham, Hampshire, PO15 7FL.



Historic England

Ms Amy Williams
City of London Corporation
Guildhall, PO Box 270
London
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: P01575410

22 April 2024

Dear Ms Williams

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

**TENTER HOUSE 45 MOORFIELDS LONDON EC2Y 9AE
Application No. 24/00209/FULMAJ**

Thank you for your letter of 9 April 2024 regarding the above application for planning permission.

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

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

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

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

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

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

Yours sincerely



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

Telephone 020 7973 3700
[HistoricEngland.org.uk](https://www.historicengland.org.uk)





Historic England

Breda Daly
Inspector of Historic Buildings and Areas
E-mail: [REDACTED]



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

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

MEMORANDUM

To Amy Williams

From City Gardens
My reference
Your reference 24/00209/FULMAJ
Being dealt with by Alex Roebuck
Telephone 07743 168769
Date 22 April 2024

**Tenter House 45 Moorfields London EC2Y 9AE
Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].**

New trees are proposed at ground floor level and elsewhere on the site. Whilst new trees and greening are welcomed, the proposals include trees in planters at the ground floor at very large initial sizes. These are not likely to establish well or provide sustainable canopy cover when planted at this size in these conditions.

Trees at a maximum size of 20-25 would be more suitable for such planting locations. I suggest that details across the site of tree species, sizes, soil volumes, planting and maintenance details should be secured by condition.

regards,

Alex Roebuck
Arboricultural projects officer

Your Ref:
Our Ref: 24/01123/OBS

Lambeth

Amy Williams
PO Box 270
Guildhall
London
EC2P 2EJ

30th April 2024

RE: REQUEST FOR OBSERVATIONS

Dear Amy Williams

DECISION NOTICE
TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and RAISES NO OBJECTION

Application Number: 24/01123/OBS Date of Application: 09.04.2024 Date of Decision 30.04.2024

Proposed Development At:

Adjoining Borough Observations Within The Corporation Of London

For: Observations on a proposed development within the adjoining Borough of City of London with respect to Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AO[]] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GIA] at Tenter House 45 Moorfields London EC2Y 9AE

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Approved Plans

Lambeth Planning
PO Box 80771
London
SW29 0Q

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

Conditions

Notes to Applicant:

Yours sincerely



Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 30th April 2024

Ms Amy Williams
Planning Department
City of London PO Box 270
Guildhall
London EC2P 2EJ

5th May, 2024

Dear Ms Williams,

Objection from the Barbican & Golden Lane Neighbourhood Forum

Reference 24/00209/FULMAJ

Address Tenter House, 45 Moorfields, London, EC2Y 9AE

Proposal Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

Summary SITE AREA: 0.3774 ha - STOREYS: 22 - HOMES: 0 - FLOOR AREA: 31933 m²

This site has been subject to multiple planning applications over the past 27 years, each one larger and taller than the one before. The current Tenter House building is still standing and substantial demolition work has not begun. There is an extant planning permission for an 18-storey building ("2020 scheme"), which the applicant suggests should be considered as having been built for the purpose of determining daylight/sunlight but demolished for the purpose of calculating carbon impact.

The problem of overlapping planning permissions and developers "picking and choosing" between elements of consented schemes is well known. In our view the City should avoid side-stepping democratically determined policy at national London-wide and City levels on Whole Life Carbon. To suggest that the existing Tenter House has been demolished under the current permission for an 18-storey tower on the site and that therefore there is a near zero carbon to consider in the demolition for this new application is a fallacy. Allowing destructive plans for a 22-storey tower to go ahead without considering the full carbon effect and the potential for retrofit is both outdated and contrary to policy at all levels of the planning hierarchy.

The applicant's suggestion that this will allow the City to claim an additional £5m in CIL, because the existing 11-storey building will have been demolished at the time of the planning decision, strikes us as highly unlikely as the building is very visibly still standing. The suggestion that, by enabling City Point Plaza to be levelled at the eastern edge, this will result in £4.65m of benefit and 186m² extra "open space" is equally questionable. Neither of these financial calculations offset the damage to carbon, townscape, amenity and heritage from this scheme.

Our objection to the application is based on the following:

The WLCA does not include demolition, in breach of the NPPF, London Plan and City guidance.

Unacceptable loss of daylight and sunlight due to the excessive height of the development.

The size/scale of the scheme which is disproportionate and over-dominant in the context of the Barbican's listed status, the five neighbouring Conservation Areas, the views of St Paul's Cathedral from the river and the impact on heritage and townscape overall.

The potential for excessive noise pollution from the roof terraces.

Light pollution from artificial lighting at night.

The inadequacy of traffic and servicing arrangements.

Demolition – and the unexplored potential for retrofit

The applicant's Whole Life Carbon Assessment (WLCA) takes as its starting point a cleared site, even though the current building has not been demolished. The requirement set out in the London Plan (and the emerging City Plan 2040) is to "take into account any carbon emissions associated with pre-construction demolition". We are concerned, therefore, that this and the NPPF requirements to help "shape places in ways that contribute to radical reductions in greenhouse gas emissions" (para 157) and for new development to be planned for in ways that "can help to reduce greenhouse gas emissions" are being side-stepped.

In order to develop this scheme, the existing Tenter House has to be demolished. That is a matter of fact. We object strongly to the acceptance of a WLCA which completely ignores the carbon emissions associated with the demolition of the existing building.

Daylight/Sunlight impact

Suitable daylight/sunlight data has not been provided by the applicant. There has been no response to our request for "*the Daylight, Sunlight and Overshadowing Report to include the visual depiction of the Transient Shadow Results, on 20 March, 20 June and 21 December - on an hourly basis. The analysis should show the pre-existing condition and the proposed condition, and further consider the cumulative impact of Tenter House and 21 Moorfields on the residential properties to the west of the site*". The 2024 reports do not appear consistent with those used in the equivalent 2020 documents and there is not enough detail to reassure consultees that the impact of the scheme is as presented.

Baselining against a cleared site and the existing 11-storey building, would enable neighbours and the local planning authority to fully assess the impact. Instead, applicants have only considered the impact of the extra four storeys over the consented 2020 scheme (para 2.6 of the daylight/sunlight assessment). In our view applicants have not shown in adequate detail the cumulative impact from developments completed since the previous scheme was consented (such as 21 Moorfields).

The applicant also claims that the impact will not be noticeable because of the Willoughby House balconies (para 1.4). By using models of the impact of balconies, rather than real-life measurements, as an excuse to reduce daylight to neighbouring homes enables real harm to residential amenity.

Even in the absence of data we have confidence in, it is apparent that the additional height of this new scheme will have a significant adverse effect on neighbouring flats. This cannot be mitigated in any other way than reducing the height of the proposed development.

Homes need a decent amount of daylight and sunlight and it shouldn't be reduced below reasonable levels simply because of technicalities in the guidelines: the reductions to the occupants are real and, as City policy recognises, loss of light in a home is more significant than in an office. Current proposals breach DM10.7 in the current Plan and HS3 in the emerging City Plan 2040.

Full and accurate information and a clear picture of the difference between what is on site now and what is proposed should be publicly available before consultation closes and a decision is taken on this scheme.

Size/scale - disproportionate and over-dominant

During consultation, the applicants received a great deal of feedback that this scheme is disproportionate and over-dominant in the context of the listed Barbican Estate and other heritage assets such as Lutyens House, the five neighbouring Conservation Areas, the immediate townscape and the strategic views of St. Paul's Cathedral. We can see no evidence that consultation responses have been considered in the scheme's evolution in any way.

All previous replacement and infill buildings along Moor Lane, from Ropemakers Street to Fore Street, respected the shoulder height of the opposite Barbican buildings. From here additional building mass was developed towards Moorfields, away from the estate: on one hand to create a consistent building height along the street and on the other to mitigate the buildings' impact on residential amenities. Moor Place at no. 1 Fore Street, completed in 2014, respectfully increased its height at a shallow angle towards the east of the site. The recently completed Deutsche Bank at 21 Moorfields followed suite, however, due to a lack of a clear language and building shapes, did so less successfully.

In contrast, the proposed seven-storey block on top of the 15-storey base of the new Tenter House transgresses the established development height of its neighbours away from the Barbican, placing substantial mass ever closer to the estate. The proposal will further close the gap between 21 Moorfields and Citypoint, thus creating an over 80-metre-high continuous wall of tall buildings between London Wall to the south and Ropemakers Street to the north.

The addition of the encroaching 22-storey block by itself and in context of its neighbouring buildings, will appear out of character and overbearing. The creation of a 'terrace of tall buildings' will be detrimental to the townscape and setting of the Grade II Barbican Estate, and it will harm close-up and wider views from the estate and its Grade II* listed landscape and gardens.

Terraces, overlooking, noise and residential amenity

As the City recognised with its own development proposal for London Wall West, terraces directly opposite residents' bedrooms and living rooms, as here, damage residential amenity. As with Londo Wall West, west-facing terraces should either be taken out of the scheme or limited by condition to restrict use after 6pm on weekdays, and none at all on weekends and Bank Holidays:

41. Hours of use (roof terraces) (C)

The roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.

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

Traffic, servicing and noise

Tenter House has never been serviced from Moor Lane, which is a strategic cycle route, an important pedestrian north-south route, a "healthy street" for traffic management and a quiet residential street. We object to the proposal to route 88 deliveries a day including at weekends down Moor Lane, particularly as servicing yard is not big enough for vehicles to turn around and therefore will result in noisy reversing. This contravenes the City's current plan policy DM 16.5 as well as Policy D14 of the London Plan. In the 2020 scheme, the City insisted on a servicing yard big enough for lorries to turn round. If it was crucial then, it is crucial now.

Bins to be inside the servicing yard at all times

The applicant is not clear on whether waste will be stored on the lower ground adjacent to the servicing yard (4.3) or to the rear of the servicing yard (4.2). Bins and compactors generate a lot of noise – they need to be inside the building at all times including when waste collection lorries service the building, as with all the other developments locally. This is a residential street, and neighbouring homes need to be protected from unacceptable noise.

Light at night – automated blinds as well as PIR controls

The City's much-publicised Lighting Strategy and SPD should be applied in full to avoid the high level of light pollution which would otherwise unacceptably affect the quiet enjoyment of neighbouring homes which City and London-wide planning policy acknowledges as "light-sensitive" usage. Experience of other developments shows that automated blinds are the most appropriate mitigation for such pollution. This should be secured by condition.

Cultural and community component

The applicant's proposed offer out-of-hours use of a meeting room (and not even free of charge) as the community and cultural contribution of this scheme to an area recognised as a strategic cultural quarter for London is laughably inadequate.

In conclusion, we note that when the previous (2020) scheme was approved, the Planning Department accepted that the proposed building would have a "significant impact" on the appearance of City Point Plaza and result in reduced levels of daylight and sunlight even though the scale and massing of that scheme corresponded to the height of 21 Moorfields. This new scheme is substantially bigger and nearer to its neighbours, harming views, homes and heritage assets in a way its predecessor did not.

Yours sincerely

Peter Jenkinson and Brenda Szlesinger

Co-Chairs, Barbican and Golden Lane Neighbourhood Forum



Representing the interests of Barbican Residents

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

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

7th May 2024

For the attention of Ms Amy Williams, Senior Planning Officer

Dear Ms Williams

Ref: Planning reference number: 24/00209/FULMAJ; Tenter House 45 Moorfields London EC2Y 9AE

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the above application for the *"Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building [34,880sq.m GIA], with two ground floor retail units, community floorspace at first floor level, new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]"*.

Our objections to this application focus on the impact of the proposals principally on the significant loss of residential amenity this development would cause - in particular 1) the loss of daylight and sunlight due to the unacceptable increase in height and mass 2) the consequent potential for light pollution 3) the potential for noise disturbance from the proposed terraces and 'woodland' and 4) the unacceptable and unworkable access, entry and servicing routes.

We have additional concerns on the impact of the proposals on townscape and heritage.

We would also reiterate our concerns regarding the deficits in both the process and information provided in the application, principally regarding the Whole Life Carbon Assessment and the Daylight, Sunlight and Overshadowing Reports.

Loss of residential amenity

In terms of height, the current Tenter House is 11-storeys high with a height of 74.9m. The proposed development will be part-14, part-22 storeys, totalling a maximum height of 85.8m (99.9m AOD). This means that it will be considered and assessed as a tall building in accordance with the City of London's definition. The previously consented scheme in 2020 was for an 18-storey building on the site giving

a height of 87.9m AOD. Hence the proposed new building will be 12m taller than the previously consented scheme at its highest point and over 20m higher than the existing building.

