

<b>Committee</b>	<b>Date:</b>
Planning Application Sub-Committee	13 December 2024
<b>Subject:</b>  1 Undershaft  Demolition of the existing buildings, retention and partial expansion of existing basement plus construction of a ground, plus 73 storey building (plus plant) for office use (Use Class E(g)); Retail/food and beverage (Use Class E(a)-(b)); Public amenity space (Flexible Class E(a)-(d) / Class F1 / Sui Generis); publicly accessible education space and viewing gallery at levels 72 and 73 (Sui Generis); public cycle hub (Sui Generis); plus podium garden at level 11, installation of a digital screen, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.	Public
<b>Ward:</b> Lime Street	<b>For Decision</b>
<b>Registered No:</b> 23/01423/FULEIA	<b>Registered on:</b> 10 January 2024
<b>Conservation Area:</b> St Helens Place	<b>Listed Building:</b> No

### Summary

The application relates to the 1 Undershaft site in the Eastern Cluster, which includes a 28 storey vacant office tower, St Helens Square and the Undershaft carriageway. A thin slither of the northern edge of the site (Undershaft carriageway) is within the St Helen's Conservation Area. The existing building is not listed and is not considered to be a Non Designated Heritage Asset. In 2019 planning permission was granted for the redevelopment of the site, works have started to implement this permission.

On the 2 July 2024 Members of the Planning Application Sub Committee considered a new scheme for the redevelopment of the site (the 2023 scheme). The proposal comprised demolition of the existing building and its replacement with a new 73 storey office tower to include a viewing gallery, education space, a publicly accessible garden, a food and beverage offer, and cultural space. The scheme sought to better respond to post pandemic needs, revised market demands and the City's changing policy context.

The scheme received objections from members of the public, local stakeholders and heritage bodies relating to design, impact on designated heritage assets and impact on the environment and amenity of the immediately surrounding area and buildings. A particular area of concern was the impact that the scheme would have on St Helen's Square, in that it would diminish some of this area.

Members considered the application and voted to defer the decision. A motion was passed that required the applicant to consider the matters raised during the meeting, notably minor adjustments in relation to the ground floor public realm.

Following the deferral, the applicant has reviewed the design of the lower levels of the 2023 scheme (levels 12 and above remain as previously proposed). A revised version of the 2023 scheme is now for consideration. The key revisions can be summarised as follows:

- Reconfiguration of the ground floor footprint to allow more of St Helen's Square to remain as public realm when compared to the 2023 scheme (10 metres longer and 193 sqm larger retaining 80% of the existing area). The triple height entrance lobby previously proposed, which included access to the level 11 podium garden, has been removed and a new public entrance is proposed on the south west side of the building.
- A single dedicated public entrance point is now proposed on the south west side of the building, comprising a new staircase and lifts which take users to a public lobby on level 1. From the lobby users would travel onwards to either the viewing gallery, education space or cultural and retail uses.
- A two storey digital screen would be incorporated into ground floor façade facing onto St Helen's Square for the screening of sporting events, outdoor cinema or public art installations.
- Cycle parking would be accessed from the north side of the building and not the west side of the building as proposed previously.
- Access to the Museum of London education space and viewing gallery would be via the level 1 public lobby as opposed to the ground floor entrance on the north west corner of the building as originally proposed.
- The restaurant has moved from level 10 in the 2023 scheme to level 2 in the revised proposal to be more prominent. The layout of cultural spaces has been revised in response to the footprint re configuration. The cultural and public amenity spaces would be on floors 1 (lobby), 2,3 and 11 as opposed to levels 10 and 11 previously.
- The design of the landscaping in the public realm has been revised to respond to the amended footprint of the building. An enhanced area of public realm is now proposed on the west side of the site referred to as 'Undershaft Square' following relocation of the cycle parking entrance.
- The design of the podium garden at level 11 has changed given revisions to the lifting arrangements. The public entrance to the garden would now be on its west side (south side previously). A garden room would now be located on the south side of the podium garden for members of the public to use.
- Revisions have been made to the basement areas to ensure compliance with the City's refuse storage and collection requirements and to allow for additional planting on the west side of the building.

It is considered that the revisions have further enhanced the design of the public realm and the lower levels of the building.

To summarise planning permission is now sought for:

Demolition of the existing buildings, retention and partial expansion of existing basement areas plus construction of a ground, plus 73 storey building (plus plant) for office use (including 400 sqm of affordable office space ); public amenity/cultural use; publicly accessible education space and viewing gallery at levels 72 and 73 (Sui Generis); public cycle hub (Sui Generis); plus podium garden at level 11, installation of a digital screen, public realm improvement works, ancillary basement cycle parking, servicing and plant.

The ground level public realm would be transformed into an accessible step free area with new greening, seating and wayfinding that could be used for cultural programming. The double height screen would enliven St Helen's Square. An extensive package of S278 works is proposed that would include enhancements to the entire length of St Mary Axe and Undershaft and part of Leadenhall Street.

The applicant has undertaken public consultation and engagement in conjunction with the originally submitted 2023 scheme and the revised 2023 scheme. The Local Planning Authority has undertaken three rounds of consultation, two in conjunction with the original 2023 scheme and one in conjunction with the revised 2023 scheme. (Comments made in response to earlier rounds of consultation are still relevant where they have not been withdrawn or superseded).

Objections and comments have been received from statutory consultees including Historic England, the Greater London Authority, 20<sup>th</sup> Century Society, the London Borough of Tower Hamlets and third parties including The Wardens and Society of the Mystery or Art of the Leathersellers, Stone Real Estate Limited who act as the Development Manager for the Baltic Exchange Holdings Limited who own the long leasehold interest in the Baltic Exchange 38 St Mary Axe and Universities Superannuation Scheme Ltd (USS) who are the owner of Fitzwilliam House. Across the rounds of consultation, a total of twelve objections have been received and three letters of support. The grounds of objection included the size and design of the development, its impact on designated heritage assets and the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

The site is within the Central Activities Zone in a highly sustainable location. The proposal would deliver a high quality, office-led development in the emerging City Cluster, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.

The scheme would provide 153,602 sq.m (GIA) of commercial office floorspace (Use Class E(g)), which would be flexible, sustainable Grade A floorspace suitable for circa 9,447 FTE City workers. The site is central to the City's growth modelling and would deliver nearly 6.53% of the required commercial space to meet projected

economic and employment growth demand until 2040. This quantity of floorspace would significantly contribute to maintaining the City's position as the world's leading international, financial and professional services business centre.

The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers. Within the podium levels of the building 400 sqm of affordable office floorspace would be provided, the details of which would be finalised through the S.106 agreement.

Alongside the office space the proposed viewing gallery, education space, flexible cultural space - including 30 sqm of affordable cultural space, and level 11 podium garden, would combine to create a compelling and inclusive cultural and public offer in the heart of the cluster in line with the Destination City agenda.

The viewing gallery and education space would be operated in partnership with the London Museum. As well as providing breathtaking views of London, these spaces would enable the Museum to deliver learning programmes to complement the exhibit focused activities that would take place at the new London Museum site in Smithfield.

The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies, including, DM3.3, CS7 (1,2, 4-7), CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21 (1-4, 6-8), OS1, S14, S21, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6. The development would provide accessible, inclusive, inviting, and animated spaces, with extensive urban greening in the heart of the City Cluster for people to pass through or linger. It is acknowledged that the proposals would result in the loss of a limited amount of ground floor public realm in quantum terms, however, taking into consideration the design and provision of new areas of high quality public realm the proposals are policy compliant in this respect. The creation of the proposed new public spaces and improvements to the existing public spaces are considered by officers to be a benefit of the scheme.

Officers consider the site to be clearly appropriate for a tall building and it is a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, B, C and D, Local Plan Policy CS 14, CS7 (1,2, 4-7), emerging City Plan S12 (1,3-6) S21 (1-4,6-8). There is some conflict with Local Plan policy CS 7 (3) and emerging City Plan 2040 S21 (5) due to impacts on two designated heritage assets and a degree of conflict with emerging policy S12 (3) on the matter of height.

The proposal would not harm the attributes or components of the Outstanding Universal Value, significance, authenticity and integrity of the Tower of London World

Heritage Site, in accordance with Local Plan Policy CS12 (5), CS13 (3) Emerging City Plan Policy S11 (5), HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

The proposals comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. In LVMF London Panoramas, and some local views from the London Boroughs Southwark and Lambeth, officers conclude the development would consolidate and enhance the visual appearance of the City Cluster on the skyline to the slight enhancement of the view.

The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging roof terraces which are also important to the character of the City of London.

The proposal would result in low to slight levels of less than substantial harm to the Church of St Helen's Bishopsgate (Grade I) and St Helen's Conservation Area. As such, it would fail to preserve the significance/special interest or setting of two designated heritage assets and conflict with Local Plan policies, CS12 (1 and 2), DM12.1 (1), emerging City Plan 2040 S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals comply with Local Plan CS14, CS 12 (3-5), CS13 and DM12.1 (2-5), DM12.2, DM12.5, emerging City Plan 2040 S11 (1,3-5), S13, HE1 and London Plan HC1 (A, B, D and E), HC2, HC3 and HC4. Giving considerable importance and weight to the desirability of preserving the setting of listed buildings, this harm would be outweighed by the public benefits of the scheme. Such public benefits include: the delivery of growth in a highly sustainable location, the provision of an accessible cultural and public offer comprising the education and gallery space at levels 72-73 and the flexible cultural space across levels 1, 2, 3 and 11, the uplift in office floorspace, the provision of affordable workspace and affordable cultural space, provision of improved, vibrant and accessible external public realm across the site with additional improvements to St Mary Axe, Undershaft and part of Leadenhall Street that would transform the streets in the cluster. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.

