

From: [REDACTED]
To: [REDACTED]
Subject: RE: Planning Application Consultation: 24/00743/FULEIA (our ref pgo-5594)
Date: 23 July 2024 13:44:18
Attachments: [image001.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Further information is available on the HSE website [here](#).

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-5594) in all future correspondence.

Kind regards

Lisa Gaskill

Operational Support for Planning Gateway One
Health and Safety Executive | Building Safety Division



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

From: [REDACTED]
Sent: Tuesday, July 23, 2024 11:57 AM
To: PlanningGatewayOne
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .
Reply with your comments to [REDACTED]

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London

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From: [REDACTED]
To: [REDACTED]
Subject: RE: Tree Works Consultation: 24/00743/FULEIA
Date: 23 July 2024 15:48:08

No concerns.

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

From: [REDACTED]
Sent: Tuesday, July 23, 2024 12:05 PM
To: Joshi, Shravan (Deputy)
Subject: Tree Works Consultation: 24/00743/FULEIA

Dear Chairman

Please see attached consultation for works to trees in a conservation area at Allianz House 60 Gracechurch Street London EC3V 0HR Reply with any comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London



PLNComments@cityoflondon.gov.uk

26 July 2024
Crossrail Ref: CRL-IP-3230

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

Dear Anastasia Tampouridou,

24/00743/FULEIA: Allianz House 60 Gracechurch Street London EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Transport for London administers the Crossrail 2 Safeguarding Direction made by the Secretary of State for Transport on 24 March 2015.

Thank you for your letter dated 23 July 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no further comment on the application.

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

Yours sincerely,

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

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

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

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

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



From: [NATS Safeguarding](#)
To: [PLN - Comments](#)
Cc: [NATS Safeguarding](#)
Subject: RE: Planning Application Consultation: 24/00743/FULEIA [SG37619]
Date: 26 July 2024 11:08:54
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image007.png](#)
[image008.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sirs, NATS has assessed the application and has identified an unacceptable impact upon its H10 radar located at Heathrow Airport.

Accordingly, should the LPA be minded to grant the scheme, NATS respectfully requests the imposition of the following planning conditions on any planning permission.

Regards
S. Rossi
NATS Safeguarding Office

Aviation Conditions

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

For the purpose of conditions 1-3 above;

"Operator" means NATS (En Route) plc, incorporated under the Companies Act (4129273) whose registered office is 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL or such other organisation licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services to the relevant managed area (within the meaning of section 40 of that Act).

"Radar Mitigation Scheme" or "Scheme" means a detailed scheme agreed with the Operator which sets out the measures to be taken to avoid at all times the impact of the development on the H10 Primary and Secondary Surveillance radar and air traffic management operations of the Operator.

"Crane Operation Plan (COP)" means a detailed plan agreed with the Operator which defines the type of crane and the timing and duration of all crane works to be carried out at the site in order to manage and mitigate at all times the impact of the development on the H10 Primary and Secondary Surveillance Radar systems at Heathrow Airport and associated air traffic management operations of the Operator.



Sacha Rossi

ATC Systems Safeguarding Engineer

D: [REDACTED]

E: [REDACTED]

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



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

Sent: Tuesday, July 23, 2024 11:53 AM

To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Subject: [EXTERNAL] Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London

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If you are not the intended recipient, please notify our Help Desk at Email Information.Solutions@nats.co.uk immediately. You should not copy or use this email or attachment(s) for any purpose nor disclose their contents to any other person.

NATS computer systems may be monitored and communications carried on them recorded, to secure the effective operation of the system.

Please note that neither NATS nor the sender accepts any responsibility for viruses or any losses caused as a result of viruses and it is your responsibility to scan or otherwise check this email and any attachments.

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

From: [Location Enquiries](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/00743/FULEIA
Date: 26 July 2024 11:39:47
Attachments: [image001.png](#)
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good morning,

Application No: 24/00743/FULEIA

Site address: Allianz House 60 Gracechurch Street London EC3V 0HR

Proposal: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Thank you for your consultation.

I can confirm that London Underground/DLR Infrastructure Protection has no comment to make on this planning application as submitted.

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

Kind regards,

Tom Li

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



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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Tuesday, July 23, 2024 11:53 AM

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for Allianz House 60 Gracechurch Street London EC3V 0HR .

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

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London

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This message has been scanned for malware by Forcepoint. www.forcepoint.com

Date: 26 July 2024
Our ref: 483338
Your ref: 24/00743/FULEIA



PLNComments@cityoflondon.gov.uk
BY EMAIL ONLY

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Sir or Madam,

Planning consultation: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Location: Allianz House 60 Gracechurch Street London EC3V 0HR

Thank you for your consultation on the above dated 23 July 2024 which was received by Natural England on 23 July 2024.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any

queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully,

Beemal Brahmhatt
Consultations Team

Anastasia Tampouridou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137255/01
Your ref: 24/00743/FULEIA
Date: 29 July 2024

Dear Anastasia,

Allianz House, 60 Gracechurch Street, London, EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

Thank you for consulting us on the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application, however, please consider the following advice.

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Pre Application Advice

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNL SustainablePlaces@environment-agency.gov.uk.

Cont/d..

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you have any questions, please email me at HNL.SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNL.SustainablePlaces@environment-agency.gov.uk

Telephone: 02030251774



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Date 1 August 2024

Our Ref DS/SUDS24/0043

Your Ref PT_AXT/24/00743/FULEIA

Subject Allianz House 60 Gracechurch Street London EC3V 0HR

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

The Lead Local Flood Authority has reviewed the Flood Risk Assessment and Drainage Strategy – July 2024 for the above application and would recommend the following conditions should the application be approved:

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

- (a) Fully detailed design, schematic and layout drawings for the proposed SuDS components including but not limited to: rainwater harvesting, attenuation systems (including green-blue roofs and underground tank), rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance including silt removal; surface water flow rates shall be restricted to no greater than 2 l/s from the building, provision should be made for an attenuation volume capacity capable of achieving this which shall be no less than 150m³;
- (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.



Historic England

Anastasia Tampouridou
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 24/00743/FULEIA
Our Ref: 222477

Contact: Helen Hawkins



01 August 2024

Dear Anastasia,

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

Allianz House 60 Gracechurch Street London EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

Recommend Archaeology Condition

Thank you for your consultation received on 23 July 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.

Assessment of Significance and Impact

The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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

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



Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

An archaeological desk-based assessment (MOLA 2024) has been submitted with the planning application. The DBA highlights that although archaeological remains of Roman and medieval date have previously been found on the site in 1959 and 1995, the current basements are likely to have removed all but the deepest cut features. The proposed development entails extending Basement 2 into a previously undisturbed area in the south-east of the site. However, this area has already been truncated by the construction of Basement 1. As there is some potential for deep cut archaeological remains to survive in this area, a watching brief during ground reduction is recommended.

Planning Policies

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

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

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

Recommendations

The significance of the asset and scale of harm to it is such that the effect can be managed using a planning condition.

I therefore recommend attaching a condition as follows:

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



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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



- B. Where appropriate, details of a programme for delivering related positive public benefits
- C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

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

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

I envisage that the archaeological fieldwork would comprise the following:

Watching Brief

An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.

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

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

Yours sincerely

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



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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

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





Your ref:
My ref: 24/04990/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: [REDACTED]

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

5 August 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

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

SCHEDULE

Application No.: 24/04990/OBS

Application Date:

Date Received: 23.07.2024

Date Amended: 23.07.2024

Plan Nos: Letter from City of London dated 23rd July 2024 ref. 24/00743/FULEIA

Address: Allianz House, 60 Gracechurch Street, City Of London, London

Proposal: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

Yours faithfully

[REDACTED]
Deirdra Armsby
Director of Town Planning & Building Control

Note:

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



Anastasia Tampouridou
City of London
By email

Heathrow Airport Limited
Airside Operations Facility
Heathrow Airport
Hounslow, Middlesex TW6 2GW
Tel: +44(0) 208 757 0887
Email: Safeguarding@Heathrow.com

07/08/24

Dear Anastasia,

Re: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement.

Location: Allianz House 60 Gracechurch Street London EC3V 0HR.

Planning Reference: 24/00743/FULEIA

Our Ref: LHR5966

We refer to your letter dated 23 July 2024, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

H10 Radar Mitigation Condition

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON: In the interests of aircraft safety and the operations of Heathrow airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON: In the interests of aircraft safety and the operations of Heathrow airport.

3. No construction work shall commence on site until the Developer has agreed a “Crane Operation Plan” which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the “Radar Operator”. Construction at the site shall only thereafter be operated in accordance with the approved “Crane Operation Plan”.

REASON: In the interests of aircraft safety and the operations of Heathrow airport.

We will need to object to this proposal unless the above-mentioned condition is applied to any planning permission.

We would also like to bring the following to your attention:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, OPDC is required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited

From: Eleftheriou-Vaus, Kyri
 Sent: Wednesday, August 7, 2024 3:15 PM
 To: Tampouridou, Anastasia [REDACTED]
 Cc: Bentley, Paul [REDACTED]
 Subject: Allianz House 60 Gracechurch Street_24/00743/FULEIA

Hi Anastasia

Before finalising my comments for this application, I would be grateful if you could please ask the transport consultant and the air quality consultants for some feedback on the traffic aspects of the assessments. An impact assessment of the operational traffic has not been undertaken; the Environmental Statement Chapter 6 states the changes in traffic flow do not meet the screening threshold levels of 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles (LDVs) per day. However, the net change in traffic flows are not provided in the air quality assessment or the Transport Assessment, in addition the data for taxis are only provided for the AM and PM peak hours in the transport assessment. I would be grateful if this data could be provided in full.


I also have some queries regarding the traffic flows used in the air quality assessment presented in Annex 4 Roads Modelling Methodology. Whilst the impact of the operational traffic of the development has been scoped out based on the thresholds (as above), future levels have been modelled at 3 locations on the development site. Table A4.2 (screenshot below) presents the AADT data used in the assessment. I note some very significant changes in traffic flows between 2022 and 2029 but it is not clear why the differences are as great as they are; I include a comparison of some of the data as examples below. The data used for 2022 is based on modelled data and presumably not affected by covid restrictions, however that is not clear; clarification of this is required. The 2029 AADT data is also modelled but in some instances the traffic flows have almost tripled compared to 2029.

	AADT 2022	AADT 2029	Change
King William st	9466	9985	519
Cannon st	9329	9841	512
Gracechurch St south of junc.	8872	12001	3129
Gracechurch St north of junc.	7600	9395	1795
Bishopsgate	3204	8592	5388
Aldgate High St	2678	7814	5136

Road Link	AADT	% Car	% LGV	% HGV	% HGV	% HGV	% HGV	% HGV	% HGV
Aldgate High Street	7814	43.2	10.1	30.4	8.8	8.5	10.4		
Old Broad Street	5252	17.5	42.7	15.0	7.3	14.4	10.1		
Transpenance Street	5088	30.7	45.4	15.5	1.2	11.2	11.9		
Bishopsgate	8592	36.5	51.8	12.8	4.7	13.1	8.4		
Leadenhall Street	3280	38.1	18.7	18.5	4.1	7.7	10.5		
Cornhill	5202	38.1	18.8	18.8	4.1	8.8	10.1		
Comptrol Street	5245	44.5	15.5	51.8	5.0	5.0	10.5		
Forenctri Street	7838	40.4	18.3	18.8	5.7	12.0	10.0		

Kind Regards

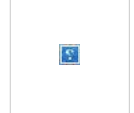
Kyri

 Kyri Eleftheriou-Vaus
 Air Quality Officer | Port Health & Public Protection
 [REDACTED]
 City of London | Guildhall | London | PO Box 270 | EC2V 7HH
www.cityoflondon.gov.uk

Bob Roberts
 Interim Executive Director Environment

Please note I work part time Monday AM, Tuesday, and Wednesday.

<https://www.air-aware.co.uk/> Helping raise awareness of local air quality



Follow us on Twitter @CityAir
 Download the CityAir App for current information on air pollution in the City

From: KJ@damconwater.co.uk
To: 246807@fleda.com
Subject: 246807@fleda.com
Date: 20 Aug 2024 14:22

THIS IS AN EXTERNAL EMAIL.

Corporation of London ODR Ref: 7571
Department of Planning & Transportation Year Ref: 24/0343/LELEA
PO Box 270
London E1C 2YJ
9 August 2024
Dear Sir/Madam,

Re: ALLIANT HOUSE 60, GRACECHURCH STREET, LONDON, E1CIV 9JH

Water Consents

The proposed development is located within 15 metres of a strategic water main. Thames Water requests the following conditions 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 borehole logs including all Thames Water meter access data, are 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 borehole logs. Reason: The proposed works will be in close proximity to underground sewerage 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 working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://pfi01.aediffia.protection.aediffia.com/act/https://www.damconwater.co.uk/development/246807/working-near-our-asset/>

Thames Water also requests the following conditions 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 borehole logs including all Thames Water meter access data, are 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 borehole logs. Reason: The proposed works will be in close proximity to underground sewerage 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 working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://pfi01.aediffia.protection.aediffia.com/act/https://www.damconwater.co.uk/development/246807/working-near-our-asset/>

As required by Building regulations part 7 paragraph 7.24, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewer flooding. In providing a positive pumped device (or an equivalent technical advance), or the acceptance that the sewerage network may discharge to ground level during storm conditions. If a part of the basement development there is a proposal to discharge ground water to the public realm, the work requires a Groundwater Risk Management Permit from Thames Water. Any discharge must not be a permit to discharge and any such permit is subject to the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharge into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02037779853 or by emailing riskmanagement@damconwater.co.uk. Application forms should be completed on line via <https://pfi01.aediffia.protection.aediffia.com/>

Thames Water would recommend the panel oil interceptors fit all entrances to ground level oil parking/washing bays. Failure to install oil interceptors could result in oil pollution/damage among local watercourses.

As per Building regulations part 7 paragraph 7.21, drainage serving lavatories is connected but full premises should be fitted with a grease separator complying with BS EN 1825-2:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommends, in line with best practice for the disposal of Fat, Oil and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio-fuel. Failure to implement these recommendations may result in block and other problems affecting block drains, sewer flooding and potential bio-fuel watercourses. Please visit our website for further information. <https://pfi01.aediffia.protection.aediffia.com/>

With the information provided, Thames Water has been unable to determine the full water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agrees a provision for FOG/WATER drainage, but has been unable to do so in the time available and as such, Thames Water request that the following conditions be added to any planning permission. "No development shall be accepted until confirmation has been provided that either: 1. Full water capacity exists off site to serve the development; or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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; or 3. A full water network upgrade required to accommodate the additional flows from the development have been completed. Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewerage flooding and potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at <https://www.damconwater.co.uk/planning/>. Should the Local Planning Authority consider the above recommendations inappropriate or not suitable to include in the decision notice, it is important that the Local Planning Authority liaise with Thames Water/Development Planning Department (e-mail: devcon@damconwater.co.uk) prior to the planning application approval.

Water Consents

The proposed development is located within 15m of a strategic water main. Thames Water request that the following conditions be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling borehole logs including all Thames Water meter access data, are 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 borehole logs. Reason: The proposed works will be in close proximity to underground sewerage 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 working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://pfi01.aediffia.protection.aediffia.com/act/https://www.damconwater.co.uk/development/246807/working-near-our-asset/>

Thames Water also requests the following conditions 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 borehole logs including all Thames Water meter access data, are 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 borehole logs. Reason: The proposed works will be in close proximity to underground sewerage 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 working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://pfi01.aediffia.protection.aediffia.com/act/https://www.damconwater.co.uk/development/246807/working-near-our-asset/>

The proposed development is located within 15m of a strategic water main. Thames Water request that the following conditions be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / edge the development, so as to prevent the potential for damage to subsurface water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unconsented access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. Any work has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your working will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://pfi01.aediffia.protection.aediffia.com/act/https://www.damconwater.co.uk/development/246807/working-near-our-asset/>

Following initial investigations, Thames Water has identified that stability permission. Thames Water will aim to provide customers with a minimum process of 10m head (approx 1 bar) and a flow rate of 0.5 litres/minute at the point where it crosses Thames Water pipes. The developer should take account of this minimum process in the design of the proposed development.

The supplied drainage sewage references F10 & Surface Water discharge to a combined sewer in Gracechurch Street. However, Thames Water have been unable to identify an acceptable discharge point that serves the site. The only point of discharge from the site is a 305mm combined connection in St Benn's Place (TQ2308028) which does not have the capacity to serve the development. Please confirm points of discharge (by number) for both F10 & Surface Water.

Yours faithfully

Development Planning Department

Thames Water,
Maple Lodge SIV,
Rushmore Way,
Reading, RG2 9JQ
Email: devcon@damconwater.co.uk

This is an automated email, please do not reply to the sender. If you wish to reply to this email, send to devcon@damconwater.co.uk

Visit us online <https://pfi01.aediffia.protection.aediffia.com/>
or by phone <https://www.damconwater.co.uk/246807/working-near-our-asset/>
or by email 246807@fleda.com

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From:
To:
Subject: Our DTS Ref: 77471 Your Ref: 24/00743/FULEIA
Date: 09 August 2024 14:13:53

THIS IS AN EXTERNAL EMAIL

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 77471 Your Ref: 24/00743/FULEIA
9 August 2024

Dear Sir/Madam

Re: ALLIANZ HOUSE 60, GRACECHURCH STREET, LONDON, -, EC3V 0HR

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 Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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

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

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.

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-2:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information : www.thameswater.co.uk/help

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, 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:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, 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:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. 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. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Water Comments

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water.

Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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>

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

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.