In terms of floorspace, the development will provide 34,880sqm of office floorspace – some 8,477sqm more than the previously consented scheme of 26,403sqm. Hence whilst the applicant states that *“The overall height and scale of the Proposed Development is consequently broadly the same as the Permitted 2020 Scheme”*, this is evidently not the case. Whilst we accept that this current application includes a greater variation in volume, height and massing across the building than the previously consented scheme, a 32% increase in mass and a 14% increase in height can hardly be described by any stretch of the imagination as being “broadly the same”. We also note that the commercial floorspace of the current Tenter House is 15,465sqm indicating that the mass of the proposed new development will be 2.25x that of the existing building.

Moreover, previous replacement buildings along Moor Lane, from Ropemakers Street to Fore Street, respected the shoulder height of the opposite Barbican buildings. Any additional building mass was developed towards Moorfields, away from the estate: on the one hand this created a consistent building height along the street and on the other it mitigated the buildings’ impact on residential amenities. The proposed development makes no attempt to do that, making it out of keeping with the surrounding townscape.

Loss of Daylight and Sunlight; Overshadowing

Our email to you of 2nd May 2024 voiced our concerns that the City of London is taking the applicant’s word for it that the extra height of the proposed building will have no effect on residents in the near vicinity – in particular those in Willoughby House. A 20m + increase in the height of the building will inevitably have an adverse impact on the level of daylight and sunlight received by neighbouring properties as will the potential for overshadowing.

Whilst the major impact will indeed be felt by residents in Willoughby House, we would advise that the additional height will also block daylight and sunlight to all of the west facing residential blocks in the Barbican in the vicinity of Moor Lane including Gilbert House and Speed House.

Revised report urgently required

We advised in our email to you of 2nd May 2024 that the applicant’s Daylight, Sunlight and Overshadowing Report failed to provide sufficient detail as to the impact of the proposed building on neighbouring properties. A revised report is now urgently required which must include the visual depiction of the Transient Shadow Results, on 20 March, 20 June and 21 December - on an hourly basis. The analysis should also show the pre-existing condition and the proposed condition, and further consider the cumulative impact of Tenter House and 21 Moorfields on the residential properties to the west of the site.

Over and above the omission of proper analysis, we also pointed out that the "baseline" for the Daylight and Sunlight report (para 2.6 of part 1 of the Daylight and Sunlight assessment) isn't the existing building but against a cleared site: *"This report has, therefore, assessed:*

*a. the likely effects of the Proposed Development against a baseline of a cleared application site; and
b. the likely effects arising in the context of a cleared site against the likely effects identified as a result of development of the site in accordance with the 2020 Permission (referenced throughout as the “Permitted 2020 Scheme”).*

How can it be possible that the building that currently exists is not being used as a baseline? Surely the proposed new development should be assessed against the cleared site and the existing 11-storey

building NOT against the cleared site and an imaginary 18 storey one. We would again urge the planning department to challenge the applicant on this sleight of hand.

Impact of balconies

The applicant also claims that the impact will not be noticeable because of the Willoughby House balconies (para 1.4) - thereby breaching guidelines with the apparent consent of the City. The Barbican Association has long argued that allowing developers to reduce daylight to residences using the existence of balconies as an excuse does real harm to residential amenity. The point about daylight and sunlight is that residences need a decent amount of daylight and sunlight and it shouldn't be reduced below reasonable levels simply because of technicalities in the guidelines: the reductions to the occupants are real. Moreover, it is not unreasonable for residential flats to have balconies: they provide residential amenity.

In this regard we find it hard to accept the information provided on this issue in the applicant's Daylight, Sunlight and Overshadowing Report. This document makes reference to the proximity of Willoughby House to the site – but claims to have “satisfactorily addressed” any negative impact of the proposed development. It claims that *‘Whilst the Proposed Development will give rise to some minor reduction in daylight and sunlight to Willoughby House these reductions are considered to be so minor as to be unnoticeable particularly as the reductions identified are principally the result the presence of very deep overhanging projections above the windows in Willoughby House itself’.*

The Report continues: *‘It is therefore clear that it is the architectural features of Willoughby House itself that are the principal factor in the relative loss of light as opposed to there being any overdevelopment.....The windows would experience no more than a 13% reduction which clearly illustrates that it is the presence of the balcony, rather than the bulk and mass of the proposed scheme, that is the principal factor for the relative loss of light. Subsequently, the VSC transgressions are solely a consequence of the overhanging projections.’*

We would question how balconies on part of a Grade II listed building, which was completed in 1971 and is located in an important and historic Conservation Area, can be at fault for the significant loss of light (and a loss of 13% is indeed significant) caused by the planned increase in height of this proposed building located on the opposite side of Moor Lane?

We would remind that this subject is referred to in the current Local Plan section 3.10.41 which states “The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments.....When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals. Where appropriate, ***the City Corporation will take into account unusual existing circumstances, such as development on an open or low rise site and the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.***” We would therefore suggest that City Corporation takes heed and follows its own guidelines on this subject and applies them to this application.

Cumulative effect of recent developments

Again, referring to the current Local Plan section 3.10.41 above, you will note that it states: ***“When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals”.*** There have been a number of significant new developments around the Moor Lane area over the past few years – including the Heron Building, 22 Ropemaker Street, City Point, 21 Moorfields, WeWork, London Wall Place. We urge the planning committee to take into account the cumulative effects of these developments together with the increased height and mass proposed in this current application regarding Tenter House.

Light pollution

The increase in height and mass of the proposed new Tenter House gives rise to serious concerns over light pollution. Policy HL3 of the current City Plan Noise and light pollution states that *“Developers must consider the noise and lighting impacts of their development..... Internal and external lighting should be designed to reduce energy consumption, **avoid spillage of light beyond where it is needed and protect the amenity of light sensitive uses such as housing, hospitals and areas of importance for nature conservation..... New development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.....”***

Policy D9 of the London Plan with regard to Tall Buildings also re-confirms this....” *buildings should not cause adverse reflected glare.....**buildings should be designed to minimise light pollution from internal and external lighting....”***

Light pollution at night is unacceptable and is a significant issue for residents. We would therefore recommend a strict and enforceable planning condition to be attached to any consent to this application for the compulsory fitting of automated blinds to the west facing windows and the independently verified commissioning of automated sensor systems to turn lights off after a certain time.

Noise pollution from terraces

The submitted documents accompanying this application talk of *“the terraces surmounting the east and west volumes will be connected by balconies around the edge of the central volume”*. Indeed, the plans show that there are over 2000sq m of balconies and terraces on the proposed building - 60sq m on levels 2, 4, 6, 8, 10 and 69sq m on level 12. The ‘design concept’ of the large roof terrace on level 14 even *‘visualises a woodland in the sky’*.

We trust that the Planning Officers are aware that the bedrooms of the 145 flats in Willoughby House face Moor Lane. The issues of noise pollution and the use of terraces and viewing galleries are covered by both the London and current City plans.

Policy D14 of the **London Plan** states that noise should be managed by *‘avoiding significant adverse noise impacts on health and quality of life’*. Policy DE5 of the current City Plan states that *“**Roof terraces will be encouraged where..... There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity.....”***

The potential for noise pollution in a location close to such a densely populated residential area is significant and has the potential to have a significant adverse impact on residential amenity – directly in contravention to both the London and City Plans. As has been the case in all of the previous development applications submitted in the vicinity in the area, **we request the setting of strict and enforceable conditions at this planning stage as to the use and timing of the proposed terraces and “woodland”**. Terraces should be closed at 6pm on weekdays and at all times at weekends and Bank Holidays (in this we have followed the recommendations of the environmental health team made in relation to the London Wall West scheme).

Unacceptable access, entry and servicing routes

The Delivery and Service Plan shows all vehicles from any direction accessing New Union Street from Moor Lane and leaving the site onto Moorfields. Those from the south come in from Fore Street, those from the east along Silk Street and those from the west along Ropemaker.

Given that some 88 deliveries are expected every day to the site – in addition to the 100+ deliveries every day to City Point – it is clear that Moor Lane is unlikely to be the quiet, greened street that was originally promised. Please note that Moor Lane is currently a quiet cycleway and the 2040 plan proposes it as a major north south pedestrian route. Neither of these uses are compatible with a run for delivery lorries

The access route to the service yard should be from and to Moorfields rather than Moor Lane given the proximity of the proposed service routes to many residential premises. Moorfields is little used.

It also appears that the servicing yard is too small for lorries to turn round in which means that they will either have to reverse out onto New Union Street or reverse into the yard. This is inappropriate both for such a densely populated residential area and for the many users of the strategic cycleway along Moor Lane. As well as creating excessive noise, this is both dangerous and unworkable and will create significant noise and disruption in the area. It also breaches City policy, which requires that vehicles should be able to turn inside a service yard in order to be able to drive out frontwards – and not have to reverse.

The service yard should be enlarged to allow lorries to turn and prevent this.

Unclear strategy regarding Waste

We would also suggest that the waste strategy is unclear and somewhat contradictory. At Point 4.3 the documents state that waste will be stored at lower ground level adjacent to the servicing yard but Point 4.2 states that refuse bins will be stored at the rear of the servicing yard. This throws up the very real potential for significant noise pollution given that the noise of throwing waste into bins – particularly solid items – can carry a long way.

The Waste Strategy needs to be clear that no bins or compactors should be stored outside of the servicing yard.

Impact on townscape and heritage

Policy HC1 of the London Plan states that *“proposals should take account of, and avoid harm to, the significance of London’s heritage assets and their settings”*.

The applicant’s Townscape, Heritage and Visual Impact Report February 2024 states at Point 4.24 that *“The Site is not located within any designated conservation areas, however the Proposed Development would be visible from within a number of conservation areas and has the potential to affect the heritage significance of those conservation areas as a consequence....”* It also states at 2.67 that *“Development on the Site would potentially be visible in direct relation to St Paul’s Cathedral in two LVMF views (LVMF 8A.1 Westminster Pier and LVMF 16B.1/2 Gabriels’s Wharf)...”*

We are therefore disappointed that the excessive height of the scheme not only damages the townscape locally but also affects views of St Paul’s from the river which is in contravention of Policy CS13 which exists *“to protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City’s landmarks....”*

Whole Life Carbon Assessment ignores the emissions from demolition

We have already voiced our concerns over these matters in our email to you of 2nd May 2024 so will not repeat them in detail.

In summary however we would like to bring to your attention once again to the **Whole Life Carbon Assessment (WLCA)** submitted by the applicant which completely ignores the carbon emissions associated with the demolition of the existing building as this had been granted under a previously granted planning consent. This - somewhat disingenuously – is clearly seeking to evade the City's "retrofit first" policy and completely ignores a very large amount of embedded carbon from its calculations. The London Plan (and indeed the emerging City Plan 2040) makes it clear that this assessment should **“take into account any carbon emissions associated with pre-construction demolition”**. This application rides a coach and horses through this formal planning guidance and it is disappointing that the City of London has chosen to turn a blind eye to it – not least given its supposed focus on reducing carbon emissions.

The following excerpts from a report to the Local Plans sub-committee meeting in April 2023 submitted by Gwyn Richards, CoL Planning & Development Director and Rob McNicol, CoL Environment Department regarding the emerging City Plan 2040 (now out for formal consultation) place the City's lack of adherence to its own policies into sharp relief. The report stated:

- *Policies SI 2 and SI 7 of the London Plan and related London Plan Guidance “Whole Life-Cycle Carbon Assessments” and “Circular Economy Statements” (March 2022) establish strategic policy and guidance. The guidance advises that re-use/retrofit be prioritised over redevelopment. **The City Plan is required to be in general conformity with the London Plan.***
- ***The draft City Plan 2040 currently requires proposals for major development to demonstrate that London Plan targets for carbon emissions have been met on site as a minimum, and that they retain embodied carbon within building structures where feasible....***

By not challenging the applicant's attempt to evade/ignore the recommendations set out in the London Plan and the merging City Plan 2040, it is troubling to observe that the City of London has chosen to ignore adherence to its own policies.

Summary

New planning applications should consider carbon before designing anything, to make sure the most climate-friendly option is built. By claiming that there is very little carbon embedded in this new scheme as the current Tenter House is being demolished under an old planning consent, the City's "retrofit first" policy is being sidestepped in a most climate-unfriendly way.

This proposed 22 storey tower is surrounded not just by several important Conservation Areas but also hundreds of people's homes and is therefore unsuitable for such a tall, bulky new build. It pokes up over the historic skyline. It cuts out daylight and sunlight for people who live next door, and who will also be overlooked by roof terraces. 88 lorry deliveries are projected to arrive every day, including weekends, along a narrow residential street and strategic cycle route.

For all of the many reasons expanded on in this representation we would therefore request that this application be refused in its current form.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

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

GREATER LONDON AUTHORITY

Good Growth

Amy Williams
City of London Corporation
By Email

Our ref: 2024/0215/S1
Your ref: 24/00209/FULMAJ
Date: 7 May 2024

Dear Amy Williams,

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

Tenter House, 45 Moorfields, London.

Local Planning Authority reference: 24/00209/FULMAJ

I refer to your letter received by the GLA on 19 April 2024 consulting the Mayor of London on the above planning application, under the terms of the Mayor of London Order 2008.

