

From: [REDACTED]  
To: [REDACTED]  
Subject: RE: Planning Application Consultation: 24/00648/FULMAJ [SG37810]  
Date: 17 July 2024 16:36:51  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37810

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  
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NATS Public

From: [REDACTED]  
Sent: Wednesday, July 17, 2024 11:19 AM  
To: NATS Safeguarding [REDACTED]  
Subject: Planning Application Consultation: 24/00648/FULMAJ

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Dear Sir/Madam

Please see attached consultation for 65 Fleet Street London EC4Y 1HT .  
Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Emma Barral  
Environment Department  
City of London

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# Advice to the local planning authority

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

<b>To LPA</b>	City of London
<b>LPA planning ref no</b>	24/00648/FULMAJ
<b>Our ref</b>	pgo-5560
<b>Site address</b>	65 Fleet Street London EC4Y 1HT
<b>Proposal description</b>	<b>Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation</b> (Sui Generis) comprising 871 rooms; <b>extension of up to two storeys for the north block</b> (up to 37.24m AOD) and <b>up to four storeys for the south block</b> (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.
<b>Date on fire statement</b>	28/05/2024
<b>Date consultation received</b>	17/07/2024
<b>Date response sent</b>	30/07/2024

## 1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

<b>Headline response from HSE</b>
Headline Response from HSE ('content')

## Scope of consultation

- 1.1. The above consultation relates to the redevelopment of the existing building at 65 Fleet Street to comprise of a Purpose-Built Student Accommodation (PBSA) led scheme. The building splits into two blocks on ground floor and above.
- 1.2. On levels two and above, the residential levels of the building are split into two blocks (north and south block). The north block continues up to Level 6 and is served by two escape stairs. The larger south block is served by four escape stairs up to Level 7 and three of which continue up to Level 9.
- 1.3. The north block is proposed to consist of 5 upper storeys and the south block will consist of 10 storeys above ground. The top storey of the north block will be 21m above lowest ground floor level.
- 1.4. The north block is served by two escape cores; Core A1 and Core A2. Both cores continue up to the top storey at Level 05 from ground floor.
- 1.5. The south block will be 42.5m above lowest ground level. The upper levels of the building are proposed to consist almost entirely of student accommodation with a total of 871 rooms.
- 1.6. The south block is proposed to be served by four cores:
  - Core B4 from lower ground to Level 07
  - Core B3 from lower ground to Level 9
  - Core B1 from lower ground to Level 11; and
  - Core B2 from Level 0 Level 11.
- 1.7. The ground floor of the south block is proposed to consist of student apartments as well as the main entrance to the PBSA and cultural uses.
- 1.8. The north block will include a new café / bookshop as well as refurbishment and enhancement of the existing Tipperary pub. The pub is proposed to be extended into the neighbouring building to the east.
- 1.9. The Design and Access Statement (dated June 2024 – Executive Summary) states:  
*“The proposed development seeks to retrofit and refurbish a derelict building to deliver a...mixed-use scheme which improves upon the existing consent while providing a long-term future for a local institution, The Tipperary.”*
- 1.10. The basement is proposed to consist of student amenity areas, as well as plant areas, refuse stores and a bike store. Lower ground floor is proposed to consist of a cultural and community space in addition to student accommodation and student amenity spaces. Ground floor is proposed to consist of commercial units including the existing Tipperary pub, in addition to student accommodation and student amenity.

1.11. Residential amenity and ancillary areas will be provided across the building:

Basement – PBSA Amenity, Cycle Store, Refuse and Plant rooms.

Lower Ground Floor – PBSA Amenity

Ground Floor – PBSA Reception

Level 10 – External terrace garden

1.12. The fire statement dated 28/05/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative.

### Listed building consent / The Tipperary pub

1.13. For information, page 14 of the Design and Access Statement (DAS) states that Listed building consent is also sought for: *“Improvements to The Tipperary pub...”*

1.14. Paragraph 2.04 of DAS informs that: *“The Tipperary Pub, dates to c.1667 and is Grade II listed. The Tipperary forms part of the north of the Site, adjoining Fleet Street.”*

### Consultation

1.15. North Block: The north block will be provided with two escape cores, one of which will be a firefighting core on the basis its footprint will be less than 900m<sup>2</sup> in area.

1.16. South Block: The larger south block is proposed to be served by four cores up to Level 7, three cores up to Level 9 and two cores up to Level 10. It is proposed that Core B2, B3 and B4 will form firefighting shafts.

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

## 2. Supplementary information

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

### Internal layout of flats

2.1. The fire statement states: *“The studio flats will generally be designed so that occupants do not have to pass within 1.8m of the cooking hob to escape. In apartments where occupants are required to pass within close proximity of cooking areas, Stove Guard devices will be provided in accordance with BS EN 50615.”*

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

### Public House

- 2.3. The fire statement states: *“The top storeys of the Tipperary Pub will be served by a single stair, however this forms part of the existing situation which is not being made any worse as a result of the works. The level of safety can be deemed to be enhanced due to the provision of sprinklers.”*
- 2.4. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

### **Basement stairs - CFD (Computational Fluid Dynamics)**

- 2.5. The fire statement states: *“Three of the four escape stairs serving the residential levels will continue down to basement level in accordance with code guidance. **This includes both stairs that serve level 10**, due to the need to be provided sufficient means of escape capacity from this level. However, this is considered reasonable on the basis the stairs will be fire separated at ground floor level. It will be demonstrated through CFD at a later stage that the lobby smoke ventilation will be effective in preventing the flow of smoke into the stair for a fire in the basement and will not impact on means of escape for the upper levels.”*
- 2.6. The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.
- 2.7. HSE acknowledges the applicant’s commitment that CFD will demonstrate (section 7 of the fire statement), that *‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’*.
- 2.8. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

### **Means of escape / Cycle stores**


- 2.9. The Design and Access Statement (page 62) states: *“Any potential storage of e-bikes or scooters within the cycle store would need further review and potentially additional safety measures due to the increased risk of these bikes.”*
- 2.10. HSE welcomes the commitment to review and potentially add further safety measures.
- 2.11. Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at [E-bikes and e-scooters fire safety guidance - NFCC](#)
- 2.12. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

### **Hydrants**

2.13. It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.

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

Yours sincerely

  
Stephen Gallagher  
Fire Safety Information Assessor

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

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

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

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

**applications for hazardous substances consent**

**London Plan policy compliance**

**APPLICATION COMMENT FORM****From:** Ben Bishop, Environmental Resilience Officer**Application No:** 24/00648/FULMAJ**Development Management Case Officer:** Emma Barral**Site Address:** 65 Fleet Street London EC4Y 1HT

**Proposal:** Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

**Application Received:** 21/06/2024**Request for Comment Received:** 24/07/2024**Response issued:** Date response sent**Comment:**

Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Design and Access Statement, Sustainability Statement, Energy and Sustainability Assessment, Ecology Appraisal and Landscape Statement.

A Climate Change Resilience and Sustainability Statement has not been prepared and supplied at this stage and should be considered and delivered as part of the WST 05 BREEAM credit.

**Overheating**

- Energy and Sustainability Assessment prepared by Applied Energy
- DSY 2 & 3 weather files, caveat of mitigation strategy to enable future compliance and adaptation to account for future climate
- greenfield runoff rate for the 1 in 100-year storm
- TM59 has been used to evaluate student halls to begin to identify cooling measures, requires further assessment to take into account future climate.
- TM52 should be assessed for retail and other use types.
- At RIBA 3 development will incorporate a range of measures to minimise contributions to the urban heat island aligning with London Plan Policy SI 4.
- Solar shading and passive design measures
- Urban greening for evaporative cooling.
- Passive ventilation and heat recovery
- Minimise reliance on cooling systems.
- Use thermal mass to moderate temperature fluctuations.

Date &  
Initials



## APPLICATION COMMENT FORM

- Would be recommended to identify potential to provide future cool spaces for pedestrian and visitor comfort.

### Flooding

- Flood risk and drainage strategy prepared by Meinhardt
- Site is located in Flood Risk Zone 1 with less than 0.1% chance of river or sea flooding.
- Site is considered low risk from ground water flooding.
- Greenfield run-off rate of 2.2l/s for 1 in 100 year storm event with an allowance of 40% for climate change.