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

Supplementary Comments

The supplied drainage strategy references Foul & Surface Water discharge to a combined sewer in Gracechurch Street. However, Thames Water have been unable to identify an accessible discharge point that serves the site. The only point of discharge from the site is a 305mm combined connection in St Benet's Place (TQ32809802B) which does not have the capacity to serve this development. Please confirm points of discharge (by manhole) for both Foul & Surface Water.

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 , follow us on twitter www.twitter.com/thameswater or find us on www.facebook.com/thameswater. We're happy to help you 24/7.

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LPA Ref: 24/00743/FULEIA

London City Airport Ref: 2024/LCY/161

Date: 09/08/2024

Dear Anastasia Tampouridou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

LPA Reference	24/00743/FULEIA
Proposal	Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.
Location	Allianz House 60 Gracechurch Street London EC3V 0HR
Borough	City of London
Case Officer	Anastasia Tampouridou

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

Radar Mitigation Condition

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON: In the interests of aircraft safety and the operations of London City Airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON: In the interests of aircraft safety and the operations of London City Airport.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON: In the interests of aircraft safety and the operations of London City Airport.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on all corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make you aware of the following:

CAA Building Notification

As the proposed development exceeds 91.4m AGL, upon grant of permission, Hammersmith & Fulham Council are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification:

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).

The following details should be provided before the crane is erected:

- the crane's precise location

- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are 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 London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Lucy Dale

On behalf of London City Airport



Historic England

Ms Anastasia Tampouridou
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01580188

12 August 2024

Dear Ms Tampouridou

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

**ALLIANZ HOUSE 60 GRACECHURCH STREET LONDON EC3V 0HR
Application No. 24/00743/FULEIA**

Thank you for your letter of 23 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

Historic England is particularly concerned about the harm to the significance to St Mary Woolnoth that would be caused by the proposed development, as seen in views as one approaches it from the west. Such harm could be avoided or minimised by a reduction in height which would bring the proposals in line with the height of neighbouring consented schemes, and by simplifying the façade design. We therefore strongly encourage you to explore such amendments.

The potential harmful impact of the proposals on other highly designated heritage assets, including the Monument and the Tower of London World Heritage Site also need to be carefully considered, particularly in a scenario when other consented developments are not built. Any conclusions on the impact on the OUV of the World Heritage Site need to be substantiated by a Heritage Impact Assessment using the appropriate methodology, which may indicate further opportunities to avoid or minimise harm.

Historic England Advice

Significance of the heritage assets

a) The Church of St Mary Woolnoth & Bank Conservation Area

St. Mary Woolnoth was completed in 1727 in the English Baroque style and represents



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

one of the most distinctive and original designs of its architect Nicholas Hawksmoor. It has an unusually imposing façade, which is dominated by two distinctive flat-topped turrets supported by Corinthian columns, a great illustration of Hawksmoor's skill in manipulating mass, Classical detail and sculptural forms to achieve a dramatic effect.

The church is grade I listed indicating its exceptional historic and architectural interest. It was designed to have a dominant and imposing presence - an appreciation of its architectural effect is reliant on its setting, including the relative scale of surrounding buildings and clear sky backdrop.

It is located within the Bank Conservation Area, covering the heart of the historic financial district, to which it makes a major positive contribution. The area is centred on Bank junction and encompasses the major thoroughfares of Poultry and Cornhill. The character of the area is defined by high-quality nineteenth century and early twentieth century commercial buildings, many of which are listed. 1 Cornhill (grade II) is one such example - its dome 'makes the principal accent of the principal crossing of the City', as described in *The Buildings of England*.

The City Cluster already appears prominently in views looking east from the junction and dominates the scale of the listed buildings in the foreground. Many of these were designed to have landmark qualities; the impact of the visually dominant cluster is distracting and therefore cause some harm to the ability to appreciate their significance. However, existing views to the south east are less affected and may therefore be more vulnerable to adverse change. 20 Fenchurch Street is the only existing tall development which appears in the backdrop; 55 Gracechurch Street would additionally appear if constructed, albeit at a lower height.

b) The Monument

The Act for the Rebuilding of the City of London, passed in 1667, stipulated a monument to the Great Fire, that was to be stone column or pillar. Sir Christopher Wren and his Chief Assistant, Dr Robert Hooke, collaborated on the design - a colossal Doric column on a tall pedestal with a cupola and ornament sitting on the capital above. It was erected 1671-7 and is one of the City's most significant landmarks.

Public monuments pre-dating the Georgian period are particularly rare and reflect the arrival of Renaissance modes of commemoration to Britain. At the time of its construction it was the tallest isolated stone column in the world, and as such is an important feat of both engineering and architectural accomplishment. The structure is grade I listed and a scheduled monument.

It was designed to have a dominant and imposing presence - an appreciation of its architectural effect is reliant on its setting, including the relative scale of surrounding



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buildings and clear sky backdrop. Its dominance and wide-ranging visibility have been diminished by modern development, leaving the remaining good quality views of it particularly vulnerable to further detrimental change. One such view is from outside the Church of Saint Magnus the Martyr, looking north up Fish Street Hill. This street was once on the alignment of Old London Bridge and would have been a well-known view of the Monument at the point where one entered the City on the historically important processional route from the south.

c) The Tower of London World Heritage Site

The Tower's attributes, as defined in the adopted WHS Management Plan (2016) convey its Outstanding Universal Value (OUV). They reflect the Tower's role as the setting of many significant episodes of European history and as a model example of the development of a medieval fortress palace. It is an iconic landmark and symbol of London which sits at the heart of our national and cultural identity. The Tower of London is a monument of exceptional historic and architectural importance as reflected in its multi-designation as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

The Tower's landmark siting and visual dominance are key aspects of its significance and adverse impacts on these will affect the integrity of the World Heritage Site. These elements of significance, as experienced through views into, within and out of the property are increasingly vulnerable due to tall buildings in the City and additional development has the potential to compound this harm.

d) Tower Bridge

With its distinctive form and silhouette, the Sir Horace Jones's nearby Tower Bridge from the late 19th century is both an engineering marvel and an internationally recognised symbol of London. On its approach from the east its structure creates the sense of a portal framing entry into central London.

Impact of the proposals

The proposals are for the replacement of the existing building on the site with a new tall building designed by 3XN Architects. It would be of a similar scale to adjacent developments - slightly shorter than 20 Fenchurch Street and slightly taller than consented developments either side at 55 Gracechurch Street and 70 Gracechurch Street.

These developments have, or would once constructed, contribute to harm to multiple highly graded heritage assets (particularly those referred to above) by increasing the visual dominance and distraction of the Cluster in their settings. The current proposals would be largely occluded or framed by these existing and consented developments



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when seen in conjunction with them, but at the height proposed would introduce some new visual impacts. Those that are of most concern to us are set out below.

The consented development at 55 Gracechurch Street (20/00671/FULEIA) is a material consideration - but if it is not built out, the current proposals would have similar harmful impacts as those previously identified in our letter of objection to that application.

a) St Mary Woolnoth and the Bank Conservation Area

The church's significance through the contribution of its setting, as appreciated in views from Bank junction, would be harmed, as would the character and appearance of the Bank Conservation Area. The proposed development would appear taller than 20 Fenchurch Street, and would be closer to the viewpoints around the junction, increasing its dominance and distracting effect on the listed buildings in the foreground. The detailed design of the proposals, with visually striking ladder of the terraces all the way up the building on its eastern elevation, would compound this impact. Existing Cluster buildings are typically plainer in character with unmodulated glass-curtain walls that are less of a visual distraction.

The best locations to appreciate St Mary Woolnoth are slightly closer, from the northern end of King William Street. The proposals would introduce a new harmful impact to the skyline in reducing the clear sky backdrop to the church's distinctive tower. This would detract from the ability to appreciate its architectural qualities and as a landmark building. The applicants own Heritage and Townscape Visual Impact Assessment has found harm to the listed building due the impact illustrated in View 6.

b) The Monument

In a cumulative scenario, the proposals would largely be occluded by 55 Gracechurch Street, which appears slightly taller due to being closer to the viewpoint in front of St Magnus the Martyr.

If 55 Fenchurch remains unbuilt, the proposals would appear directly behind the column of the Monument up to the height of the capital and viewing gallery. This effect would diminish in a kinetic experience moving north along Fish Hill Street, but one would still be left with an impression of the Monument being dwarfed by its context, which runs counter to its intended purpose. The applicants own assessment also concludes that harm to the significance of the listed building and scheduled monument would be caused.

c) The Tower of London World Heritage Site

In a cumulative scenario, the proposals would largely be hidden by 20 Fenchurch



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Street and 55 Gracechurch Street (if constructed) in views of and from the World Heritage Site. It would slightly add to the bulk and density of the Cluster and could result in an adverse impact on attributes forming the OUV of the World Heritage Site. Those attributes include its Physical Dominance, its appreciation as an Internationally Famous Monument and its Landmark Siting.

If the latter development is not built, the current proposals would increase the visual dominance of the Cluster in a similar way to the approved scheme for 55 Gracechurch Street, albeit more of the development would be behind 20 Fenchurch Street in most views.

d) Tower Bridge

When viewing Tower Bridge from Butler's Wharf looking upstream towards 20 Fenchurch and 55 Gracechurch Street would be prominently visible in the backdrop of Tower Bridge, framed by the bridge's iconic form. If the latter development is not built, the current proposals would add considerable additional built form to this framed view and further reduce the amount of clear sky within the space between the two towers and upper and lower decks of the bridge that allows the unique form of the bridge to be appreciated and understood. The proposals would therefore add some harm to the considerable harm already caused by the presence of No. 20 Fenchurch Street to the significance of Tower Bridge through development within its setting, albeit less than 55 Gracechurch Street would.

Relevant policy and guidance

a) The City of London Plan 2015 - 2026

Policy CS12: Historic Environment, seeks the "safeguarding [of] the City's listed buildings and their settings" and "Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value...of the Tower of London World Heritage Site and its local setting."

Policy CS13: Protected Views, aims "to protect and enhance significant City and London views of important buildings, townscape and skylines...by...securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV."

Policy CS14: Tall Buildings, states that such development will only be permitted on sites that are considered suitable, having regard to the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features. The policy indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.



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b) The London Plan 2021

London Plan Policy HC1 Heritage conservation and growth requires development proposals affecting heritage assets and their settings to conserve their significance. It further requires the cumulative impacts of incremental change to be actively managed.

London Plan Policy HC2 World Heritage Sites, requires development proposals in the setting of WHSs to conserve, promote and enhance their OUV, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their OUV, or the authenticity and integrity of their attributes. It additionally requires development within the setting of a WHS to be supported by a Heritage Impact Assessment.

London Plan Policy D3 requires all development to follow a design-led approach that optimises the capacity of sites, including consideration of design options to determine the most appropriate form of development that responds to a site's context.

London Plan Policy D9 Tall Buildings requires that proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification. Where the proposals concern the setting of a World Heritage Site, the policy reserves the strongest protection, stating that new tall buildings "must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it".

c) The National Planning Policy Framework (NPPF)

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). This includes those obligations under the 1972 World Heritage Convention which require that the UK Government protects and conserves the World Heritage within its territory.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 195 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a



development proposal (Paragraphs 200-201).

If harm is deemed to be less than substantial, paragraph 208 of the NPPF requires that harm be weighed against the public benefits of the proposals. Great weight should be given to the conservation of designated heritage assets, irrespective of the level of harm caused, and the more important the asset, the greater the weight should be (Paragraph 205). Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification (Paragraph 206).

Chapter 12 of the NPPF considers good design as a key aspect of sustainable development. Paragraph 135 requires that developments should be sympathetic to local character and history, and Paragraph 193 states that development that is not well designed should be refused permission, especially where it fails to reflect local and government design guidance. Related to this, the National Design Guide (NDG, 2021) emphasises the importance of heritage and context when considering the merits of a design.

d) The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (GPA3)

GPA3 recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

- § Proximity to asset
- § Position in relation to key views to, from and across
- § Prominence, dominance or conspicuousness
- § Competition with or distraction from the asset
- § Dimensions, scale and massing
- § Materials (texture, colour, reflectiveness, etc)
- § Change to skyline, silhouette
- § Lighting effects and 'light spill'

Historic England's position

The proposals would cause harm to highly valued features of the historic City. In each case the harm would be less than substantial in the language of the NPPF, and relatively low in the range. However, this harm would occur to heritage assets of the highest significance and therefore attracts the greatest possible weight. We are therefore unable to support the proposals in their current form.

The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the Tower. Similarly, the London Plan provides for a robust protection of significance,



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including OUV in policies HC1 and HC2. All of these policies indicate the need to carefully manage the cumulative impacts of incremental change.

We are concerned about the new harmful impacts that would be caused to the significance of the Grade I listed Church of St Mary Woolnoth, as appreciated in some of the best views of it from the west. Such harm could be avoided or minimised by a reduction in height which would bring the proposals in line with the height of neighbouring consented schemes, and by simplifying the façade design. We therefore strongly encourage you to explore such amendments.

Any conclusions on the impact on the OUV of the World Heritage Site need to be substantiated by a heritage impact assessment using the appropriate methodology, which may indicate further opportunities to avoid or minimise harm. The application submission does not adequately assess the impact on attributes of OUV and this must be undertaken in order to comply with the requirements of Para 200 of the NPPF and Policy HC2 of the London Plan.

The Operational Guidelines for the Implementation of the World Heritage Convention (2023) advise that a Heritage Impact Assessment (HIA) is essential for all interventions, including development projects, that are planned within or around a World Heritage property (paragraphs 110, 118bis). Specific guidance on the HIA process has been produced: UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022). This explains how a HIA can be used iteratively throughout the design process as a tool to identify how a proposal might affect a property's attributes, its integrity and authenticity, and how any negative effects might be avoided.

UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative impact of tall building development within the Tower of London's setting.

In the context of this heightened international scrutiny we would urge you to request a proportionate heritage impact assessment, guided by UNESCO's Guidance and Toolkit for Impact Assessments in a World Heritage Context (2022). This will address the UK's obligations under the World Heritage Convention as implemented in line with the Operational Guidelines (paragraphs 110 and 118bis), and will assist in confirming the extent of any potential impacts in relation to attributes of the World Heritage Site's OUV to inform determination of this application.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We would welcome the opportunity to discuss ways of avoiding or minimising the harm we



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have identified above. A modest reduction in height would potentially resolve some of our key concerns because it would likely remove or reduce new harmful impacts.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention, as soon as a proportionate Heritage Impact Assessment is available. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

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.

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

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

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

Yours sincerely

Alexander Bowring

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



From: [REDACTED]
To: [REDACTED]
Subject: RE: Planning Application Consultation: 24/00743/FULEIA
Date: 13 August 2024 14:41:52

Good Afternoon,

Having reviewed the relevant documents, I am satisfied with the developments proposals to accommodate all utility services.

Happy to approve. Kind regards, Sye

Sye Thevathas
Strategic Infrastructure & Highways Asset Manager
City of London | Environment Department | City Operations Division
Guildhall | London | EC2V 7HH
[REDACTED]

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

From: [REDACTED]
Sent: Friday, August 2, 2024 9:43 AM
To: Thevathas, Sye [REDACTED]
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .
Reply with your comments to HYPERLINK "<mailto:PLNComments@cityoflondon.gov.uk>"
PLNComments@cityoflondon.gov.uk

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London

Anastasia Tampouridou
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/24/01290
Your ref: 24/00743/FULEIA

Enquiries to: Eleanor Downton
Tel: 0207 364 5009
Email: [REDACTED]

14 August, 2024

Dear Anastasia Tampouridou,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

**Location
Proposal**

Allianz House 60 Gracechurch Street London EC3V 0HR
Observation requested by City Of London for demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out about into consideration:-

1. **CITY OF LONDON REFS: 24/00743/FULEIA**

TOWER HAMLETS REF: PA/24/01290

ADDRESS: Allianz House 60 Gracechurch Street London EC3V 0HR



The best of London in one borough

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

PROPOSAL: Observation requested by City Of London for demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

Comments:

These proposals are for a new office-led tall building development on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London's Central Activities Zone (CAZ).

The Councils' main considerations in respect of this application is the impact on the setting of the Tower Of London, World Heritage Site. The development will also likely be viewed from other locations within Tower Hamlets including The Tower Conservation Area.

The assessment should have regard to relevant LBTH guidance such as the following: Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study (2009) and its Addendum (2016) and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy.

In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated. In views 9, a wireline is used to demonstrate the proposed development in the backdrop of the bridge.

Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 11 and 12. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it.

City of London Corporation should consider whether these should also be provided as rendered views, as the Proposed Development is clearly visible alongside the massing of existing developments in the area. This is of even further importance as views 10 and 11 would experience a significant effect during operational development.

Additionally, it is unfortunate that the Applicant has not taken into account and

provided the visibility from LBTH Borough Designated View 2 from Wapping Wall bridge to St Paul's Church (as shown in Figure 6 of Tower Hamlets Local Plan 2031), as requested in the LBTH consultation response to the Scoping Opinion Request.

In summary, the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. We therefore object to the proposal due to the harm cause to the setting of the Tower of London.

ES Statement:

LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where relevant.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.15 of Chapter 3.

The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Noise and Vibration, Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, Wind Microclimate, Climate Change, Heritage, Townscape and Visual Impact Assessment.

In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction which should be taken into account in the assessments. It is unfortunate to see that none of those have been considered.

A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been provided within Volume 2 of the ES. The HTVIA follows an unusual format given that the effects during demolition and construction are provided in Chapter 7, before even understanding the baseline and scoping process of the relevant receptors.

The assessment concludes a minor adverse effect during demolition and construction and minor neutral effect during operational development on the Tower

of London WHS, listed buildings within and the Tower Conservation Area. LBTH considers that the Applicant should have provided an assessment on each receptor so the residual effects can be clearly understood for distinct receptors and designations, however, the non-significant effects both during demolition and construction and operational development are agreed.