The applicant proposes: *Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. - Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).*

I have assessed the details of the application and, given the scale and nature of the proposals, conclude that the amendments do not give rise to any new strategic planning issues.

Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA. I will be grateful, however, if you would send me a copy of any decision notice and section 106 agreement.

City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Yours sincerely



John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Sakina Sheikh, Chair of London Assembly Planning Committee
National Planning Casework Unit, DLUHC
TfL



Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]

From Kyri Eleftheriou-Vaus
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date 08/05/2024

Your Ref: 24/00209/FULMAJ

Subject: Tenter House, 45 Moorfields EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14- storey and part 22- storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

SUMMARY OF DEVELOPMENT

The proposed development will provide hot water and heating through air source heat pumps. No generator is proposed.

The site is deemed a medium risk during the construction phase however all sites are considered high risk in the City of London and therefore maximum control measures in line with the City's Code of Practice should be employed, to mitigate against dust and emission releases.

Should the development be approved please attach the following conditions:

Condition M32 NRMM

Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and

provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

Reason

To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993

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

Generators and combustion plant

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

From: [REDACTED]
To: [REDACTED]
Subject: FW: 24/00209/FULMAJ; Tenter House 45 Moorfields
Date: 09 May 2024 14:46:58
Attachments: [image001.png](#)
[image002.png](#)

Hi,

Please log and upload the below email as Transport for London comments to the file for 24/00209/FULMAJ, suitably redacted.

Kind regards,
Amy

Amy Williams | she/her
Senior Planning Officer (Development Management and Design)
Development Division
Environment Department
[REDACTED]



Environment Department
City of London Corporation

City of London Corporation | PO Box
270 | London EC2P 2EJ |
www.cityoflondon.gov.uk



From: Paklim Wong [REDACTED] >
Sent: Wednesday, May 8, 2024 5:13 PM
To: Williams, Amy [REDACTED] >
Subject: Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

THIS IS AN EXTERNAL EMAIL

Dear Amy

Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

With regards to the above-mentioned site, TfL offers the following comments:

1. The site is situated close to Moorfields Underground and Liverpool Street Elizabeth Line Station; therefore, prior approval on the proposal's detailed design must be obtained from London Underground Infrastructure team and Crossrail team; this is ensuring that the proposal would not cause adverse impact to TfL rail infrastructure.
2. TfL welcomes that the applicant is committed to provide cycle parking with various type of cycle rack meeting the London Plan cycle parking standards; along with the provision of shower and changing facilities. The final approval of cycle parking details shall be secured by conditions.
3. TfL welcomes that the site would be car free, and the underground car parking would be removed. However, the applicant shall demonstrate how disabled users would be accommodated, in line with London Plan Parking policy.
4. TfL welcomes the removal of the underground car park ramp, enabling new open public realm provided within the City Point Plaza area, and enhance street environment and permeability of the site.
5. It is welcomed that an off-street servicing yard will be provided in line with London Plan policy. TfL also supports that consolidated servicing will be introduced as part of the Delivery & Servicing Strategy. While servicing will be planned during the off-peak; it is recommended that Night time servicing shall be considered where possible to ease day time traffic level; as well as servicing by bikes should also be promoted and encouraged.
6. Regarding trip generations, the submitted TA recognise that the proposed development would generate lesser number of trips compare to the existing development; TfL requires clarify on how this would be achieved, and floor area details of the existing and proposed development should be provided for clarity.
7. It is welcomed that an Active Travel Zone Assessment has been undertaken, five routes have been studied. It is noted that route to Barbican may require attention on improving security; and route to Bank Station have highlighted a number of improvement opportunities such as installing more CCTVs and possible measure to reduce traffic along the route to make walking more attractive. The ATZ also notes there are number construction works being undertaken on various route which may impact pedestrian/ cyclists experience to/ from the site. The city is encouraged to secure a package of improvements toward local public realm, walking and cycling where appropriate.
8. It is noted that a Pedestrian Level of Comfort assessment has been undertaken; on the assumption that the proposal would generate less trips that the existing proposal, it is concluded that there will be improvements to Pedestrian LOS on streets in the vicinity of the site.
9. On the basis that the latest proposal would have no material highway and transport capacity impact over and above the 2020 (17/01050/FULMAJ) consent, TfL therefore would not seek additional mitigation against local public transport service and highway capacity.

10. A Full Construction Management Plan and Construction Logistics Plan shall be submitted for City's approval in consultation with TfL prior to commencement.
11. All highway and transport improvements secured under the 2020 (17/01050/FULMAJ) consent shall be carried forward and be re-secured by s106 planning obligations.
12. The final Cycle Promote Plan and Travel Plan should be secured s106 planning obligations.

In conclusion, while TfL is principally agree that the proposal would not result in an unacceptable impact to the TLRN and surrounding highway network; clarify is needed to confirm that the proposal would result in lesser trip impact than the existing development; and the City is recommended to secure improvement toward walking/ cycling and public realm in light of the ATZ finding, along side with cycle parking provision, car free restriction, revised DSP in light of comments, Travel Plan and cycle promotion Plan. Condition should also be secured in relation to construction management and construction logistics arrangement.

Please do not hesitate to contact me if I can be of any further assistance.

Kind regards

PakLim Wong
Planning Officer
Spatial Planning, Transport for London
5 Endeavour Square, Westfield Avenue, Stratford E20 1JN
Email: [REDACTED]

For more information regarding the TfL Borough Planning team, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit

<http://www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications?intcmp=3484>

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

Application Reference: 24/00209/FULMAJ

Site: Tenter House 45 Moorfields London EC2Y 9AE

Case Officer: Amy Williams

Application Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point

Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,701sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

CIL and Planning Obligations

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

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£6,458,896.44	£6,200,540.59	£258,355.86

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£2,630,475.00	£2,498,951.25	£131,523.75
City Planning Obligations			
Affordable Housing	£1,753,650.00	£1,736,113.50	£17,536.50
Local, Training, Skills and Job Brokerage	£1,052,190.00	£1,041,668.10	£10,521.90
Carbon Reduction Shortfall (<i>as designed</i>) <i>Not indexed</i>	£298,110.00	£298,110.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£TBC	£TBC	£TBC
S106 Monitoring Charge	£5,500.00	£0	£5,500.00
Total liability in accordance with the City of London's policies	£5,739,925.00	£5,574,842.85	£165,082.15

City's Planning Obligations

5. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

7

- 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 (Construction)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion Plan)
- Construction Monitoring Cost (£53,820 *First Year of development* and £46,460 *for subsequent years*)
- Carbon Offsetting

- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Section 278 Agreement (CoL)
- Public Routes (*Public Access*)
- Public Realm Space (*Specifications, Public Access & Management Plan*)
- Cultural Implementation Strategy
- Television Interference Survey
- Wind Audit
- Solar Glare
- Creative Workspace (TBC)
- Highways Contribution (towards improvement works along Moorfields - £TBC)
- Dedication of new public highway
- Dedication of permissive path
- Community Meeting Space (Management Plan)
 - Provision of 179sqm (GIA) of community floorspace to be made available to [X] groups during [X hours]

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

Monitoring and Administrative Costs

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



Historic England

Ms Amy Williams
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00209/FULMAJ
Our Ref: 220630

Contact: Helen Hawkins



24th May 2024

Dear Ms Williams,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2023**

Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development)

Recommend Archaeological Conditions

Thank you for your consultation received on 09 April 2024.



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

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

Assessment of Significance and Impact

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

The Archaeological Desk Based Assessment has been fully revised in line with the comments provided by GLAAS and is now of an acceptable standard. The DBA has illustrated that some impact to archaeological remains will be caused by the redevelopment of the site and therefore archaeological mitigation work is recommended as part of the planning permission.

Although it is likely that demolition will take place under the previous application conditions, the same conditions have been applied here as well, in case there is a change in the programme and all below ground work is carried out under the new permission.

Planning Policies

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

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

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

Recommendations

I advise that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of



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the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition and a foundation design condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.

I therefore recommend attaching a condition as follows:

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

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

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

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

Condition 2: Foundation Design ...

No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by



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

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the local planning authority. The development shall be carried out in accordance with the approved details.

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

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

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

Excavation

Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.

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

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

Yours sincerely

Helen Hawkins



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

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



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

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Memo

To Assistant Director (Development Management)

Environment Department

Tele phone [REDACTED]

Email [REDACTED]



From Alexander Carlyon Smith

Environmental Health Officer

Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 28/05/2024

Our Ref 24/02230/NPLN

Your Ref PT_A W /24/00209/FULMA J

Subject Tenter House, 45 Moorfields, London

Thank you for your memorandum and attached drawings etc. For

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,880sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

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

The following conditions should be applied:

- 14C No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- I11C No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- I18C No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
- I20C Self-closing mechanisms must be fitted on the doors at street entrances before the Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- I26 The roof terraces on hereby permitted shall not be used or accessed between the hours of 21:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- I27 No amplified or other music shall be played on the roof terraces.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- I28 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- M7D (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
- (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
- (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

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

- M1 1G There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- M1 8D Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Sui Generis(Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use takes place.

REASON: In order to protect residential/commercial amenities in the

building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

M1 Before any mechanical plant is used on the premises it shall be mounted in a way
9C 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.

M2 Before the development hereby permitted shall commence, unless otherwise agreed with the
OD Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):

- a. a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
- b. an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
- c. A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, to prevent pollution of the water environment, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to

satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- M2 1D Prior to occupation and unless otherwise agreed with the Local Planning Authority, a verification report produced in accordance with LCRM and other associated guidance detailing the remediation measures completed and final condition of the site must be submitted to and approved in writing by the Local Planning Authority.
The developer must include a statement to confirm that the site development is safe, suitable for its intended use, and would not be considered under Part 2A of the Environmental Protection Act 1990.

REASON:

To ensure that the development is safe and suitable for its intended use for the future users of the land, neighbouring land, and that risks to controlled waters, property and ecological systems are minimised, in accordance with the Local Plan DM15.8. These details are required prior to occupation in order that appropriate evidence of the remedial works is agreed and accepted by the Local Planning Authority prior to any potential exposure of occupiers or harm to the environment from land contamination.

- M2 2D Should unexpected contamination be identified during development hereby approved, the Local Planning Authority must be notified in writing within five working days. An investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management.
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON:

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

- M2 3D Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- M2 4I Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

- M2 5J Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the

approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

M2 No cooking shall take place within any A5 Sui Generis (Pubs with expanded food
7B provision, hot food takeaways) use/Class E (Restaurant) unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

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

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

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

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

STANDARD INFORMATIVES

14C

The Environment Department (Environmental Health Team) must be consulted on the following matters:

- (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.
- (b) Installation of engine generators using fuel oil.
- (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
- (d) Alterations to the drainage and sanitary arrangements.
- (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:
the identification, encapsulation and removal of asbestos in accordance with a planned programme;
provision for window cleaning (internal and external) to be carried out safely.
- (f) The use of premises for the storage, handling, preparation or sale of food.
- (g) Use of the premises for public entertainment.
- (h) Approvals relating to the storage and collection of wastes.
- (i) The detailed layout of public conveniences.

- (j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.
- (k) The control of noise from plant and equipment;
- (l)

15D

Air Quality

- (e) **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.

Boilers and CHP plant

- (f) The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.
- (g) All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.
- (h) When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Environment Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Environment Department is satisfied

that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

- (i) Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

- (j) Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.
 - (k) There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.
- (o) The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Environment strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Alexander Smith
Environmental Health Officer



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Tele phone [REDACTED]

Email [REDACTED]

Date 31 May 2024

Our Ref DS/SUDS24/0023

Your Ref PT_AW /24/00209/FULMA J

Subject Tenter House 45 Moorfields London EC2Y 9AE

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

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

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

- (a) Fully detailed design, schematic and layout drawings for the proposed SuDS components including but not limited to: rainwater harvesting, attenuation systems (including green-blue roofs and the above ground tank), rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance including silt removal; surface water flow rates shall be restricted to no greater than 2.59 l/s from the building, provision should be made for an attenuation volume capacity capable of achieving this, the area allowed to free drain shall be no greater than 1390 square meters;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;

- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.

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

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk



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

Date 07 June 2024
Our Ref 24/02230/NPLN
Your Ref 24/00209/FULMAJ

Subject Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 22-storey [+99.9m AOD] office building (Class E(g)(i)) [34,701sq.m GIA], with two ground floor retail units (Class E(a/b)) [556sq.m GIA], community floorspace at first floor level (Class F2(b)) [179sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 39,490 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ (the Proposed Development).

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

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

Roof terraces hereby permitted shall not be used or accessed between the hours of 1800

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hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.

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

No amplified or other music shall be played on the roof terraces.

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

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 kitchen uses. The details approved must be implemented before the individual commercial kitchen uses are implemented.