### Water Stress

- Flood risk and drainage strategy prepared by Meinhardt
- Water re-use proposed in drainage strategy prioritising irrigation, infiltration and attenuation.
- Surface water falling onto proposed development to be routed into attenuation tanks.

### Biodiversity

- Landscape statement prepared by B | D Landscape Architects
- Ecology Appraisal prepared by Hilson Moran
- Proposed Urban Greening Factor of 0.301.
- No BNG assessment or strategy supplied.
- Use of extensive green/brown roofs has potential to provide positive biodiversity benefits for City of London target species.
- Variation in substrate depth and type welcomed to create a range of habitat niches and increase plant diversity.
- In BNG assessment further artificial measures should be proposed including nest boxes, invertebrate mounds/bee banks rocky piles and areas of standing water.

### Pests and Diseases

- No evidence supplied, can be covered in the Climate Change Resilience Sustainability Statement (CCRSS) to be supplied as part of the condition proposed below.

### Food, Trade, and Infrastructure

- As a residential use type the development should be assessed for risk to occupants based on the potential risk to supply chains, access and infrastructure failure. Can be covered in CCRSS

### Recommendation:

The proposed development **is partially** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2.

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

**APPLICATION COMMENT FORM**

*Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.*

**BB**  
**01/08/24**



Ms Emma Barral  
City of London Corporation  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Direct Dial: 0207 973 3777

Our ref: P01580083

5 August 2024

Dear Ms Barral

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

**65 FLEET STREET LONDON EC4Y 1HT  
Application No. 24/00648/FULMAJ**

Thank you for your letter of 17 July 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.

**Summary**

The proposals are for the recladding and extension of a group of buildings in the City of London. The site is located within an area that has a rich tapestry of heritage. It is situated partly within the Fleet Street Conservation Area and contains two grade II listed buildings. It is also located in close proximity to other heritage assets, including the Temples and Whitefriars Conservation Areas and the grade I listed Church of St. Bride's.

In our view, the proposals are unlikely to harm the character and appearance of the Fleet Street conservation area and have the potential to enhance the significance of the listed remains of the Whitefriars Convent. The proposals also have the potential to impact on the significance of heritage assets outside of the site through development within their setting. We recommend that further clarity is provided on those impacts and that any harm to heritage assets is adequately justified or mitigated, in accordance with policy.

**Background**

We understand that planning permission has been granted for a scheme of alteration and extension to the existing buildings on this site, including provision of a large roof addition over the building on the south side of the site.

**Significance**

The site is located on the south side of Fleet Street and comprises two blocks of



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buildings separated by a courtyard and alleyways. The site is bounded by the narrow thoroughfares of Bouverie Street to the west and Whitefriars Street to the east, and by an existing adjacent building to the south. The northernmost block is located within the boundaries of the Fleet Street Conservation Area, which is typically characterised by buildings from a wide range of periods, many of which have historic associations with the newspaper industry. This block includes four buildings that front onto Fleet Street as follows:

- Two early 20th century office buildings that turn the corners onto Whitefriars Street and Bouverie Street. These buildings are finished in high quality stonework with carved detailing. Both buildings are considered to make a positive contribution to the character and appearance of the Fleet Street Conservation Area.
- The Tipperary public house, which has origins back to the 17th century. Although altered in the 19<sup>th</sup> and 20<sup>th</sup> centuries, the building retains its original plot width and modestly proportioned street frontage. In recognition of the heritage significance of the pub it is listed at grade II.
- At the centre of the block is a postmodern development that references the general scale and form of the surrounding buildings and provides an arched entrance way to the courtyard behind.

The southernmost block is occupied by a large building that dates from the 1990s. To the south of the block, the historic narrow thoroughfares of Magpie Alley and Ashentree Court are retained, as well as the partial remains of the former Whitefriars Convent. These remains are incorporated into the basement of the existing building on the site and include the medieval vault of the former convent, possibly dating to the 14<sup>th</sup> Century, and a small stone chamber with curved stair, probably dating to the 16<sup>th</sup> Century. In recognition of the early date and rare survival of this fabric, the structure is listed at grade II.

In the wider setting of the site are a number of conservation areas, including the Temples Conservation Area, which lies to the west and includes an enclave of late 17<sup>th</sup> Century barrister's chambers around King's Bench Walk, listed at Grade I. The Whitefriars Conservation Area lies to the south and includes a number of early 20<sup>th</sup> century newspaper printing offices, many of which are listed as fine examples of office and manufacturing premises. To the east of the site is St. Bride's Church, which is one of Sir Christopher Wren's greatest City churches. It dates from 1670-84 and has a notable tiered spire that apparently inspired the form of the wedding cake. In recognition of its high heritage significance it is listed at grade I. The above-mentioned heritage assets feature in many views originating from the River Thames, with the spire of St. Brides forming a particular point of interest.



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## Impact

The proposals are for the remodelling and extension of the existing buildings on the site.

To the northernmost block, the buildings are proposed to be extended at roof level in the form of mansard extensions, whilst the existing postmodern building would be re-clad.

Subject to the quality of design and execution, these proposals are unlikely to have a harmful impact on the character and appearance of the Fleet Street Conservation Area.

The south building would be re-clad and extended at roof level. The proposed extension is likely to be visible in views from the neighbouring Temples Conservation Area and would appear on the skyline behind buildings on the east side of King's Bench Walk. We note that existing developments are visible in the backdrop setting of these buildings in longer views from the west and the previous planning permission did introduce development into this area of sky space. As such, the proposed roof extension will appear on the skyline and will distract from the architectural composition of the buildings in King's Bench Walk. As such, the proposals are considered to cause a low degree of harm to the significance of the affected heritage assets through development within their setting.

In relation to the Whitefriars Conservation Area, any proposed visual impacts within the immediate area of the site are likely to be minimal due to the relatively narrow widths of the surrounding streets, which afford limited views of the site.

The submitted Heritage, Townscape and Visual Impact Assessment includes a series of images of the proposals from various vantage points along the Thames, which are intended to illustrate the potential visibility of the proposals in a number of significant views of the of the Temples and Whitefriars Conservation Areas and the church of St. Bride's. However, those images are of a very low resolution and it is not possible to assess the impact of the proposals with any certainty. Whilst we do not consider the proposals to raise any significant concerns in relation to the setting of the conservation areas as experienced in these views, it is clear that the proposed roof extension would be seen in close proximity to the church spire of St. Brides. Where any part of the spire of the church is proposed to be partially blocked from view, the proposals have the potential to cause harm to the significance of the church through development within its setting.

To the Ashentree Court elevation, the façade of the southern building would be partly



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remodelled and extended to provide greater visibility of the remains of the former Whitefriars Convent. A new accessible public entrance would also be provided direct access off Ashentree Court. Subject to details of design of the new extension and any works to the fabric of the historic structure, the proposals have the potential to enhance the significance of the remains.

### **Relevant Planning 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.

The development plan for this area is the City of London Local Plan 2015. Relevant policies include: CS10 and DM10.1, which relate to design and refer to heritage as a consideration; policies CS12 and DM12.1, which relate to the conservation and enhancement of the City's heritage and the management of change to those assets and their settings; and CS13 which relates to important views and notes the spire of St. Bride's Church.

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.

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).

### **Position**

Historic England welcomes the opportunity to comment on these proposals.

The proposals appear have the potential to enhance the character and appearance of the northmost street block that fronts onto Fleet Street, subject to the quality of the final design and detailing.

The proposed works to the former Whitefriars Convent remains have the potential to enhance the presentation of this important listed historic structure and could enable



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greater public access and understanding. We would therefore encourage you to enter into a S106 agreement to secure these potential heritage benefits, including any necessary works of repair to the historic structure, future maintenance, public access and interpretation

We would also recommend that options are explored for linking the proposed new internal space around the former convent remains to other publicly-accessible activities. For example, the London Wall at Vine Street has a linked café space that ensures that the public have visibility of the wall, that the space is well staffed, and is welcoming to the public.