The HTVIA considers the impact on the following heritage receptors within LBTH: Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and Grade I Tower Bridge and its surrounds. The Tower of London's designation as Scheduled Monument is only mentioned, however, it appears that no assessment of that particular designation has been carried out. Similarly, it is not clear whether all listed buildings within the Tower of London as stated in paragraph 8.253 of the HTVIA have been considered in the assessment.

Views 10 and 11 would experience a significant effect during operational development leading to moderate to major beneficial. With regard to the visual impact assessment, the relevant receptors within LBTH include Views 12a, 12b and 12c, all which are located within the Tower of London. LBTH welcomes the use of winter photography for these views so that full impact from the Proposed Development can be understood.

Assessed views 12a, 12b and 12c would all experience non-significant effects, concluded as negligible to minor adverse effect during the demolition and construction phase. This would be the same for the cumulative assessment of demolition and construction for Views 12a and 12b while View 12c would experience no effect.

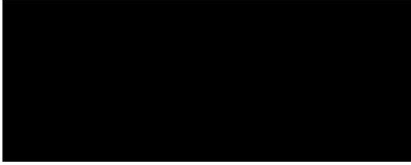
All of the three views would experience negligible to minor neutral effect (non-significant) as a result of the operational development. This would be the same in the cumulative assessment for Views 12a and 12b, while for View 12c there would be no effect in the cumulative assessment.

It should be noted that the assessments within the Built Heritage and Townscape and Visual Assessments are subjective. City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects.

In terms of the ES, LBTH has no objections in relation to the aspects listed, on the basis that the ES is considered to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulation.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control



HISTORIC ROYAL PALACES

City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Attn: Ms A Tampouridou
By email to: PLNComments@cityoflondon.gov.uk

19 August 2024

Ref: 60 Gracechurch Street, London, EC3V 0HR
Application No. 24/OO743/FULEIA

Dear Ms Tampouridou

Thank you for your letter of 23 July notifying us of this planning application and inviting us to submit observations within 30 days.

The Tower of London is a monument of exceptional historic and architectural importance as reflected in its designations as a World Heritage Site, scheduled monument, collection of listed buildings, and conservation area. Its Landmark Siting and the Physical Dominance of the White Tower are two of the key attributes of its Outstanding Universal Value (OUV), experienced through views into, within and out of the property, that are vulnerable to the impact of tall buildings in the City.

This development is located within the City of London's proposed southern extension of the City Cluster, appearing on the west side of the Cluster when viewed from the Tower of London. It remains our view that the continual encroachment of the City Cluster on the key views to and from the Tower have caused incremental harm to the OUV of the World Heritage Site. The extension of the Cluster to incorporate 20 Fenchurch St will exacerbate that harm.

The proposed development at 60 Gracechurch Street will be largely occluded from key views to and from the Tower by 20 Fenchurch Street and the consented scheme for 55 Gracechurch Street (if built out) and so in the cumulative view the additional harm would be less than substantial.

If the latter scheme is not constructed however, the proposals for 60 Gracechurch Street would add significantly to the bulk of the cluster on the western edge and hence on the OUV attributes described above. We do not agree that the effect would be in any way 'beneficial' as described in the applicant's Heritage and Townscape Visual Impact Assessment (HTVIA) and the harm must be weighed against the public benefits of the proposals.

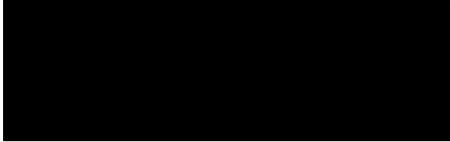
Historic Royal Palaces
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The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU



HISTORIC ROYAL PALACES

Yours sincerely



Adrian Phillips
Palaces & Collections Director



Historic Royal Palaces

Tel +44(0)20 3166 6000 www.hrp.org.uk

Historic Royal Palaces is a Registered Charity (No. 1068852) and Historic Royal Palaces Enterprises Ltd, a company registered in England (No. 3418583)

The registered office and address for services of both bodies is Hampton Court Palace, Surrey, KT8 9AU

[REDACTED]

From: Tastsoglou, Anna [REDACTED]
Sent: Thursday, August 22, 2024 2:09 PM
To: Eleftheriou-Vaus, Kyri [REDACTED]; Tampouridou, Anastasia [REDACTED]
Cc: Bentley, Paul [REDACTED]
Subject: RE: Allianz House 60 Gracechurch Street_24/00743/FULEIA

Hi Kyri,

I can confirm that Delivery and Servicing Plans are secured and monitored by planning obligations.

To secure that no diesel generators are not installed, we can impose a compliance condition that would restrict their installation. If in the future they would wish to install one, they would need to remove the condition and this can only be done via the submission a S73 application.

I trust the above is of some assistance.

Kind regards,

Anna



Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH

[REDACTED] www.cityoflondon.gov.uk

Katie Stewart – Executive Director, Environment



From: Eleftheriou-Vaus, Kyri [REDACTED]
Sent: Wednesday, August 21, 2024 5:30 PM
To: Tampouridou, Anastasia [REDACTED]; Tastsoglou, Anna [REDACTED]
Cc: Bentley, Paul [REDACTED]
Subject: RE: Allianz House 60 Gracechurch Street_24/00743/FULEIA

Hi Anna/ Anastasia

Thank you for forwarding the information to me. It appears that the traffic data used in the air quality assessment is based on the assumption from the transport statement (EIA) and Outline Delivery and Servicing Plan that the expected 119 servicing vehicles per day expected for the proposed development will be, as a result of off-site freight consolidation, reduced by at least 75%, to approximately 30 vehicles per day. It is therefore essential that this level of reduction can be achieved. I would therefore be grateful if you could confirm what controls can be applied to ensure that systems are in place within the final Delivery and Servicing Plan to achieve this. The outline plan does not provide detailed proposals on how this will be achieved or how it will be monitored. This is key as the combined increase in taxis, servicing and delivery vehicles without this reduction would otherwise have triggered a dispersion impact assessment.

Lastly the Utility Statement (July 24) proposes that two new incoming power supplies from two independent UKPN primary substations will be provided which will allow the removal of standby diesel generators within the building, both for life safety and mains failure. How do we ensure that future occupiers do not install diesel generators, as without the necessary assessments and conditions it is unlikely that any future installations will be able to meet the necessary requirements to minimise emissions and reduce the impact on neighbours and within the building itself?

I would be grateful on your views on whether the most appropriate way to deal with these concerns would be within the section106 agreement.

Kind Regards

Kyri

From: Tastsoglou, Anna [REDACTED]
Sent: Tuesday, August 20, 2024 3:54 PM

To: Eleftheriou-Vaus, Kyri <[REDACTED]>
Cc: Tampouridou, Anastasia <[REDACTED]>
Subject: FW: Allianz House 60 Gracechurch Street_24/00743/FULEIA

Hi Kyri,

I forward you the applicant's responses to your comments in Anastasia's absence.

Kind regards,

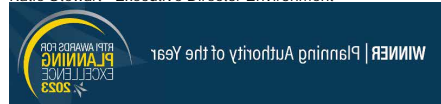
Anna



Anna Tastsoglou | Principal Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH

[REDACTED] | www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment



From: Michael Green <[REDACTED]>
Sent: Monday, August 19, 2024 5:05 PM
To: Figueira, Pearl <[REDACTED]>; Tampouridou, Anastasia <[REDACTED]>
Cc: Tastsoglou, Anna <[REDACTED]>; Peter.Twemlow <[REDACTED]>
Subject: RE: Allianz House 60 Gracechurch Street_24/00743/FULEIA

THIS IS AN EXTERNAL EMAIL

Hi Anastasia,

Appreciate Pearl has now left the City.

Please could you circulate our response onto your Air Quality colleagues?

Updated appendices now attached.

Thanks,

Michael

Michael Green
Senior Planner



DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ
telephone: 020 7004 1700 website: www.dp9.co.uk

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From: Michael Green
Sent: Monday, August 19, 2024 5:03 PM
To: Figueira, Pearl <[REDACTED]>; Tampouridou, Anastasia <[REDACTED]>
Cc: Tastsoglou, Anna <[REDACTED]>; Peter Twemlow <[REDACTED]>
Subject: RE: Allianz House 60 Gracechurch Street_24/00743/FULEIA

Hi Pearl,

Please see below our responses to your Air Quality team's comments.

CoL Air Quality Team comments

Before finalising my comments for this application, I would be grateful if you could please ask the transport consultant and the air quality consultants for some feedback on the traffic aspects of the assessments. An impact assessment of the operational traffic has not been undertaken (**Response 1**); the Environmental Statement Chapter 6 states the changes in traffic flow do not meet the screening threshold levels of 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles

(LDVs) per day. However, the net change in traffic flows are not provided (Response 1) in the air quality assessment of or the Transport Assessment, in addition the data for taxis are only provided for the AM and PM peak hours in the transport assessment. I would be grateful if this data could be provided in full. (Response 1)

I also have some queries regarding the traffic flows used in the air quality assessment presented in Annex 4 Roads Modelling Methodology. Whilst the impact of the operational traffic of the development has been scoped out based on the thresholds (as above), future levels have been modelled at 3 locations on the development site. Table A4.2 (screenshot below) presents the AADT data used in the assessment. I note some very significant changes in traffic flows between 2022 and 2029 but it is not clear why the differences are as great as they are: I include a comparison of some of the data as examples below. The data used for 2022 is based on modelled data and presumably not affected by covid restrictions, however that is not clear; clarification of this is required. The 2029 AADT data is also modelled but in some instances the traffic flows have almost tripled compared to 2029 (Response 2).

Applicants Response

Response 1:

Please refer to para 6.67 in ES Chapter 6, which sets out the operational traffic movements:

“In addition, the Proposed Development will generate four HDVs and 32 LDVs on Gracechurch Street, Fenchurch Street and Eastcheap, both of which are well below the screening thresholds and are lower than the movements associated with the existing Site. It is, therefore, not considered necessary to assess the impacts of traffic emissions during the operational phase and it can be concluded that the Proposed Development will not have a significant impact on local roadside air quality as a result of road traffic emissions.”

With respect to taxis, the proposals will generate 40 taxis (20 arrivals/departures) across the day which equates to a net uplift of 30 daily taxis from existing. It is assumed that taxi trips are already on the network and associated with pass-by trips.

Response 2:

AQC (Air Quality Consultant for this project) has been through the calculations and reporting in detail following this comment. The tables in the Annex to the ES Chapter have a couple of typographical errors, i.e. some of the data may accidentally have corresponded to a different road, hence the significant differences between the 2022 and 2029 values. These have been updated to provide the correct values and the Annex is attached, and table provided below. This does not alter the assessment or results of the ES Chapter, as the values were correctly used in the modelling, they were just misrepresented in the annex table.

For the Air Quality Assessment and for the modelling undertaken as part of this, the extend of the model domain was beyond the information initially provided by Velocity as the Transport Consultants. As such, and to maintain consistency across the modelling scenarios (e.g., for verification and opening year), traffic data from the London Atmospheric Emissions Inventory (LAEI) were used explicitly.

	AADT 2022	AADT 2029	Change
King William St	9466	9985	519
Cannon St	9329	9841	512
Gracechurch St south of junc.	8872	9395	523
Gracechurch St north of junc.	7600	8017	417
Bishopsgate	8145	8592	447
Aldgate High St	7408	7814	407

Please could you circulate this response onto your Air Quality team?

Please let me know if any further queries are received prior to their issue of the formal comments.

Kind regards,

Michael

Michael Green
Senior Planner



DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

telephone: 020 7004 1700 website: www.dp9.co.uk

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From: Michael Green

Sent: Wednesday, August 14, 2024 2:10 PM

To: Figueira, Pearl <[redacted]>; Peter Twemlow <[redacted]>

Cc: Tampouridou, Anastasia <[redacted]>; Tastsoglou, Anna <[redacted]>

Subject: RE: Allianz House 60 Gracechurch Street_24/00743/FULEIA

Hi Pearl,

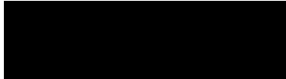
I hope you're well.

Apologies for the delay coming back to you, I returned from leave yesterday and catching up on emails.

We are discussing the Air Quality Teams comments below with Velocity and Trium and will come back with our responses asap (likely to be early

next week, but we will endeavour to reply sooner).

Thanks,
 Michael Green
 Senior Planner



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 London
 SW1Y 5NQ
 telephone: 020 7004 1700 website: www.dp9.co.uk

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From: Figueira, Pearl <[redacted]>
 Sent: Thursday, August 8, 2024 9:33 AM
 To: Peter Twemlow <[redacted]>; Michael Green <[redacted]>
 Cc: Tampouridou, Anastasia <[redacted]>; Tastsoglou, Anna <[redacted]>
 Subject: FW: Allianz House 60 Gracechurch Street_24/00743/FULEIA

Hi Peter

Hope all well.

Could you please send the below queries from air quality team to the consultants for air quality and transport?

many thanks

Before finalising my comments for this application, I would be grateful if you could please ask the transport consultant and the air quality consultants for some feedback on the traffic aspects of the assessments. An impact assessment of the operational traffic has not been undertaken; the Environmental Statement Chapter 6 states the changes in traffic flow do not meet the screening threshold levels of 25 Heavy Duty Vehicles (HDVs) or 100 Light Duty Vehicles (LDVs) per day. However, the net change in traffic flows are not provided in the air quality assessment of or the Transport Assessment, in addition the data for taxis are only provided for the AM and PM peak hours in the transport assessment. I would be grateful if this data could be provided in full.

I also have some queries regarding the traffic flows used in the air quality assessment presented in Annex 4 Roads Modelling Methodology. Whilst the impact of the operational traffic of the development has been scoped out based on the thresholds (as above), future levels have been modelled at 3 locations on the development site. Table A4.2 (screenshot below) presents the AADT data used in the assessment. I note some very significant changes in traffic flows between 2022 and 2029 but it is not clear why the differences are as great as they are; I include a comparison of some of the data as examples below. The data used for 2022 is based on modelled data and presumably not affected by covid restrictions, however that is not clear; clarification of this is required. The 2029 AADT data is also modelled but in some instances the traffic flows have almost tripled compared to 2022.

	AADT 2022	AADT 2029	Change
King William st	9466	9985	519
Cannon st	9329	9841	512
Gracechurch St south of junc.	8872	12001	3129
Gracechurch St north of junc.	7600	9395	1795
Bishopsgate	3204	8592	5388
Aldgate High St	2678	7814	5136

Road Link	TDA	% Cat	% LDV	% HGV	% HGV	% HGV	% HGV	% HGV	% HGV	% HGV
Enfurchr Street	7.898	40.4	18.3	18.8	5.7	12.0	10.0			
Comptre Street	3.843	44.5	22.1	21.8	2.0	0.0	10.3			
Comhill Street	5.805	28.1	18.8	18.8	4.1	8.8	10.1			
Leadenhall Street	3.380	38.1	18.7	18.3	4.1	7.7	10.3			
Bishopsgate Street	8.803	38.3	21.8	18.8	4.7	13.1	8.4			
Treadwell Street	5.888	20.7	23.4	15.3	1.8	11.8	11.8			
Old Broad Street	5.825	17.3	22.7	15.0	0.7	14.4	10.1			
Aldgate High Street	7.814	47.3	10.1	20.4	8.8	8.3	10.4			

Pearl Figueira
 Planning Officer
 Environment Department
 Tel: 07749 714 818



EC2P 2EJ

www.cityoflondon.gov.uk

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60 Gracechurch Street, City of London- TfL comments

Summary

- £200,000 is sought for a new Cycle Hire docking station at the site or in the local vicinity.
- More detailed Construction plans and further engagement with TfL are required due to potential impacts on pedestrians, cyclists and buses along A10 Gracechurch Street.
- This must include a Stage 1 Road Safety Audit (RSA) and Pedestrian Comfort Levels (PCLs) analysis for the proposed construction access arrangements, provided prior to determination.
- A Section 106 (S106) contribution of £729,869 (BCIS index linked) is sought for the A10 Transport for London Road Network (TLRN) improvement scheme including junction, crossing and footway improvements and making permanent the footway extensions delivered in temporary materials during the COVID pandemic. This also requires a backstop clause to ensure delivery of TLRN highway works around the site boundary in the event that our scheme should not proceed as planned, though it is currently expected to do so in good time for completion and opening of the development, as required by CIL and S106 regulations.
- ATZ (Active Travel Zone) and local highway improvements, particularly at the Fenchurch Street pedestrian crossing, should be secured by the Corporation and funded by the development.
- The proposed cycle parking entrance on Fenchurch Street should also be subject to a Stage 1 RSA and Designer's Response prior to determination. RSAs requested must comply with TfL Road Safety Audit Procedure May 2014 SQA 0170.
- The trip generation and London Underground (LU) impact assessment in the TA requires further work, especially given that full strategic modelling would usually be expected given the size and scale of the proposed development.
- PCL analysis of adjacent local crossings is also requested.
- Currently the cycle parking proposed does not comply with London Plan policy T5 and the London Cycle Design Standards (LCDS) in terms of design and amounts of different parking types.

Existing site and local transport context

The site is 16,158 sqm (GIA) made up of offices with some retail on the ground floor. Current vehicle access is located on the A10 Gracechurch Street. This serves both delivery and servicing including waste, and car park of 9 spaces, 10 motorcycle parking spaces and 40 cycle parking spaces. Pedestrian access is on Gracechurch Street for the office aspect and the retail entrances are on the northwest corner on the Gracechurch and Fenchurch Street junction.

The nearest current Cycle Hire docking stations are located at St Mary Axe, Aldgate approximately 460m northeast; Great Tower Street, Monument approximately 250m south and Bank of England Museum approximately 400m northwest.

In addition, Monument junction south of the site, just north of London Bridge, has been identified by TfL and the City Corporation as a priority location for highway safety improvements.