The proposals comply with the required initial steps of archaeology investigation, in accordance with Local Plan DM 12.4, emerging City Plan 2040 HE2 and London Plan HC1, subject to a two stage archaeology condition.

The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result

in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission. Further to this, in the cumulative scenario only, three amenity spaces (Devonshire Square 2; Cutler's Gardens Estates; and Royal Fusiliers) would not comply with BRE guidance as there would be 100% losses in terms of the area of these spaces receiving at least 2 hours of direct sunlight on the 21<sup>st</sup> March. The impact of the proposal on these spaces is acknowledged and officers consider the benefits of the proposal outweigh the harm caused to these spaces.

In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Acceptable levels of cycle parking and facilities are proposed, which would encourage active travel to the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistic guidance. The servicing of the site has been discussed in depth during the planning stage and would subject to stringent controls details of which would need to be set out in a delivery and servicing management plan, it is considered at this stage that the proposed servicing arrangement would be acceptable. Long term bicycle spaces would be provided with associated shower and locker facilities and expected numbers would be provided. The scheme is in compliance with Local Plan Policy DM16.3 and London Plan policy T5.

Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. While the retention and retrofit of the existing tower would result in some improvements, it is considered that only the redevelopment option would be able to overcome inefficiencies in the design, construction, operation and quality constraints of the minor and major refurbishment options to unlock the greatest number of benefits that would contribute to the wider sustainability and future proofing of the City.

Compared to the 2019 approved tall building scheme on the site, this proposal now incorporates circular economy principles, such as substantial basement retention, and a strategy to reduce embodied carbon emissions for the tall building typology, reducing overall embodied carbon emissions close to the GLA's Standard Benchmark for commercial buildings. The energy strategy has been updated to provide an all electric MEP system, and the proposed design is on track to address climate adaptation and mitigation positively by targeting a BREEAM 'outstanding' rating and providing a robust structural and façade design, MEP strategy and an urban greening strategy for biodiversity, climate resilience, health and wellbeing. In addition, the two churches to the north (St Helen's Church, Bishopsgate) and east (St Andrew Undershaft Church) of the site could potentially receive waste heat from the new development. An assessment of opportunities to facilitate such a heat transfer will be prioritised during the detailed design stage, and confirmation of measures will be required and secured through the Section 106 agreement.

It is the view of officers that it as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, as policy CS1 is complied with, as policies relating to office floor space delivery, Eastern/City Cluster and public realm would be complied with that, notwithstanding the conflict with CS7 (3) (City Cluster), CS12 (1 and 2) (Historic Environment), DM12.1 (1) (Managing Change affecting all heritage assets and spaces), emerging City Plan Policies 2040 S11 (2) (Historic Environment), S12 (3) (Tall Buildings), S21 (5) (City Cluster) and London Plan HC1 (C) (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with other relevant design, culture, environmental and public realm related policies.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S106 agreement.

Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be).

In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.

National Planning Guidance advises that conflict between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs as guided by the NPPF.

It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in

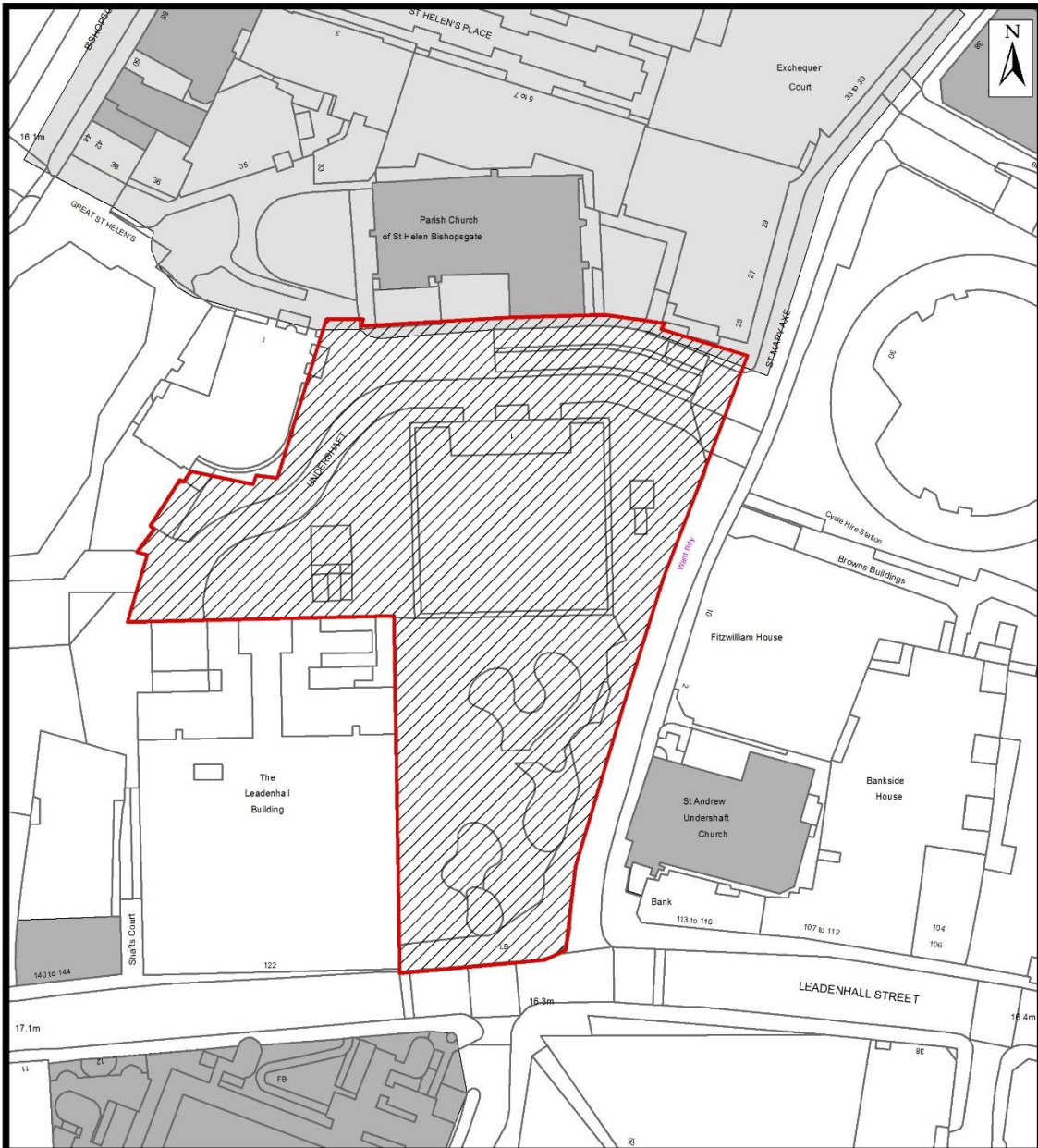
favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

### **Recommendation**

- (1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:
  - (a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);
  - (b) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) Direction 2021 and the application not being called in under section 77 of the Town and Country Planning Act 1990;
- (2) That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.
- (3) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highways Act 1980.
- (4) That members note that land affected by the building which is currently public highway and land over which the public have a right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order under the delegated arrangements approved by the Court of Common Council.
- (5) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.