We consider the proposed roof extension over the south building to cause a low level of harm to the significance of the Temples Conservation Area and the listed buildings within King's Bench Walk. In accordance with relevant policies, we would recommend that your authority seek to ensure that this harm is justified and reduced or minimised as far as possible.

In respect to the impact of the proposals on the ability to see the tower of St. Bride's Church in views from the Thames, we would recommend that the proposals seek to ensure there is no blocking or obscuring of the church spire in these views (for clarity, beyond the extent of any existing buildings or permitted schemes). As mentioned in the Impact section above, such proposals have the potential to cause harm to the significance of the church through development within its setting and in our view, such harm should be avoided, bearing in mind that the church is a grade I heritage asset of the highest significance.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 201, 205 and 208 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the



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Historic England

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

**Claire Brady**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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**From:**  
**To:**  
**Subject:** Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ  
**Date:** 08 August 2024 12:42:25

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ  
8 August 2024

Dear Sir/Madam

**Re: 65, FLEET STREET, LONDON, EC4Y 1HT**

#### **Waste Comments**

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](mailto: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>

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.

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](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

#### **Water Comments**

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>

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

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 our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are 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](mailto:developer.services@thameswater.co.uk)

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](mailto:devcon.team@thameswater.co.uk)

Visit us online [www.thameswater.co.uk](http://www.thameswater.co.uk) , follow us on twitter [www.twitter.com/thameswater](http://www.twitter.com/thameswater) or find us on [www.facebook.com/thameswater](http://www.facebook.com/thameswater). We're happy to help you 24/7.

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From: [REDACTED]  
To: [REDACTED]  
Subject: FW: 65 Fleet Street - 24/00648/FULMAJ, 24/00756/MDC & 24/00757/MDC  
Date: 15 August 2024 15:58:57  
Attachments: [image002.png](#)  
[image003.png](#)

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Hello,

Please scan and save as sensitive to 24/00648/FULMAJ.

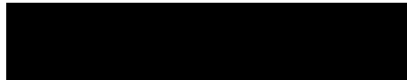
Kind Regards

Emma



**Emma Kate Barral MRTPI | Planning Officer**

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



| [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)



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From: Elliott, Chris <[REDACTED]>  
Sent: Monday, August 12, 2024 4:16 PM  
To: Barral, Emma <[REDACTED]>; McBirney, Georgia  
<[REDACTED]>  
Cc: Flynn, James <[REDACTED]>; Begolli, Nora  
<[REDACTED]>  
Subject: 65 Fleet Street - 24/00648/FULMAJ, 24/00756/MDC & 24/00757/MDC

Hi Emma and Georgia,

I'm emailing you both as I believe you are a case officer for 65 Fleet Street project, but apologies if this is not in your remit.

I met with James earlier today to discuss some delivery and servicing aspects, I just wanted to raise a couple queries that should go back to the applicant.

In the Delivery and Servicing Management Plan (DSMP), Figures 4.1 and 4.2 should

include the disabled parking bay and motorcycle spaces opposite the entrances to the service yard, within the drawing. This could create conflict for delivery vehicles wanting to access the service yard, as they have shown in their swept path analysis, if a vehicle is parked in the disabled bay.

I would also like to see the outputs of the TRICS assessment that the applicant has submitted, as part of their DSMP, just to make sure we are satisfied with their proposed delivery/servicing trip rates.

Finally, if the applicant would be able to provide estimates on the frequency of delivery activity, per vehicle type (4.6tn and 7.5tn box van). I am not 100% comfortable with the 7.5tn box van having to reverse into the service yard, in order to make deliveries, as they have shown in the swept path analysis (Fig 4.2).

Best,  
Chris



**Chris Elliott MRTPI | Transport Planner (Development Management)**  
Environment Department | City of London | Guildhall | London EC2V 7HH  
[Redacted] [www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

Katie Stewart –Executive Director Environment



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# Memo

To Assistant Director (Development Management)  
Environment Department

Email [REDACTED]

From Paul Bentley  
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 13/08/24

Your Ref: 24/00648/FULMAJ

## **Subject:** 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 871 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

The proposed development will be car free and space/ water heating will not be provided from a combustion source which is welcomed. No details regarding the proposed backup generator are known at this stage (to be confirmed at Stage 3). This will need to be assessed and therefore all relevant conditions have been applied.

Should the development be approved please attach the following conditions:

### **Air Quality Neutral Assessment**

A revised air quality neutral assessment that considers the building and transport emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance.

### **Reason**

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies S11 Improving Air Quality Part B(2)(a) and E of the London Plan

### **Condition M26F**

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 operation of the building.

#### **Reason**

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, London Plan policies SI1, SI3 D, and SD4 D

#### **Condition M28C amended**

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

#### **Reason**

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

#### **Condition M29**

Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.

#### **Reason**

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide

and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

### **Condition M32 NRMM**

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

### **Reason**

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

### **Informatives**

#### Roof gardens

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

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

#### Compliance with the Clean Air Act 1993

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

#### Generators and combustion plant

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





Memo

To Assistant Director (Development Management)  
Environment Department

From Lead Local Flood Authority  
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 22/08/2024

Our Ref DS/SUDS24/0045

Your Ref PT\_EB/24/00648/FULMA J

Subject 65 Fleet Street London EC4Y 1HT

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

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

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

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems (including green-blue roofs), rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2.2l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 590m<sup>3</sup>;
- (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.**



Your ref: 24/00648/FULMAJ

Our ref: CITY/24/34

Emma Barral

Development Management, City of London Corporation

By email only to: [REDACTED]

Transport for London  
City Planning

5 Endeavour Square  
Westfield Avenue  
Stratford  
London E20 1JN

[www.tfl.gov.uk](http://www.tfl.gov.uk)

RE: 24/00648/FULMAJ, 65 Fleet Street, City of London, EC4Y 1HT

Thank you for consulting TfL with regard to this planning application reference 23/01102/FULMAJ.

## Site Location

The site of the proposed development is located on Fleet Street which forms part of the Strategic Road Network (SRN). TfL has a duty under the Traffic Management Act 2004 to ensure that any development does not have an adverse impact on the SRN. The site is also bound by Whitefriars Street to the east and Bouverie Street to the west and Tudor Street to the south, all forming part of the City of London road network.

Bouverie Street operates a one-way system southbound off Fleet Street and Whitefriars Street operates one way north bound onto Fleet Street with the exception of cyclists both ways.

The site is also located approximately 190m west of the A201, New Bridge Street which forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

The nearest bus stop is located on Fleet Street adjacent to the site named Fetter Lane, serving routes 15, 17, 26, 40, 63, 76, 341, N15, N21, N26, N63, N89, N199, N550, N551.

The closest station to the site is also Liverpool Street which serves the Central, Circle, Hammersmith & City, Metropolitan and Elizabeth Lines as well as Overground and National Rail services.

The site has a Public Transport Access Level (PTAL) of 6b on a scale from 0 to 6b where 0 is the lowest and 6b is the highest, therefore the site rank is excellent in terms of accessibility.

Cycleway 6 is located on New Bridge Street, 190m from the site, connecting Elephant and Castle to Hampstead.

The nearest station is City Thames Link approximately 285 metres east of the site along Fleet Street. The nearest London Underground station is Blackfriars at approximately 430 metres southeast and Temple station approximately 700 south west, both serving the District Line, Circle Line and Blackfriars also serving national rail.

The nearest cycle hire docking station is Bouverie Street directly outside of the site.

### **Neighbouring sites**

It should be noted that there is a consented application for 'Land bounded by Fleet Street, Salisbury Court, Salisbury Square, Primrose Hill & Whitefriars Street'.

This site secured the closure of Shoe Lane (Stop H) bus stop located on Fleet Street directly outside of the site and has been relocated and secured via S278 agreement with TfL.

Throughout the construction there is a narrow gantry designed to enable pedestrian movement on the footway along Fleet Street, with a pitlane along Fleet Street meeting the junction adjacent to the site and Whitefriars Street. If a gantry must be retained for construction at this site, we request installation of a wider gantry with improved lighting, as the current arrangement is narrow and dark even in daylight, which is not sufficiently inclusive.

### **Consented scheme**

A previously consented planning application (Planning ref. 19/00058/FULMAJ) was to re-provide an office-led scheme with some retail floorspace for the ground and first floors to the north of the building and flexible retail/gym/office uses at lower ground floor level.