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

No cooking shall take place within any commercial kitchen units hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

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

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

Details of the design and acoustic properties of the loading bay door shall be submitted to and approved by the Local Planning Authority before any works thereby affected are begun and shall be maintained for the life of the building.

REASON: To ensure a satisfactory external appearance and to minimise disruption to nearby residents in accordance with the following policies of the Local Plan: DM10.1 and DM21.3.

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

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

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and

arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

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

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

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

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

M19C Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

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

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

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

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

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

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

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

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

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

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

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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

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

Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

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

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

Prior to the commencement of 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 NRMM Regulations and the 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. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

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

Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3..

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

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.

Regards

Donal Rooney


Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ



From: Paklim Wong
Sent: Tuesday, June 11, 2024 3:12 PM
To: Williams, Amy <[REDACTED]>
Subject: RE: 24/00209/FULMAJ; Tenter House 45 Moorfields

THIS IS AN EXTERNAL EMAIL

Dear Amy

Thank you for forwarding me the applicant's response to my earlier comments. I have now reviewed it have the following observations:

1. The applicant has now provided clarification on trip generation, and it is concluded that the likely increase in trip rate is unlikely to cause a significant material impact over and above the consented proposal to the local highway/ transport network.
2. I also considers that other matters have been addressed and relevant planning obligations or conditions should be secured accordingly.
3. Any planning conditions/ obligations (if Any) in relation to London Underground secured in previous consented proposal should be carried over.

Kind regards

PakLim Wong
Planning Officer
Spatial Planning, Transport for London
5 Endeavour Square, Westfield Avenue, Stratford E20 1JN

From: Williams, Amy <[REDACTED]>
Sent: 31 May 2024 21:35
To: Paklim Wong
Subject: RE: 24/00209/FULMAJ; Tenter House 45 Moorfields

Dear PakLim,

Thank you for the below.

Please see attached response document produced by the applicant, as well as area schedules.

Please can you let me know if this now acceptable?

Kind regards,
Amy

Amy Williams | she/her
Senior Planning Officer (Development Management and Design)
Development Division
Environment Department



Environment Department
City of London Corporation

City of London Corporation | PO Box
270 | London EC2P 2EJ |
www.cityoflondon.gov.uk



From: Paklim Wong
Sent: Wednesday, May 8, 2024 5:13 PM
To: Williams, Amy [REDACTED]
Subject: Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

THIS IS AN EXTERNAL EMAIL

Dear Amy

Re: 24/00209/FULMAJ; Tenter House 45 Moorfields

With regards to the above-mentioned site, TfL offers the following comments:

1. The site is situated close to Moorfields Underground and Liverpool Street Elizabeth Line Station; therefore, prior approval on the proposal's detailed design must be obtained from London Underground Infrastructure team and Crossrail team; this is ensuring that the proposal would not cause adverse impact to TfL rail infrastructure.
2. TfL welcomes that the applicant is committed to provide cycle parking with various type of cycle rack meeting the London Plan cycle parking standards; along with the provision of shower and changing facilities. The final approval of cycle parking details shall be secured by conditions.
3. TfL welcomes that the site would be car free, and the underground car parking would be removed. However, the applicant shall demonstrate how disabled users would be accommodated, in line with London Plan Parking policy.
4. TfL welcomes the removal of the underground car park ramp, enabling new open public realm provided within the City Point Plaza area, and enhance street environment and permeability of the site.
5. It is welcomed that an off-street servicing yard will be provided in line with London Plan policy. TfL also supports that consolidated servicing will be introduced as part of the Delivery & Servicing Strategy. While servicing will be planned during the off-peak; it is recommended that Night time servicing shall be considered where possible to ease day time traffic level; as well as servicing by bikes should also be promoted and encouraged.
6. Regarding trip generations, the submitted TA recognise that the proposed development would generate lesser number of trips compare to the existing development; TfL requires

clarify on how this would be achieved, and floor area details of the existing and proposed development should be provided for clarity.

7. It is welcomed that an Active Travel Zone Assessment has been undertaken, five routes have been studied. It is noted that route to Barbican may require attention on improving security; and route to Bank Station have highlighted a number of improvement opportunities such as installing more CCTVs and possible measure to reduce traffic along the route to make walking more attractive. The ATZ also notes there are number construction works being undertaken on various route which may impact pedestrian/ cyclists experience to/ from the site. The city is encouraged to secure a package of improvements toward local public realm, walking and cycling where appropriate.
8. It is noted that a Pedestrian Level of Comfort assessment has been undertaken; on the assumption that the proposal would generate less trips that the existing proposal, it is concluded that there will be improvements to Pedestrian LOS on streets in the vicinity of the site.
9. On the basis that the latest proposal would have no material highway and transport capacity impact over and above the 2020 (17/01050/FULMAJ) consent, TfL therefore would not seek additional mitigation against local public transport service and highway capacity.
10. A Full Construction Management Plan and Construction Logistics Plan shall be submitted for City's approval in consultation with TfL prior to commencement.
11. All highway and transport improvements secured under the 2020 (17/01050/FULMAJ) consent shall be carried forward and be re-secured by s106 planning obligations.
12. The final Cycle Promote Plan and Travel Plan should be secured s106 planning obligations.

In conclusion, while TfL is principally agree that the proposal would not result in an unacceptable impact to the TLRN and surrounding highway network; clarify is needed to confirm that the proposal would result in lesser trip impact than the existing development; and the City is recommended to secure improvement toward walking/ cycling and public realm in light of the ATZ finding, along side with cycle parking provision, car free restriction, revised DSP in light of comments, Travel Plan and cycle promotion Plan. Condition should also be secured in relation to construction management and construction logistics arrangement.

Please do not hesitate to contact me if I can be of any further assistance.

Kind regards

PakLim Wong
Planning Officer
Spatial Planning, Transport for London
5 Endeavour Square, Westfield Avenue, Stratford E20 1JN

For more information regarding the TfL Borough Planning team, including TfL's

Transport assessment best practice guidance and pre-application advice please visit

<http://www.tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications?intcmp=3484>

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Memo

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

From District Surveyors Office
Environment Department

Tele phone [REDACTED]

Email [REDACTED]



Date 13 September 2024

Our Ref DS/FS24/0035

Your Ref PT_A W /24/00209/FULMA J

Subject Tenter House 45 Moorfields London EC2Y 9AE

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

I have reviewed the fire statement and have no comments. I consider that the application meets policies D5 and D12.

From:
To:
Cc:
Subject: 24/00209/FULMAJ - Tenter House 45 Moorfields
Date: 15 September 2024 00:45:30

Hi Amy

The proposed waste storage and collection facilities indicated on Drawing No. P0199 Rev B and as outlined in the Delivery, Servicing and Waste Management Plan, Feb 2024, and the Transport Assessment Addendum, Aug 24, are adequate for this proposal. Therefore, this division, will not raise any objection to this application.

Thanks

Vimal

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

From:
Sent: Monday, September 9, 2024 9:57 AM
To: Varma, Vimal; Turner, Lee
Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation for Tenter House 45 Moorfields London EC2Y 9AE .
Reply with your comments to HYPERLINK "<mailto:PLNComments@cityoflondon.gov.uk>"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

From:
To:
Cc:
Subject: FW: 24/00209/FULMAJ - Tenter House 45 Moorfields London EC2Y 9AE
Date: 17 September 2024 13:01:18
Attachments:

THIS IS AN EXTERNAL EMAIL

Hi Amy
Thanks for reconsulting me on this application. The revised proposals have not affected my original advice, which I have attached for reference
Regards
Helen

Helen Hawkins MCIFA

Archaeology Adviser, City of London

Greater London Archaeology Advisory Service (GLAAS)

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

www.historicengland.org.uk

Please send all your planning and pre-planning archaeology consultations to:
e-glaas@historicengland.org.uk

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 09 September 2024 09:54

To: E-Glaas
Subject: 24/00209/FULMAJ -
Tenter House 45 Moorfields
London EC2Y 9AE

-- WARNING: This is an external message. Please use caution when replying, opening attachments or clicking on any links in this e-mail.--

Dear Sir/Madam

Please see attached consultation for proposed works involving a material change to a building which is listed grade NO.

The application and associated documents are available for viewing at
<http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S9IXTQFHIBE00>

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Amy Williams

OUR REF: 24/00209/FULMAJ

ADDRESS: Tenter House 45 Moorfields London EC2Y 9AE (Grid Reference: 532686, 181715)

PROPOSAL: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

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Corporation of London Department of Planning &
Transportation PO Box 270 Guildhall London EC2P 2EJ
18 September 2024

Our DTS Ref: 75854 Your Ref:
24/00209/FULMAJ - Amended App

Dear Sir/Madam

Re: TENTER HOUSE , 45 MOORFIELDS, LONDON, -, EC2Y 9AW

Waste Comments

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

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit

from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. 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 he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 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.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Water Comments

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

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme

for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

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

Thames Water are currently working with the developer of application 24/00209/FULMAJ to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 19,00sqm of office space at 1.5l/s but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 19,00sqm of office space at 1.5l/s 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 additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures 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. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple
Lodge STW, Denham Way, Rickmansworth,
WD3 9SQ Tel:020 3577 9998 Email:
devcon.team@thameswater.co.uk



It's everyone's water



Your ref:
My ref: 24/06285/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: southplanningteam@westminster.gov.uk

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

18 September 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 24/06285/OBS **Application Date:**
Date Received: 09.09.2024 **Date Amended:** 09.09.2024

Plan Nos: Consultation letter from City of London dated 9 September 2024.

Address: Tenter House, 45 Moorfields, City Of London, London

Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ.

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Yours faithfully



Deirdra Armsby
Director of Town Planning & Building Control

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



Note:

- 3f The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



GREATER LONDON AUTHORITY

Good Growth

Amy Williams
City of London
By Email

Our ref: 2024/0479/NSI
Your ref: 24/00209/FULMAJ
Date: 20 September 2024

Dear Amy Williams

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008
45 Moorfields, London EC2Y 9AE
Local Planning Authority reference: 24/00209/FULMAJ

I refer to your letter received by the GLA on 10 September 2024 consulting the Mayor of London on the above planning application, under the terms of the Mayor of London Order 2008.

The applicant proposes: *Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].*

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

The GLA has been consulted on the application due to the provisions of Article 4 of the Mayor of London Order (Consultation required by Secretary of State direction), as the development is within the following Protected Vista and exceeds its threshold plane:

Protected vista 8: Westminster Pier to St Paul's Cathedral

City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

I have assessed the details of the revised application and, given the scale and nature of the proposals, conclude that the proposals would not adversely affect the above Protected Vista, and therefore the proposals do not give rise to strategic planning issues.

Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA. I will be grateful, however, if you would send me a copy of any decision notice and section 106 agreement.

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL

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

Application Reference: 24/00209/FULMAJ

Site: Tenter House 45 Moorfields London EC2Y 9AE

Case Officer: Amy Williams

Application Proposal: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

CIL and Planning Obligations

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

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£5,835,395	£5,601,979	£233,416

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£2,373,450	£2,254,778	£118,673
City Planning Obligations			
Affordable Housing	£1,582,300	£1,566,477	£15,823
Local, Training, Skills and Job Brokerage	£949,380	£939,886	£9,494
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£265,172	£265,172	£0
S106 Monitoring Charge	£4,500	£0	£4,500
Total liability in accordance with the City of London's policies	£5,174,802	£5,026,313	£148,489

City's Planning Obligations

5. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- Highway Reparation and other Highways Obligations (*Highways Schedule of Condition Survey, site access, consents, licences etc*)
 - Local Procurement Strategy (*Demolition and Construction*)
 - Employment and Skills Plan (*Demolition and Construction*)
 - Delivery and Servicing Management Plan (*including Consolidation*)
 - Travel Plan (*including Cycling Promotion Plan*)
 - Construction Monitoring Cost (£53,820- *First Year of development and £46,460 for subsequent years*)
 - Carbon Offsetting

- 'Be Seen' Energy Performance Monitoring
 - Utility Connection Requirements
 - Section 278 Agreement (*CoL*)
 - Television Interference Survey
 - Wind Audit
 - Solar Glare
 - Cultural Implementation Strategy
 - Creative Workspace (*Management Plan*)
 - Community Space (*Management Plan*)
 - Open Space Agreement
 - Removal of existing car park ramp
6. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
7. The scope of the s278 agreement may include, but is not limited to:
- repaving of footways and re-alignment of road to suit new site layout
 - resurfacing of the carriageway
 - provision road markings
 - Provision of disabled parking bays and associated traffic orders
 - Removal of redundant street furniture, if applicable
 - Any highways repair works in the vicinity of the site, upon construction works

Monitoring and Administrative Costs

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

Informative – 005B

Informative 005B - CIL

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

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

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

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

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

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: [Download the forms - Community Infrastructure Levy - Planning Portal](#))

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.