# Site Location Plan



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ADDRESS:  
1 Undershaft

CASE No.  
23/01423/FULEIA

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT

## Site Photos

Existing view of the site from Lime Street

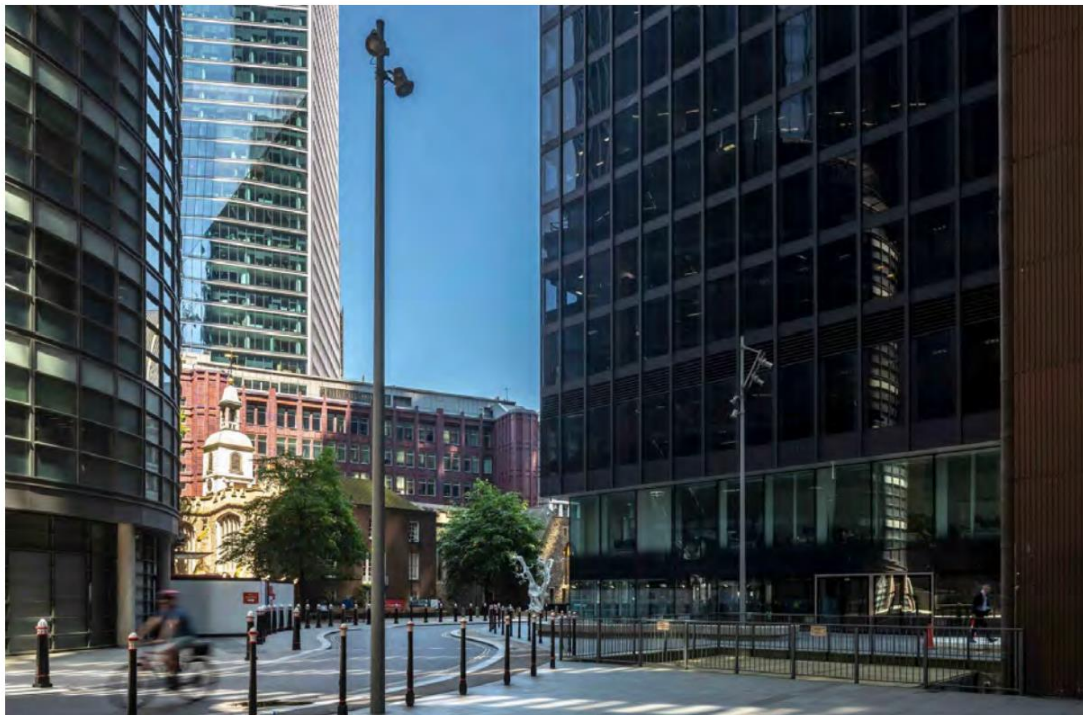




**Existing view of the site from Lime Street**



**Existing view of the western part of the site, including St Helen's Bishopsgate**

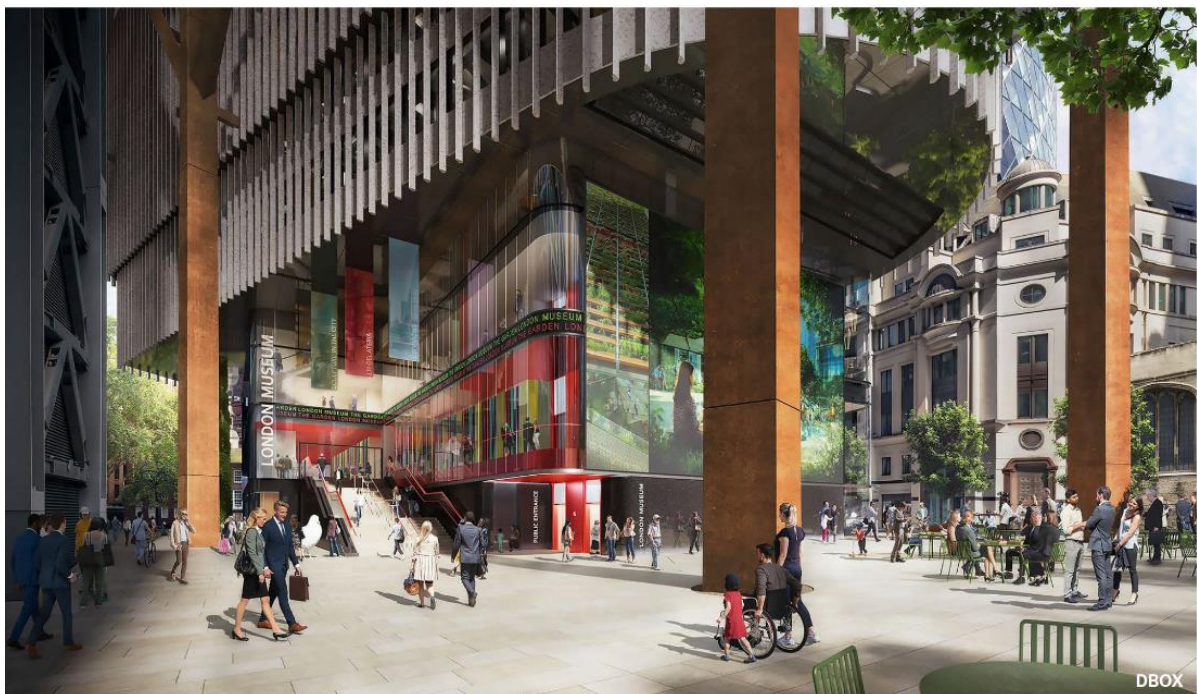




**Proposed aerial view from the south (CGI, not verified)**



**Proposed from St Helen's Square (CGI, not verified)**





**Proposed view of the western part of the site, including St Helen's Bishopsgate (verified view)**



**Aerial view of the proposed podium garden above the proposed public realm with views towards St Paul's Cathedral. (CGI, not verified)**





**Proposed view of the west podium elevation (CGI, not verified view)**



**Proposed view of the servicing bay and Undershaft, from St Mary Axe looking west (Verified image)**



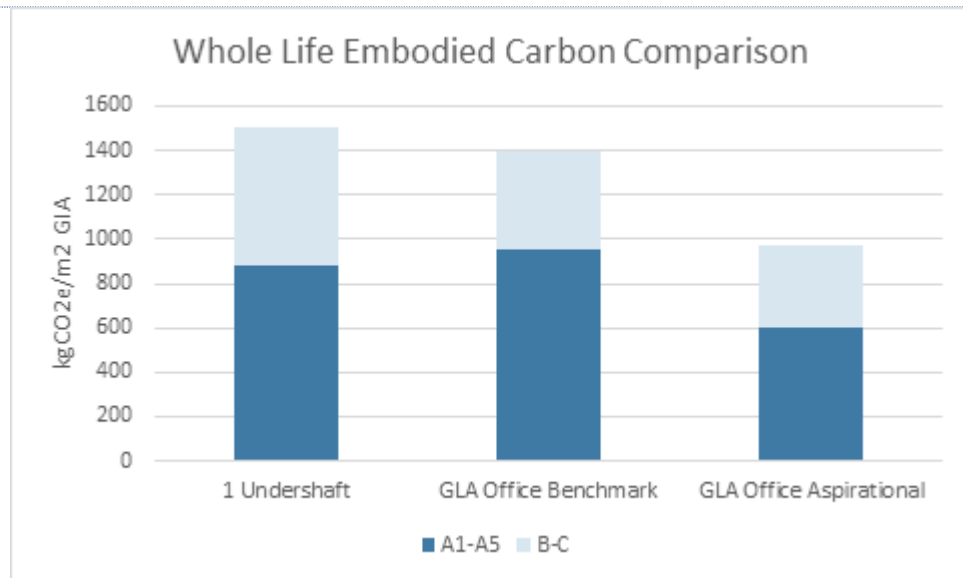
## Application Cover Sheet

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	133m AOD		309.6m AOD	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Office	49,083 sqm	Office	153,602 sqm
			Retail / food and beverage (Use Class E(a)-(b))	1,400 sqm
			Public Gallery / education (Sui Generis)	3,134 sqm
			Public amenity (Flexible Class E(a) – (d) / Class F1 / Sui Generis)	3,942 sqm
			Public Cycle Hub (Sui Generis)	526 sqm
			Plant	17,775 sqm
	TOTAL	49,083 sqm	TOTAL	180,379 sqm
		TOTAL UPLIFT:	131,296 sqm	
3. OFFICE PROVISION IN THE CAZ	<p>Existing GIA = 49,083 sqm  Proposed GIA = 153,602 sqm  Uplift GIA = 104,519 sqm</p>			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	0		<p>Estimated 8,759 FTE</p> <p>Also the creation of approximately 838 net jobs annually through the deconstruction and construction stages, adding £123.3m annually as a result of the Proposed Development.</p>	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	2 blue badge spaces
	Cycle long stay	N/A	Cycle long stay	2,264
	Cycle short stay	N/A	Cycle short stay	178
	Lockers	N/A	Lockers	1,668
	Showers	N/A	Showers	189 of which 5 are DDA compliant.
Changing facilities	N/A	Changing facilities	N/A	
6. HIGHWAY LOSS / GAIN	Based on Drawing Number 1US-WSP-ZZ-xx-DR-000012 Rev P05 there will be gain of 154m <sup>2</sup> with the total going from 623m <sup>2</sup> to 787m <sup>2</sup> .			