The consented scheme was to provide a total of 32,144sqm GIA, an uplift of 1,350 sqm GIA from the existing floor area.

The existing public house is to be retained in the new application, whereas the previously consented application proposed to remove it.

### **Site access**

#### *Pedestrian access*

There is an existing courtyard within the site connecting Bouverie Street and Whitefriars Street, which will be retained, TfL request clarity on the status of this access point. We also request whether the access will be 24/7 access in line with Policy D8 and the Public London Charter.

TfL request that new access points for the site should improve current natural surveillance and street lighting. The main access for the student accommodation will be on Bouverie Street. Given the access is off the main road network at Fleet Street, safety for the students should be prioritized and carefully considered.

#### *Cycle access*

Cyclists would access the site via Whitefriars Street providing access to basement level cycle parking using the existing servicing ramp. As well as the ramp, a cycle lift

is proposed which is described as for disabled cyclists to use. The lift should be match minimum dimensions specified in the London Cycle Design Standards (LCDS), specifically 1.2 by 2.3 metres, with a minimum door opening of 1000mm. For further guidance see: <https://content.tfl.gov.uk/lcnds-chapter8-cycleparking.pdf>

Given that student accommodation is the primary use proposed for the site, further analysis is needed to show how the relationship from the site to local Cycleways will be improved, as required by London Plan policy T5. Specifically S278 works should include the entire link route from the site to Cycleway 6 at New Bridge Street, 190m away, all of which must be assessed against and if necessary improved to comply with the Cycle Route Quality Criteria (<https://content.tfl.gov.uk/cycle-route-quality-criteria-technical-note-v1.pdf>) This can identify any works required to link routes in the local highway network to stitch the development into local and London-wide cycling networks.

Lastly, further clarification should also be given to demonstrate how the condition of Bouverie Street and Whitefriars Street will be enhanced to provide a better walking and cycling experience, especially adjacent to delivery and servicing access points. This is necessary to ensure compliance with London Plan policies T2 and D8. Specific enhancements should be secured to ensure delivery by section 278 (S278) agreement or section 106 (S106) contribution to Corporation-delivered local highway works.

### **RSA and Healthy Streets Check for Designers**

The Mayor's Healthy Streets and Vision Zero approaches are essential to delivering good growth in London and increasing travel by walking, cycling and public transport, as required by London Plan policies GG3, T1, T2 and others.

TfL expects all streets and public realm within and around the site to be designed in line with these approaches to help achieve the outcomes of the Mayor's Transport Strategy (MTS), which is also explicitly referenced in London Plan policy.

Considering this, we recommend that the proposed highway works are designed up in further detail to enable a Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers prior to determination.

These assessments should be audited and approved by TfL and the City Corporation's transport team before they are considered valid and considered by relevant planning decision makers at the City.

### **Active Travel Zone Assessment (ATZ)**

The ATZ includes a day time assessment which is welcomed by TfL however, since the previously consented application, TfL now requires a 'night-time/dark hours' ATZ assessment is submitted to gain a true assessment of the walking environment paying particular attention to Healthy Streets criteria 'People feel Safe'. TfL is committed to improving women's safety, and delivering the Mayor's Strategy to Reduce Violence Against Women and Girls. For information on the issue, TfL also recommends the newly published GLA guidance: Safety in Public Space; Women, Girls and Gender Diverse People.

The daytime ATZ has been completed between 9:30-10:30 AM, assessing four routes, destination in order of route being; City Thameslink Station, LSE University Library, Chancery Lane Underground Station, Blackfriars Underground Railway Station.

To summarise the ATZ assessment, no improvements were suggested for Route 1. Route 2 identified an area of footway on Carey Street where tactile paving needs to be added. Route 3 identified the worst section being the footway prior to the Rolls Building / Fetter Lane crossing, due to Lime Bikes presence reducing the footway, which could negatively impact pedestrians who require a wider pavement such as those with pushchairs and wheelchairs. Route 4 also requires some tactile paving on the crossing at the south section of Whitefriars Street, as well as the repainting of cycle lanes to stop cyclist confusion, which is especially required given this street is where the long stay cycle parking is proposed to be accessed.

A Vision Zero analysis has been provided which confirms there have been no fatal collisions across 2020-2022 along local ATZ routes assessed, but two collision clusters of multiple serious injuries.

The first is at the crossing at the eastern end of Fleet Street, part of journey one, and the second at the crossing at the eastern end of Tudor Street, part of journey four. We therefore recommend requests the applicant engages with the City of London as the highway authority to agree highway safety improvements at these locations, meaning specific appropriate works and sufficient applicant funding.

### **Public Realm and placemaking**

TfL request further clarification to demonstrate the relationship between the public and private spaces and how the function and hierarchy of the public realm could integrate with the land use and building blocks.

The site should operate in line with London Plan policy D8 and the Public London Charter, which highlights that all public and semi-public spaces in London should be safe, accessible, inclusive, attractive, well-connected, and easy to understand – even if privately managed, they should read as public spaces and be subject to the same rules.

We have safety concerns about the path proposed between Ashentree Court and Magpie Alley, which is poorly lit. This space needs further design attention to ensure it is safe, with appropriate street furniture and security management in place, in line with the Healthy Streets principles and policies T2 and D8 of the London Plan.

The development also needs a clear wayfinding system at key access points in the public realm to lead people to local destinations. We would be happy to support provision of Legible London signage within the site, subject to applicant funding. The City may wish to secure a wayfinding signage scheme by condition or another appropriate planning obligation, with future costing, design and delivery by TfL, prior to occupation.

### **Trip Generation**

A multi-modal trip generation has been undertaken to assess and quantify the potential impact of the proposed development in terms of the number of trips expected to be generated by the development.

The report claims a reduction in trips, thus no impact. However, the development will clearly result in an increase in trips between 19:00 – 24:00, given the proposed change from office to student accommodation. There may also be an increase in public transport trips away from the development at AM peak hours.

Overall the site is expected to generate a total of 3176 two way trips including 1808 pedestrian and 1053 trips London Underground (LU) and National Rail trips. The application argues this is expected to be 3412 fewer daily trips than the site's existing land use.

Delivery and servicing trips appear to have been severely underestimated for the student accommodation proposed and overestimated for the other uses. This should be addressed. The projection of 28 deliveries per day for over 900 student accommodation units is completely unrealistic.

The mode share of just 6% for cycling is also too low for a car free site in the City of London. This should be increased to make the analysis robust and enable negotiation and agreement of suitable mitigation. The site is well connected to cycleways (C6 on New Bridge Street) and will have the maximum provision of long stay parking, which can cater for a mode share of at least 19%.

### **Pedestrian Comfort Levels (PCLs)**

We request the applicant conducts a PCL assessment as walking is projected to make up 59% of trips and given the proposed land use for the site will be a favourable mode of travel. This should include full assessment of the crossings at the junctions of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, and Bouverie Street / Tudor Street.

Ludgate Circus should also be assessed as it is on the main route to City Thameslink Station. Please see the attached link for further information <https://content.tfl.gov.uk/pedestrian-comfort-guidance-technical-guide.pdf>

### **Cycle Parking**

The cycle parking proposed would comply with London Plan Policy T5, whereby there are to be 653 long stay spaces for the student accommodation and six for the other site uses. 22 short stay spaces are proposed for the student accommodation which also meets London Plan standards.

For the other uses 26 short stay spaces are proposed for the non food retail / gallery use and 26 for the retained public house. This is also supported

The TA details that 5% of all cycle parking will be provided as Sheffield stands to accommodate for larger / adapted cycles, in line with LCDS.

The cycle parking should be secured by condition and discharged in consultation with TfL. Details on bay width, access aisle width and spacing between stands should be provided, to confirm compliance with the standards in figure 8.1 of the London Cycling Design Standards (LCDS).

### **Cycle hire**

The TA details that an under provision of short stay for the non-student accommodation short stay could be provided through expanding the current cycle parking facilities on Bouverie Street.

Given the nature of the site, we request a contribution of £100,000 to increasing capacity of the existing docking station, to support and promote active travel to and from the site.