However, a TfL Safer Junction scheme to improve safety at Monument, Camomile Street and Fenchurch Street is currently unfunded.

In line with expected increases in pedestrian crowding and general transport and travel demand at these locations, safety issues are likely to become more acute and should be addressed.

A10 Gracechurch Street is now subject to a permanent order restricting traffic to buses and cycles only from Monday to Friday from 7am to 7pm between the junctions with Commercial Road in Shoreditch and at Monument close to London Bridge. It also features several footway extensions and other highway improvements currently built from temporary materials.

We are working to deliver improvement works along the A10 and make elements of the temporary COVID pandemic scheme there permanent, for example through improvements to the highway layout and surface materials. Costs will depend on the exact works undertaken, which are not yet clarified. Such potential permanent works are also currently partially unfunded. Implementation from 2025 onwards is likely.

The application should be supported by a nighttime Active Travel Zone (ATZ) assessment.

It has so far included five key routes which we are satisfied adhere to our ATZ guidance, but only day time assessment has been provided. We have the following comments on the submitted assessment:

Route One (to Liverpool Street station)

The worst section of this route was identified where the crossing is at Bell Inn Yard. The reason being for poor footway condition, with lack of tactile paving, irregular dropped kerb, providing accessibility issues for some footway users. Given this is on Gracechurch Street, the footway works will mitigate this issue on this route and therefore TfL have no significant concerns.

Route Two (to Aldgate station)

The worst section of this route was identified as a narrow section of footway on the northern side of Fenchurch Street, east of Lime Street, which the ATZ details are a difficult section of footway to navigate for mobility impaired users. There is also a signalized crossing which may result in queuing, deepening the issue.

Any footway widening will need to be agreed with the City of London as the highway authority, via S278.

Route Three and Four (to Canon Street and London Bridge stations)

The worst section of this route was identified as an informal pedestrian island on Cannon Street for Route Three and Route Four was on the same junction on the

section of King William Street consisting of a long pedestrian refuge island resulting in a longer crossing time.

As we recently commented, on the draft Local Plan, Monument junction needs major improvements to ensure cyclist safety.

Its list of highway improvements due to be delivered by 2030 includes the route north-south, London Bridge to Liverpool Street via Bishopsgate with Monument junction, marked as to be delivered as 'in partnership with TfL'.

Route Five (to Bank station)

The worst section of this route is the western end of Lombard Street which has concerns regarding cyclist experience. Towards Bank Station is a segregated contraflow cycle lane, but in the location, car and delivery vehicles infringe upon the lanes resulting in an uncomfortable experience for cyclists. Given cycling will be a main mode of accessing the site, TfL recommends the applicant enters discussions with the City of London, as the highway authority to address these issues.

The main pedestrian entrance is proposed to remain at the northwest corner of the site where Fenchurch Street meets Gracechurch Street, similar to the existing retail entrance, with secondary entrances proposed into a new public realm area to the south along A10 Gracechurch Street.

The cycle access is proposed to be located on Fenchurch Street to the north, with entry via a dropped kerb. The delivery and servicing access is proposed to remain in via Gracechurch Street; but accessing into a shared space with upgraded public realm, described as the 'undercroft' in the submitted application materials.

Deliveries and servicing are therefore proposed to take place only at night. This would align with the traffic restrictions on the A10 and is therefore supported.

The design of the undercroft space should comply with London Plan policy D8 part H and reflect the Public London Charter. Public access is proposed from 7am-11pm only, as 24/7 public access would conflict with night-time loading.

Short stay cycle parking is proposed within the Undercroft space. This must be accompanied by signage explaining it will be unusable and inaccessible from 11pm to 7am each night. Furthermore, this time-limited access does not meet LCDS as required by London Plan policy T5 and therefore the short stay cycle parking proposed is significantly below required standards.

We acknowledge the application has clarified St Benet's Place is outside of the site boundary and is privately owned. It is also not within or close to TfL highway. However, if possible, the applicant and the City should investigate potential for it to be made permeable northwards through to the Gherkin in future.

Cycle parking

Access

The access for all cycle parking will be located on Fenchurch Street to the north.

We are disappointed to see that our concerns regarding the level of safety and accessibility of the Fenchurch Street access have not been addressed in the submitted TA. These were expressed through the TfL Pre-Application service.

We request further consideration of a fresh design for the cycling access. The proposed cycling access in off Fenchurch Street will be designed to accommodate cyclist access and pedestrian flows as a safe and welcoming environment for both. This could include road markings, dropped kerbs, tactile paving, and the advice given on LCDS chapter 4.5.5, taking account of forecast cycle and pedestrian flows.

The access proposed would lead to three dedicated cycle parking lifts, which the TA confirms would be LCDS compliant in terms of dimensions (1.2m x 2.3m). The doors to the long stay cycle parking areas must also be self opening and closing with a minimum opening of 1000mm. We acknowledge no dedicated stairs with gully are proposed to be provided.

The applicant must also confirm if the access proposed on Fenchurch Street will be accessible 24 hours a day or will be locked during the night.

The applicant should clarify a contradiction in the TA at section 3.6.16, where it states all cycle parking and end of journey facilities are to be located in the basement off Fenchurch Street. However, below on paragraph 3.6.18, it discusses short stay cycle parking and cycle lockers to in the Undercroft area.

Given that the Undercroft is to be dual use, public realm during the day and a delivery and servicing area at night, we are concerned that short stay bikes could be left overnight, conflicting with visits by delivery and servicing vehicles.

We require further information on how the development is going to manage and mitigate this conflict.

The Delivery and Servicing Plan (DSP) details that cargo bikes will be able to use the entrance off Fenchurch Street for daytime deliveries only, given the bike store is inaccessible between 11pm-7am. This is supported by TfL.

Amount

Given the investment in cycle networks leading to the City of London, and the high demand for cycle parking, the applicant should aim to achieve the London Plan standard. TfL recognises that work has been done to comply with London Plan standards, and the applicant has suggested use of British Council for Offices February 2023 Key Design Criteria which sets out approximate occupancy levels for modern buildings. This calculates Net Internal Area space per person (NIA), rather than Gross External Area (GEA), as per London Plan policy. However, London Plan cycle parking standards are based on GEA which will continue to be the basis for TfL comments.

Under London Plan requirements the site should provide 849 long stay and 41 short stay cycle parking spaces with at least 5% for larger / adapted cycles. The site should provide a mixture of two tier and Sheffield stands.

The applicant is proposing 608 long stay spaces to be located in the basement and 12 short stay cycle parking spaces are proposed within the Undercroft, 27 below London Plan requirements.

The remaining short stay spaces are instead proposed as 27 active travel lockers, accessed via Fenchurch Street. There is need to robustly justify why such a shortfall in short stay and no end of journey facilities located in the Undercroft area.

In pre-application advice we requested for the applicant to explore options for additional cycle parking on upper floors, which we believe could potentially be accommodated on the 1st floor.

Design

Crowding at peak times around access points into the cycle parking considering pedestrian levels of comfort and congestion may prevent the cycle parking arrangements proposed being well-located, convenient and accessible for all as required by the LCDS and London Plan policy T5.

The long stay cycle parking is proposed as 61% two tier stands, 5% Sheffield stands, 5% larger Sheffield stands and 29% 'active travel lockers'. This represents too high a proportion of lockers which are not LCDS compliant and do not count towards a policy compliant cycle parking provision overall.

Further design and layout information is requested by TfL to ensure better London Plan compliance in relation to cycle parking, which the current proposals do not achieve.

Cycle Hire

We request £200,000 funding and if possible land within the site for a new Cycle Hire docking station. Should land be unavailable within the site a specific off-site location on local City highway should be identified and specified in the planning decision and appropriate planning obligations secured.

Cycle Hire usually caters for shorter ad hoc journeys, often as part of multi-stage public transport trips, as distinct from general cycling as a transport mode.

Notwithstanding, in this determination, Cycle Hire may be acceptable in lieu of full compliance with London Plan cycle parking under policy T5. The applicant should have considered this when presenting their case for cycle parking as requested during TfL pre-application discussions.

Demand for TfL Cycle Hire is extremely high locally and the vicinity is not currently served by a docking station within close walking distance. The nearest ranks in the top 4% and the second closest is in the top 15% busiest in London.

Furthermore, the development itself will contribute to increased demand which requires mitigation. Without additional Cycle Hire capacity, additional drivers and vans will be required to visit the area to redistribute bikes between existing oversubscribed docking stations, to prevent them regularly becoming completely full or empty.

Following a site visit with the City of London, TfL has identified Rood Lane as a potentially suitable site for new TfL Cycle Hire infrastructure. The docking station would be located approximately 130m east of the site directly serving and benefiting users of the proposed development. This should be investigated and clarified further prior to determination, to inform appropriate planning obligations and a contribution as requested.

Deliveries and Servicing

The proposed development is expected to generate 30 delivery and servicing trips a day mostly from 11pm-7am. The offsite freight consolidation proposed is strongly supported by TfL in line with London Plan Policy T7 (Deliveries, servicing and construction).

The Undercroft would include two night only loading bays at grade. At the entrance of the proposed delivery and servicing area a Copenhagen crossing is proposed extending the footway treatment across the inward access.

This is supported by TfL as it would prioritise pedestrians and improve the streetscape legibility where the highest number of pedestrian movements occur on A10 Gracechurch Street. The Copenhagen crossing style treatment and other works to establish access and relate our highway to the new internal Undercroft public realm will need to be delivered via Section 278 (S278) works agreement with TfL with full sign-off by TfL and at no cost to us. This must be secured in the S106 agreement.

We suggested during pre-application discussions that the applicant explored options of the cargo bike deliveries being on street, potentially on Fenchurch Street to avoid conflict with pedestrians on the busier Gracechurch Street. The applicant is now proposing this which is welcome, so daytime deliveries by bike would use the main cycle entrance and away from the Undercroft public realm.

Swept paths have been provided showing a 7.5t box van and refuse collection vehicle should be able to enter and egress the site safely in forward gear.

We note the outline DSP says A small number of food and beverage deliveries to the retail unit and offices will be 'direct to site', rather than consolidated. Between 7am-7pm on weekdays arrivals from the A10 will need to be by cargo bike due to traffic restrictions. As some clarity is lacking and there may be some risk of failure to comply with the DSP as proposed, we would support simply capping the total number of deliveries per day by condition and restricting all access by motor vehicles to match our local Traffic Order.

The Delivery and Servicing Plan (DSP) should be secured by pre-occupation condition to support London Plan policy T7.

Nighttime servicing only with no vehicle trips to and from the site except between 11pm and 7am should also be secured by a separate pre-occupation condition.

Trip generation and modelling

Improvements are required to the trip generation analysis. The current data tables should be checked against the borough level mode share data available in our public strategic modelling dashboard to re-estimate expected mode shares. The application currently uses outdated mode splits from the 2011 Census.

Impact assessment should be provided for the lunchtime peak, which is likely to be significant due to the nature of the development. LU station distribution splits should be re-checked using 2023 NUMBAT data should it be published by TfL prior to determination.

The expected mode shares used for cycling in the Transport Assessment (TA) are 14% for the AM and 12% for the PM peak. The City should note the London Plan cycle parking requirements are sufficient to serve a future cycling mode share of at least 19%.

The expected trip generation for deliveries and servicing is 30 per day as the site is aiming for 75% consolidation, noting these trips will take place at night between 11pm-7am, which is supported.

The TA estimates the development proposal would generate approximately 1,609 and 1,360 additional total LU trips at local stations during peak hours. A

The applicant has failed to carry out any strategic modelling which would usually be expected given the size and scale of the development. Active travel mitigation should therefore be secured instead. City Corporation decision reports for similar recent planning consents have acknowledged and secured, where necessary, local works to widen pavements and improve pedestrian crossings through S278 and S106 obligations with financial contributions to TfL.

Although the proposals are not supported by modelling, we are of the view that contributions to TfL of £200,000 for Cycle Hire and £729,869 (BCIS index linked) for highway mitigation are reasonable and necessary.

In pre-application discussions we also requested detailed static capacity analysis should be undertaken for Bank and Liverpool Street stations following the LU Methodology which was attached to the TfL pre application meeting report. This analysis should demonstrate any capacity issues at the stations and forecast station interchange patterns.

The application does not include any such analysis, or full strategic modelling, both of which would usually be expected given the size and scale of the development. Active travel mitigation should therefore be secured instead. City Corporation decision reports for similar recent planning consents have acknowledged and secured, where necessary, local works to widen pavements and improve pedestrian crossings through S278 and S106 obligations with financial contributions to TfL.

Although the proposals are not supported by modelling, we are of the view that contributions to TfL of £200,000 for Cycle Hire and £729,869 (BCIS index linked) for highway mitigation are reasonable and necessary.

Pedestrian Comfort Levels (PCLs) and Vision Zero analysis

The proposals are supported by a PCL assessment which is welcome. The growth factor assumed for future baseline pedestrian movement are acceptable in principle.

However the more recent TfL MoTION dashboard shows total public transport trips to and from the City of London are currently expected to increase by approximately 2% in our 2031 planning forecast and 15% in our 2041 planning forecast.

Those uplifts should also be tested prior to determination as a worst-case scenario assumption for future crowding in the PCL assessment.

The PCL assessment submitted has covered the footways and crossings immediately outside the development, as these are often recognised as local footway capacity pinch points.

The applicant has conducted a PCL footway assessment with future baseline with development and TfL COVID footway widening. The results show location 1, which is southwest of the site adjacent to the proposed Undercroft location, score as C+, location 2 on the western side of the site as C+, location 3 northwest of the site as B-, location 4 north of the site as B and location 5 which is where the new cycle parking entrance on Fenchurch Street is located is B.

A further assessment of PCLs including all crossing waiting areas on footways adjacent to all arms of the adjacent Fenchurch Street/Gracechurch Street/Lombard Street junction has been conducted. This was assessed during the morning peak of 8:15-9:15am, the Gracechurch Street north and south crossings made up 71% of the movement distribution.

The PCL identified that the Fenchurch crossing would be worsened with the proposed development lowering it from a C to C-. As a result, the applicant is proposing to increase the crossing width by 400mm and relocate the existing island to the west, which we support. This should be secured with applicant funding. The PCL identified that the Fenchurch crossing would be worsened with the proposed development lowering it from a C to C-. As a result, the applicant is proposing to increase the crossing width by 400mm and relocate the existing island to the west. Along Fenchurch Street adjacent to the main proposed cycling access, the applicant should consider highway design changes in terms of the future road markings and kerb alignment to ensure that vehicles as well as pedestrians are aware of turning manoeuvres. We are concerned about crowding and potential future conflict between people and vehicles at this access point.

The proposed results for the crossings PCL with development for the Fenchurch Street as detailed above would be C-, or C if the applicant widens the crossing width, Gracechurch Street south arm would be B-, north arm would be B and Lombard Street would be B. However cyclist access needs to be further explored prior to agreeing a widened crossing.

Finally, we also request PCL assessment of the pit lane and for any footway gantry arrangements proposed temporarily for during construction. We feel this is essential to ensure Vision Zero and full compliance with London Plan policies T2 and T7. Overall, the current crossings at all arms of the junction are PCL E, with D being on the Gracechurch Street north arm. The current footways with the temporary COVID materials are B-,C,C+,C and C-. These scores reflect on the low level of pedestrian comfort

Highway improvements contribution requested

Our request £729,869 (BCIS index linked) to the A10 improvement scheme is proportionate to that recently secured to the development permitted at 55 Bishopsgate and matches the approach being applied to all similar emerging planning proposals nearby.

As we advised at pre-application stage, TfL would prefer to carry out the A10 highway works. We recently advised the City Corporation in comments on their draft local plan 'City Plan 2040' that we currently expect to deliver walking improvements along the A10 by 2030.

Should the requested contribution be agreed, no Section 278 (S278) highway works to the TLRN outside the site boundary on A10 Gracechurch Street would be necessary. Although, a 'backstop' clause in the S106 will need to ensure delivery by the applicant of the same highway improvements previously agreed, if our scheme is not implemented by completion and occupation of the development.

Furthermore, a S278 agreement with TfL will be required for construction access and remediation should construction vehicles access the site from the TLRN side. The highway improvement works are currently built in temporary materials, due to budget constraints, and for ease of implementation during the COVID pandemic.

Further works are needed to make the temporary materials permanent and improved condition. The highway works and planning obligations secured to support this development must therefore be updated to ensure they are robust and deliverable, with sufficient flexibility different future scenarios.

Overall, mitigations on impacts or the direct provision of public transport, walking and cycling facilities, along with highway improvements / financial contributions will be required to address adverse transport impacts that are identified.

Therefore, as stated above applicant should provide a financial contribution for TfL to deliver significant improvements under an agreed scope, in line with the Mayor's Vision Zero and Healthy Streets strategies.

Further information regarding the construction access and time scales is required to aid TfL understanding on what is required on Gracechurch Street, and to help TfL co-ordinate your emerging works with the A10 scheme, whilst addressing any highway safety and pedestrian and cycling priority issues appropriately.

All highway works proposed, secured and eventually delivered will follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria. The

applicant should also consider the recommendations of Stage 1 safety audits in the final design of proposals for construction access and on local highway.

Car parking

The development would be car free except for one Blue Badge space within the Undercroft public realm space, as required by London Plan Policy T6.E.

The Blue Badge space must meet national accessibility standards and this should be demonstrated prior to determination. Further information is also required on how access to it could be practically managed if it were made available to a permanent regular full-time worker on request.

A survey of 3 nearby on-street blue badge parking spaces should also be carried out and shared with City and TfL transport officers, to enable assessment of their current capacity and the step free accessibility of existing walking routes from them to the site.

Construction logistics

An Outline Construction Logistics Plan (CLP) has been produced, but a detailed version in accordance with TfL best practice guidance must be secured by condition and approved in consultation with TfL.