7. PUBLIC REALM		Existing	Original Scheme (Dec 2023)	Revised 2023 scheme (October 2024)
	Public Realm (GF)	4,669 sqm	3,821 sqm	3,850 sqm
	Podium (Level 11)	0 sqm	2,459sqm	2,515 sqm
	TOTAL	4,669 sqm	6,280 sqm	6,365 sqm
8. TREES	EXISTING		PROPOSED	
	9 (broadleaved trees)		<ul style="list-style-type: none"> <li>17 trees (common beech, English oak and Norway Maple) at ground level. 1 tree by St Helen's retained;</li> <li>51 trees of different sizes at Level 11 (podium garden);</li> <li>9 trees of different sizes at Level 30; and</li> <li>9 trees of different sizes at Level 48.</li> </ul> <p>TOTAL = 87 trees (plus potential for an additional 16 trees in future S278 works)</p>	
9. SERVICING VEHICLE TRIPS	EXISTING		PROPOSED	
	385 daily servicing trips		193 daily servicing trips	
10. SERVICING HOURS	Servicing will not take place between: <ul style="list-style-type: none"> <li>07:00 – 09:00;</li> <li>12:00 – 14:00; and</li> <li>16:00 – 18:00.</li> </ul>			
11. VOLUME OF RETAINED FABRIC	Substructure = approximately 22% will be retained.			
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvement against Part L 2021: 9% GLA Requirements: 35%			
13. OPERATIONAL CARBON EMISSIONS	<b>130,265</b> tonnes CO <sub>2</sub> over 60 years 0.722 tonnes CO <sub>2</sub> per square meter over 60 years (includes life-cycle modules B6+B7)			
PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS				



**14. UPFRONT  
CARBON  
EMISSIONS**







1 Undershaft Whole Life (A-C) Carbon Comparison to GLA Benchmark [kg CO<sub>2</sub>e/m<sup>2</sup>]

Total upfront embodied carbon 159,415 tonnes CO<sub>2</sub>e / 884 kgCO<sub>2</sub>e per sqm

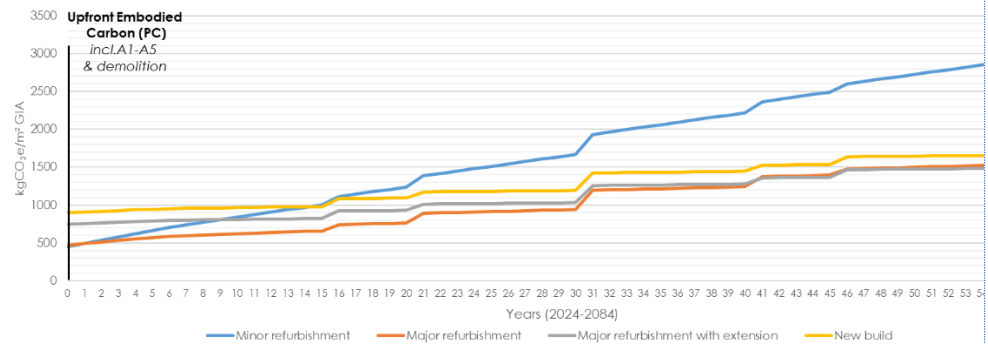
**15. WHOLE  
LIFE CYCLE  
EMBODIED  
CARBON  
EMISSIONS  
(kgCo2e/m<sup>2</sup>)**

Total whole life-cycle embodied carbon emissions: **406,177 tonnes CO<sub>2</sub>**  
 Total whole life-cycle carbon embodied emissions per square meter: **2,252kg CO<sub>2</sub>/sqm**

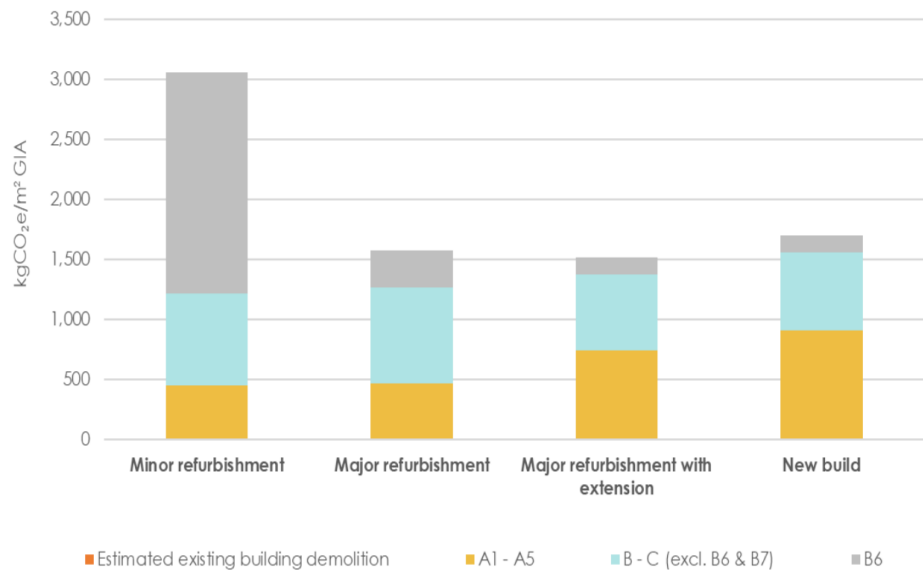
## 16. WHOLE LIFE-CYCLE CARBON OPTIONS

	Option 1 Minor Refurb	Option 2 Major Refurb	Option 3 Major Refurb with Extension	Option 4 New Build
				
<b>Structure</b>	Full retention	Full retention	Full retention of superstructure, partial retention of substructure, extension	Demolition of existing superstructure, partial retention of basement and foundations
<b>Façade</b>	Full Replacement, retaining current aesthetic	Full Replacement, retaining current aesthetic	New utilised façade	New utilised façade
<b>MEP</b>	Full replacement, retaining current % gas and % electric split	New MEP, 100% electric	New MEP, 100% electric	New MEP, 100% electric
<b>Finishes and FF&amp;E</b>	New Finishes and FF&E	New Finishes and FF&E	New Finishes and FF&E	New Finishes and FF&E
<b>GIA, m2</b>	51662	51662	157510	183142
<b>Reference Study Period, years</b>	60	60	60	60
<b>Upfront Embodied Carbon (A1-A5), kgCO2e/m2 GIA</b>	450	469	744	900
<b>% Substructure retained relative to existing (by mass)</b>	100%	100%	40%	40%
<b>% Superstructure retained relative to existing (by mass)</b>	100%	100%	100%	0%
<b>% Façade retained relative to existing (by mass)</b>	0%	0%	0%	0%
<b>Lifecycle Embodied Carbon (A-C Excl. B6-B7), kgCO2e/m2 GIA</b>	1218	1271	1376	1548
<b>Operational Energy (B6), kgCO2e/m2 GIA</b>	1842	305	137	137
<b>Total WLCA (A-C excl. B7)+pre-demolition, kgCO2e/m2 GIA</b>	3060	1576	1516	1697

Based on Option 4:



Carbon Options Study – WLC (A-C Excl. B7) over Reference Study Period



Carbon Options Study – WLC (A-C Excl. B7) over Reference Study Period

The carbon optioneering studies were carried out at pre-app, therefore some deviation from “final planning” WLC numbers is expected.

17. TARGET BREEAM RATING



18. URBAN GREENING FACTOR

0.59(surpasses policy requirement of 0.3)

19. AIR QUALITY

The Proposed Development will deliver an Air Quality Neutral development in operation and not have significant effects requiring mitigation. Any construction stage impacts can be appropriately mitigated by planning conditions which is considered acceptable and in accordance with the Development Plan.

20. Biodiversity Net Gain

The Proposed Development is predicted to result in a net gain of 1.24 area-based habitat units; the equivalent of a+527.63% gain through the proposed landscaping measures across the building.

## **Main Report**

### **Environmental Statement**

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The Council issued an EIA Scoping Opinion (23/00870/SCOP) on the 17 November 2023. The following topics were scoped in:
  - Socioeconomics
  - Transportation and Access
  - Air Quality
  - Noise and Vibration
  - Ground Conditions
  - Wind Microclimate
  - Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare
  - Electronic Interference
  - Archaeology
  - Townscape, Heritage and Visual Impact Assessment
  - Climate Change

The following topics were scoped out:

- Ecology
- Waste and Materials
- Water Resources, Drainage and Flood Risk
- Aviation
- Human Health
- Major Accidents and Disasters

The submitted ES accords with the Scoping Opinion issued.

4. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
  - a) To examine the environmental information

- b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
  - c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
  - d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
5. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
7. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
8. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in May 2024 and October 2024. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.
9. Mitigation/ monitoring measures as proposed in the ES would be secured through planning conditions and/or planning obligations within the S106 agreement.

### **Site and Surroundings**

10. The application site is located on the south side of Undershaft. It is approximately 0.72 hectares and is bound by Undershaft and the Church of St Helen

Bishopsgate to the north, Leadenhall Street to the south, St Mary Axe to the east, and 122 Leadenhall (the Leadenhall building) to the west.

11. The existing office building on the site was built in the 1960s and suffered bomb damage in 1992 and 1993 which resulted in it being reclad. To the south of the building is publicly accessible open space known as 'St Helen's Square'. The existing building is 28 storeys in height, with 5 levels of basement containing plant and ancillary space, this is in addition to a two-storey basement underneath St Helen's Square containing ancillary office space a loading bay, car parking, storage and plant areas. The existing building provides 49,083 sq.m GIA of office floorspace.
12. The site includes Undershaft which is public highway. The road provides access to the service entrances for 6-8 Bishopsgate, 22 Bishopsgate and 122 Leadenhall Street. On the north side of Undershaft is a vehicle service ramp that provides access to the car park and basement level servicing bay for the existing building.
13. The majority of the application site is not within a conservation area, all be it a minute sliver of the northern edge of the application red line boundary falls within the southernmost boundary of the St Helens Place Conservation Area.
14. The existing building is not listed and benefits from a Certificate of Immunity from Listing, granted by Historic England which expires on 27 September 2027.
15. The existing building is not considered to be a Non-Designated Heritage Asset (NDHA) (a full explanation of the reasoning for this is set out in the 'Direct Impacts- Non-designated heritage asset' section of this report).
16. There are a number of designated heritage assets in the immediate vicinity of the site. These include:
  - Church of St Helens Bishopsgate (Grade I); located to the north,
  - Church of St Andrew Undershaft (Grade I); located to the south-east,
  - Lloyd's Building (Grade II); located to the south, and
  - St Helen's Place Conservation Area; located to the north.
17. Other designated heritage assets in the wider area include:
  - The Tower of London World Heritage Site (WHS, Scheduled Monument including Listed Buildings);
  - St Paul's Cathedral (Grade I);
  - Tower Bridge (Grade I);
  - Royal Exchange (Grade I);
  - St Katherine Cree (Grade I);
  - Church of St Botolph, Aldgate (Grade I);
  - Guild Church of St Ethelburga the Virgin (Grade I);