### **Car parking**

Given the site has the highest PTAL of 6b, TfL welcome that the site is car free. The site is proposed to have one blue badge parking space located off Bouverie Street. Despite proposed access by reversing in, subject to local highway authority support on balance this is acceptable.

TfL welcome that the blue badge space will have an Electric Vehicle Charging Point (EVCP) from the outset and request for a Parking Design and Management Plan, in line with London Plan Policy T6 to identify where additional blue badge spaces could be provided if demand exceeds current requirements.

### **Delivery and Servicing**

A draft Delivery and Servicing Management Plan (DSP) has been submitted with the documents. The final DSP should be secured by condition.

The existing basement servicing yard can only accommodate small vans no larger than 4.5t. Therefore, proposals detail that on street provision is required on Whitefriars Street.

TfL highlight that London Plan Policy T7 identifies that on street provision is only accepted when off street is not possible and understand that work has been done to prove larger vehicles cannot be accommodated for in the service yard. The TA details four options to mitigate on street servicing, including reversing into the servicing yard, weight limits, lengthening and increasing the depth of the servicing yard. All options were discounted.

In conclusion it was identified that Option 1 (reversing) was considered the most viable, TfL do not accept reversing off the TLRN or SRN, however given access is proposed from a City of London road, this is a matter for the local highway authority.

TfL would be supportive of a high percentage of deliveries being consolidated prior to entering the site, to reduce the number of deliveries and be more sustainable.



Provision should be made to accommodate and encourage cargo bike access via Bouverie Street (the main entrance for the student accommodation). We request cycle parking stands for these types of deliveries, to prevent any blocking of vehicles / pedestrians on Bouverie Street.

### **Travel plan**

A framework Travel Plan has been submitted with the TA this includes a student and staff mode split. As mentioned above the 6% expected baseline mode share for cycling is unacceptable, and the Travel Plan target to increase cycling by occupants by only 4% to 10% over five years is also insufficiently ambitious and must be increased.

We strongly encourage the City to consider securing funding for Cycle Hire memberships as part of the planning obligations for this development.

The Travel Plan should be secured, implemented and monitored as part of any Section 106 agreement. We also recommend that the applicant provides a staff travel plan for construction of the development.

### **Student move in and out strategy**

A Student Move In / Out Strategy is to be prepared and we request to review the final plans once finalised. TfL should be consulted on discharge if this is secured by a separate condition to the DS and Travel Plans.

A booking system is proposed to be implemented for the site whereby cars will be parked on a stretch of 75 metres of Bouverie Street, where a single yellow line permits loading and unloading for up to 40 minutes. The students will be contacted prior to arrival to provide detail of their travel arrangements, enabling a time slot to be booked if arriving by car.

We are very concerned about the proposed arrangement due to bus operations and request that staff ensure no queuing and parking on Fleet Street. If cars arrive early they must leave the area and return at their appointed time.

### **Construction Management**

The current Construction Logistics Plan (CLP) sets out indicative Traffic Management plan layout for Fleet Street during site construction, the final CLP should be secured by condition.

The indicative Programme Timescale indicated has an overlap with the neighbouring Sailsbury Square development, due for completion in early 2027. The applicant should therefore work in collaboration with the developers of this site to streamline access and reduce collective highway network impact. The applicant should aim to mirror the existing pit lane width and operation at a 3.2m width, rather than using a wider pitlane of 3.6 metres.

The applicant should look at off-site holding area locations that could be utilised to avoid a situation where there is delay for vehicles accessing the pit lane, that may block the nearby pedestrian crossing and cause traffic queuing.

The applicant should coordinate with TfL and the City of London to ensure that suitable provisions, such as optimised signal timings further along Fleet Street, can be made to accommodate the loss of the pedestrian crossing in the immediate vicinity of the site during the works.

TfL should be consulted once a contractor has been appointed the finalised pit lane layout emerges, as Fleet Street is on the Strategic Road Network (SRN). This includes detailing any changes to existing road widths and demonstrating that access to the adjacent bus stop Fleet Street (Stop 8570, Fetter Lane) will be safely maintained for both buses and pedestrians, which should be demonstrated showing a swept path of an electric bus stopping at this location.

For the new wider pitlane being proposed, as a worst case scenario, TfL request swept paths of two electric buses passing each other.

The indicative pit lane layout shows a potential user conflict at the kerb of Whitefriars Road and Fleet Street when Articulated Vehicles enter the pit lane. Marshal locations should therefore clearly be demonstrated in the final Traffic Management Plans.

The CLP shows Route 2 involves exiting off Fleet Street onto Bouverie Street leading to Tudor Street and onto New Bridge Street, located south of the site. We have strong concerns on this proposed routing as it uses an uncontrolled road and a give way across Cycleway 6 to give way onto New Bridge street. We would not support any construction access via this route during weekday tidal cycling peaks.

## **Summary**

Further clarity is required on the status of access to the courtyard within the site connecting Bouverie Street and Whitefriars Street

Further information on the design of the cycle parking, including lift dimensions.

A nighttime / dark hours ATZ using the same routes as the daytime completed ATZ.

Stage 1 Road Safety Audit (RSA) and Designer's Response and Healthy Streets Check for Designers for all proposed highway works prior to determination.

Further clarity is needed on the relationship between public and private space within the site.

We would be supportive of implementing a new wayfinding strategy featuring Legible London signage.

TfL must be consulted on discharge of the Student Move In Move Out Strategy.

The routes from the site to Cycleway 6 should be assessed against the Cycle Route Quality Criteria.

We request a PCL assessment of crossings at the junction of Whitefriars Street / Fleet Street, Whitefriars Street / Tudor Street, Bouverie Street / Fleet Street, Bouverie Street, Tudor Street.

We request a contribution of £100,000 to increasing capacity of the existing docking station on Bouverie Street.

Further consultation with TfL is required regarding construction plans, pitlanes and impact on Fleet Street.

The final DSP, CLP and Travel Plan should be secured by condition. The Travel Plan requires more ambitious targets and funding for measures including free Cycle Hire memberships for future residents.



Concerning 65 Fleet Street Development proposal.

Planning Application PT\_EB/24/00648/FULMAJ

Dear City of London Planning Team,

The City of London Police have inspected/reviewed the planned Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works on the current site of 65 Fleet Street London EC4Y 1HT.

The current proposals whilst generally acceptable, we have raised a number of concerns within the development, which will directly impact on the safety and security of the build and have a likelihood of affecting the community.

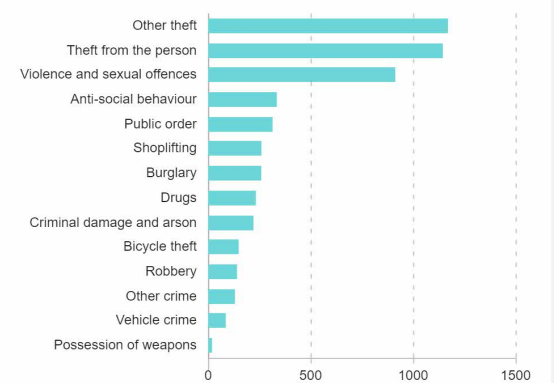
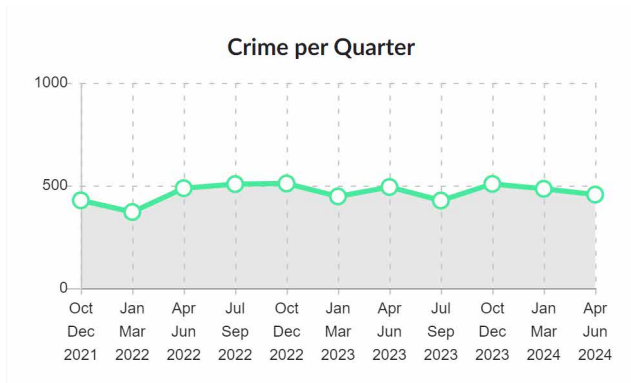
Looking at the current crime statistics for the local area, burglary, antisocial behaviour and a wide range of offences they are on par with the majority of wards within the City of London, but with the proposed redevelopment of venues within the zone will no doubt increase the footfall and ergo the crime levels.