23/09/2024

EK



Historic England

Ms Amy Williams
City of London Corporation
Guildhall, PO Box 270
London
EC2P 2EJ

Direct Dial: 020 7973 3765

Our ref: P01575410

25 September 2024

Dear Ms Williams

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

**TENTER HOUSE 45 MOORFIELDS LONDON EC2Y 9AE
Application No. 24/00209/FULMAJ**

Thank you for your letter of 6 September 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Historic England is the Government's advisor on the historic environment and has a statutory role in the planning process. Our role in this site is to assess the impacts on the wider historic environment including the setting of designated heritage assets. This letter only refers to the designated assets and any matters related to non-designated archaeological assets are covered in separate correspondence from my colleague Helen Hawkins.

Significance

St Paul's Cathedral

St Paul's Cathedral is of exceptional architectural and historic significance. It was built in 1675-1710 in the Classical style by Sir Christopher Wren, following the destruction of the medieval cathedral in the Great Fire. In recognition of its national, and indeed international significance, the Cathedral is listed at Grade I.

Key features of the Cathedral that appear in skyline views include its dome, western towers and upper parts of the elevations. In many riverside views, these features are clearly visible and recognisable due to their distinctive form and scale, making a strong contribution to its architectural significance. In many wider London views, the architectural composition of the Cathedral creates a distinctive and recognisable silhouette on the skyline.



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

Telephone 020 7973 3700
HistoricEngland.org.uk

Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

The London View Management Framework (LVMF) is adopted Supplementary Planning Guidance (SPG) issued by the Greater London Authority (GLA) to protect key views of Westminster World Heritage Site and St Paul's Cathedral from public spaces across the capital. The framework identifies key panoramas, river prospects and townscape views, known as designated views, where developments are required to make a positive contribution and consider their impact on foreground, middle ground and background views.

An evidence-based analysis of the setting of St Paul's Cathedral has recently been undertaken by Historic England in conjunction with the Dean and Chapter of the Cathedral. The report, which equates to steps 1 and 2 in Historic England's *Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets* (2017), assesses all aspects of its setting. The role of clear sky space is identified as central to its significance and ability to appreciate its significance both individually and in combination with others.

Previous consents

Planning permission was previously granted for the redevelopment of this site in 2020. Historic England was consulted in both 2017 and 2018. Whilst we did not provide detailed advice, we recommended that specialist conservation advice be sought from within the City of London's own planning department.

Proposals and their impact

The current proposals by David Walker Architects are for the complete demolition of the 11-storey post-war building on the site and construction a new part 14 and part 22 storey building for a mixed-use scheme that includes offices, retail and community floorspace. The proposed height of the development means that it will have an impact on the settings of more distant designated heritage assets in key views of them.

In respect of this new application, impacts on LVMF View 16B.2 The South Bank Gabriel's Wharf have been identified. The viewing platform provides views east towards the City of London and as a river prospect view, the Thames dominates the foreground. The focus of the view is St Paul's Cathedral, recognisable due to the distinctive silhouette of the dome and peristyle beside the western towers and pediment set against clear sky.

Although the proposed development would not appear in the view from the spot identified in the LVMF, it would be clearly visible as one approaches the viewing platform via the walkway east of 16B.2. It will appear behind the western pedimented parapet with statue of St Paul at its pinnacle, filling the clear sky between it and the tower to the north of the west elevation with built form. Removing the clear sky from behind this distinctive element would dilute the effect of the highly characterful



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

Telephone 020 7973 3700
HistoricEngland.org.uk

silhouette. The visual impact of the proposals does cause harm to the Grade I listed building through development in its setting.

Policy

The 1990 Planning (Listed Buildings and Conservation Areas) Act makes it a statutory duty for a planning authority to give special regard to the desirability of preserving listed buildings or their setting (section 16 and 66) when making decisions which affect them.

Guidance on the fulfilment of statutory planning duties is set out in the government's National Planning Policy Framework 2023 (NPPF). The NPPF makes clear that when considering the impact of a scheme, any conflict with the conservation of heritage assets should be avoided or minimised (para.201). Great weight should be given to the conservation of heritage assets, and this weight should be greater for the most important assets (para.205). Clear and convincing justification should be provided for any harm caused (para.206), and any harm should be weighed against the public benefits of the scheme (para.208).

The strategic policy framework for London is set out in the London Plan. Its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance and appreciation, and to avoid harm. It justifies this by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets.

The London View Management Framework (LVMF) is a piece of Supplementary Planning Guidance (SPG) published by the Greater London Authority (GLA) in support of policies in the Mayor of London's 'London Plan' 2021. It is a material consideration in all planning decisions that relate to the designated views it identifies which focus on the Westminster WHS and St Paul's Cathedral.

The City of London Local Plan, adopted in 2015, includes policies which seek to protect: · the Historic environment (CS12) including policies to protect gardens and open spaces (DM12.5); · Protected Views (CS13) and only allow tall buildings in suitable locations (CS14).

Recommendation

Historic England does not object in principle to these proposals as established in our previous responses to earlier planning applications on this site.

However, Historic England considers the impact identified above would cause some



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

Telephone 020 7973 3700
HistoricEngland.org.uk



harm, which would be less than substantial, through development within the setting of a designated heritage asset of the highest significance. A reduction in the height of the scheme would help to mitigate against this harm and we would encourage you to pursue this with the applicants as part of your wider discussions about these proposals. In accordance with the NPPF, this harm to the significance of the Grade I listed St Paul's Cathedral will need to be weighed against the public benefits of the scheme by the City of London Corporation as part of your decision-making process.

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

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

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

Yours sincerely

Breda Daly

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



Memo

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



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

Date 25 September 2024
Our Ref 24/05267/NPLN
Your Ref 24/00209/FULMAJ

Subject Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

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

There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition

process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

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

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

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

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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

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

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

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

Before any 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.

Roof terraces and balconies hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.

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

No amplified or other music shall be played on the roof terraces or balconies.

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

No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Any works that would materially affect the external appearance of the building will require a separate planning permission.

REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

The restaurant/cafe use hereby permitted shall not be open to customers between the hours of 23:00 on one day and 07:00 on the following day.

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

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen uses. The details approved must be implemented before the individual commercial kitchen uses are implemented.

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

Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

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

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

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

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

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

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

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

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

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

Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: 07592120750

From: Location Enquiries
Sent: Friday, September 27, 2024 5:36 PM
To: PLN - Comments
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Importance: High

THIS IS AN EXTERNAL EMAIL

FAO Amy Williams,

Our ref 24/00209/FULMAJ

Location: Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Thank you for your consultation.

IP Engineer requires more time to review the above proposal, would it be acceptable to extend the consultation to 4th October please?

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering

Transport for London

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



Please consider the environment before printing this e-mail.

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

From:

Sent: Monday, September 9, 2024 9:53 AM

To: Location Enquiries

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams

Environment Department

City of London

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PLNComments@cityoflondon.gov.uk

30 September 2024
Crossrail Ref: CRL-IP-3275

Transport for London
Crossrail Safeguarding
5 Endeavour Square
LONDON
E20 1JN

Dear Amy Williams,

24/00209/FULMAJ : Tenter House 45 Moorfields London EC2Y 9AE

Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b)) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

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

Thank you for your letter dated 09 September 2024, requesting the views of TfL on the above application. I confirm that this application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction. If the Council, in its capacity as Local Planning Authority, is minded to grant planning permission, please apply the following conditions on the Notice of Permission:

Elizabeth line condition for foundation design and settlement

C1 None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which:-

- (i) Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail),
- (ii) Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

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

Elizabeth line Informative - transmitted groundbourne noise & vibration

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

If you require any further information, please contact:
CRL_Safeguarding@tfl.gov.uk

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
CRL_Safeguarding@tfl.gov.uk

TfL Infrastructure Protection Team
Floor 7 B5 : 5 Endeavour Square : London : E20 1JN

.....
Please send, by email, all planning application consultations that are captured by the SoS Crossrail
Safeguarding Direction to CRL_Safeguarding@tfl.gov.uk

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

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

From: [Location Enquiries](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Date: 30 September 2024 17:11:34

THIS IS AN EXTERNAL EMAIL

FAO Amy Williams,

24/00209/FULMAJ

Location: Tenter House 45 Moorfields London EC2Y 9AE
Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Thank you for your consultation.

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

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

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

a) Enabling works

No preparatory works (including removal of roof top plant enclosures; roof top plant rooms; rear conservatory; signage; main reception (including glass cladding); stone cladding panels; rear extension to loading bay; and removal of the railings to the terrace) shall take place until a detailed design and method statement (in consultation with London Underground) for such works has been submitted to and approved in writing by the local planning authority which:

- provides details on all existing structures;
- provides details on the use of tall plant / scaffolding;
- accommodates the location of the existing London Underground Structures;
- demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to demonstrate that there will at no time be any potential security risk to our railway,

- property or structures;
- accommodates ground movement arising from the demolition thereof.

b) Phase 1 – Demolition of existing building down to slab level

No demolition (other than preparatory works covered by part (a) of this condition) shall take place until a detailed design and method statement (in consultation with London Underground) for demolition has been submitted to and approved in writing by the local planning authority which:

- provides details on all existing structures;
- provides details on the use of tall plant /scaffolding;
- accommodates the location of the existing London Underground Structures;
- demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
- accommodates ground movement arising from the demolition thereof.

c) Phase 2: Plaza Works

No works (other than demolition as per the requirements of 12a) and b) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provides details on all proposed structures;
- provides details on the use of tall plant/scaffolding;
- accommodates the location of the existing London Underground structures;
- accommodate ground movement arising from the construction thereof; and
- mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

d) Phase 3 and 4: Basement and Tenter House construction

No works (other than demolition and the Plaza Works as per the requirements of 12 a) 12 b) and 12 c) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

- provides details on all proposed structures;
- provides details on the use of tall plant/scaffolding;
- accommodates the location of the existing London Underground structures;
- demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
- demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
- accommodate ground movement arising from the construction thereof; and
- mitigate the effects of noise and vibration arising from the adjoining operations within the

structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

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

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

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering
Transport for London

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



Please consider the environment before printing this e-mail.

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: Monday, September 9, 2024 9:53 AM

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

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From: [Location Enquiries](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/00209/FULMAJ
Date: 30 September 2024 17:26:24

THIS IS AN EXTERNAL EMAIL

FAO Amy Williams,

Please find amended response with our recommendations numbered per phase

24/00209/FULMAJ

Location: Tenter House 45 Moorfields London EC2Y 9AE
Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA].

Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ

[RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

Thank you for your consultation.

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

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

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

a) Enabling works

No preparatory works (including removal of roof top plant enclosures; roof top plant rooms; rear conservatory; signage; main reception (including glass cladding); stone cladding panels; rear extension to loading bay; and removal of the railings to the terrace) shall take place until a detailed design and method statement (in consultation with London Underground) for such works has been submitted to and approved in writing by the local planning authority which:

1. provides details on all existing structures;
2. provides details on the use of tall plant / scaffolding;
3. accommodates the location of the existing London Underground Structures;
4. demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to

- demonstrate that there will at no time be any potential security risk to our railway, property or structures;
5. accommodates ground movement arising from the demolition thereof.

b) Phase 1 – Demolition of existing building down to slab level

No demolition (other than preparatory works covered by part (a) of this condition) shall take place until a detailed design and method statement (in consultation with London Underground) for demolition has been submitted to and approved in writing by the local planning authority which:

1. provides details on all existing structures;
2. provides details on the use of tall plant /scaffolding;
3. accommodates the location of the existing London Underground Structures;
4. demonstrates that access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land to demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
5. accommodates ground movement arising from the demolition thereof.

c) Phase 2: Plaza Works

No works (other than demolition as per the requirements of 12a) and b) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

1. provides details on all proposed structures;
2. provides details on the use of tall plant/scaffolding;
3. accommodates the location of the existing London Underground structures;
4. accommodate ground movement arising from the construction thereof; and
5. mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

d) Phase 3 and 4: Basement and Tenter House construction

No works (other than demolition and the Plaza Works as per the requirements of 12 a) 12 b) and 12 c) above) shall be commenced until detailed design and method statements (in consultation with London Underground), for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:

1. provides details on all proposed structures;
2. provides details on the use of tall plant/scaffolding;
3. accommodates the location of the existing London Underground structures;
4. demonstrates access to elevations of the building adjacent to the property boundary with London Underground can be undertaken without recourse to entering LUL'S land;
5. demonstrate that there will at no time be any potential security risk to LUL'S railway, property or structures;
6. accommodate ground movement arising from the construction thereof; and

7. mitigate the effects of noise and vibration arising from the adjoining operations within the structures.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed in their entirety, before any part of the building hereby permitted is occupied.

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

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

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering
Transport for London

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



Please consider the environment before printing this e-mail.