- Bevis Marks Synagogue, Heneage Lane (Grade I);
- The Monument (Scheduled Monument and Grade I);
- 13 Bishopsgate (Grade I) ;
- Museum of the Home (formerly The Geffrye Museum, 136 Kingsland Road – Grade I);
- Former Port of London Authority (Grade II\*);
- Holland House (1-4 Bury Street) (Grade II\*);
- Leadenhall Market (Grade II\*);
- Lloyd’s Registry, 71 Fenchurch Street (Grade II\*);
- Bishopsgate Institute (and 6 Brushfield Street) (Grade II\*);
- Church of St Botolph Without Bishopsgate (Grade II\*)
- Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II);
- Gateway in yard of Church of St Katherine Cree (Grade II);
- Liverpool Street Station (Grade II);
- 46 Bishopsgate (Grade II);
- 48 Bishopsgate (Grade II);
- Hasilwood House 52-68 Bishopsgate (Grade II);
- Park House and Garden House (Grade II);
- Finsbury House (Grade II);
- London Wall Buildings (Grade II);
- 139- 144 Leadenhall Street (Grade II);
- 147-148 Leadenhall Street (Grade II);
- 38 St Mary Axe (The Baltic Exchange) (Grade II);
- 20 and 21 Billiter Street (Grade II);
- 2-16 Creechurch Lane (Grade II);
- 10 Brushfield Street (Grade II);
- 14 Brushfield Street (Grade II);
- Whitehall Court (Grade II\*);
- Horse Guards (Grade I);
- War Office (Grade II\*);
- Ministry of Defence (Grade I);
- Leadenhall Conservation Area;
- Bank Conservation Area;
- Creechurch Conservation Area;
- Bishopsgate Conservation Area;
- Finsbury Circus Conservation Area;
- The Tower of London Conservation Area;
- Bunhill Fields and Finsbury Square Conservation Area;
- St James Park Registered Historic Park and Garden (Grade I);
- Finsbury Circus Registered Historic Park and Garden (Grade II);
- Bunhill Burial Ground Registered Historic Park and Graden (Grade I)

- 113-116 Leadenhall Street (Non-designated heritage asset);
- Liverpool Street Arcade (Non-designated heritage asset);
- 33-34 Bury Street (Non-designated heritage asset);
- 18-20 Creechurch Lane (Cree House) (Non-designated heritage asset);
- 24 Creechurch Lane (Fibi House) (Non-designated heritage asset);
- 12-14 Mitre Street (Mitre House) (Non-designated heritage asset);
- 27-31 Mitre Street (Non-designated heritage asset);
- 30 St Mary Axe (Non-designated heritage asset); and
- Liverpool Street Arcade (Non-designated heritage asset)

18. The application site is situated within the Eastern Cluster as defined in the Local Plan 2015 and the City Cluster as defined in the emerging City Plan 2040. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The emerging City Plan in Strategic Policy S21: City Cluster, identifies the Cluster as a key area of change. In the Local Plan 2015 the site is within the Eastern Cluster Key City Place as set out within policy CS7.

## **Relevant Planning History and Background to the Proposal**

### **The 2019 Consent**

19. In 2016 planning permission was sought for: ‘Demolition of the existing building and construction of a ground plus 72 storey building (304.94m AOD) for office use (Class B1) [131,937sq.m GEA], retail (Class A1-A3) [2,178sq.m GEA] at ground and lower ground floor, a publicly accessible viewing gallery (Sui Generis) [2,930sq.m GEA] at level 71-72 and a restaurant (Class A3) [1,220sq.m] at level 70. Public Realm improvement works, ancillary basement cycle parking, servicing and plant’ [Total 154,100sq.m GEA] (app ref. 16/00075/FULEIA).
20. The application was granted on the 8 November 2019 (herein referred to as the 2019 consent).and is subject to planning conditions and a S106 agreement. Condition 1 of the 2019 consent requires the development to begin within five years of the date of the decision notice or the planning permission would expire on the 8 November 2024. The relevant pre commencement planning conditions associated with this permission were discharged in September/October 2024. This planning permission has been implemented; this has been confirmed by way of a Certificate of Lawfulness Application (24/01151/CLEUD). The 2019 consent is a material consideration in the determination of this application.
21. The application was for a singular tower with a square plan shape form. The office reception was elevated above ground level to enable the public realm to be extended and utilised below the built form above. Public amenities were proposed at lower ground level, accessed through a large opening in the



southern square. This included food space offers and access to the restaurant, public viewing gallery and education space at the top of the building.

### **The 2023 scheme**

22. The applicant reviewed and re-evaluated the design of the 2019 consent. A further planning application was submitted in December 2023 with a revised proposal for the site which sought to better respond to post pandemic needs, revised market demands and the changing policy context of the City of London.
23. In the 2023 scheme the proposed tower would have a stepped massing to accommodate improvements to the public and workplace offer in terms of wellbeing and urban greening by providing outdoor amenity spaces throughout the building. (The upper levels of the building in the 2019 consent did not have access to any outdoor spaces). The top two levels of the building would include a free to visit public viewing gallery and education space.
24. A public realm transformation was proposed at ground level that would be complemented by an elevated podium garden at level 11, supported by new flexible food and beverage and cultural spaces to align with the City's Destination City agenda. (The opening in St Helen's Square proposed in the 2019 consent was not proposed as part of the 2023 scheme).
25. The 2023 scheme was considered by the City's Planning Applications Sub Committee on 2<sup>nd</sup> July 2024. Members deferred the scheme and asked the applicant to make minor adjustments in relation to the ground floor public realm. Concerns were raised over the impact of the scheme on the size and quality of St Helen's Square.

### **The revised 2023 scheme**

26. Following the deferral the applicant has reviewed the design of the lower levels of the building in the 2023 scheme. A revised version of the 2023 scheme was submitted in October 2024 and is now for consideration. The key revisions are set out in the following paragraphs of this report (the revisions relate only to the lower floors of the building (ground to level 12). The upper levels remain as was originally proposed in the 2023 scheme):

- *Reconfiguration of the ground floor footprint*

27. The extent of the ground floor footprint of the building has been reduced on its southern side through the removal of the triple height entrance lobby proposed under the 2023 scheme. This enables more of St Helen's Square to remain as public realm when compared to the 2023 scheme (10 m longer and 193 sqm larger, 80% of the existing area). The public entrance and circulatory arrangements have been moved to the western side of the building.

- *Reconfiguration of the entrance arrangements and layout of the ground floor*

28. The change in the shape of the footprint of the building has necessitated reconfiguration of the entrance arrangements, the layout of the ground floor and the lifting arrangements.

29. In the 2023 scheme the level 11 podium would have been accessed from an entrance off St Helen’s Square. Lifts would take users between ground and podium level. Access to the viewing gallery and education space at levels 72 and 73 was via a dedicated entrance on the northwest corner of the building. The cycle hub was accessed via an entrance on the west side of the building.

30. It is now proposed that there would be a single dedicated public entrance for the public uses on the southwest side of the building. A new public staircase and lifts on the west side of the building would take users from ground level to a shared lobby on level one. From level 1, lifts would provide access to the public restaurant (level 2), cultural spaces (levels, 2,3 and 11), podium garden (level 11) and education centre and viewing gallery (levels 72 and 73). Access to the cycle hub would be direct from Undershaft on the north west side of the building.