Burglary within the western side of the City of London has been consistently higher and the primary means of burglary has been artifice burglary or daytime walk in burglaries.

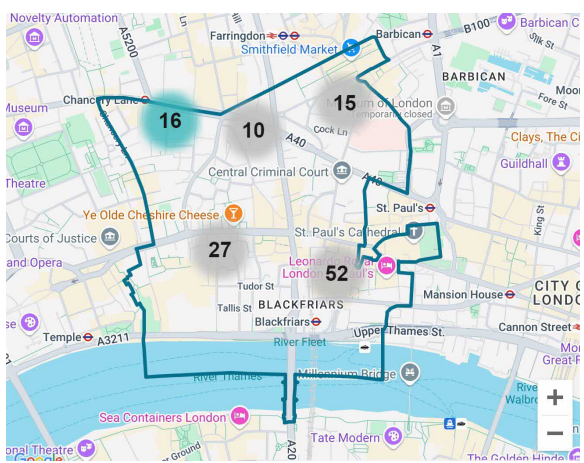
Vagrancy within this area of the City, being such a close neighbour to the London borough of Westminster has again been consistently high over the years which does bring a certain amount of associated antisocial behaviour.

Theft offences, particularly theft from the person was a prevalent offence. This development will no doubt increase the opportunity of crime within the local area.

I have included a snapshot of crime over the past 3 years to display crime patterns over the wards associated.



A snapshot from the month of July 2024 will show typical offending patterns throughout the year.



This area within the City of London is a mix of new development and historically significant buildings and alleyways. The main focus area is currently in a high state of development and it is essential that this site is held in keeping with the high standards of security and maintenance of neighbouring buildings, one of note will be the Salisbury Square development, housing the new Police Headquarters and Courts within the City of London.

Internally within the site, we would recommend further compartmentation to ensure that penetration into the site would be limited.

Due to the high number of student domiciles that have been proposed to be included into the development, City of London Police feel that it would be appropriate and proportionate to apply a condition of build to the project, that they secure a minimum of Silver Award certificate of secured by design for homes. This will help to ensure that the residents and common users will have an enhanced feeling of safety and security inside of their abodes.

Similar student accommodation sites within the City of London area have already decided to include SBD as a standard within their build environments. It has been noted that new

Student accommodation that has achieved Secured By Design have seen a dramatically lower crime output than comparable sites without accreditation.

Older adjacent sites within the local area of Fleet Street have seen the introduction of retrofitted additional security measures. The security measures that have been introduced would draw an inference that they were necessary to safeguard residents and commercial buildings due to reported crime and antisocial behaviour within the area.

Within the plans are proposals for further retail and commercial office spaces, again we would recommend that the developers be conditioned to build these integrated units to achieve a minimum Silver Award of Secured by Design Commercial.

As a result of our review we would appeal/invite City of London Planning Team to consider the proposed conditions for build.

**To assist the development in achieving Secured by Design accreditation, I would seek to have Secured by Design conditions attached to any permission that may be granted in connection with this application.**

**The wording such that the development will follow the principles and physical security requirements to be submitted and approved in writing by planning pre-commencement, and will achieve Secured by Design accreditation prior to occupation, and be maintained thereafter. This would include the residential portion of the build meeting the SBD Homes Guide 2023 and the Commercial Venue meeting the SBD Commercial Guide 2023.**

The proposed conditions are in keeping with the City of London Local Plan 2015 and proposed Plan for 2040.

#### The City of London Local Plan 2015

Policy DM 3.2 Security measures in new developments and around existing buildings To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;

measures to be integrated with those of adjacent buildings and the public realm;

that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;

the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;

an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

3.3.8 Design & Access Statements accompanying applications should meet the recommendations of the ALO and set out how security matters have been considered at the design stage. New development should incorporate “Secured by Design” (SBD) principles. The design should fully incorporate protective security requirements within the site boundary, as far as practicable. Building designs should provide for a high level of natural surveillance of all surrounding public areas and highway.

3.3.9 Incorporating security measures early in the design of new development or the refurbishment of existing buildings will avoid the need for later retro-fitting of security measures, which can impact on the architectural quality and design of the development.

3.3.10 All new developments need to maximise the level of security provision to reduce the risk and the likely impact. It is not always possible to provide security measures wholly within the building or development site, particularly when there is a need to provide stand-off distances to protect against potential vehicle-borne attacks, or where the building line is immediately bounded by public highway. Security features on the public highway should be considered as a last resort when all other alternative proposals have been exhausted.

#### Achieving Safe spaces to prevent domestic violence

Within the City of London Violence against Women and Girls Strategy, the City of London committed to providing accommodation suitable and capable of ensuring a victim of domestic violence or abuse had the feeling of safety within their home.

#### Regional Planning Policy – The London Plan 2021

3.11.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate fire safety solutions and represent best practice in fire safety planning in both design and management. The London Fire Commissioner should be consulted early in the design process to ensure major developments have fire safety solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9.

3.11.3 Measures to design out crime, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme<sup>34</sup> published by the Police. Further guidance is provided by Government on security design<sup>35</sup>. This will ensure development proposals provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

3.11.4 By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the

probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to physical, personnel and electronic security (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan/City of London Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

### National Planning Policy Framework

Paragraph 98-107 within the National Planning Policy Framework explains the need and expectation to achieve well designed and safe environments that do not allow or permit the growth of crime and antisocial behaviour, by creating safe environments for residents and workers within a community. Security within the built environment is essential for ensuring that communities within the City of London can feel safe.

Under the Crime and Disorder Act '98, local authorities have a duty/statutory requirement to work with the police to reduce crime and disorder, which has been held to apply to the planning process.

City of London Police would be pleased and happy to assist with the developers on this scheme to achieve accredited status with Secured by Design.

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PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub

City of London Police | Bishopsgate Police Station | 182 Bishopsgate, London, EC2M

4NP T: [REDACTED] - Mobile :-

Email: [REDACTED]

**CITY OF LONDON  
POLICE**





# Advice to the local planning authority

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

<b>To LPA</b>	City of London
<b>LPA planning ref no</b>	24/00648/FULMAJ
<b>Our ref</b>	pgo-5560
<b>Site address</b>	65 Fleet Street London EC4Y 1HT
<b>Proposal description</b>	<b>Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation</b> (Sui Generis) comprising 871 rooms; <b>extension of up to two storeys for the north block</b> (up to 37.24m AOD) and <b>up to four storeys for the south block</b> (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.
<b>Date on fire statement</b>	28/05/2024
<b>Date consultation received</b>	17/07/2024
<b>Date response sent</b>	30/07/2024

## 1. Substantive response for the local planning authority

Thank you for consulting HSE about this application.

<b>Headline response from HSE</b>
Headline Response from HSE ('content')

## Scope of consultation

- 1.1. The above consultation relates to the redevelopment of the existing building at 65 Fleet Street to comprise of a Purpose-Built Student Accommodation (PBSA) led scheme. The building splits into two blocks on ground floor and above.
- 1.2. On levels two and above, the residential levels of the building are split into two blocks (north and south block). The north block continues up to Level 6 and is served by two escape stairs. The larger south block is served by four escape stairs up to Level 7 and three of which continue up to Level 9.
- 1.3. The north block is proposed to consist of 5 upper storeys and the south block will consist of 10 storeys above ground. The top storey of the north block will be 21m above lowest ground floor level.
- 1.4. The north block is served by two escape cores; Core A1 and Core A2. Both cores continue up to the top storey at Level 05 from ground floor.
- 1.5. The south block will be 42.5m above lowest ground level. The upper levels of the building are proposed to consist almost entirely of student accommodation with a total of 871 rooms.
- 1.6. The south block is proposed to be served by four cores:
  - Core B4 from lower ground to Level 07
  - Core B3 from lower ground to Level 9
  - Core B1 from lower ground to Level 11; and
  - Core B2 from Level 0 Level 11.
- 1.7. The ground floor of the south block is proposed to consist of student apartments as well as the main entrance to the PBSA and cultural uses.
- 1.8. The north block will include a new café / bookshop as well as refurbishment and enhancement of the existing Tipperary pub. The pub is proposed to be extended into the neighbouring building to the east.
- 1.9. The Design and Access Statement (dated June 2024 – Executive Summary) states:  
*“The proposed development seeks to retrofit and refurbish a derelict building to deliver a...mixed-use scheme which improves upon the existing consent while providing a long-term future for a local institution, The Tipperary.”*
- 1.10. The basement is proposed to consist of student amenity areas, as well as plant areas, refuse stores and a bike store. Lower ground floor is proposed to consist of a cultural and community space in addition to student accommodation and student amenity spaces. Ground floor is proposed to consist of commercial units including the existing Tipperary pub, in addition to student accommodation and student amenity.