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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: Monday, September 9, 2024 9:53 AM

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Planning Application Consultation: 24/00209/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Tenter House 45 Moorfields London EC2Y 9AE .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams
Environment Department
City of London

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Corporation of London Department of Planning & Transportation Our DTS Ref: 75854 Your Ref:
PO Box 270 Guildhall London EC2P 2EJ 24/00209/FULMAJ
1 October 2024

Dear Sir/Madam

Re: TENTER HOUSE , 45 MOORFIELDS, LONDON, -, EC2Y 9AW

Waste Comments

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

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit

from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. 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 he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 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.

With regard to SURFACE WATER drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Management of surface water from new developments should follow Policy SI 13 Sustainable drainage of the London Plan 2021. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Water Comments

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

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme

for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

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

Thames Water are currently working with the developer of application 24/00209/FULMAJ to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 19,000sqm of office space at 1.5l/s but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 19,000sqm of office space at 1.5l/s 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 additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures 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. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3
9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk



It's everyone's water

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Planning application 24/00209/FULMAJ - Objection to the scheme amendments for Tenter House, 45 Moorfields, EC2Y 9AE
Date: 03 October 2024 09:27:55

Some people who received this message don't often get email from [REDACTED]

THIS IS AN EXTERNAL EMAIL

Dear Ms Williams,

[Planning application 24/00209/FULMAJ - Objection to the scheme amendments for Tenter House, 45 Moorfields, EC2Y 9AE](#)

The Barbican and Golden Lane Neighbourhood Forum objects to this development on the boundary of our Neighbourhood Area, which adversely affects the setting of the Listed Barbican Estate and damages the amenity for residents within our Area.

Application 24/00209/FULMAJ, as recently revised, seeks to increase the height of Tenter House to 21 storeys [+95.25m AOD]. This is three storeys higher than the previous consent (the 2020 scheme) resulting in a “tall building” which City of London emerging planning policy (City Plan 2040), and the Mayor of London, recognise as unsuitable for this location as it is not a cluster.

There is no suitable mitigation to the damage to the views of St Paul’s Cathedral, which are being progressively compromised by one small-scale encroachment after another.

The building is still too high and the Forum sees no justification for going beyond the 18 storeys approved previously on this site.

As the servicing yard is not big enough for vehicles to turn around there will also be noisy reversing, breaching the City’s current plan policy DM 16.5. Tenter House is next to people's homes and bedrooms, where noise is an issue. It is on a strategic cycle route and is a potential "quiet street" in the Barbican, Bunhill and Golden Lane Healthy Neighbourhood programme. For these reasons, servicing should comply with the Local Plan and be done entirely within the building with a turning circle large enough to allow vans to enter and exit in a forward direction.

To safeguard amenity under the Local Plan (DM15.7, DM21.3), terraces overlooking should be limited by condition to restrict use after 6pm on weekdays, and none at all on weekends and Bank Holidays, as with the London Wall West application which said (condition 41) that: “The roof terraces hereby permitted shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency”.

To protect from intrusive light at night, and to comply with the City’s Lighting SPD, window units with integral blinds should be required as a condition.

Finally, the Forum also objects to the treatment of Whole Life Carbon. The demolition currently underway under a previous application and this application are clearly one scheme. Guidance on WLCA allows them to be treated as such and we do not understand why the City would choose to undermine its own Retrofit First policy by failing to do so.

Please note that the Forum was not consulted on the revisions to this application during design evolution and before they were submitted to planning.

Yours sincerely,

Brenda Szlesinger and Peter Jenkinson,
BGLNF Co-Chairs

Memo

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



From Mrs Claire Callan-Day
Environmental Health Technician
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 04 October 2024

Our Ref: 24/05267/NPLN

Your Ref: 24/00209/FULMAJ

Subject: Tenter House 45 Moorfields London EC2Y 9AE

RE: Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA]. Note: Demolition of the existing 11 storey building (except for the Class E Unit and its related structures) will take place pursuant to planning permission reference 17/01050/FULMAJ [RECONSULTATION DUE TO SCHEME AMENDMENTS, INCLUDING REDUCED HEIGHT, AND ADDITIONAL INFORMATION].

I wish to make the following comment in an amendment to the comments provided on 25 September 2024, by my colleague Donal Rooney:

Balconies that are solely located on the eastern façade (Moorfields elevation), and have no access to any other facade, hereby permitted shall not be used or accessed between the hours of 2100 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency. All other roof terraces and balconies shall not be used or accessed between the hours of 1800 hours on one day and 0800 hours on the following day and not at any time on Saturdays, Sundays or Bank Holidays, other than in the case of emergency.

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

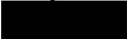
Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details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

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

Regards



**Claire Callan-Day Environmental
Health Technician** Environment
Department
City of London Corporation 





Representing the interests of Barbican Residents

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

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

6th October 2024

For the attention of Ms Amy Williams, Senior Planning Officer

Dear Ms Williams

Ref: Planning reference number: 24/00209/FULMAJ; Tenter House 45 Moorfields London EC2Y 9AE

We are writing on behalf of the Barbican Association, a Recognized Tenants' Association representing the 4000+ residents of the Barbican Estate, to **object** to the revised application for the *“Demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [33,758sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works [Total 35,533 sq.m GEA]”.*

Our objections to this application remain focused both on the impact of the proposals on the significant loss of residential amenity that this development would cause, its impact on the setting of the Grade II and II* listed Barbican Estate and on the seemingly blatant disregard of the developers to adhere to City planning policies.

We would therefore highlight:

- Lack of consultation on revised plans
- Increase in height remains unacceptable
- Increase in mass remains unacceptable
- Loss of Daylight & Sunlight and Overshadowing remain unacceptable
- Spurious argument re balconies remains unacceptable
- Design and bulk out of keeping with surrounding townscape
- Cumulative impact of recent developments ignored
- Light pollution remains a worrying issue
- Concerns re noise pollution from terraces unassuaged

- Unacceptable access, entry and servicing routes
- Unclear strategy regarding waste
- Whole Life Carbon Assessment ignores emissions from demolition

Taking each in turn:

1. Lack of consultation on revised plans

It is disappointing that notice of this re-consultation was only made available to those who had made representations to the earlier planning application and not to the wider community affected by these proposals. Despite the fact that around 100 new documents had been loaded on to the planning portal in September 2024, no direct contact was made by the applicant to neighbouring stakeholders to make them aware of and discuss the changes that had been made to the plans - nor was notice of this re-consultation published on the widely distributed weekly planning lists sent out by the City of London Corporation.

The so-called Statement of Community Involvement – Addendum, dated August 2024 and which was loaded on to the Planning portal on 6th September 2024, remains focused on the consultation process undertaken **prior** to the submission of the planning application in February 2024 and not to the current revised proposals. The document states (erroneously, in our view) on the subject of “Engagement with Barbican residents” that *“At the time of writing, a meeting is being arranged with Barbican Estate residents to brief them on the design changes, which is due to take place in early September”*. On speaking to a number of residents and House Group Chairs, it is our understanding that no such meeting has ever taken place. Why not?

This lack of communication and consultation with stakeholders surely does not comply with the City of London’s recent Statement of Community Involvement, dated July 2024, which stresses that developers should not only *...enter into meaningful engagement with local communities and key stakeholders in a positive and timely fashion ...*” but should also ensure that *“...stakeholders will be provided with all the information they need **when they are consulted** so that they can offer informed views. This includes the consultation aims, methods to be used and the timetable for responding...”*

In this case, stakeholders were most definitely “not provided with all the information they need when they are consulted” as no re-consultation ever took place. It is clear, therefore, that the applicant has not complied with the City’s own obligations.

It is also our understanding that this revised application is to be determined at the next Planning Applications Sub-Committee which is to be held on 29th October 2024. It is therefore hard to believe that the Planning Officer’s recommendation will be anything other than positive, thus rendering this re-consultation not only meaningless and ineffective but also carried out as a mere box-ticking exercise.

2. Increase in height remains unacceptable

Whilst we welcome the small reduction, we maintain our view that the building is still too high. The previous planning application, which was validated on 26th March 2024, proposed a new part 14-storey and part 22-storey building, rising to a height of 99.9m AOD. This revised application is for a part 14-storey and part 21-storey building rising to a height of 95.25m – a reduction in height of just 4.66m or 5%.

We would make the observation however that the current Tenter House is just 11 storeys high with a height of 74.9m and that the previously consented scheme (planning reference number: 17/01050/FULMAJ) was for a building of 18-storeys giving a height of 87.9m AOD. The proposed height

in this revised application, whilst slightly reduced from the earlier application validated in March 2024, is therefore 7.45m higher than that proposed in the previously consented scheme – and over 20m higher than the existing building.

It will therefore still be considered and assessed as a tall building in accordance with the City of London's definition. We would remind you that both the Mayor of London and the emerging City Plan 2040 state that this location is not a suitable one for tall buildings (definition over 75m AOD) and we are concerned that granting approval to this scheme in its present form will set a precedent for similar unsuitable applications, thereby riding a coach and horses through this important London policy by simply ignoring it. The current version of the 2040 plan confined tall buildings of over 75m AOD to two specific areas – the Eastern Cluster and near Fleet Street – precisely because the London Mayor found the previous draft of the City Plan, which enabled tall buildings more or less anywhere in the City, non-compliant with the London Plan.

It is also of concern that the reduction in height was driven by its impact on the views of St Paul's Cathedral rather than the adverse impact on the many residents in the adjacent location. The Replacement Townscape, Heritage and Visual Impact (THVIR) document states that *"The Proposed Development assessed in this Report takes into account amendments to the design made since the application was submitted – most notably the reduction in the maximum height of the proposals by 4.66m together with changes to the detailed design of the building top. **These design changes were made in consultation with and agreed by City of London (CoL) Officers** following a review by the Applicant in light of concerns raised by the CoL as to the extent of visibility of part of the top of the Proposed Development beyond St. Paul's Cathedral in albeit limited views from the South Bank when moving east from LVMF Viewing Location 16B.*

We would observe, however, that the increased mass still interferes with views of St Paul's, albeit to a more limited extent. We also have to say that it is disappointing to note not only that distant views have driven the reduction in height rather than the impact on the peoples' lives but also that these changes have already been agreed by the CoL officers. This calls into question yet again the purpose of this so-called re-consultation as it appears that an approval decision has already been agreed.

We would also like to comment at this stage that we find the current practice of specifying height by AOD rather than "real" levels as unhelpful and unrealistic. As people walk around the streets of the City and see a tall building and wonder how high it is, they are unlikely to ask "how high is this area above sea level" before determining the outcome. People need to know the height of the building in front of them in absolute terms, not just on AOD terms. We therefore suggest that both measurements be included in applications to enable everyone to understand the height of proposed applications in real terms.

3. Increase in mass remains unacceptable

Turning now to the mass of the proposed building, the previous planning application (validated on 26th March 2024) proposed office floorspace of 34880sqm and 2 retail spaces totalling 556sqm. This revised application proposes office floorspace of 33758sqm (a reduction of a mere 3%) and 1 retail space of 287sqm (a reduction of 48%). Again, we would note that the office floorspace in the current Tenter House totals 15465sqm scheme – hence the **revised proposal will still provide more than double the office floorspace of the existing.**

It is also 23% more than the previously consented scheme which was for office floorspace of 27443sqm. The applicant's previous claim that *"The overall height and scale of the Proposed Development is consequently broadly the same as the Permitted 2020 Scheme"* is therefore clearly

wrong. The design is also wider at the top than the previously consented scheme, which again will have a more detrimental impact on residential amenity and the wider townscape.

4. Significant Loss of Daylight and Sunlight and Overshadowing remain unacceptable

We voiced our concerns over this matter in our May 2024 objection letter and, given the very slight reductions in height and mass that are now proposed, they remain unassuaged. We continue to contest the applicant's view that the extra height of the proposed building will have no effect on residents in the near vicinity – in particular those in Willoughby House. A 20m + increase in the height of the building (and some 7 metres higher than the previously consented scheme) will inevitably have an adverse impact on the level of daylight and sunlight received by neighbouring properties as will the potential for overshadowing. Whilst the major impact will indeed be felt by residents in Willoughby House, the additional height will also block daylight and sunlight to all of the west facing residential blocks in the Barbican in the vicinity of Moor Lane including Gilbert House and Speed House.

Neighbours, in particular those in Willoughby House which is a mere 70 metres from the site, were not shown or informed of the impact that the revised proposals would have on the levels of daylight and sunlight that they could expect. The detrimental impact of the increase in height of the scheme remains, however, significant. Indeed, not only does the data provided in the Daylight Sunlight and Overlooking Report – Addendum show a substantial reduction in both NSL and VSC vs the 2020 permitted scheme but it also shows that the detrimental impact on some rooms is even greater than the earlier application made in February 2024 due, we must assume, to the increased mass at the top of the proposed building.