- *Amended location and layout of public uses across the lower floors (ground to level 12)*

31. As part of the reconfiguration of the entrance and lifting arrangements and removal of the triple height entrance lobby, it is proposed that the layout of the uses would be revised. A summary of the arrangement of the land uses is set out below:

<b>Level</b>	<b>2023 scheme</b>	<b>Revised 2023 scheme</b>
Ground level	<ul style="list-style-type: none"> <li>• Viewing gallery lobby</li> <li>• Cycle hub entrance (west elevation)</li> <li>• Public garden lobby</li> <li>• Office reception</li> </ul>	<ul style="list-style-type: none"> <li>• Office reception</li> <li>• Cycle hub entrance (north west corner)</li> </ul>
Level 1	<ul style="list-style-type: none"> <li>• Office reception mezzanine</li> </ul>	<ul style="list-style-type: none"> <li>• Public lobby (providing access to the uses that are accessible to the public including the level 11 podium garden)</li> <li>• Office reception mezzanine</li> </ul>
Level 2	<ul style="list-style-type: none"> <li>• Office space</li> </ul>	<ul style="list-style-type: none"> <li>• Flexible public amenity/culture space</li> </ul>

		<ul style="list-style-type: none"> <li>Public restaurant (retail/food and beverage sui generis)</li> </ul>
Level 3	<ul style="list-style-type: none"> <li>Office space</li> </ul>	<ul style="list-style-type: none"> <li>Flexible public/culture space</li> </ul>
Level 4	<ul style="list-style-type: none"> <li>Office space</li> </ul>	<ul style="list-style-type: none"> <li>Office space</li> </ul>
Level 5	<ul style="list-style-type: none"> <li>Office space</li> </ul>	<ul style="list-style-type: none"> <li>Office space</li> </ul>
Level 6	<ul style="list-style-type: none"> <li>Office space</li> </ul>	<ul style="list-style-type: none"> <li>Office space</li> </ul>
Level 7	<ul style="list-style-type: none"> <li>Office space</li> </ul>	<ul style="list-style-type: none"> <li>Office space</li> </ul>
Level 8	<ul style="list-style-type: none"> <li>Office space/plant</li> </ul>	<ul style="list-style-type: none"> <li>Office space</li> </ul>
Level 9	<ul style="list-style-type: none"> <li>Office space/plant</li> </ul>	<ul style="list-style-type: none"> <li>Office space/plant</li> </ul>
Level 10	<ul style="list-style-type: none"> <li>Restaurant/cultural space</li> </ul>	<ul style="list-style-type: none"> <li>Office space/plant</li> </ul>
Level 11	<ul style="list-style-type: none"> <li>Podium garden with complimentary cultural and food and beverage uses</li> </ul>	<ul style="list-style-type: none"> <li>Podium garden with complementary cultural and food and beverage uses.</li> </ul>
Level 12	<ul style="list-style-type: none"> <li>Cultural space/office amenity</li> </ul>	<ul style="list-style-type: none"> <li>Office amenity</li> </ul>

32. As a result of the reconfiguration of the lower levels of the building there would be some changes to the proposed land use figures when compared to the originally submitted 2023 scheme and a marginal increase in floor area (floor areas for the existing building have been included in the table for information). These are set out below:

Land Use	Existing Building (sqm GIA)	2023 Application (sqm GIA)	Revised 2023 Application (sqm GIA)	Explanation of the changes between the 2023 application and the revised 2023 application
Office (Class E(g))	49,093	154,156 (Office reception and mezzanine levels ground and 1, plus levels 2 -9, 12 – 71)	153,602 (Office reception and mezzanine levels ground and 1, plus levels 4 – 10, 12 – 71)	The base of the building between ground and level five has been reduced and public amenity spaces have been relocated. This has resulted in a slight reduction in office floorspace over the podium floors.

<b>Public gallery/education space (sui generis)</b>	0	3,134 (Lobby to access ground floor plus levels 72 – 73)	3,134 (Lobby to access first floor plus Levels 72 – 73)	The upper levels of the building would not change as part of the revised 2023 scheme and therefore the amount of gallery and education space remains the same between the two schemes. The lobby to access the top of the building has been moved to level as part of the revised 2023 scheme.
<b>Retail/food and beverage (Class E(a)-(b))</b>	0	1,337 (Lobby to access ground floor, plus levels 10, 11, 12?)	1,400 (Lobby to access ground floor plus levels 2, 11)	As a result of the relocation of the restaurant to level two there has been a slight increase in its area. The revised location of the restaurant has a disproportionate amount of core in comparison to its previous location which has resulted in a slight increase.
<b>Public amenity/cultural space (Flexible Class E(a)-(d)/Class F1/Sui Generis)</b>	0	3,479 (Lobby to access ground floor plus levels 10, 11, 12)	3,942 (Lobby to access first floor plus levels 2, 3 and 11)	A bigger lobby area is proposed that would serve the podium garden, the London Museum, the restaurant and the gallery space. Formation of this arrival experience has resulted in an increase in

				floorspace for the public amenity uses.
<b>Public Cycle Hub (Sui Generis)</b>	0	526	526	
<b>Plant</b>	n/a	17,734	17,775	Slight increase in the area of plant needed in order to accommodate air source heat pumps.
<b>Total</b>	49,093	180,366	180,379	Amendments to the basement to ensure that the waste and storage collection facilities comply with the City's requirements, have resulted in an increase in floor area (see explanation text below).

- *Amended facade design through the incorporation of a digital screen and new public entrance*

33. The new public entrance would be located at first floor level on the south west side of the building. A new lift portal and external stone staircase are proposed to create a prominent arrival point, that would take people between ground and first floor level.

34. A two storey digital screen would be incorporated into the ground floor facade facing onto St Helen's Square to enhance the vitality of this area allowing it to be used for the screening of sporting events, outdoor cinema or public art installations.

- *Amended landscape and public realm design at ground floor level*

35. More of St Helen's Square would be retained because of the revised ground floor design and the reduction in the depth of the southern part of the building. Amendments have been made to the landscape design to create more

accessible and flexible public realm. The amended design includes an increased amount of seating (350 seats, 82 seats more than the originally submitted 2023 scheme) and 17 trees (five more than the originally submitted 2023 scheme).

36. The relocation of the cycle entrance has enabled the formation of an enhanced area of public realm to the west of the site, named 'Undershaft Square' in the application documentation. This area includes five planting beds, benches and bicycle parking bays. The water feature proposed to the west of the site under the original 2023 scheme has been replaced with smaller integrated water elements throughout the landscaping.

- *Amended level 11 podium garden design*

37. The layout of the podium garden has been revised and the shape and layout of the internal spaces has been reconfigured. The public arrival point in the garden would be located on its west side aligning with changes to the lifting arrangements on the ground floor. Access to the garden was from the south side previously. Flexible outdoor seating and a 'garden room' are now proposed on the south side of the garden. The garden room would be a double height space with tables, chairs and landscaping. It would be fully glazed giving views of the surrounding garden.

- *Increased basement excavation*

38. The depth of basement level B2 would be excavated by an additional 2 metres in some areas. This would allow for: additional planting at ground floor level in the western public space, opportunity for an improved cycle hub layout and increased headroom in the basement B2 loading bay which would enable access by all refuse collection providers.

- *Updated application documentation*

39. Following the changes to the scheme and given the passage of time since the original application was submitted, the applicant has reviewed and updated all application documentation where relevant. The documentation and assessments have been updated to acknowledge that a thin sliver of the northern edge of the site falls within the St Helen's Place Conservation Area. In respect of the cumulative scenario within the ES a review has been undertaken to identify new planning applications submitted, approved or existing cumulative schemes that have lapsed during the period 4 December 2023 (preparation of the application documentation for submission, the 2023 scheme) and 13 August 2024 (preparation of the revised 2023 scheme). Furthermore, the construction status of approved schemes has been reviewed.

40. The cumulative scenarios within the application documentation have been updated and tested accordingly and any changes to results and conclusions presented previously are set out in the assessment sections of this report. A planning application (accompanied by an ES) for the redevelopment of 99 Bishopsgate (24/00836/FULEIA) was validated in early September 2024. The application documents for this revised Undershaft submission were at their final stages when the 99 Bishopsgate scheme was submitted and therefore it has not been included within the cumulative scenario tests. Notwithstanding, the ES has been updated to include a qualitative assessment of the potential effect of the development together with 99 Bishopsgate.
41. The remaining sections of this report set out full details and assessment of the revised 2023 application which is now for consideration.

### **Proposals (now the revised 2023 scheme)**

42. Planning permission is sought for:

*Demolition of the existing buildings, retention and partial expansion of existing basement plus construction of a ground, plus 73 storey building (plus plant) for office use (Use Class E(g)); Retail/food and beverage (Use Class E(a)-(b)); Public amenity space (Flexible Class E(a)-(d) / Class F1 / Sui Generis); publicly accessible education space and viewing gallery at levels 72 and 73 (Sui Generis); public cycle hub (Sui Generis); plus podium garden at level 11, installation of a digital screen, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.*

43. The proposed scheme would provide 180,379 sq.m (GIA) of floorspace comprising:
- 153,602 sq.m (GIA) of office floorspace (Use Class E(g))
  - 3,134 sq.m (GIA) of public gallery/education floor space (Use Class Sui Generis) at levels 72 and 73 (accessed via the lobby at level 1)
  - 1,400 sq.m (GIA) of retail/ food and beverage floor space (Use Class E(a)-(b)) at level 2 and 11 (accessed via the lobby at level 1)
  - 3,942 sq.m (GIA) of public amenity (Flexible Use Class E(a)-(d)/ Use Class F1/ Sui Generis) at levels 1, 2, 3 and 11 (accessed via the lobby at level 1)
  - 526sq.m (GIA) of public cycle hub (Use Class Sui Generis) at basement level
  - 17,775 sq.m (GIA) of plant
44. The maximum height of the proposed building is 309.6m AOD, comprising 73 full storeys above ground level plus plant. The building would be the tallest building in the Cluster.