1.11. Residential amenity and ancillary areas will be provided across the building:

- Basement – PBSA Amenity, Cycle Store, Refuse and Plant rooms.
- Lower Ground Floor – PBSA Amenity
- Ground Floor – PBSA Reception
- Level 10 – External terrace garden

1.12. The fire statement dated 28/05/2024 states that the adopted fire safety design standards are BS 9991 and BS 9999. HSE has assessed this application on that basis. It is noted the fire statement was helpfully detailed and informative.

### Listed building consent / The Tipperary pub

1.13. For information, page 14 of the Design and Access Statement (DAS) states that Listed building consent is also sought for: *“Improvements to The Tipperary pub...”*

1.14. Paragraph 2.04 of DAS informs that: *“The Tipperary Pub, dates to c.1667 and is Grade II listed. The Tipperary forms part of the north of the Site, adjoining Fleet Street.”*

### Consultation

1.15. North Block: The north block will be provided with two escape cores, one of which will be a firefighting core on the basis its footprint will be less than 900m<sup>2</sup> in area.

1.16. South Block: The larger south block is proposed to be served by four cores up to Level 7, three cores up to Level 9 and two cores up to Level 10. It is proposed that Core B2, B3 and B4 will form firefighting shafts.

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

## 2. Supplementary information

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

### Internal layout of flats

2.1. The fire statement states: *“The studio flats will generally be designed so that occupants do not have to pass within 1.8m of the cooking hob to escape. In apartments where occupants are required to pass within close proximity of cooking areas, Stove Guard devices will be provided in accordance with BS EN 50615.”*

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

### Public House

- 2.3. The fire statement states: *“The top storeys of the Tipperary Pub will be served by a single stair, however this forms part of the existing situation which is not being made any worse as a result of the works. The level of safety can be deemed to be enhanced due to the provision of sprinklers.”*
- 2.4. This is noted and it will be for the applicant to demonstrate compliance at later regulatory stages.

### **Basement stairs - CFD (Computational Fluid Dynamics)**

- 2.5. The fire statement states: *“Three of the four escape stairs serving the residential levels will continue down to basement level in accordance with code guidance. **This includes both stairs that serve level 10**, due to the need to be provided sufficient means of escape capacity from this level. However, this is considered reasonable on the basis the stairs will be fire separated at ground floor level. It will be demonstrated through CFD at a later stage that the lobby smoke ventilation will be effective in preventing the flow of smoke into the stair for a fire in the basement and will not impact on means of escape for the upper levels.”*
- 2.6. The cited fire safety standard states that where there is more than one common stair from an upper storey or part thereof, at least one such stair serving the upper storeys (or parts thereof) should terminate at ground level. Accordingly, one of the two stairs that serve level 10 should not continue to the basement.
- 2.7. HSE acknowledges the applicant’s commitment that CFD will demonstrate (section 7 of the fire statement), that *‘the smoke extract system will be effective in preventing the flow of smoke into the escape stair...’*.
- 2.8. However, if the CFD modelling does not support the design, any subsequent redesign may affect land use planning considerations. It will be for the applicant to demonstrate compliance at later regulatory stages.

### **Means of escape / Cycle stores**


- 2.9. The Design and Access Statement (page 62) states: *“Any potential storage of e-bikes or scooters within the cycle store would need further review and potentially additional safety measures due to the increased risk of these bikes.”*
- 2.10. HSE welcomes the commitment to review and potentially add further safety measures.
- 2.11. Mobility Scooter guidance for residential buildings has been produced by the National Chief Fire Council (NFCC) which will provide guidance on fire safety provision. Further information in relation to e-bikes and e-scooter can be found at [E-bikes and e-scooters fire safety guidance - NFCC](#)
- 2.12. Accordingly, it will be for the applicant to demonstrate compliance at later regulatory stages.

### **Hydrants**

2.13. It is not clear if the existing hydrants are currently operational. It is understood that the applicant intends to check these once there is a construction presence. Should there not be an operational hydrant within 90m, an application will be made for a new hydrant.

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

Yours sincerely

  
Stephen Gallagher  
Fire Safety Information Assessor

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

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

- matters that are or will be subject to Building Regulations regardless of whether such matters have been provided as part of the application
- matters related to planning applications around major hazard sites, licensed explosive sites and pipelines
- applications for hazardous substances consent
- London Plan policy compliance

# 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 12 September 2024

Our Ref 24/05334/NPLN

Your Ref 24/00648/FULMAJ

Subject 65 Fleet Street London EC4Y 1HT

**Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.**

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

No 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.

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

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

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

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

The roof terraces on level 10 hereby permitted shall not be used or accessed between the hours of 22:00 on one day and 07:00 on the following day other than in the case of emergency.

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.

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.

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

Bedrooms- 30dB LAeq,T\* and 45dB LAmax

Living rooms- 30dB LAeq, T\*

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

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

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

Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 and does not exceed NR35 in other habitable rooms attributable to the proposed commercial uses within the



development. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.

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

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

- (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation.
- (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. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.
- (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.

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.

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. 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.

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

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

Mob: 

From: [REDACTED]  
To: [REDACTED]  
Subject: RE: Planning Application Consultation: 24/00648/FULMAJ [SG37810]  
Date: 16 September 2024 12:07:17  
Attachments: [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG37810]

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](http://www.nats.co.uk)



NATS Internal

**From:** [REDACTED]  
**Sent:** Tuesday, September 10, 2024 3:27 PM  
**To:** NATS Safeguarding <[REDACTED]>  
**Subject:** Planning Application Consultation: 24/00648/FULMAJ

Your attachments have been security checked by Mimecast Attachment Protection. Files where no threat or malware was detected are attached.

Dear Sir/Madam

Please see attached consultation for 65 Fleet Street London EC4Y 1HT .

Reply with your comments to [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk).

Kind Regards

Planning Administration

On behalf of

Emma Barral  
Environment Department  
City of London

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---



From: [REDACTED]  
To: [REDACTED]  
Subject: Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ  
Date: 20 September 2024 14:50:40

THIS IS AN EXTERNAL EMAIL

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 60833 Your Ref: 24/00648/FULMAJ  
20 September 2024

Dear Sir/Madam

**Re: 65, FLEET STREET, LONDON, EC4Y 1HT**

#### Waste Comments

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](mailto: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>

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](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers: Groundwater discharges section.

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

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.

#### Water Comments

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>

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

The proposed development is located within 15m of our underground water assets and as such we would like the following informative attached to any approval granted. The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are 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](mailto:developer.services@thameswater.co.uk)

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.

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

Visit us online [www.thameswater.co.uk](http://www.thameswater.co.uk) , follow us on twitter [www.twitter.com/thameswater](http://www.twitter.com/thameswater) or find us on [www.facebook.com/thameswater](http://www.facebook.com/thameswater). We're happy to help you 24/7.

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# Memo

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



From Ms Hazel Austin  
Environmental Health Officer  
Environment Department  
Telephone [REDACTED]  
Email [REDACTED]

Date 26 September 2024  
Our Ref 24/04209/NPLN  
Your Ref PT\_EB/24/00648/FULMA J

**Subject** 65 Fleet Street London EC4Y 1HT

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

This department acknowledges receipt for the above application and have the following comments and observations to make:

## **Roof Terrace Hours:**

The roof terraces on levels 8,9&10, throughout the property, hereby permitted shall not be used or accessed between the hours of 08.00 on one day and 23:00 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.

## **Roof Terrace Music:**

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.

Fumes from Use Class E / Sui Generis affecting offices or residential:

No cooking shall take place within any Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission. REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.