The data provided clearly does not support the applicant's claim of *'whilst the Proposed Development will give rise to some minor reductions in daylight and sunlight to Willoughby House these reductions are considered to be so minor as to be unnoticeable'*. We would counter this claim and remind the City of its own planning policies, in particular Policy HS3, which states that *"All development proposals should be designed to minimise overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation"*. The policy regarding Residential Environment in the emerging City Plan 2040 (Policy HS3) repeats and reinforces this *"All development proposals should be designed to minimise overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation. Light spill from development that could affect residential areas should be minimised, in line with policy DE8..."*

This application clearly breaches this requirement and it is disappointing in the extreme to note that City yet again chooses to ignore its own planning policies to the detriment of residents.

5. Spurious argument re balconies remains unacceptable

The applicant's claim that the reductions in daylight and sunlight *"are considered to be so minor to be unnoticeable"* are spurious, not least as the report goes on to admit that *"there are some transgressions from the BRE Guidelines seen for daylight and sunlight within Willoughby House...."*

However, the applicant does not blame this on the significant increase in height and mass of the proposed building situated just 70 meters away from this densely populated residential area but instead blames *"these transgressions are almost entirely due to the presence of the overhanging balcony...."*

We would question yet again how balconies (actually important and vital fire escapes) on part of a Grade II listed building, which was completed in 1971 and is sited in a significant and historic

Conservation Area, can be at fault for the substantial loss of light caused by the planned increase in height of this proposed building located less than 100 meters away from the Barbican Estate on the opposite side of Moor Lane?

We would remind that this subject is referred to in the current Local Plan section 3.10.41 which states “The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments.....When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals. Where appropriate, ***the City Corporation will take into account unusual existing circumstances, such as development on an open or low rise site and the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.***” We would therefore suggest that City Corporation takes heed and follows its own guidelines on this subject by applying them to this application.

The Barbican Association has long argued that allowing developers to reduce daylight to residences using the existence of balconies as an excuse does real harm to residential amenity. The point about daylight and sunlight is that residences need a decent amount of daylight and sunlight and it shouldn't be reduced below reasonable levels simply because of technicalities in the guidelines: the reductions to the occupants are real. Moreover, it is not unreasonable for residential flats to have balconies: they provide residential amenity.

To the old legal adage that “you take your victims as you find them” – which means that particular oddities/frailties of an injured party (in this case residents with balconies) cannot be used as a defence to limit the liability of the at-fault party (in this case the developer of a much larger building), we would add the “Agent of Change Principle”. This, which features prominently in the National Planning Policy Framework and the London Plan, requires that new nuisance-generating development proposed close to residential areas should put in place measures to mitigate and manage the nuisance. In the case of a loss of daylight, which cannot be mitigated, the increase in height that leads to the loss of daylight should be refused. Although this principle is often thought of in the context of noise nuisance it applies also to other nuisances such as loss of daylight, light pollution, and construction noise, and deliveries (see below).

6. Design and bulk out of keeping with surrounding landscape

As we stated in our previous objection letter in May 2024, preceding replacement buildings along Moor Lane, from Ropemaker Street to Fore Street, have largely respected the shoulder height of the opposite Barbican buildings, with any additional building mass developed towards Moorfields and away from the residential estate. On the one hand this created a consistent building height along the street and on the other it mitigated the buildings' impact on residential amenities.

This proposed development makes no attempt to do that, making it not only out of keeping with the surrounding townscape but also damaging the setting of the listed Barbican Estate and Conservation Area. We therefore take issue with the applicant's claim that *“The Proposed Development would be seen and understood within an established urban setting of large scale modern commercial development to the east of the Estate..... and would not affect the character and appearance of the conservation area overall...”*

7. Cumulative effect of recent developments ignored

Both the current Local Plan and the emerging City Plan 2040 state that *“The cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered.”* There have been a number of significant new developments around the Moor Lane area

over the past few years – including the Heron Building, 22 Ropemaker Street, City Point, 21 Moorfields, WeWork, London Wall Place. These have all had a detrimental impact on the residential amenity of the neighbouring properties but this has been – erroneously in our view – consistently ignored by the City Planning Officers.

We urge the planning committee to take into account the cumulative effects of these developments in tandem with the increased height and mass proposed in this current application regarding Tenter House. We also urge the committee to pay particular regard to its policies on protecting residential amenity next to the City’s largest residential cluster (DM21.3 in City Plan 2015 and Policy HS3.2. and HSE.3 in the emerging Plan 2040) .

8. Light pollution remains a worrying issue

Referring to the current Local Plan section 3.10.41, you will be aware that it states: “***When considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals***”. We have already mentioned that the proposed increase in height and mass of the new Tenter House also gives rise to serious concerns over light pollution. Policy HL3 of the current City Plan Noise and light pollution states that “*Developers must consider the noise and lighting impacts of their development..... Internal and external lighting should be designed to reduce energy consumption, **avoid spillage of light beyond where it is needed and protect the amenity of light sensitive uses such as housing**..... New development must include suitable mitigation measures such as attenuation of noise or light spillage or restrictions on operating hours.....”*

Policy D9 of the London Plan with regard to Tall Buildings also re-confirms this....” *buildings should not cause adverse reflected glare.....**buildings should be designed to minimise light pollution from internal and external lighting**....”*

Light pollution at night is unacceptable and is a significant issue for residents. We would therefore recommend a **strict and enforceable planning condition to be attached to any consent** to this application for the compulsory fitting of integral blackout blinds to the west facing windows to drop automatically at, say 7pm, to prevent the high level of light pollution adversely impacting the many residential homes opposite the site. We would also request the independently verified commissioning of automated sensor systems to turn lights off after a certain time. In addition, we seek that the contractors fit black Corex sheeting while fit out is taking place to ensure no light spillage into residential areas. The application of these conditions would be in line with and support the recommendations in the City of London’s own Lighting SPD, which was adopted in October 2023. And they would be in line with the Agent of Change principle – that the new development should mitigate the impact of nuisance (in this case light pollution) on existing residents

9. Concerns re noise pollution from terraces unassuaged

It is also disappointing to note that no substantive changes have been made to the size and location of the terraces. We commented in our previous objection letter that we trusted “that the Planning Officers are aware that the bedrooms of the 145 flats in Willoughby House face Moor Lane”. The lack of any substantive change to the applicant’s plans suggests that this is sadly not the case. The issues of noise pollution and the use of terraces and viewing galleries are covered by both the London and current City plans

Policy D14 of the **London Plan** states that noise should be managed by *'avoiding significant adverse noise impacts on health and quality of life'*. Policy DE5 of the current City Plan states that ***"Roof terraces will be encouraged where..... There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity....."***

The potential for noise pollution in a location close to such a densely populated residential area is substantial and has the potential to have a significant adverse impact on residential amenity – in direct contravention to both the London and City Plans. As has been the case in all of the previous development applications submitted in the vicinity in the area, **we request the setting of strict and enforceable conditions at this planning stage as to the use and timing of the proposed terraces and "woodland". Terraces should be closed at 6pm on weekdays and at all times at weekends and Bank Holidays ..other than in the case of emergency (in this we have followed the recommendations of the environmental health team made in relation to the London Wall West scheme).**

10. Unacceptable access, entry and servicing routes

The applicant's plans show a more than doubling of the mass of the building which will inevitably increase the number of deliveries to and for the servicing of the site. It is surely therefore the applicant's responsibility to change the internal design to accommodate this substantive increase in a manner which is compliant with City policy.

City policy dictates that vehicles should be able to turn inside a service yard in order to be able to drive out frontwards – and not have to reverse. **The applicant should be reminded of this basic requirement.** Indeed, we recall that the service yard for the 21 Moorfields development was moved from Fore Street Avenue to Moor Lane so that all vehicles could drive in, turn and drive out in forward gear and would suggest that this applicant does likewise.

Frustratingly, the applicant openly admits that the servicing yard is too small for lorries to turn round in which means that they will have to reverse into the yard. Reversing beepers from these HGVs will therefore create a serious noise nuisance in such a densely populated residential area and it remains worrying that white noise beepers are still not mandatory in such areas of the City.

The Transport Assessment Addendum confirms that there have been no substantive changes to the Delivery and Service Plan (DSP). It suggests that the prior submitted proposals would generate a demand for 80 deliveries per day for the office use and 7-8 deliveries per day for the retail/commercial use, a total of 88 deliveries per day – whereas this revised application would give rise to a mere 82 deliveries per day. Nevertheless, when this total is added to the 100+ deliveries every day to City Point, it is clear that Moor Lane is unlikely to be the quiet, greened street that was originally promised.

The applicant then tries to minimise the adverse impact of its inadequately sized servicing yard by claiming that *"the proposal is for vehicles to reverse into the service yard and exit in forward gear* and that *"The service yard has been designed to accommodate vehicles up to and including a 10m rigid lorry, albeit most vehicles will be smaller than this..."* i.e. they will be small enough to turn in the area. The Assessment Addendum then seeks to reassure further *"that deliveries will be consolidated at the Site, with the potential for 50% of deliveries to be consolidated, which would reduce servicing demand to around 41 deliveries per day.*

Nevertheless, **the analysis demonstrates that the development in its worst-case scenario of 82 deliveries per day, would generate up to 10 HGVs per day, with the remainder (72 deliveries) being**

by smaller vehicles of motorcycles, cars and vans, which have substantially lower impact on the environment and the local highway network and neighbouring residential amenity. However, in “the consolidated scenario.... the 41 deliveries per day would **generate up to 5 HGVs per day**, with the remainder (36 deliveries) being by LGVs including motorcycles which most definitely would have an impact on the environment, the local highway network and neighbouring residential amenity.

The Addendum goes on *“it is expected that the vast majority of vehicles will be small to medium sized (such as motorcycles, cars or vans) which are generally not equipped with the audible warnings or reverse beeps which can affect amenity. Whilst **HGVs are more likely to emit audible warnings**, they service the development much less frequently....”*

The Applicant seeks to reassure by stating that they are *“willing to limit servicing hours as reasonably recommended by the CoL to minimise any potential impact on amenity and the local highway network. As per the consented development, deliveries would be undertaken at off-peak times”* but without stating what constitutes off-peak times.....perhaps deliberately as off-peak hours are typically pre 7am and post 9pm – which would clearly have a significantly adverse impact on residential amenity.

We would remind that City Policy HS3 states that *“The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance **from noise, fumes and smells and vehicle or pedestrian movements**. 1. New noise-generating uses should be sited away from residential uses where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided within the new development and, where required, planning conditions will be imposed to protect residential amenity...”*

It is therefore patently clear that **the access route to the service yard should be from and to Moorfields rather than Moor Lane.**

We recall that the CoL insisted on a servicing yard big enough for lorries to turn around in when approving the 2020 scheme. The same requirement should surely also be applied to this application.

The significant increase in traffic will also be a danger for the many users of the strategic cycleway along Moor Lane. As well as creating excessive noise, the plans as they currently stand are both unsafe and unworkable and will create significant noise and disruption in the area. The applicant has also clearly overlooked the fact that Moor Lane is to form part of the Healthy Neighbourhood Scheme.

Bunhill, Barbican and Golden Lane Healthy Neighbourhood Consultation

We would remind that the City is about to publish a consultation on a healthy neighbourhood for the Bunhill, Barbican and Golden Lane area. This would include Moor Lane (which is already a designated quiet road for cycling) and may end up with restrictions on the use of this street.

You may recall that the results of the preliminary neighbourhood engagement consultation was reported to the 4 July 2024 meeting of the Streets and Walkways Sub-Committee. With specific reference to Moor Lane, concerns included traffic volumes, vehicle speeds, vehicle parking, air quality, noise pollution, and cycle and pedestrian access and safety. Suggestions were therefore made to introduce, inter alia, vehicle restrictions, traffic calming and enforcement measures and measures to reduce noise pollution, including restricting access to loud vehicles.

Has the applicant been made aware of this consultation? We question this as the service and delivery proposals put forward in this application most certainly do not conform to the recommendations being made, particularly in terms of traffic volumes and noise. Joined up thinking would anticipate this by requiring all service vehicles to enter and leave via Moorfields

11. Unclear strategy regarding Waste

We continue to feel that the waste strategy remains unclear and contradictory. We continue to object to the plan that waste is to be stored adjacent to but not within the servicing yard given that this creates the very real potential for significant noise pollution given that the noise of throwing waste into bins – particularly solid items – can carry a long way. The storage and handling of waste should be made within the building.

12. Whole Life Carbon Assessment ignores the emissions from demolition

We would also reiterate the point made in our previous objection letter – that is that the WLCA excludes the carbon associated with the current building's demolition. The WLCA submitted by the applicant completely ignored the carbon emissions associated with the demolition of the existing building as this had been granted under a previously granted planning consent. This - somewhat disingenuously – is clearly seeking to evade the City's "retrofit first" policy and completely ignores a very large amount of embedded carbon from its calculations.