45. The proposals include a two-storey basement across the entire site with a localised three storey basement located beneath the main core to the north of the site. Existing basement areas would be reused along with the existing basement walls and slabs where possible.
46. Office floorspace is proposed with office terraces at levels 30 and 48. The office entrances would be located on the eastern elevation. The floorplates respond to the massing of the building, all being arranged around a central core.
47. Within levels four to 10 (precise location to be secured through the S.106 agreement), 400 sqm of affordable work space is proposed.
48. A projecting podium garden is proposed at level 11 alongside complementary cultural floor spaces and a food and beverage offer. These uses would be accessed from a public lobby on the first floor of the building.
49. Level 2 would include a proposed restaurant plus cultural/public space and the level three floorplate would be entirely used for a cultural/public use.
50. At levels 72 and 73, education and viewing gallery floor spaces is proposed. This would be accessed via a double height lobby at ground floor level on the northwest corner, with two dedicated lifts providing direct access. These spaces would be operated in partnership with the London Museum.
51. The public cycle hub for short stay cycle parking, would be located at basement level 1 and would be accessed via the north facing elevation off Undershaft.
52. As part of the proposal the existing public realm around the base of the building would be redesigned. Level differences across St Helen's Square would be reconciled allowing it to be transformed into an accessible and step free environment with new seating and planting. A new and enhanced public realm area and new walking route would be formed on the west side of the site following the removal of an unsightly ventilation shaft. New surfacing, water features and seating are proposed in this area.
53. St Helen's Square would be enlivened and activated by a new double height screen that would be incorporated into the lower levels of the southern elevation of the building. It would show content such as sporting events and art work.
54. The Undershaft carriageway, which incorporates basement access to the existing building would be removed, and a new Undershaft carriageway would be formed directly to the north of the existing one. Servicing access for the proposed building would be off street, accessed via an entrance off St Mary Axe.



55. An extensive package of S278 works is proposed which would include enhancements to the entire length of St Mary Axe, Undershaft and part of Leadenhall Street.

### **Consultations**

#### *Statement of Community Involvement Addendum October 2024*

56. An addendum to the Statement of Community Involvement has been submitted. Following deferral of the application in July 2024, the applicant has undertaken further consultation to understand the views of key stakeholders and to discuss the revised proposals for the site. The following consultation activities were undertaken between August and October 2024:

- Stakeholder meetings: meetings have taken place with Lime Street ward members, St Helen's Church, Lloyds of London, the Eastern City BID and CC Land
- Circulation of a flyer: a flyer has been issued in the local area with updated details of the proposal
- Consultation website: the revised details of the proposal have been updated on the consultation website for the development
- A Social Media Campaign
- Pop up sessions: two pop up sessions were held in St Helen's Square to raise awareness of the proposals

57. The following feedback has been given in respect of the revised proposal:

- The Applicant's commitment to address previous concerns around the proposals is acknowledged.
- The decision to pull the building line back by 10 metres on St Helen's Square and to incorporate a screen facing onto St Helen's Square are welcomed. Notwithstanding, it was questioned whether the building line could be pulled back any further and noise from the screen could have the potential to impact on neighbouring operations.
- Bringing the restaurant down to second floor level would make it more accessible and visible.
- The improvements to the landscaping on the northwest part of the site are positive.
- It was questioned how pedestrians would move around the public realm and access the upper levels of the building from the new public staircase and mezzanine level.
- Concerns were raised around the space to the north of the building and it potentially becoming a secondary space.
- Concerns were raised about wind on the podium garden, and it was questioned whether it could be used all the time.
- Further information is needed on construction timescales.

### *Statement of Community Involvement December 2023*

58. The consultation set out above (between August 2024 and October 2024) related to the revised scheme and was undertaken in addition to the engagement that was carried out prior to the submission of the original application in December 2023. The Statement of Community Involvement 2023 detailed that the initial engagement was conducted in two phases in addition to the applicant reaching out to:

- The Eastern Cluster Partnership
- Local ward Councillors
- EC BID
- The Rectors of St Helen and St Andrew
- Neighbouring property owners
- The Chair and Deputy Chair of the Planning and Transportation Committee

59. The first phase of engagement explained how the proposed development had changed from the 2016 consented scheme, the reasons for pursuing a new application and it sought feedback on the emerging ideas for the site. This engagement took place between 17 August 2023 and 24 September 2023 and consisted of:

- 3 in person exhibition drop in sessions attended by 45 people
- A newsletter distributed to 4,547 addresses
- A dedicated consultation website visited by 1,197 people
- A social media campaign reaching 6,794 people

60. Feedback from this phase focused on design, public realm, sustainability and the new podium garden. A summary of the comments received is set out below:

- It was queried why the existing building needs to be demolished.
- The existing building does not create a crown for the cluster and its office space is outdated.
- It was questioned why the scale and bulk had changed from the previously consented scheme.
- It was questioned whether there is sufficient demand for office space after Covid 19.
- The 10th floor podium garden was considered positive all be it impact at ground level was questioned.
- The ground floor of the site currently becomes very congested.
- The approach to urban greening did not go far enough in ambition.
- Concern was expressed about the existing urban greening at St Helen's Square and that it would be removed as part of the proposal.
- The proposed sustainability aspirations were welcomed.

- The approach to encouraging active and sustainable transport was well received.
61. The applicant subsequently worked up the proposals taking on board feedback received as follows:
- Design of the crown was amended to include a bronze material to add visual interest in London's skyline.
  - The podium garden was moved from level 10 to level 11 to ensure that the ground floor of the site could still benefit from direct sunlight.
  - Development of the material palette to take inspiration from neighbouring sites and the wider colour palate of the Eastern Cluster.
  - Enhancing the greening strategy for the site, including additional greening on the south facing terraces and further greening at ground floor level.
62. Phase two of the engagement focused on the design evolution of the proposals. It took place between 17 November 2023 and 15 December 2023 and consisted of:
- 2 in person sessions attended by 117 people
  - A newsletter distributed to the same addresses as those in the first phase
  - 493 visitors to the website
  - A social media campaign reaching 26,392 people
63. Feedback from this phase included:
- A mixed response to the design with some commenting that it is not ambitious enough and does not reflect the status of the site. Notwithstanding, some were supportive of the proposed design and that it could potentially remedy current wind issues at ground floor level.
  - The crown of the building needs to show more ambition.
  - The bulk and massing would be detrimental to other buildings in the area, particularly immediate neighbours and it would impact negatively on the ground floor and public realm.
  - Concern about the impact that the podium garden would have on the ground floor public realm.
  - The proposal would result in a loss of useable public realm at ground floor level in an area which is popular for workers.
  - Materiality of the proposal was questioned with some expressing the view that it felt like an inconsistent collection of materials.
  - More needs to be understood regarding the public benefit package associated with the development.
  - Questioning whether the sustainability aspirations for the scheme were ambitious enough.
  - Praise for the proposed urban greening strategy.

64. Following receipt of the revised and updated application documentation in October 2024 the Local Planning Authority has advertised the application on site and in the press, local residents have been notified and it has been consulted upon under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
65. Copies of all received letters and emails making representations in conjunction with the October 2024 consultation are attached in full and appended to this report. A summary of the representations received, and the consultation responses are set out below. Details of the Local Planning Authority consultation undertaken prior to October 2024 and the 2 July 2024 committee meeting are set out in a subsequent section of this report.

<b>Consultation responses</b>	
Greater London Authority	<p>The GLA has previously provided comments on the scheme in the Stage 1 letter and commented on amendments to the design of the scheme in June 2024.</p> <p>Most notably, officers supported the design changes to the top of the building introducing colour to the grid and dichroic glazing which were seen as creating a more celebratory crown to the Eastern Cluster. At that time, no changes were proposed to the ground floor public realm.</p> <p>Regarding St Helen’s Square, in the Stage 1 report GLA officers noted that the amount of public realm south of the site would be reduced by the almost doubling of the existing building footprint. Officers also raised that what remained would be almost entirely over-sailed by the podium overhang at L11. Given the local nature of these impacts, GLA officers said that it was for CoL officers to be satisfied that the quality of the public realm, micro-climate impacts, and pedestrian comfort at ground level are acceptable, achieving a suitable balance between hard and soft landscaping and the flexibility for the space to be used in a variety of ways. Whilst the latest revisions appear to be a positive step (regaining approximately 200 square metres of public realm compared to the submitted proposals), GLA officers consider this a matter primarily for CoL officers to reach a view on.</p> <p><b>Officer response: the content of the GLA’s stage 1 letter is summarised in a subsequent section of this report below which summarises the consultation responses</b></p>

	<p><b>received from the first round of consultation. Appraisal of the public realm is set out in the Design and Heritage section of this report.</b></p>
<p>Transport for London</p>	<p><u>Modelling and A10 contribution</u></p> <p>The applicant team has continued to work with TfL to complete the strategic transport modelling, however at this point, the final report remains outstanding and TfL await the final conclusions to comment on the impact in full. This is also due to inform the final A10 Corridor Contribution request (the amount is still under discussion between TfL and the applicant). TfL have requested approximately £1.7m towards the scheme which is crucial to support the anticipated growth of the Eastern Cluster and is vital for pedestrian and cyclist comfort and safety. This mitigation is also in line with City of London Planning Policy, City of London Sustainable Transport Strategy, the London Plan, the Mayor’s Transport Strategy.</p> <p><u>Pedestrian, cyclist and vehicular access</u></p> <p>TfL note the changes in the access for pedestrians, cyclists and vehicles to the site (as part of the revisions to the 2023 scheme) which is deemed acceptable. The applicant should clarify if there are any management plans for pedestrians accessing the office building and public elements during peak periods. Given the size and scale of the office, any on site security measures have the potential to cause congestion on the footway which is already under pedestrian pressure. For cyclists, the City of London and the applicant should consider how wider access to the surrounding cycle network could be improved given the proximity of an excellent cycle network.</p> <p><u>Active Travel Zone Assessment</u></p> <p>The City of London should secure Active Travel Zone improvements, given the size and scale of the development.</p> <p><u>Cycle parking</u></p> <p>As raised previously, whilst the TA addendum states it will be London Plan compliant, the applicant is requested to demonstrate the numbers via a table, to include the whole GEA. This should demonstrate London Plan compliance.</p> <p>Also, it is disappointing that the applicant does not appear to have added additional short stay cycle parking spaces in the</p>

public realm. Whilst TfL note there is access to the basement, this may discourage some cyclists who prefer an on street option or who may not have the ability to access the on site basement short stay cycle parking for various reasons. As part of the cycle parking management plan, public access should be secured appropriately for short stay cycle parking access.