The CLP must be in place before construction commences in line with London Plan policy T7 (Deliveries, Servicing and Construction). Due to the sensitive location, we request the applicant engages with TfL to mitigate potential conflicts on the A10.

We understand the applicant hopes to commence construction early 2026 and complete by mid 2029, so a 41 month programme of construction works is expected.

Construction vehicles are proposed to access the site via Fenchurch Street and exit via Eastcheap. Two pitlanes are proposed on both the A10 and Fenchurch Street frontages, which seems excessive.

Any proposed pitlane and gantry on Gracechurch Street would require a S278 agreement and highway licenses from TfL, and our prior approval. It currently appears major footway improvements as part of our A10 improvement scheme are likely to be under construction at the same time as the development.

We request swept paths for all types of bus and construction vehicle likely to pass or use the proposed construction access, as well as 2 buses passing with the potential pitlane proposed in place.

PCL assessments are also required for any proposed gantry temporarily narrowing footway space, in line with TfL Healthy Streets and Vision Zero principles. Footways must be accessible for all members of the public, including wheelchair users, prioritising safety in terms of visibility and lighting and surveillance.

Further discussions with TfL are strongly advised due to the limited information given at this stage. We note ongoing discussions with the neighbouring office

development, 70 Gracechurch, and encourage collaboration with them to share highway space and limit strategic highway and vulnerable road user impacts.

We also request a Stage 1 RSA for the construction access arrangements currently proposed, to support further discussions.

All construction vehicles accessing the site should be Construction Logistics and Community Safety standard (CLOCS) and Fleet Operator Recognition Scheme (FORS) Silver or Gold accreditation and be at least Direct Vision Standard 3. This is vital to mitigate any safety issues.

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0033

Date of issue of this decision: 09/09/2024



www.southwark.gov.uk

LBS Reg. No.: 24/OB/0033

Date of Issue of Decision: 09/09/2024

Your Ref No.:

Applicant Ms Anastasia Tampouridou
City of London Corporation

NO COMMENTS made in reference to your consultation on the following development:

Request for observations from City of London Corporation for 'Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development'.

At 60 Gracechurch Street London EC3V 0HR

In accordance with your letter received on 29 July 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

Anastasia Tampouridou
Environment Department
City of London
Sent via email only

23 September 2024

Dear Anastasia,

Letter in Response to Planning Application: 60 Gracechurch Street (ref:
24/00743/FULEIA)

Introduction

Further to a review of the submission documents and a prior pre-application meeting, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the emerging proposals for 60 Gracechurch Street.

Background & Pre-application Discussion

We thank the project team for reaching out regarding pre-application discussion for the emerging scheme and for their time and thoughtful presentation.

We issued comment to the developer team in response to pre-application discussion. As the scheme is, in the main, unchanged from pre-application stage, much of our comment is repeated below.

Relevant Planning Policy

Planning Policy Context

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

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

City of London Local Plan 2015:

Core Strategic Policy CS10: Design

Policy DM 10.1 New Development

Policy DM 10.4 Environmental Enhancement

Core Strategic Policy CS12: Historic Environment

Policy DM 12.1 Managing change affecting all heritage assets and spaces

Core Strategic Policy CS13 Protected Views

Core Strategic Policy CS14 Tall Buildings

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

The London Plan 2021:

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

Policy D4: Delivering Good Design

Policy D9: Tall Buildings

Policy HC1: Heritage Conservation and Growth

Policy HC3: Strategic and Local Views

Policy HC4: London View Management Framework

National Planning Policy Framework:

Chapter 12: Achieving well designed places

Chapter 16: Conserving and enhancing the historic environment

Comment

Given the location of the scheme, potential visual and heritage impacts to the Cathedral from the Processional Way are of greatest concern. As previously raised with regards to the design development of the extant consent for 70 Gracechurch Street nearby, we would be strongly opposed to any proposals that impinge on these Processional Way views and kinetic experience, that (if found) would have the potential to cause a high level of

visual impact and heritage harm to this Grade I listed building of exceptional significance.

We welcome discussion of potential impacts from the Processional Way within the submission material and our pre-application meeting. The concept of the 'cloak of invisibility' developed by MillerHare, and the adherence of the emerging scheme to this development envelope, is welcome. As discussed, we still seek assurances that the proposals will absolutely not be visible in these views. To be clearest, we would object to any 'technical visibility' so often discussed in relation to proposals of this nature.

We therefore welcome sight of MillerHare's methodology for this 'invisibility' envelope, including both technical and non-technical summaries to be reassured that our understanding of the proposal is correct and there will be absolutely no visibility from the Processional Way. We request that Officers interrogate this material accordingly and welcome its inclusion in the proposals.

As the applicant made clear in the materials shared, the proposal for this major tower will also be appreciable in views from the south west where the Cathedral is visible. These include LVMF view 15B.2, where the cluster appears to the viewer to the right-hand side of the Cathedral.

LVMF guidance for this view states that 'New tall buildings should seek to complement the City's eastern cluster of tall buildings with buildings of a height appropriate to their site and of high architectural design quality' and ultimately that development proposals maintain the visual prominence of the Cathedral and not diminish the ability to appreciate the building as a Strategically Important Landmark.

From recent experiences (and discussion in our pre-application meeting) we acknowledge the rate of development within the cluster – especially those constructed and consented schemes between 20 Fenchurch Street (the Walkie Talkie) and the centre of the cluster. Many of these are located along Gracechurch Street, now including No. 60.

It was helpful to understand from the submission materials and the pre-application presentation how proposals fit within this emerging context. However, following consideration, we have some concerns regarding the height and massing of the proposals in relation to the overall urban form of the cluster. While these are predominantly view management and urban

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design considerations (with relevance to important views of the Cathedral, within which St Paul's is appreciable as a Strategically Important Landmark), this does not preclude the potential for heritage harm – which officers should interrogate and judge accordingly.

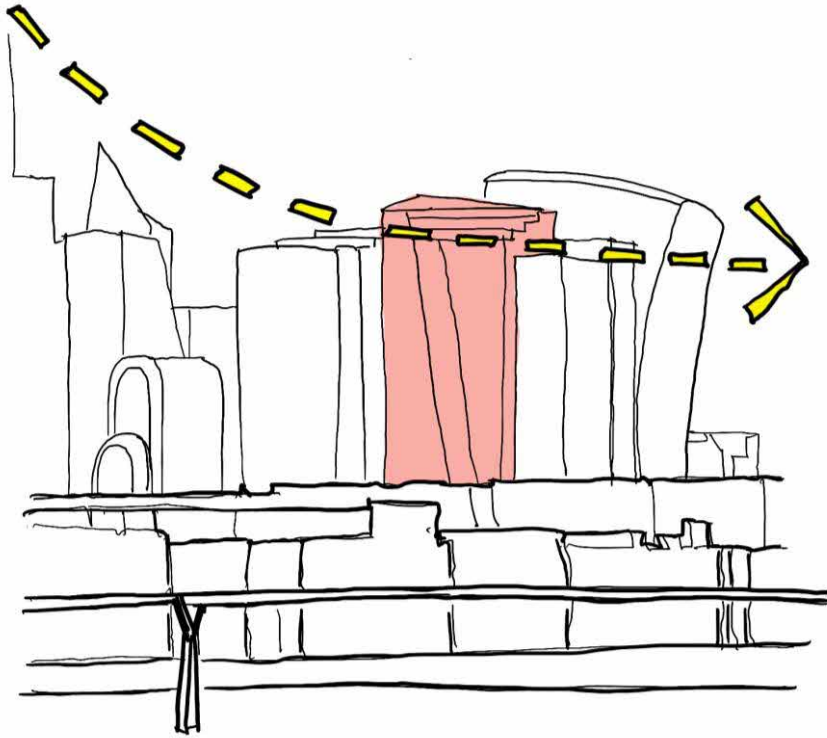
As described, the height of the emerging proposals for No. 60 attempts to mediate between the consented 70 Gracechurch Street and extant 20 Fenchurch Street.

Our concern remains that there appears to be a lost opportunity to manage the urban form of the cluster appropriately. We suggest that the Walkie-talkie (which is in the background) should not appear to be a 'target' for the scale of these new buildings. We would encourage design exploration of proposals mediating between the consented 70 Gracechurch Street and the nearby, lower, 55 Gracechurch. We also suggest that design dialogue should take into account the now live planning application for 70 Gracechurch Street.

While 20 Fenchurch Street does indeed stand out markedly at this edge of the cluster, we would be concerned of proposals responding to its height and creating a very tall 'wall' of buildings along Gracechurch Street. This would effectively reinforce a hard datum to urban form, almost a plateau rather than a gentler descending gradient to the cluster's edge (see below extract and LVMF view 15B.1, cumulative and proposed).

Please note, the below extracts of rendered views are taken from pre-application images, as only wirelines of the consented and emerging baseline are provided within the application documents.

The sketch immediately below has been prepared by the Surveyor's Office following pre-application discussion.



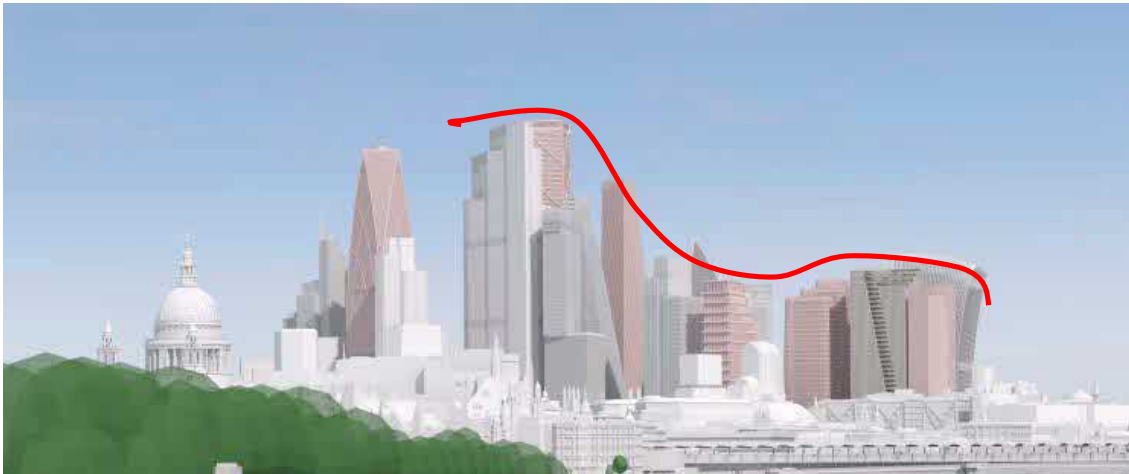
We suggest that the relationships between these proposals are not satisfactorily coordinated within the general design aspirations and policy intent of the Cluster. Whilst some may feel that the built form of cluster has the appearance of a ‘massing and architecture competition’, with each new major development seeking to out-compete a neighbour, we have always understood that the planning authority has an eye for overall form, urban design, and overall quality – especially as this impacts public amenity in key views. Policy CS14 of the adopted 2015 Local Plan states proposals must have due regard to ‘the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.’ This is mirrored more broadly within Policy CS10 Design. Indeed, whilst not yet adopted, the Draft City Plan 2040 also mentions at Policy S12 Tall Buildings that new development should ‘not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form.’

What appears to be emerging with the recent sequence of developments for Gracechurch street does not appear to be measured and ordered with

an eye to urban design of the skyline and topography in relation to the river Thames. This sequence seems to be a bulky wall 'infilling' to the scale and mass of the Walkie Talkie; ending in a cliff-edge. Is there not a more considered approach needed; some deliberation and judgement?



Broadly, our thesis is that the urban form of the cluster should be tailing off to the river as indicated by the overlaid line, with the Walkie-Talkie as the background, not making a camel's 'hump' and a cliff-edge.



It is stated that the proposals would be compliant with emerging policy in the 2040 Local Plan – though we here note we have our own queries and concerns as to the nature of this policy that are yet to be resolved. In the interim, we would hope that development aligns with the spirit of established policy that has informed the development of the cluster to date – namely that new development maintains and contributes to an appropriate gradient of urban form with design deliberation and care. We

feel this is in line with the language of the LVMF noted above that new development 'should seek to complement the City's eastern cluster of tall buildings with buildings of a height appropriate to their site.'

We are not persuaded that this aim is achieved in letter or spirit with this proposal, and that the proposals would not have minor adverse visual and townscape affects.

Conclusion

We again thank the project team for their time and effort with regards to their pre-application engagement, and the inclusion of additional and specific information within the planning submission to respond to some of our comments.

We also warmly welcome the ethos of the project team with regards to their clear investment in the site and its long-term prospects. Given these considerations, our comments are intended to assist the project team's aspirations and investment for the site in the long term.

However, we do have concern regarding the way the proposals would respond to the current and emerging context in terms of urban design, and as appreciable in strategic and local views.

We hope that our comments are constructive and assist the project team, and Officers at the City, moving forward.

Yours sincerely,



Surveyor to the Fabric

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

Directors:
Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:
Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

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 27 September 2024
Our Ref 24/04353/NPLN
Your Ref 24/00743/FULEIA

Subject Allianz House 60 Gracechurch Street London EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

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

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 office terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency. The public terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day

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.

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

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

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

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 proposed café/bar 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.

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

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

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

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

commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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

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

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

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Regards



Donal Rooney

Environmental Health Officer

Pollution Team

Dept. of Markets & Consumer Protection

City of London, PO Box 270,

Guildhall, London, EC2P 2EJ

Mob: 

Memo

To Assistant Director (Development Management)
Environment Department

Email [REDACTED]

From Kyri Eleftheriou-Vaus
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]



Date 7/10/24

Your Ref: 24/00743/FULEIA

Subject: Allianz House 60 Gracechurch Street London EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

Pollutant emissions

The proposed development will have one disabled car parking space and is planned to be fossil-fuel free with no combustion on-site; heating will be through air source heat pumps which is welcome.

A Utility Statement (July 24) states it is proposed that two new incoming power supplies from two independent UKPN primary substations will be provided. This allows for the removal of standby diesel generators for the building, both for life safety and mains failure.

Based on the CoL Code of Practice for Deconstruction and Construction Sites, the Site is considered to be a 'high risk' site and therefore appropriate mitigation measures to control dust are to be adopted as laid out in Air Quality Appendix, Annex 6 Construction Mitigation.

The service and delivery vehicles are the only source of pollutant emissions during the operational life of the development as no operational combustion plant is proposed. The transport statement states that the proposed site would generate 119 servicing vehicles per day. However off-site freight consolidation is expected to reduce the number of servicing vehicle trips by at least 75%, approximately 30 vehicles per day.

Air Quality Neutral

The development meets both the transport and building emissions for the Air Quality Neutral Assessment (taxi, servicing and delivery vehicles are excluded from this assessment).

Air Quality Positive

The application is supported by an Air Quality Positive Statement. The air quality positive matrix should consider as many relevant measures as possible however it does not include a full range of measures.

The matrix contains a number of positive measures regarding cycling, sustainable travel, and no car parking provision; however, these measures are well established and are expected of any major development, not least an EIA development, within the City.

While referring to the proposal that there will be no diesel fired life-safety generators, it is not included in the matrix. As this is a positive measure which should be acknowledged as innovative/future-proofing it should be included in the matrix. To ensure that no diesel generators are installed in the future, I recommend that a compliance condition that would restrict their installation.

Separately an Outline Delivery and Servicing Plan has been prepared which states it will 'manage deliveries and servicing activity by: Ensuring deliveries are undertaken with the most appropriately sized vehicle, with an emphasis on sustainable freight, last-mile deliveries, coordination within the Site occupiers and with other schemes, in the local area to consolidate deliveries, where possible'.

However, there is no mention of the Outline Delivery and Service Plan within the AQ positive statement. As this offers the only means of limiting the impact of these vehicles on pollutant and carbon emissions and ensuring that the predicted increase in vehicles do not breach impact assessment levels this should be addressed in the assessment.

As a very significant reduction of 75% is predicted through consolidation a greater commitment to this aim is required and methods to monitor the scheme is vital to ensure that it is achieved. In addition, measures which provide improved facilities and access to the site will enable greater numbers of sustainable deliveries by cargo bikes, cycles and by foot. For example, dedicated stands/loading and unloading zones for cargo bikes will aid such deliveries. These measures should be included in the Air Quality Positive Statement.

Should the development be approved please attach the following conditions:

Air Quality Positive Assessment

A revised Air Quality Positive Assessment that includes all the proposed measures including proposed systems, and monitoring, of the measures undertaken to reduce the number of servicing vehicle trips by at least 75% and measures that incorporate dedicated stands/loading and unloading zones for cargo bikes be submitted.

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 SI1 Improving Air Quality Part B(2)(b, and d) of the London Plan

Generators

There shall be no installation of diesel generators to the building he

Reason

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

Condition M32 NRMM

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

Reason

To reduce the emissions of construction and demolition in accord.
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)

Tel: 020 8921 5222



Anastasia Tampouridou
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
24/2578/K

**Directorate of Regeneration,
Enterprise & Skills**
The Woolwich Centre, 5th Floor
35 Wellington Street
London, SE18 6HQ

09 October 2024

DECISION NOTICE –RAISE NO OBJECTION

Dear Sir/Madam,

Site: Allianz House 60 Gracechurch Street London EC3V 0HR
Applicant: Anastasia Tampouridou City of London
Proposal: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).
Drawings Email from City Of London & Email from City Of London (PDF).