Noise from use Class E / Sui Generis affecting offices / non offices:

The proposed Class E / Sui Generis development sharing a party element with office / 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 existing neighbouring premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have 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.

Full Lighting Strategy submission:

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.

**Noise control:**

(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.

### **Ventilation & Extraction Equipment:**

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

### Hours of servicing:

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.

### Scheme of Protective works:

Works shall not begin 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 development 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: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

Regards

**Hazel Austin**  
**Environmental Health Officer**  
Pollution Team

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

Mob: 



Historic England

Emma Barral  
City of London PO Box 270  
Guildhall  
London EC2P 2EJ

Your Ref: 24/00648/FULMAJ  
Our Ref: 223995

Contact: Helen Hawkins



02 October 2024

Dear Emma,

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

**65 Fleet Street London EC4Y 1HT**

*Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works*

**Recommend No Archaeological Requirement**

Thank you for your consultation received on 18 September 2024.

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



Historic England, 4<sup>th</sup> 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.

NPPF section 16 and the London Plan (2021 Policy HC1) make the conservation of archaeological interest a material planning consideration.

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The site is located in an area of known archaeology, and previous investigations on the site in the 1920s and 1980s revealed the remains of the medieval Whitefriars priory, as well as Roman and post-medieval remains. The medieval undercroft of the priory, now a listed building, has been preserved within the current development, albeit in a different location to where it was found.

Although some below ground excavations such as lift pits and pump pits are proposed, these will be located within the current basement footprint where archaeological remains have already been removed and are therefore unlikely to have an impact on archaeological remains of significance. The Whitefriars undercroft is to become part of a visitor centre within the site and will therefore be much more accessible to the public. This public benefit is very much welcomed.

Given that no below ground excavations are proposed outside the footprint of the current basements, no archaeological mitigation will be necessary.

No further assessment or conditions are therefore necessary.

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

Yours sincerely

**Helen Hawkins**

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



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://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.



**Memo**

**To** Assistant Director (Development Management)  
Environment Department

**From** Lead Local Flood Authority  
Environment Department

**Tele phone** [REDACTED]

**Email** [REDACTED]

**Date** 02/10/24

**Our Ref** DS/SUDS24/0045

**Your Ref** PT\_EB/24/00648/FULMA J

**Subject** 65 Fleet Street London EC4Y 1HT

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 relevant information for the proposed non-material amendment. The changes do not appear to impact the drainage system or proposed SUDs features as originally consented and therefore the Lead Local Flood Authority has no objection to the application.

---

**From:** Pundsack, Mark  
**Sent:** Wednesday, [October 9, 2024 4:19 PM](#)  
**To:** Barral, Emma; Roy, Gordon  
**Cc:** McCallum, Kieran  
**Subject:** RE: 65 Fleet Street - 24/00648/FULMAJ

Emma,

We will not comment on gateway 1 applications as this is HSEs role as statutory consultee.

Mark

---

**From:** Barral, Emma  
**Sent:** Wednesday, [October 9, 2024 4:09 PM](#)  
**To:** Roy, Gordon; Pundsack, Mark  
**Cc:** McCallum, Kieran  
**Subject:** 65 Fleet Street - 24/00648/FULMAJ  
**Importance:** High

Hi Roy/Mark,

I hope you are well.

Really sorry to trouble you and I hope you don't mind me reaching out. I have been passed your details by my colleague Kierian (CC'd) in.

We are working together on the above project at 65 Fleet Street which is for the following –

Partial demolition and refurbishment and extension of buildings to provide: purpose-built student accommodation (Sui Generis) comprising 856 rooms; extension of up to two storeys for the north block (up to 37.24m AOD) and up to four storeys for the south block (up to 55.72m AOD) with provision of roof terraces; provision of cultural uses (learning and non-residential institution uses, Use Class F1); provision of commercial uses including retail (Use Class E); external alterations and extension to the Tipperary Pub (Sui Generis); enhancements to Whitefriars Crypt; public realm works including to passageway and Courtyard; hard and soft landscaping; and associated works.

I attach HSE comments, it would be really helpful if you are able to review the



submitted material for us.

Unfortunately, we have very tight timescales due to Committee deadlines.

I attach the submitted Fire Statements for your viewing purposes. I wasn't sure if you would comment as HSE have commented.

Kind Regards

Emma



**Emma Kate Barral MRTPI | Planning Officer**

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

[www.cityoflondon.gov.uk](http://www.cityoflondon.gov.uk)

**WINNER** | Planning Authority of the Year





70 Cowcross Street  
London EC1M 6EJ  
Telephone: (+44/0) 207 608 2409  
Email: [enquiries@thegardenstrust.org](mailto:enquiries@thegardenstrust.org)  
[www.thegardenstrust.org](http://www.thegardenstrust.org)

Emailed to Emma Barral  
[plncomments@cityoflondon.gov.uk](mailto:plncomments@cityoflondon.gov.uk)  
City of London Corporation

10<sup>th</sup> October 2024

Dear Ms Barral,

**Re: 24/00648/FULMAJ | Partial demolition and refurbishment and extension of buildings... | 65 Fleet Street London EC4Y 1HT**

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

We are grateful for the opportunity to comment on this application, which has a material impact on the significance of Inner Temple, a historic designed landscape which is Registered by Historic England at Grade II. The inclusion of this site on this statutory register requires great weight to be given to its conservation.

We have assessed the amended documents supplied, particularly the Design and Access Statement Addendum and the amended Heritage and Townscape Visual Impact Assessment (HTVIA), and are disappointed to note that, rather than any reduction in height of the building, the amended proposals simply reduce the extent of the 10<sup>th</sup> floor and step the 9<sup>th</sup> floor in a little more. Unfortunately, this does nothing to reduce the impact of the development on the setting of Temple Gardens, as can be seen in the image on p97 of the amended HTVIA, with the roof extension still rising by approx. 4 storeys above the Grade I Listed buildings of King's Bench Walk.

We stand by our previous response to this application (as submitted on 20<sup>th</sup> August 2024), and ask again that consideration is given to reducing the height of the roof extension by at least two storeys, so that the new development, when viewed from the Inner Temple RPG, appears to rise no higher than the existing buildings (Harmsworth House and 10 Bouverie Street) and the visual intrusion of this modern building into the historic RPG is lessened.

We would be grateful to be advised of your decision, or if further information is submitted.

Yours sincerely,

Dr Tamsin McMillan

Acting Conservation Officer  
The Gardens Trust

*For further information, we refer you to the Gardens Trust publication *The Planning System in England and the Protection of Historic Parks and Gardens (2024)*, which is available online at <https://thegardenstrust.org/wp-content/uploads/2024/02/Parks-and-Gardens-in-English-Planning-System-2024.pdf>*

# City of London Conservation Area Advisory Committee

Department of the Built Environment,  
Corporation of London,  
P.O. Box 270,  
Guildhall,  
London EC2P 2EJ

11<sup>th</sup> October 2024

Dear Sir/Madam,

At its meeting on 19<sup>th</sup> September 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

## **24/00648/FULMAJ - 65 Fleet Street**

### **Fleet Street Conservation Area/Castle Baynard Ward. No Ward Club rep.**

The Committee received a detailed presentation on this application. Members thanked the representatives of DP9 and their associates for the explanation of their proposals and for answering questions. The Committee then considered the application.

The Committee had no objection to the proposed uses. Members acknowledged that the greater part of the site lay outside the Fleet Street Conservation Area and that there was already a large building south of the Fleet Street frontage. There were no objections to the proposals as far as they affected the detailed treatment of the buildings in the Fleet Street Conservation Area, including the added storeys and the new entrance. As far as the longer views were concerned the Committee expressed reservations about the raised height of the south block in the proposals. Members were concerned about the apparent bulk and horizontal character of the proposal shown in the views from sites on the South Bank, though accepting that the zoom images may have accentuated the harmful effects of the proposals, but were especially concerned by the effects of the proposals in the view from the Temple – View 12 in the applicant's HTVI – which the applicants Heritage, Townscape and Visual Assessment accepts might do some harm. The Committee considered this to have an adverse effect on the Temple Conservation Area.

The Committee also wondered whether the proposed recladding of the existing building in GRC would introduce an unwelcome new material into the City's townscape.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox  
Secretary