The London Plan (and indeed the emerging City Plan 2040) makes it clear that this assessment should ***"take into account any carbon emissions associated with pre-construction demolition"***. This application rides a coach and horses through this formal planning guidance and it is disappointing that the City of London has chosen to ignore it through a technicality – not least given its much publicised and focus on and dedication to reducing carbon emissions.

Summary

The revisions made to this application are minimal and will continue to have an unacceptable impact on residential amenity and the surrounding townscape. By claiming that there is very little carbon embedded in this new scheme as the current Tenter House is already in the process of being demolished under an old planning consent, the City's "retrofit first" policy is being sidestepped in a most climate-unfriendly way.

This proposed 21 storey tower is surrounded not just by several important Conservation Areas but also hundreds of peoples' homes and is therefore unsuitable for such a tall, bulky new build. It pushes up over the historic skyline. It cuts out daylight and sunlight for people who live next door, and who will also be overlooked by roof terraces. 82 deliveries are projected to arrive every day, including weekends, along a narrow residential street and strategic cycle route, with HGVs being forced to reverse into the servicing yard given the inadequate space provisions made. This will create unacceptable levels of noise and traffic and is a danger to residents, pedestrians and cyclists alike. Many of the proposals run counter to City policies.

For all of the many reasons expanded on in this representation we would therefore request that this application be refused in its current form.

Yours sincerely,

Jane Smith – Chair, Barbican Association Planning Sub-Committee

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

Amy Williams
Development Division
Corporation of the City of London
Sent via email only

8th October 2024

Dear Amy,

**Planning Application Follow Up Response Letter, Tenter House (ref:
24/00209/FULMAJ)**

Introduction

I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the proposed redevelopment of Tenter House.

This letter has been prepared following review of the planning application material uploaded to the planning portal. It follows and should be read with a previous letter prepared following consultation with the applicant, which is included appended to this response.

As a related matter, we noted in the previous letter that we had not been consulted on this project. We note that the Planning Team advise that consultation notices had been issued to St Paul's: we have searched our records and cannot find this notification. Outside of discussions on Tenter House, we can follow up with the City on this matter to see if we can identify what has happened.

Discussion

A review of the submission material has not prompted any change in our view on the scheme, as outlined in the previous letter. We raise an **objection** to the enlarged and higher scheme and consider it should be refused.

The enlarged proposals will appear directly behind and impact the silhouette of the west front pediment in nearby views along the south bank of the Thames (east of Gabriel's Wharf).

As appreciable from this part of the setting of the cathedral, the proposals will cause heritage harm to the significance of the Grade I listed building, affecting its architectural and historic special interest. This impact occurs to one of the most important and sensitive part of Wren's composition of this building, which is of exceptional heritage significance and sensitivity.

We also consider this would run contrary to the guidance related to the backdrop and skyline setting of the Cathedral outlined within the City's Protected Views SPD.

We understand that the proposals build on an extant consent. However, the additional height included within the submission scheme would lead to harm not previously present. It is our understanding that the extant consent is not appreciable in these views. The new scheme adds height where harm is appreciable and, in our view, can and should be avoided – not mitigated.

We have also reviewed the submission pack, and to our knowledge cannot find any meaningful discussion of a 'no harm' option in the justification. In our view the 'no harm' option is exemplified by the existing consent - which shows that there must be a viable and architecturally acceptable no-harm (not visible) scheme which, by dint of the approval granted, has been deemed compliant with policy.

We welcome the technical work that has indicated with care and precision how the proposal is visible in views. We also recognise the design efforts made to reduce and mitigate harm by thoughtful consideration of detail and materials thus far, as outlined within the submission pack and within our consultation meeting.

However, the lack of a 'no impact' option within the formal pack of submission materials is of concern and, to our understanding, does not satisfy the need to clearly and convincingly justify harm as outlined within the NPPF.

We understand that there may be, as in many such cases, a viability justification for the proposals. We also understand that the proposal may deliver public benefit. However, this would come at the cost of heritage harm to an important aspect of a Grade I listed building of exceptional significance, in the context of repeated erosions of the contribution of the setting of the Cathedral to date.

As we note above, there clearly is a viable 'no-harm' solution, which would be to either build out or modify the current consented scheme to optimise the development opportunity, without there being any visibility in this most sensitive of contexts.

We therefore hope for meaningful change in the proposals to avoid this heritage harm.

Yours sincerely,



Surveyor to the Fabric

Encl: Letter dated 13th September

cc: Rebecca Thompson: Director of Property, St Paul's Cathedral
Tom Nancollas: Assistant Director (Design), City of London

Directors:

Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:

Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

Amy Williams (& Tenter House Project Team)
City of London
Sent via email only

13 September 2024

Dear Amy Williams (& Members of the Tenter House Project Team),

**Letter in Response to Planning Application: Tenter House (ref:
24/00209/FULMAJ)**

Introduction

Further to a meeting of 20th August, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the evolving proposals for Tenter House.

Background to Response

We welcome dialogue with the project team. We also seek to acknowledge their approach to consultation, openness to discussion, and the high quality of the material issued to us to assist us understanding the scheme.

We note that additional material may have been very recently uploaded to the planning portal. This letter of response has been prepared in response to material received as part of direct discussions with the project team only – the need for a timely response has meant that any additional information has not yet been reviewed. Further comment may follow following review of the additional information submitted.

As we understand it, this application was not notified to St Paul's because the visual impacts were not identified. The very need for dialogue highlights issues within the planning process with regards to discovery, disclosure and acknowledgment of potential impacts to the Cathedral (and indeed other heritage assets). It is regretted (by all concerned) that impacts to the Cathedral were not identified by the City or applicant team ahead of this time, whilst the application was already in process.

Whilst the scheme may not be appreciable in any strategic views (of relevance is 16B.1 and 2 at Gabriel's Wharf) assessment by the project team has shown that the proposals would be visible behind the highly significant west front of the Cathedral from areas just beyond this viewpoint.

It is now clear and confirmed by the project design team that the proposals would have adverse visual impact to locally identified views. In our view, even the revised (lowered) proposals will cause heritage harm (see below).

We have concerns that this was not picked up during the development of the scheme, or during the early submission process. Despite being advised that 'the context has changed' since the submission of the extant consent in 2020, there have been no fundamental shifts in policy or guidance since this time. While technology has improved, we would argue this makes it more likely that potential impacts would be identified.

Our discussion of the impact of the proposals is provided below. Please note, we have provided this initial letter based upon information presented to us to date. We understand further information and heritage and visual assessment is being provided. However, given our concerns it was considered a prompt initial response would be beneficial.

Planning Policy Context

A number of key policies are relevant to this proposal in relation to the Cathedral. These are drawn from the adopted City of London Local Plan 2015, the London Plan 2021, and the National Planning Policy Framework. We have also given consideration as to the emerging draft City Plan 2040 (previously City Plan 2036). Whilst a broad range of policies are relevant, particular consideration is given to those concerning protection of the historic environment and tall buildings.

The key policies relevant to the impact of the emerging proposals on the Cathedral are summarised below:

City of London Local Plan 2015:

- Core Strategic Policy CS10: Design
- Policy DM 10.1 New Development
- Policy DM 10.4 Environmental Enhancement
- Core Strategic Policy CS12: Historic Environment
- Policy DM 12.1 Managing change affecting all heritage assets and spaces
- Core Strategic Policy CS13 Protected Views
- Core Strategic Policy CS14 Tall Buildings

One of the particular points of emphasis within the Emerging City Plan 2040 – and as directed by the GLA – is the correct and suitable placement of tall buildings. The spirit and detail of these emerging policies therefore has some relevance for this application.

The London Plan 2021:

Policy D1: London’s Form, character and capacity for growth

Policy D4: Delivering Good Design

Policy D9: Tall Buildings

Policy HC1: Heritage Conservation and Growth

Policy HC3: Strategic and Local Views

Policy HC4: London View Management Framework

National Planning Policy Framework:

Chapter 12: Achieving well designed places

Chapter 16: Conserving and enhancing the historic environment

Comment on the Proposals

We have concerns regarding the visual and heritage impact of the proposals as appreciable from Bankside, near to Gabriel’s Wharf. As we read the situation and the impacts, even the reduced height scheme will impact and be visible in the background of the most significant features of one of the most sensitive and exceptionally significant buildings in London.

The proposals do not lie within the St Paul’s Heights Policy Area but would be appreciable in the backdrop of the Cathedral. As such, the ‘backdrop and skyline setting of the Cathedral’ section of the City’s Protected Views SPD is relevant. This states that, ‘From other Heights viewpoints where no tall buildings appear in the backdrop and the Cathedral is seen against clear sky, new development should maintain this situation.’

Currently, the silhouette of the west front pediment between the west towers, including the statue of St Paul atop, is visible against open sky in parts of this kinetic sequence. The proposals would appear behind the pediment, eroding this silhouette. Whilst we appreciate that real and material design efforts have been made since submission to minimise this erosion (through lowering the height of the building twice) we consider that

the proposals would still run contrary to the guidance within the SPD and cause adverse visual impact and be contrary to Core Strategic Policy CS14: Tall Buildings (of the adopted Local Plan 2015) which states ‘Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.’

This adverse visual impact would cause heritage harm. From this location, the clear sky setting around the pediment is indicative of the way in which the Cathedral was intended to be viewed. These views allow for an appreciation of the architectural interest of the Cathedral through the legibility of its key forms. Views also allow for an understanding of the historic interest of the Cathedral, the remaining clear skyspace allows for an understanding of the historic pre-eminence of St Paul’s in London.

In addition, the pediment is a focal point of the west front, the ‘principal elevation’ of the building architecturally, symbolically, and historically. It is important to how the Cathedral is identified and its significance appreciated from its setting, especially where it is visible with only clear sky beyond, increasing its legibility and the ability to appreciate this significance.

While we appreciate these this sky setting is already comprised in parts of this kinetic sequence, and that efforts have been made to minimise the extent of skyspace eroded, the proposals would still cause harm to a Grade I listed building of exceptional heritage value. As noted within the NPPF, when considering impacts ‘great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be)’.

We also understand that the proposals build upon an extant consent. However, the project team have confirmed that the consented scheme would not be visible from the viewpoints noted above. As such, when compared to the consented baseline or the current situation, the proposals would cause impact to the Cathedral. We submit that this impact is clearly avoidable and should not, in our view, be consented.

Therefore as proposed, the scheme would not be concordant with planning policy and we suggest that proposals should either be amended or refused approval.

Conclusion & Next Steps

We again thank the project team for their frank and constructive dialogue to date, though wish that the need for this dialogue had been avoided.

We await the detailed heritage assessment of heritage significance and impact currently being prepared by the project team. We would also be open to further dialogue with the team, including Officers from the City.

As part of future discussion, we would hope to see a meaningful reduction in the height of the building, and exploration of a 'no-harm' option to understand why this has not been achieved.

We hope this a response that furthers the shared aspirations of the City and Cathedral.

Yours sincerely,



Surveyor to the Fabric

cc: Tom Nancollas, Deputy Director (Design), City of London
Rebecca Thompson, Director of Property, St Paul's Cathedral

Directors:

Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:

Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

Your Ref:
Our Ref: 24/02695/OBS



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Amy Williams
PO Box 270
Guildhall
London
EC2P 2EJ

8th October 2024

RE: REQUEST FOR OBSERVATIONS

Dear Amy Williams

DECISION NOTICE
TOWN AND COUNTRY PLANNING ACT 1990.

REQUEST FOR OBSERVATIONS

I refer to your application detailed below and have to inform you that this Council has considered the under-mentioned proposal and **RAISES NO OBJECTION**

Application Number: 24/02695/OBS Date of Application: 10.09.2024 Date of Decision 08.10.2024

Proposed Development At:
Adjoining Borough Observations Within The Corporation Of London

For: Observations on a proposed development within the adjoining Borough of City of London with respect to demolition of the Class E unit (and related structures), ground and basement floor slab, car park and access ramp of Tenter House together with the demolition of part of the City Point Plaza floor slab and New Union Street, to provide a new part 14-storey and part 21-storey [+95.25m AOD] office building (Class E(g)(i)) [26,345sq.m GIA], with one ground floor retail unit (Class E(a/b)) [287sq.m GIA], community floorspace at ground floor level (Class F2(b)) [142sq.m GIA], new level plaza (open space), and a reconstructed New Union Street, together with cycle parking, waste storage, servicing, landscaping, plant, and other associated works at Tenter House 45 Moorfields London EC2Y 9AE.

Approved Plans

Cover Letter dated 9 September 2024

Conditions

Lambeth Planning
PO Box 80771
London
SW2 9QQ

Telephone 020 7926 1180
www.lambeth.gov.uk
planning@lambeth.gov.uk

1 The London Borough of Lambeth raises no comment to the proposal.

Notes to Applicant:

Yours sincerely



Rob Bristow
Director - Planning, Transport & Sustainability
Climate and Inclusive Growth Directorate

Date printed: 8th October 2024