I refer to your letter dated 23 July 2024 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

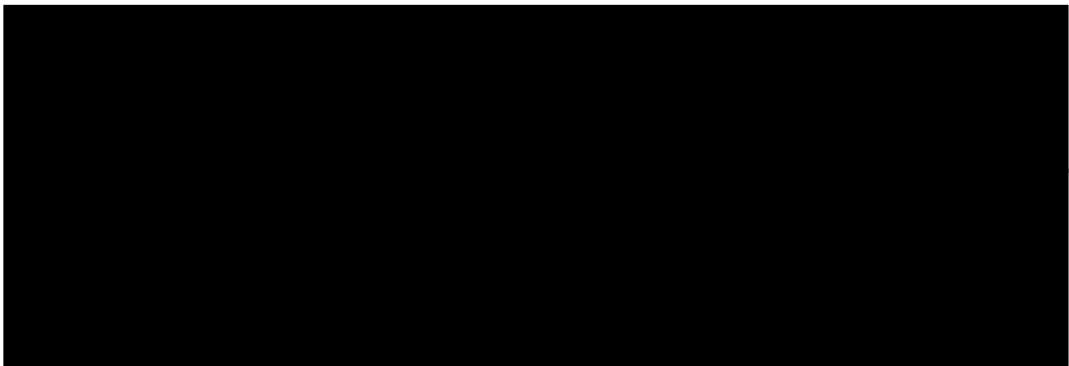
The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director



From: Bell, Harriet [redacted]
Sent: Thursday, October 10, 2024 2:06 AM
To: Tampouridou, Anastasia [redacted]
Subject: 60 Gracechurch St

Hi,

Comments for now.

- Note that there is a full **Access Statement** as part of the DAS
- Recognise **value of sensorial mapping** which has a greater focus on a holistic experience of the site and the potential to be more inclusive of a greater range of people than existing regulations allow. However, it's not clear how relevant disabled persons' and other relevant groups have been engaged and integrated into this (London plan D5)
- Welcome **biophilic focus** and engagement with nature (PAS 6463)
- Recognise the ambition of the **undercroft providing a space to move away from busy access routes** and provide a degree of respite, which echoes the focus of PAS 6463 on places for restoration and recovery
- Step free public transport from train to street is not available within 50m of the site, although there is greater proximity for bus stops. It should be noted that public transport is not suitable for everyone. **Resting points** at every 50m along principal access routes from points of arrival should be identified as set out in BS 8300(1) and Inclusive Mobility –is there potential for S106 works to provide more where missing? Refer to Transport team for information on where benches are 'missing'?
- No public **Blue Badge** bays nearby –off street space is consequently the more important. Welcome off-street provision even though it means the undercroft and vehicle movement will have to be carefully managed. Note protection zone is shown to driver side and rear of vehicle.
- Owing to the lack of parking within 50m of the main entrances **setting down** will be important. BS 8300 (1) 6.1 recommends a designated setting down space. Has this been identified?
- **Cycle parking.** Good clear entrance and the three cycle lifts avoid separation. Note what's said in Access Statement regarding dimensions of cycle lifts. Would be helpful to have those confirmed and are the security gates all 1000mm like doors on cycle lifts (LCDS Ch.8)? There are no further doors to the cycle storage, but the route to the accessible end of trip facilities on B1 includes more than two doors. Can we

have confirmation that these will be automated? Some of the larger cycle stands are at some distance from the lifts which may disadvantage some cyclists with mobility impairments. Can they be clustered so as to reduce travel distances? Can we also have swept paths for the larger cycle storage bays - not sure how, e.g., 3 spaces to east of passenger lift would work?

- **End of trip facilities** Welcome that accessible shower is provided on same level as storage, as well as on B1 mezzanine, but if only one accessible facility is provided at this level, right hand transfer would be suitable for more people. See Diagram 24 of AD M(2). Suggesting reversing what's shown in terms of B1 and B1 mezzanine provision. Toilets need to be consistent with AD M and updated AD T –note that ambulant accessible toilets are identified. Will want more on detail of toilets later. People should not have to travel more than 40m to an AWC, as confirmed.
- It is regrettable that no **mobility scooter storage and charging** is currently shown, with associated EV charging provision and fire protection. Has this been investigated further?
- **Entrances** –p.206 of DAD describes '**revolving drum doors**'. Not sure what's intended? The following text would suggest they mean drum doors, rather than standard revolving doors, which are not inclusive of many people. Drum doors are significantly more inclusive. Will need to reserve details of the design but, in principle, this is welcome.
- **Feature stair and lift–how will the experience be made equitable for people who need to use step-free access** as the northern entrance has a feature amphistair and the southern entrance is stepped, with a platform lift shared by people requiring step-free routes, and the movement of refuse. How will design of the lifts and amphistair ensure that step-free routes are intuitive and a comparable, welcoming experience? Need to review sightlines as well as signage, lighting and materials to ensure that step-free access doesn't equate to a lesser experience. At present there is unwelcome separation (LP D5 3.5.9).
- There are particular concerns about the **platform lift** to the south. Traditional platform lifts are not suitable for a range of people. AD M2 says that they should only be used for existing buildings and in 'exceptional' circumstances (AD M(2) 3.22) What options –including ramp and passenger lifts were explored and why were they discounted? What kind of platform lift is proposed? Need more justification here.
- **The route to the viewing gallery lift** is down the end of a corridor. I have concerns about the potential number of visitors and congestion in this area. This will need careful management to limit potential for fatigue and sensory overload. How will this be managed (queuing etc?). Seating? We will also need to see the management protocol for the shared goods/passenger functioning of the lift.
- Although indicative, the café **tables in the entrance access route** as shown would obstruct access to the toilets. A clear route of 2m should be maintained. I note that there is no Changing Places toilet included, which is regrettable. Can this be reviewed if one is not required as a consequence of visitor numbers (see AD m(2)? Baby change facilities should also be provided, separate to AWC toilets, as noted in the Access Statement
- Note what's said regarding an **evacuation lift**, firefighting/evacuation, and separate

firefighting lifts. Not all levels will have the separate lifts, as set out in the Fire Strategy. Refuge points look as though they won't project into access routes. Note what's said about audio and visual alarms, which is welcome. Two-way communication systems should also be provided.

- There's quite a lot that will need to be **reserved by condition** but I'm content that we have enough in the Access Statement to do that for:
 - Entrance doors
 - Reception
 - Café area and seating
 - Toilets –subject to clarification as above
 - Landscape including roof terraces, floor surfaces, planters, planting and threshold details
 - Seating including provision for recesses for wheelchair users and people with assistance animals to sit 'alongside'
 - Culture offer –including opportunities for disabled people
 - Wayfind and signage –which should be consistent and intuitive. This will be particularly important for the service corridor/access to viewing platform lift
 - Prior/preview information for visitors
 - Access Management Plan (which may incorporate some of the above) including provision for emergency exit such as preparation of PEEPs

Hope that's clear, but let me know if I've forgotten something or you want to discuss anything.

Thanks

Harriet



Harriet Bell | Access Advisor (she/her)

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

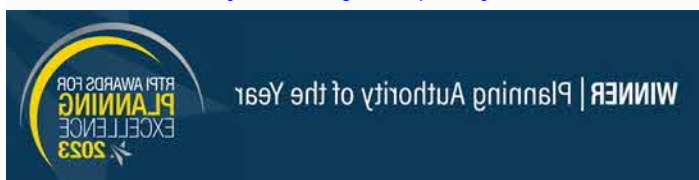


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Katie Stewart –Executive Director Environment

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From: [ROSSI, Sacha](#)
To: [PLN - Comments](#)
Cc: [NATS Safeguarding](#)
Subject: RE: Planning Application Consultation: 24/00743/FULEIA [SG37619]
Date: 22 October 2024 14:55:33
Attachments: [image001.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

NATS acknowledges receipt of the revised scheme and the alterations sought to the application. Its position remains unchanged from that previously communicated, and reiterated below.

Regards
S. Rossi
NATS Safeguarding Office

NATS Internal

From: NATS Safeguarding
Sent: Friday, July 26, 2024 11:09 AM
To: PLNComments@cityoflondon.gov.uk
Cc: NATS Safeguarding <NATSSafeguarding@nats.co.uk>
Subject: RE: Planning Application Consultation: 24/00743/FULEIA [SG37619]

Dear Sirs, NATS has assessed the application and has identified an unacceptable impact upon its H10 radar located at Heathrow Airport.

Accordingly, should the LPA be minded to grant the scheme, NATS respectfully requests the imposition of the following planning conditions on any planning permission.

Regards
S. Rossi
NATS Safeguarding Office

Aviation Conditions

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON:

In the interests of aircraft safety and the operations of NATS En-route PLC.

For the purpose of conditions 1-3 above;

"Operator" means NATS (En Route) plc, incorporated under the Companies Act (4129273) whose registered office is 4000 Parkway, Whiteley, Fareham, Hants PO15 7FL or such other organisation licensed from time to time under sections 5 and 6 of the Transport Act 2000 to provide air traffic services to the relevant managed area (within the meaning of section 40 of that Act).

"Radar Mitigation Scheme" or "Scheme" means a detailed scheme agreed with the Operator which sets out the measures to be taken to avoid at all times the impact of the development on the H10 Primary and Secondary Surveillance radar and air traffic management operations of the Operator.

"Crane Operation Plan (COP)" means a detailed plan agreed with the Operator which defines the type of crane and the timing and duration of all crane works to be carried out at the site in order to manage and mitigate at all times the impact of the development on the H10 Primary and Secondary Surveillance Radar systems at Heathrow Airport and associated air traffic management operations of the Operator.



Sacha Rossi

ATC Systems Safeguarding Engineer



4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

www.nats.co.uk

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

Sent: Tuesday, October 22, 2024 12:53 PM

To: NATS Safeguarding <NATSSafeguarding@nats.co.uk>

Subject: Planning Application Consultation: 24/00743/FULEIA

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 Allianz House 60 Gracechurch Street London EC3V 0HR .

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

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London

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

From: [PlanningGatewayOne](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 24/00743/FULEIA (Our ref pgo-6077)
Date: 22 October 2024 15:55:14
Attachments: [image001.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

Thank you for your email in relation to the above application.

HSE is the statutory consultee for planning applications that involve or may involve a relevant building.

Relevant building is defined as:

- contains two or more dwellings or educational accommodation and
- meets the height condition of 18m or more in height, or 7 or more storeys

“Dwellings” includes flats, and “educational accommodation” means residential accommodation for the use of students boarding at a boarding school or in later stages of education (for definitions see article 9A (9) of the Town and Country Planning Development Management (England) Procedure Order 2015 as amended by article 4 of the 2021 Order.

However, from the information you have provided for this planning application it does not appear to fall under the remit of planning gateway one because the purpose of a relevant building is not met.

Further information is available on the HSE website [here](#).

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-6077) in all future correspondence

Kind regards

Lisa Gaskill

Operational Support for Planning Gateway One
Health and Safety Executive | Building Safety Division
PlanningGatewayOne@hse.gov.uk



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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Tuesday, October 22, 2024 12:56 PM
To: [PlanningGatewayOne](mailto:PlanningGatewayOne@hse.gov.uk) <PlanningGatewayOne@hse.gov.uk>
Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .

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

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London

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From: [David Tom](#)
To: [Sue Greenway](#)
Subject: [Re: Planning Application for Construction: 24/0001/PAL/24](#)
Date: 27 October 2024 14:50
Attachments: [Linda_Powell_Construction_Schedule](#)

THIS IS AN EXTERNAL EMAIL

Good morning

Thank you for consulting Thames Water on this planning application. Having reviewed the details, we have no comments to make as there are no new drainage strategy details referenced to Foot & Surface water discharge to a combined sewer, in our recent response issued on 19th August, we've requested further information to identify an accessible discharge point that serves the site. However the developer will need to confirm the points of discharge (by manholes) for both Foot & Surface water. Can these please be provided.

Many Thanks

Kind Regards

Linda Powell
Development Database Administrator
Thameswater.co.uk

Melip Lodge SW7, Datchet Way, Richmond-upon-Thames, WD1 8SQ

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

From: [PLN.Commentary@cityoflondon.gov.uk](#)
Sent: 27 October 2024 11:54
To: Davron Tom <davron.tom@thameswater.co.uk>
Subject: Planning Application Construction: 24/0001/PAL/24

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Dear Sir/Madam

Please see attached consultation for Alham House 40 Greenwich Street London E17V 8BE.

Reply with your comments to PLN.Commentary@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amenity Team/Environment Department
City of London

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

Application Reference: 24/00743/FULEIA

Site: 60 Gracechurch Street

Case Officer: Anastasia Tampouridou

Application Proposal: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (*sui generis*), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

CIL and Planning Obligations

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

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£7,535,721.29	£7,234,292.43	£301,428.85

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£3,336,000	£3,169,200	£166,800
City Planning Obligations			
Affordable Housing	£2,224,000	£2,201,760	£22,240
Local, Training, Skills and Job Brokerage	£1,334,400	£1,321,056	£13,344
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£512,785	£512,785	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£TBC	£	£0
Security Measures Contribution (Eastern City Cluster)	£444,800	£440,352	£4,448
S106 Monitoring Charge	£5,500	£0	£5,500
Total liability in accordance with the City of London's policies	£	£	£212,332

City's Planning Obligations

5. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.
- Highway Reparation and other Highways Obligations
(Highways Schedule of Condition Survey, site access, consents, licences etc)
 - Local Procurement Strategy
 - Employment and Skills Plan (Demolition / Construction)
 - Delivery and Servicing Management Plan (including Consolidation)
 - Active Travel Plan (including Cycling Promotion Plan)
 - Construction Monitoring Cost (£53,820 for first year of development and £46,460 for subsequent years)
 - A10 Transport for London Road Network (TLRN) improvement scheme contribution

(£729,869 BCIS index linked)

- Cycle Hire Contribution (£200,000)
 - Carbon Offsetting
 - 'Be Seen' Energy Performance Monitoring
 - Utility Connection Requirements
 - Section 278 Agreement (*CoL*)
 - Section 278 Agreement (*Transport for London*)
 - Public Viewing Gallery (Sanctuary and Roof Garden) (Public Access & Management Plan)
 - Management Plan for Learning Space
 - Public Realm Space (Specifications, Public Access & Management Plan)
 - Cultural Implementation Strategy
 - Television Interference Survey
 - Operational Management Plan for the Undercroft
 - Affordable Workspace Management Plan
 - Wind Audit
 - Solar Glare
6. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
7. The scope of the s278 agreement may include, but is not limited to X

Monitoring and Administrative Costs

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



LPA Ref: 24/00743/FULEIA

London City Airport Ref: 2024/LCY/244

Date: 23/10/2024

Dear Anastasia Tampouridou,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found **to have the potential to conflict** with London City Airport's safeguarding criteria. If the local planning authority are of a mind to approve this application, then London City Airport suggests the condition contained in this letter is added to any future approval.

LPA Reference	24/00743/FULEIA
Proposal	Re-consultation due to amendments. Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.
Location	Allianz House 60 Gracechurch Street London EC3V 0HR
Borough	City of London
Case Officer	Anastasia Tampouridou

London City Airport's response must change to an objection unless these conditions are applied to this planning permission.

Radar Mitigation Condition

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON: In the interests of aircraft safety and the operations of London City Airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON: In the interests of aircraft safety and the operations of London City Airport.

3. No construction work shall commence on site until the Developer has agreed a "Crane Operation Plan" which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the "Radar Operator".

Construction at the site shall only thereafter be operated in accordance with the approved "Crane Operation Plan".

REASON: In the interests of aircraft safety and the operations of London City Airport.

Permanent Obstacle Lighting Scheme

Obstacle lights shall be placed on all corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation.

Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.

We would also like to make you aware of the following:

CAA Building Notification

As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification:

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk).

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position

of any other party, whether they are 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 London City Airport in regard to this application which become the basis of a revised, amended or further application for approval, then as a statutory consultee London City Airport Ltd requires that it be further consulted on any such changes prior to any planning permission, or any consent being granted.

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of London City Airport or not to attach conditions which London City Airport has advised, it shall notify London City Airport and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Kind regards,

Lucy Dale

On behalf of London City Airport

Anastasia Tampouridou
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/137255/02
Your ref: 24/00743/FULEIA
Date: 23 October 2024

Dear Anastasia,

Allianz House, 60 Gracechurch Street, London, EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. Re-consultation due to amendments.

Thank you for reconsulting us on the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application, however, please consider the following advice.

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Pre Application Advice

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet

to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNL SustainablePlaces@environment-agency.gov.uk.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

If you have any questions, please email me at HNL SustainablePlaces@environment-agency.gov.uk, quoting the reference at the beginning of this letter.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNL SustainablePlaces@environment-agency.gov.uk
Telephone: 02030251774

Anastasia Tampouridou
City of London
By email

Heathrow Airport Limited
Airside Operations Facility
Heathrow Airport
Hounslow, Middlesex TW6 2GW
Tel: +44(0) 208 757 0887
Email: Safeguarding@Heathrow.com

24/10/24

Dear Anastasia,

Re: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments.

Location: Allianz House 60 Gracechurch Street London EC3V 0HR.

Planning Reference: 24/00743/FULEIA

Our Ref: LHR6062

We refer to your letter dated 22 October 2024, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

H10 Radar Mitigation Condition

1. No construction shall commence on site until a Radar Mitigation Scheme (RMS), (including a timetable for its implementation during construction), has been agreed with the Operator and approved in writing by the Local Planning Authority.

REASON: In the interests of aircraft safety and the operations of Heathrow airport.

2. No construction work shall be carried out above 100m AOD unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

REASON: In the interests of aircraft safety and the operations of Heathrow airport.

3. No construction work shall commence on site until the Developer has agreed a “Crane Operation Plan” which has been submitted to and has been approved in writing by the Local Planning Authority in consultation with the “Radar Operator”. Construction at the site shall only thereafter be operated in accordance with the approved “Crane Operation Plan”.

REASON: In the interests of aircraft safety and the operations of Heathrow airport.

We will need to object to this proposal unless the above-mentioned condition is applied to any planning permission.

We would also like to bring the following to your attention:

CAA Building Notification

If any part of the development exceeds 91.4m AGL, upon grant of permission, City of London is required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). Crane notification | Civil Aviation Authority (caa.co.uk)

The following details should be provided before the crane is erected:

- the crane's precise location
- an accurate maximum height
- start and completion dates

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited



PLNComments@cityoflondon.gov.uk

25 October 2024
Crossrail Ref: CRL-IP-3302

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

Dear Anastasia Tampouridou,

24/00743/FULEIA : Allianz House 60 Gracechurch Street London EC3V 0HR

Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments..

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

Thank you for your letter dated 22 October 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

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

Yours sincerely,

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

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

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

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

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

Memo

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

From District Surveyors Office
Environment Department

Telephone [REDACTED]

Email [REDACTED]



Date 28 October 2024

Our Ref DS/FS24/0051

Your Ref PT_AXT/24/00743/FULEIA

Subject Allianz House 60 Gracechurch Street London EC3V 0HR

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

I have reviewed the submitted fire statement and have no comments.

I consider that policies D5 and D12 have been met.

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

Application Reference: 24/00743/FULEIA

Site: 60 Gracechurch Street

Case Officer: Anastasia Tampouridou

Application Proposal: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (*sui generis*), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

CIL and Planning Obligations

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

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£7,535,721.29	£7,234,292.43	£301,428.85

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£3,336,000	£3,169,200	£166,800
City Planning Obligations			

Affordable Housing	£2,224,000	£2,201,760	£22,240
Local, Training, Skills and Job Brokerage	£1,334,400	£1,321,056	£13,344
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£512,785	£512,785	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£TBC	£	£0
Security Measures Contribution (Eastern City Cluster)	£444,800	£440,352	£4,448
S106 Monitoring Charge	£5,500	£0	£5,500
Total liability in accordance with the City of London's policies	£	£	£212,332

City's Planning Obligations

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

- Highway Reparation and other Highways Obligations

(Highways Schedule of Condition Survey, site access, consents, licences etc)

- Local Procurement Strategy
- Employment and Skills Plan (Demolition / Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- Active Travel Plan (including Cycling Promotion Plan)
- Car Parking Management Plan (including Passive Electric Vehicle Charging Point)
- Construction Monitoring Cost (£53,820 for first year of development and £46,460 for subsequent years)
- A10 Transport for London Road Network (TLRN) improvement scheme contribution (£729,869 BCIS index linked)
- Cycle Hire Contribution (£200,000)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring

- Utility Connection Requirements
 - Section 278 Agreement (*CoL*)
 - Section 278 Agreement (*Transport for London*)
 - Public Viewing Gallery (Sanctuary and Roof Garden) (Public Access & Management Plan)
 - Management Plan for Learning Space
 - Public Realm Space (Specifications, Public Access & Management Plan)
 - Cultural Implementation Strategy
 - Television Interference Survey
 - Operational Management Plan for the Undercroft
 - Wind Audit
 - Solar Glare
6. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
7. The scope of the s278 agreement may include, but is not limited to X

Monitoring and Administrative Costs

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

Memo



To Department of Planning & Transportation

From Paul Jones

City Operations Division

Environment Department

Telephone 0207 332 1545

Email paul.jones@cityoflondon.gov.uk

Date 31 October 2024

Subject GREASE TRAP REQUIREMENT

For action

Application PT_AXT/24/00743/FULEIA

Address: **Allianz House, 60 Gracechurch Street, London EC3V 0HR**

Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, the proposals for the above planning application, need to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being;

ANY BUILDING PROPOSAL WHICH INCLUDES CATERING FACILITIES WILL BE REQUIRED TO BE CONSTRUCTED WITH ADEQUATE GREASE TRAPS TO THE SATISFACTION OF THAMES WATER UTILITIES LTD OR THEIR CONTRACTORS.

I would be obliged if you could incorporate this in your response to the planning department, regarding this application.

Paul Jones

From:
To:
Subject: Planning Application Consultation: 24/00743/FULEIA
Date: 04 November 2024 11:25:35
Attachments:

THIS IS AN EXTERNAL EMAIL

Dear Anastasia Tampouridou

Our ref: **491890**

Your ref: **24/00743/FULEIA**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated **26 July 2024** reference number **483338**

The advice provided in our previous response applies equally to this **amendment** The proposed amendments to the original application are unlikely to have significantly different impacts on the natural environment than the original proposal.

Should the proposal be amended in a way which **significantly** affects its impact on the natural environment then, in accordance with Section 4 of the Natural Environment and Rural Communities Act 2006, Natural England should be consulted again. Before sending us the amended consultation, please assess whether the changes proposed will materially affect any of the advice we have previously offered. If they are unlikely to do so, please do not re-consult us.

Yours faithfully

David Reid

Officer

Natural England

Consultation Service

Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP

Email:



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

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

Sent: 22 October 2024 12:51

To: SM-NE-Consultations (NE)

Subject: Planning Application Consultation: 24/00743/FULEIA

Dear Sir/Madam

Please see attached consultation for Allianz House 60 Gracechurch Street London EC3V 0HR .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department
City of London

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From:
To:
Cc:
Subject: FW: 24/00743/FULEIA - Allianz House 60 Gracechurch Street London EC3V 0HR
Date: 05 November 2024 10:50:30
Attachments: [ufm92_English_Heritage_Consultation_Email.pdf](#)
[60 Gracechurch Street rec cond_222477.pdf](#)

THIS IS AN EXTERNAL EMAIL

H Anastasia

Thank you for reconsulting me on this application. The proposed amendments do not affect my previous advice, which I have reattached for information

Regards

Helen



Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.

Follow us: [Facebook](#) | [Twitter](#) | [Instagram](#) Sign up to our [newsletter](#)

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically stated. If you have received it in error, please delete it from your system and notify the sender immediately. Do not use, copy or disclose the information in any way nor act in reliance on it. Any information sent to Historic England may become publicly available. We respect your privacy and the use of your information. Please read our full [privacy policy](#) for more information.

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

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

Sent: 22 October 2024 12:

To: E-Glaas <

Subject: 24/00743/FULEIA - Allianz House 60 Gracechurch Street London EC3V 0HR

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

Dear Sir/Madam

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

The application and associated documents are available for viewing at <http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=SGGVKXFHL6A00>

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Anastasia Tampouridou

Details

OUR REF: 24/00743/FULEIA

ADDRESS: Allianz House 60 Gracechurch Street London EC3V 0HR (Grid Reference: 532979, 180921)

PROPOSAL: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).

Re-consultation due to amendments.

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Your ref:
My ref: 24/07358/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: [REDACTED]

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

6 November 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

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

SCHEDULE

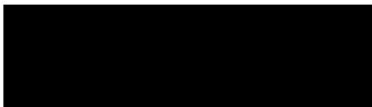
Application No.: 24/07358/OBS **Application Date:**
Date Received: 22.10.2024 **Date Amended:** 22.10.2024

Plan Nos: Letter from City of London dated 22 October 2024.

Address: Allianz House, 60 Gracechurch Street, City Of London, London

Proposal: Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA). Re-consultation due to amendments.

Yours faithfully



Deirdra Armsby
Director of Town Planning & Building Control

Note:

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



SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0050

Date of issue of this decision: 15/11/2024



www.southwark.gov.uk

LBS Reg. No.: 24/OB/0050

Date of Issue of Decision: 15/11/2024

Your Ref No.:

Applicant Anastasia Tampouridou - City Planning
City of London

NO COMMENTS made in reference to your consultation on the following development:

Re consultation for Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M

At Allianz House 60 Gracechurch Street London EC3V 0HR

In accordance with your letter received on 28 October 2024 and supporting documents.

Signed: *Stephen Platts* Director of Planning and Growth

[REDACTED]

From: Gregory Barrett [REDACTED]

Sent: 19 November 2024 07:35

To: Tampouridou, Anastasia [REDACTED]

[REDACTED]

[REDACTED] >

Subject: Allianz House 60 Gracechurch Street London EC3V 0HR (ref: 24/00743/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Anastasia,

Many thanks for notifying the Cathedral of updated proposals for 60 Gracechurch Street.

Following review of the updated proposals, we would note that our previous comments still stand –though we welcome attempts to positively respond to the cluster context.

In addition, we would register concerns regarding any increase in visual impact at night as a result of changes to the detail of the façade and the proposed lighting strategy. We therefore consider that ‘architectural’ external lighting, as appears to be indicated within the scheme, would not be required.

We would be happy to discuss this further with City Officers to understand impacts, if helpful.

Kind regards,

Greg

Gregory Barrett

BA (Hons) MPhil (Cantab) FRSA IHBC

Lead Heritage Consultant and Clerk to the Surveyor

[REDACTED]

on behalf of Caroe Architecture Ltd

I may send email outside normal working hours from time to time.

Please be assured I do not expect a reply outside normal working hours.

For our **COVID-19 Business Continuity** arrangements please click [here](#)



Cambridge Office:

Office 5, Unit 8; 23-25 Gwydir Street
Cambridge CB1 2LG
Tel: 01223 472237

London Office:

The Surveyor's Office, The Chapter House, St Paul's Churchyard
London EC4M 8AD
Tel: 020 7246 8341

Visit our website: caroe.com

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From: James Lerpiniere <[REDACTED]>
Sent: 20 November 2024 13:12
To: Tampouridou, Anastasia <[REDACTED]>
Cc: Ronald Henry <[REDACTED]>; Daniel Hiscock
<[REDACTED]>
Subject: 60 Gracechurch Street - 24/00743/FULEIA
Importance: High

Good afternoon Anastasia,

Many thanks for your email, and for keeping us abreast of this planning application.

Please find my comments (in yellow) attached (attachment two...CTSA response to 60 Gracechurch Street planning). In short I am very happy with the way things are progressing as the security consultant appears to have taken my advice onboard, and appears to be progressing things nicely.

My only concern is that a Counter Terrorism Risk Assessment (CTRA) hasn't been carried out, and whilst this isn't a condition of this planning application, remains good practice. I note that an SNA has been carried out, however this is to assess the security needs of the building/area, much of this centring around crime, rather than specific threats/vulnerabilities to this building. That said I do still advise a CTRA to be carried out. I am more than happy to meet with the consultant regarding this, should it be required.

Reference the HVM condition. I note that the following has been suggested...

HVM:

The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.

I have seen a few of these conditions now and being new to the City of London wasn't sure where these were coming from. I now understand these to be coming from the transport team within the CoLC.

Should a development require a Counter Terrorism condition, then best practice is for this to be recommended by a CTSA. The reason for this is that we can ensure that the correct condition(s) are being made in the right instances, that they are worded in such a way to insure the correct mitigation measures are being stipulated, that the work required to meet the condition is being carried by the right people (in this instance a suitably qualified blast specialist), that all related vulnerabilities are being considered (in this instance the structure may not be the only element vulnerable to a blast, the glazing and other material such as cladding may also be vulnerable) and the condition is written in such a way that it can be suitably discharged by the right people (the last couple have come to our team).

We are proposing a meeting with the CoLC to discuss this, hopefully to find a suitable way forward, however in the interest of our very tight deadline please can I suggest that, should you still require the above condition to be made, that this is replaced with the following:

The development shall instal blast mitigation measures, informed through consultation with a suitably qualified Structural Blast Engineer (SBE) from the Register of Security Engineers and Specialists (RSES). This will help to reduce this sites vulnerability to the effects of blast.

The SBE will help inform both the design and mitigation by:

1. Evaluating the buildings envelope for effects relating to air blast (including exterior walling systems, exterior and interior glazing and roofing systems) at varying explosive device sizes (i.e. VBIED and placed device attack) and pre-determined stand-off distances.
2. Providing performance specifications for pre-manufactured systems subject to air-blast loading (i.e. precast panels, windows etc.)
3. Providing specialist advice to the structural engineer and other design team members on incorporating blast analysis results into the buildings design.

Note: This will still remain a CoLC initiated condition at this time.

From reading the attached this appears very much in hand by the security consultant, therefore I can't envisage any problems with this at this time.

I hope this all makes sense, and helps. Should you have any questions please don't hesitate to make contact with me.

Kind regards

James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police

T [REDACTED]

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From: Tampouridou, Anastasia <[REDACTED]>
Sent: 15 November 2024 08:57
To: James Lerpiniere <[REDACTED]>
Cc: Daniel Hiscock <[REDACTED]>
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA
Importance: High

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Hi James,

The applicant responses are in the attached email following your memo and a couple of my points. I would be grateful if you could have a look and let me know if this is to your satisfaction.

We are securing an HVM condition and operation and management plans for the public areas of the building under S.106 agreement. If there are any planning conditions you would like to recommend, please let me know so I can take that into consideration. Otherwise, I have already included the standard informative which informs the development to engage further with CTSA at a later design stage.

I am submitting my report next week, so it'd be appreciated if I could have CTSA's final response beforehand so I can add it there.

Many thanks,
Anastasia

From: James Lerpiniere <[REDACTED]>
Sent: 25 October 2024 14:42
To: Tampouridou, Anastasia <[REDACTED]>
Cc: Daniel Hiscock <[REDACTED]>
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

Thanks Anastasia,

I will await your response. Please can you also CC my colleague Daniel Hiscock in.

Kind regards
James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
T [REDACTED]

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t www.twitter.com/citypolice



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From: Tampouridou, Anastasia <[REDACTED]>
Sent: 25 October 2024 12:13
To: James Lerpiniere <[REDACTED]>
Cc: Kelly Hemmise <[REDACTED]>; Ronald Henry <[REDACTED]>; Russell Pengelly <[REDACTED]>
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

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Thank you very much for your response James.

I have asked the applicant to clarify if the HVM restrictions identified in May remain

outstanding in the current submission and how CTSA's recommendations are being met. I am also waiting some clarifications on the consideration of blast mitigation in the design (materials) and further details on the access control system for the visitors of the public spaces at level 35 to demonstrate a secure flow of people and no external queuing.

These are the areas I identified as being planning material. I will happily report back to you when I have more information on these areas. Please do let me know if there is anything else you would like us to cover at planning stage, or if you would be satisfied with our standard recommendation as outlined in my previous email, below.

Kind regards,
Anastasia

From: James Lerpiniere <[REDACTED]>
Sent: 24 October 2024 12:45
To: Tampouridou, Anastasia <[REDACTED]>
Cc: Kelly Hemmise <[REDACTED]>; Ronald Henry <[REDACTED]>; Russell Pengelly <[REDACTED]>
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

Good afternoon Anastasia

Many thanks for your email.

I provided CTSA advice on this project back in May. Please find this attached (please note that this isn't for the public domain).

As you can see I made some comments around the need for HVM (page 4). I was advised that a Vehicle Dynamic Assessment (VDA), in order to assess what appropriate HVM measures were required, was carried out, however that there were restrictions regarding such mitigation. I advised that we met separately regarding this but I didn't hear back.

I am more than happy to attend a meeting, should this be require, however I am on leave after tomorrow for a week and understand that timings are now quite tight.

Please let me know.

Kind regards
James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
T [REDACTED]

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t www.twitter.com/citypolice



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From: Kelly Hemmise <[REDACTED]>
Sent: 24 October 2024 11:43
To: James Lerpiniere <[REDACTED]>
Cc: Ronald Henry <[REDACTED]>; Russell Pengelly <[REDACTED]>
Subject: FW: 60 Gracechurch Street - 24/00743/FULEIA

James –please see below.

I think you dealt with this back in May.

Kind regards,

Kelly.

Kelly Hemmise LCGI (she / her)
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
T [REDACTED]

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t www.twitter.com/citypolice



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From: Tampouridou, Anastasia <[REDACTED]>
Sent: 23 October 2024 14:58
To: Doco <[REDACTED]>
Cc: Russell Pengelly <[REDACTED]>; Ronald Henry <[REDACTED]>; Kelly Hemmise <[REDACTED]>
<[REDACTED]>
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

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Hi all –just copied some more contacts I found in my previous inbox. I am looking for some feedback regarding the above EIA planning application which is going to our committee for determination on 6th December. It would be great if City Police could provide some feedback on the security of the proposed development (included in the submitted Planning Statement, available online). The submission mentions that the proposed development would be protected by a 'security line', which has been designed in consultation with the City of London Police and includes measures for Hostile Vehicle Mitigation (HVM).

The development incorporated a public realm area underneath the building directly accessed from Gracechurch Street. This area would be accessible by car as it will form a loading area by night and a public space with sitting and accessible car parking by day. At level 35 a new public terrace would be formed alongside a learning space for schools' usage. Our recommendation would be to secure further details of the overall security strategy including a management strategy for the ground level public realm area and level 35 terrace under condition/obligation.

It would be much appreciated if you could provide your feedback on the above before the end of next week, so we can incorporate it into our report for Member's consideration.

Kind regards,
Anastasia

From: Tampouridou, Anastasia
Sent: 10 October 2024 09:02
To: Doco2 <[REDACTED]>
Cc: Russell Pengelly <[REDACTED]>
Subject: RE: 60 Gracechurch Street - 24/00743/FULEIA

Hello,

Apologies to email again but we would appreciate your feedback on the proposed scheme as soon as possible.

Kind regards,
Anastasia

From: Tampouridou, Anastasia
Sent: Tuesday, September 24, 2024 4:10 PM
To: Doco2 <[REDACTED]>
Cc: Russell Pengelly <[REDACTED]>
Subject: 60 Gracechurch Street - 24/00743/FULEIA

Hello,

The Planning team consulted City Police and Counter-Terrorism advisors regarding the above application. Have you had the chance to review the submission documents and provide us with your feedback?

[24/00743/FULEIA | Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use \(Class E\), retail / cafe use \(Class E\), free publicly accessible area and learning space at level 35 \(sui generis\), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. \(PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA\). | Allianz House 60 Gracechurch Street London EC3V 0HR \(cityoflondon.gov.uk\)](#)

Kind regards,
Anastasia



Anastasia Tampouridou | Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH

[REDACTED] | www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment



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1. Undertake a Counter Terrorism Risk Assessment (CTRA) and Operational Requirement (OR).

QCIC have completed a Security Needs Assessment (SNA).

That's fantastic that an SNA has been carried out, however I would still advise a full CTRA and OR be conducted, to inform of any threats and vulnerabilities, thus any proportionate mitigation measures required. The SNA can feed into these processes.

2. Carry out a full HVM review, which should include a Counter Terrorism Risk Assessment to identify all areas vulnerable to a hostile vehicle attack, and a Vehicle Dynamic Assessment (VDA), to identify the appropriate standard and placement of HVM required.

A full HVM review and Vehicle Dynamic Assessment (VDA) was completed. Vehicle-borne protective measures are being included which be developed in more detail at the next stage of design.

Action supported by CoLP CTSA's.

3. Public areas should be designed to minimise opportunities for concealing items, which should see unnecessary furniture avoided.

The public areas have been designed to limit and minimise opportunities for concealing items - this will be a specific consideration in the detailed design stage of the Undercroft, which will review the detailed layout and arrangement of any planters, recesses or ledges to minimise hidden spaces.

Action supported by CoLP CTSA's.

4. Commission Explosive Consequence Analysis (ECA) to understand what effects a blast could have on this building. Blast mitigation measures should then be considered accordingly.

A blast analysis has been completed for the scheme. This is a confidential document.

Action supported by CoLP CTSA's. Blast analysis to inform any blast mitigation measures.

5. Consider where post and deliveries will be received, along with any security measures.

Both post room and delivery location options have been considered within the design along with appropriate security measures, with the Post Room currently being accommodated at GF level, accessed via the secure cycle entrance. These spaces will be developed in more detail at the next stage of design, with further input from QCIC and the building management team.

Action supported by CoLP CTSA's.

6. Implement a Security Control Room (SCR).

A Security Control Room requirement is included within the design, currently located within the building management suite at L1. The Security Control Room shall act as a central command and control position for the security management team. This space shall also serve as a technical management and oversight building that allows for the central monitoring of all video-surveillance

cameras, security system alarm notifications, and other integrated security system activity. The Security Control Room will be developed in more detail at the next stage of design, with further input from QCIC and the building management team.

Action supported by CoLP CTSA's.

7. Ensure adequate CCTV is installed for the purposes of detection and verification.

Adequate CCTV will be installed for the purposes of detection and verification which will be developed in more detail at the next stage of design; the Security Needs Assessment (SNA) undertaken addresses this requirement.

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

8. Ensure adequate security lighting is installed.

The Security Needs Assessment (SNA) addresses this requirement. Adequate security lighting will be included and developed in more detail at the next stage of design. Luminaires, with suitable photometry (serving to reduce light spill and light pollution), and controlled using photo-electric cells, will be used to illuminate the public realm, including areas immediately adjacent to the buildings, all perimeter doors, and footpaths. Lighting elements shall be vandal resistant, with illuminated elements mounted no less than 2.5m from finished grade. Lighting across the development will be designed to levels as identified within BS 5489-1:2013. The lighting design will be completed by a certified Institute of Lighting Professional (ILP).

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

9. Ensure adequate access control measures are installed for non-public areas.

The Security Needs Assessment (SNA) addresses this requirement. Adequate access control measures will be installed in non-public areas and developed in more detail at the next stage of design. Control measures include 1) Free egress – exit button, lever, or push bar release; 2) Key – mechanical lock / thumb turn / latched bolts; 3) AACCS – access control managed; door will be monitored for status.

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

10. Ensure lockdown capability in the event of a security incident.

The Security Needs Assessment (SNA) addresses this requirement. The building will be equipped with a dynamic lockdown function that shall control movement, access and egress or people around the building in direct response to an identified risk, threat or hazard that might impact on the safety and security of people and assets.

Action supported by CoLP CTSA's, however the CTRA should be used to address this requirement.

11. Implement a Public Announcement (PA) system.

This would be developed in more detail at the next stage of design

Action supported by CoLP CTSA's.

12. Mitigate against a Fire as Weapon (FAW) attack.

The Security Needs Assessment (SNA) addresses this requirement. As above, the building will be equipped with a dynamic lockdown function that shall control movement, access and egress or people around the building in direct response to an identified risk, threat (i.e. Marauding Terrorist Firearms Attack (MTFA)).

Action supported by CoLP CTSA's. Please can I just ensure you are working with the London Fire Brigade regarding this action.

13. Consider 'grey space' areas.

Further clarification required from CoL Police and CTSA on this point.

This site is encouraged to engage regarding any grey space areas which the site may have an impact on or impact from. This includes the period of time that the site is being built, so how the impact of any construction works may effect the security posture of any neighbouring properties/the local area. Examples include the removal of street furniture, which may be protecting other sites against the threat of a VAW attack, or the introduction of hoarding, which may have an effect on ingress/egress/dispersal routes.

Engagement around any grey spaces areas should continue once the building is operational, however this is something that the local CTSA team can facilitate.

Clarifications to facilitate report writing:

- I note the DAS HVM section responds to the attached CTSA advice (recommendation 2 of page 2). On page 4 CTSA advised 'that there were some HVM restrictions around the perimeter of the sit. A further meeting to discuss HVM is advised'. Can you please advise if these restrictions are present in the current submission and what these are?

During the pre-application meeting, QCIC set out the anticipated Hostile Vehicle Mitigation (HVM) solution for proposed development. The solution includes Vehicle Security Barriers (fixed and automatic) and Structural Goalpost Arrangement. The details on this are set out in the DAS. Final details on the product type and positioning of Vehicle Security Barriers (VSB) and Hostile Vehicle Mitigation (HVM) elements will be developed in more detail, and with further input from QCIC and the building management team, at the next stage of design.

Noted. Should you require any further input from the CoLP CTSA team then please don't hesitate to make contact.

- I understand a further meeting with CTSA has not been carried out, so it would be good to understand how CTSA's recommendations are being met.

CTSA letter stipulates 'recommendations' not 'requirements'. All CTSA recommendations have been reviewed and will be incorporated into the design as necessary.

Noted – thankyou.

- **Blast Mitigation – has the design (materials) considered blast mitigation?**

A blast analysis has been completed for the scheme. This is a confidential document.

Action supported by CoLP CTSA's. As above, the blast analysis should now inform any blast mitigation measures, including structural, glazing, and any associated material (i.e. cladding).

- **Where is the Security Control Room located in the plans?**

A Security Control Room requirement is included within the design, currently located within the building management suite at L1. The Security Control Room will be developed in more detail, and with further input from QCIC and the building management team, at the next stage of design.

Noted – thankyou.

- **What is the access control system for the site, especially for the public spaces?**

See response above. Adequate access control measures will be installed and developed in more detail at the next stage of design.

Noted – thankyou.

- **The submission mentions check-in within the Undercroft and scanning for controlled access to areas of level 35. Can you please elaborate a bit further on the control process? (incl. location of check in, scanning measures introduced – i.e. walk-through metal detectors or security staff checking and where these occur - option of personal item locker in case of restricted items identified through scanning or would visitors be denied access , etc). Having said that, has there been a robust analysis of the maximum number of visitors arriving at the same time which factors in the maximum time required to check in and go through all scan controls, lift capacity / travel time, maximum capacity at level 35 and time spend in the area (including the learning space visitors), etc. that demonstrates a good/secure flow and no queueing outside the building/on the footway?**

Whilst the security processes for the rooftop garden and associated spaces will be developed during future stages of design, the current proposals have allowed space for a security / check in reception on the GF, accessed directly from the Undercroft. This space provides secure access to the corridor which leads to the rooftop public spaces, offering direct and indirect surveillance alongside space allowances for metal detectors / supporting security rooms etc - this space is marked on the plans. The public rooftop spaces have been designed to accommodate 125 people, with lifting, access and supporting functions designed around this expected occupancy. The detail of this operation (as requested above) will need further analysis following the development of the public use(s) within the Proposed Development, but the spatial allowance has been sized according to the principles of operation outlined in the planning submission.

Noted – thankyou.

This detail would be reserved by a planning condition/obligation, which we suggest is required prior to occupation of the development. This would form part of the Public Viewing Gallery Public Access and Management Plan.

Not for CTSA's.

Anastasia Tampouridou
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/24/01833
Your ref: 24/00743/FULEIA

Enquiries to: Eleanor Downton
Tel: [REDACTED]
Email: [REDACTED]

20 November, 2024

Dear Anastasia Tampouridou,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

**Location
Proposal**

Allianz House 60 Gracechurch Street London EC3V 0HR
Observation requested by City of London for the Demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development. (PLEASE NOTE: This application is accompanied by an Environmental Statement. Copies of the Environmental Statement are available from Obayashi Properties UK Limited, Bracken House, 1 Friday Street, London EC4M 9JA).
Re-consultation due to amendments.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out above into consideration:-

1. **CITY OF LONDON REFS: 24/00743/FULEIA**

TOWER HAMLETS REF: PA/24/01290

ADDRESS: Allianz House 60 Gracechurch Street London EC3V 0HR



The best of London in one borough

Tower Hamlets Council
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

PROPOSAL:

Observation requested by City Of London for demolition of the existing building, retaining existing basement and the erection of a new building comprising basement levels and ground floor plus 36 upper storeys, including office use (Class E), retail / cafe use (Class E), free publicly accessible area and learning space at level 35 (sui generis), cycle parking, servicing, refuse and plant areas, new and improved public realm, highways works and other works associated with the development.

Re-consultation comments:

LBTH previously provided comments on the scheme on 14.20.2024, given the similarities with the current scheme, our previous comments reflect LBTH position. These comments are reprovided for ease below:

Comments:

These proposals are for a new office-led tall building development on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London's Central Activities Zone (CAZ).

The Councils' main considerations in respect of this application is the impact on the setting of the Tower Of London, World Heritage Site. The development will also likely be viewed from other locations within Tower Hamlets including The Tower Conservation Area.

The assessment should have regard to relevant LBTH guidance such as the following: Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020), Urban Structure and Characterisation Study (2009) and its Addendum (2016) and other relevant guidance, such as Conservation Area appraisals, design guides, supplementary planning documents and the Tower Hamlets Conservation Strategy.

In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated. In views 9, a wireline is used to demonstrate the proposed development in the backdrop of the bridge.

Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 11 and 12. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it.

City of London Corporation should consider whether these should also be provided

as rendered views, as the Proposed Development is clearly visible alongside the massing of existing developments in the area. This is of even further importance as views 10 and 11 would experience a significant effect during operational development.

Additionally, it is unfortunate that the Applicant has not taken into account and provided the visibility from LBTH Borough Designated View 2 from Wapping Wall bridge to St Paul's Church (as shown in Figure 6 of Tower Hamlets Local Plan 2031), as requested in the LBTH consultation response to the Scoping Opinion Request.

In summary, the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. We therefore object to the proposal due to the harm cause to the setting of the Tower of London.

ES Statement:

LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where relevant.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.15 of Chapter 3.

The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Air Quality, Noise and Vibration, Daylight, Sunlight, Overshadowing, Solar Glare and Light Trespass, Wind Microclimate, Climate Change, Heritage, Townscape and Visual Impact Assessment.

In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction which should be taken into account in the assessments. It is unfortunate to see that none of those have been considered.

A Heritage, Townscape and Visual Impact Assessment (HTVIA) has been provided

within Volume 2 of the ES. The HTVIA follows an unusual format given that the effects during demolition and construction are provided in Chapter 7, before even understanding the baseline and scoping process of the relevant receptors.

The assessment concludes a minor adverse effect during demolition and construction and minor neutral effect during operational development on the Tower of London WHS, listed buildings within and the Tower Conservation Area. LBTH considers that the Applicant should have provided an assessment on each receptor so the residual effects can be clearly understood for distinct receptors and designations, however, the non-significant effects both during demolition and construction and operational development are agreed.

The HTVIA considers the impact on the following heritage receptors within LBTH: Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and Grade I Tower Bridge and its surrounds. The Tower of London's designation as Scheduled Monument is only mentioned, however, it appears that no assessment of that particular designation has been carried out. Similarly, it is not clear whether all listed buildings within the Tower of London as stated in paragraph 8.253 of the HTVIA have been considered in the assessment.

Views 10 and 11 would experience a significant effect during operational development leading to moderate to major beneficial. With regard to the visual impact assessment, the relevant receptors within LBTH include Views 12a, 12b and 12c, all which are located within the Tower of London. LBTH welcomes the use of winter photography for these views so that full impact from the Proposed Development can be understood.

Assessed views 12a, 12b and 12c would all experience non-significant effects, concluded as negligible to minor adverse effect during the demolition and construction phase. This would be the same for the cumulative assessment of demolition and construction for Views 12a and 12b while View 12c would experience no effect.#

All of the three views would experience negligible to minor neutral effect (non-significant) as a result of the operational development. This would be the same in the cumulative assessment for Views 12a and 12b, while for View 12c there would be no effect in the cumulative assessment.

It should be noted that the assessments within the Built Heritage and Townscape and Visual Assessments are subjective. City of London Corporation should consider whether adequate justification has been provided for the conclusions of the ES in relation to townscape, visual and heritage effects.

In terms of the ES, LBTH has no objections in relation to the aspects listed, on the

basis that the ES is considered to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulation.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control



Historic England

Ms Anastasia Tampouridou
City of London Corporation
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01580188

20 November 2024

Dear Ms Tampouridou

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

**ALLIANZ HOUSE 60 GRACECHURCH STREET LONDON EC3V 0HR
Application No. 24/00743/FULEIA**

Thank you for your letter of 23 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

Historic England is concerned about the harmful impact of the proposals on the significance of St Mary Woolnoth, the Monument and the Tower of London World Heritage Site (WHS).

We have previously advised that such impacts need to be carefully considered, particularly in a scenario when other consented developments are not built. We understand that 55 Gracechurch Street, which was a key consideration in the design of these proposals and the cause of similar harmful impacts, is now no longer a live consent, which changes the baseline.

A Heritage Impact Assessment (HIA) for the WHS has now been submitted. We have some methodological concerns and we do not agree with its conclusions. The proposals would cause some harm to multiple attributes of the Tower's Outstanding Universal Value (OUV) and contribute to a greater harmful cumulative impact.

Historic England Advice

We have set out our position on these proposals in detail in our letter of 12 August 2024 and continue to refer you to this advice. A Heritage Impact Assessment for the Tower of London World Heritage Site has been submitted following this advice. In light of this new information we offer the following comments.



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The submitted HIA argues that the Concentric Defences attribute of OUV relates wholly to the physical fabric of the Tower of London. We disagree and consider that setting makes an important contribution to how the defences can be appreciated. The WHS Management Plan notes the visual linkage of the wall-walks with the surrounding cityscape and river as a key component of this attribute.

We think that there would be some harm to this attribute, further to the Tower's Physical Dominance, its appreciation as an Internationally Famous Monument and its Landmark Siting. This harm would arise because of the bulkier and more distracting form of the cluster when seen in relation to the Tower in cross river views. It would also negatively impact views from the Inner Ward of the Tower where it would increase the amount of modern development encroaching on the historic buildings in the foreground.

A further view has been provided in the HIA - south of the Tower on the north riverbank (Figures 6.8 and 6.9). We think that this view demonstrates some further harm. The encroachment of the proposals on the WHS as viewed from this area would harm an appreciation of the Concentric Defences and Landmark Siting attributes of OUV. The proposed building would impinge on the silhouette of St Thomas's Tower, presenting a visually dominating and distracting form.

The updated visualisations in the submitted Heritage Impact Assessment do not include 55 Gracechurch Street in the cumulative scenarios. We understand that this is because the consent is no longer live and is therefore not a material consideration. Whilst our previous advice already considered that the proposals would cause harm to attributes of OUV, the new baseline clarifies the harmful impact. These proposals would contribute further harm to the negative cumulative impact of tall buildings in the cluster, particularly owing to its scale and exposed position at its southern edge.

This development would cause a relatively low level of less than substantial harm in the language of the NPPF, but to an asset of the greatest significance. Furthermore, it would contribute to the erosion of the contribution made by setting to the ability to appreciate the World Heritage Site's attributes of OUV. This contribution is already vulnerable to the cumulative impact of new tall development.

ICOMOS, as adviser to the World Heritage Committee, has previously stated that 'the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe' (Bury House Technical Review, 20/00848/FULEIA) and that 'integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA).

We note that ICOMOS's comments in these cases concerned developments at the eastern edge of the cluster. The impact of the current proposals, at the opposite edge



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of the cluster, would be different, but would contribute to the overall negative cumulative impact of the cluster as described above. We therefore advise that you take ICOMOS's concerns about the overall cumulative impact of the cluster seriously when considering the impact of these proposals. This is particularly important in the in the context of the current heightened international scrutiny regarding the property. UNESCO's World Heritage Centre has recently requested that the UK Government submit a report about the WHS' State of Conservation by 01 December 2024. This request was prompted by concerns about the cumulative effect of tall building development within the Tower of London's setting.

Lastly, we query the materiality of the exposed southern elevation, which would be formed of predominantly metallic cladding comprised of aluminium fins and fascias. This could have a bright reflective quality, even if it has a matt finish. This may not be accurately depicted in the submitted visualisations and we suggest requires careful scrutiny to ensure that the proposed building would not unintentionally leap out from the cluster. This could increase the harmful impacts we have already flagged. As a largely blind façade, we question whether the design quality is sufficient given the prominence it would have.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We recommend that amendments are sought to avoid or minimise the harm to the heritage assets of the highest possible significance, including a reduction in height and review of the materiality of the southern façade.

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

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.



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Historic England

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

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

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

Yours sincerely

Alexander Bowring

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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