#### Car Parking Strategy

Noted and considered acceptable. The provision and access of the spaces should be secured appropriately and highlighted in relevant conditions/obligations.

#### Delivery and servicing

TfL note the delivery and servicing proposal and the consolidation which will be secured appropriately. However one key area of concern is that the proposed swept paths fail to show the existing on street motorbike parking and existing contraflow cycle lane in situ. The applicant should revise plans to show the existing situation to ensure that there is not an increase in danger for cyclists and other road users, which would be contrary to policy.

Additionally, the local highway authority should also provide robust on street restrictions which prevent on street delivery parking, which also increases danger.

#### Big Screen

The addition of the proposed big screen on the side of the 1 Undershaft is also noted. If the proposal is considered appropriate, the City of London should secure the relevant obligation and/or condition to reduce the visual impact and potential distraction to road users.

#### Revised ped modelling

Note the Space Syntax report and its conclusions, but also question the methodology of the large numbers of people using St Mary Axe, when the natural desire line is towards Bishopsgate.

#### Highways works and S278

Whilst TfL appreciate the build out period of this proposal is significant. TfL wish to understand the current scope of the

	<p>proposed S278 works as concerns over the location of the existing motorcycle parking bay remain.</p> <p><u>Cycle hire contribution</u> The financial contribution of £220k towards the TfL Cycle Hire network within the vicinity of the site remains.</p> <p><u>Legible London</u> Would be as per the previous request submitted in conjunction with the originally submitted 2023 scheme.</p> <p><b>Officer response: These comments are addressed in the Highways and Transportation section of this report.</b></p>
Natural England	<p>No objection. Natural England considers that the proposed development would not have a significant adverse impact on statutorily protected nature conservation sites or landscapes.</p>
Thames Water	<p>Waste Comments</p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water therefore request that a piling method statement is provided and secured by condition.</p> <p>It is requested that applicant incorporate the following into the development: measures to prevent sewage flooding, petrol/oil interceptors within vehicle parking facilities and grease traps in conjunction with drainage serving kitchens and commercial food premises.</p> <p>If work is planned near sewers then the risk of damage must be minimised.</p> <p>Thames Water advise that with regard to the combined waste water network infrastructure capacity, there would be no objection to this planning application.</p> <p>Water Comments</p> <p>The proposed development is located within 15 metres of a strategic water main. Thames Water therefore request that a piling method statement is provided and secured by condition.</p>

	<p>There are water mains crossing or close to the development. Thames Water do not permit building over or construction within 3 metres of water mains.</p> <p>Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water recommend a condition that requires an infrastructure phasing plan to be agreed by condition.</p> <p><b>Officer Response – The Thames Water advice has been shared with the applicant and the recommended conditions are included within the recommended conditions schedule.</b></p>
<p>Twentieth Century Society</p>	<p>The Society wishes to maintain their objection set out in their letter of 23 February 2023, remaining strongly opposed to the demolition of the Aviva Tower.</p> <p><b>Officer Response: Details of the objection is set out in a subsequent section of this report which summarises the consultation responses received from the first rounds of consultation.</b></p>
<p>Historic England</p>	<p>Historic England’s previous advice (letters dated 22 February 2024, 7 June 2024 and 19 June 2024) set out our position in detail. Our current advice should be read alongside these objection letters.</p> <p>We are disappointed that the opportunity to address the harmful impact on the Tower of London has not been taken.</p> <p>The latest proposals would, additionally, still seriously degrade the scale and character of the public realm around the site, causing harm to the significance of the three Grade I listed buildings adjacent. The slight reduction of the footprint of the building to the south (offset by its expansion to the west) would not meaningfully improve these impacts.</p> <p>The introduction of a large digital screen would arguably worsen the impacts. It would draw the eye, by design, contributing to further harm to the Grade I listed St Andrew, Undershaft in particular, by distracting from its prominence.</p>



	<p>The present St Helen's Square represents some of the best of modern and historic architecture in the City. We note others' comments on the importance of it as a place of commerce. The screen could considerably change its character and function by dominating the space, further to being overshadowed and encroached upon.</p> <p>Recommendation</p> <p>Historic England continues to object to the application on the grounds of the harmful impact on the highly graded listed buildings adjacent to the development site, which has not been improved by these amendments.</p> <p>In addition, serious concerns are raised about the harmful impact on the Tower of London World Heritage Site, which it is considered could be greatly reduced with minor changes, and urge amendments are sought to achieve this.</p> <p>These representations should be taken into account to seek amendments, safeguards or further information as set out in Historic England's advice. If, however, the Local Planning Authority propose to determine the application in its current form, please treat this as a letter of objection, inform Historic England of the date of the committee and send us a copy of your report at the earliest opportunity.</p> <p><b>Officer Response: The impact of the scheme on the Tower of London, listed buildings and the public realm is covered in the Design and Heritage section of this report. Details of Historic England's previous objections are set out in a subsequent section of this report which details consultation responses received to earlier rounds of consultation on proposals for this site.</b></p>
Historic England Greater London Archaeology Advisory Service (GLAAS)	<p>The proposed amendments do not alter previous advice given on the proposal which still stands.</p> <p><b>Officer Response: The previous consultation response from GLAAS is detailed in a subsequent section of this report which details the consultation responses received from earlier rounds of consultation on the proposals for this site.</b></p>
Westminster City Council	Does not wish to comment on the application.

London Borough of Southwark	Does not wish to comment on the application.
London Borough of Tower Hamlets	<p>The objection raised in the response from London Borough of Tower Hamlets sent to the City of London on 11/06/202 is maintained. The proposed building, by reason of its excessive height, will cause harm to the setting of the Tower of London World Heritage site. The new revisions to the design of the building would not alter this assessment.</p> <p><b>Officer response: An assessment of the impact of the development on the Tower of London is set out in the Design and Heritage section of this report. Tower Hamlets original objection is set out in a subsequent section of this report which details objections received from early rounds of consultation on the scheme.</b></p>
Transport for London Crossrail Safeguarding	No comment on the application.
Environment Agency	<p>The Environment Agency have no comments on the application. The letter sets out advice in respect of Water Resources.</p> <p><b>Officer Response: The content of the letter has been shared with the applicant.</b></p>
Lead Local Flood Authority	<p>Conditions are recommended relating to SUDs and measures to prevent flooding.</p> <p><b>Officer Response: The recommended conditions have been included within the conditions schedule.</b></p>
London City Airport	<p>The 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 is of a mind to approve this application, then London City Airport suggests that a series of conditions would need to be applied to any future approval. The conditions relate to Radar Mitigation, Construction Methodology, Instrument Flight Procedures (IFPs) Impact and Building Obstacle Lighting. If any part of the development exceeds 91.4m AGL, upon grant of permission, the City of London is required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30</p>

	<p>– 32 of DfT/ODPM Circular 01/2003 ‘Safeguarding of Aerodromes &amp; Military Explosives Storage Areas’.</p> <p><b>Officer Response: The recommended conditions have been included within the conditions schedule. The CAA would be notified should planning permission be granted.</b></p>
Heathrow Airport	<p>The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria. Heathrow Airport request conditions relating to H10 Mitigation and Instrument Flight Procedures (IFPs) Impact are applied should planning permission be granted. Where a crane is 100 m or higher crane operators are advised to notify the Civil Aviation Authority. 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 &amp; Military Explosives Storage Areas’.</p> <p><b>Officer Response: The recommended conditions have been included in the conditions schedule. The CAA would be notified should planning permission be granted.</b></p>
London Gatwick	<p>The proposed additions/amendments and the development as a whole have been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria. We therefore have no objection to this proposal.</p> <p>This response only relates to London Gatwick, other airports will have different requirements.</p> <p>For information, please note that the DfT Circular ‘Town &amp; Country Planning (safeguarded aerodromes, technical sites &amp; Military Explosives Storage Areas) Direction 2002, under Annexe 2 ‘High Structures’ requires that Local Planning Authorities notify CAA of any building works extending 91.4 m or more above ground level as soon as permission has been granted.</p> <p><b>Officer Response: The CAA would be notified should planning permission be granted.</b></p>

NATS  
Safeguarding  
Office

NATS (En Route) plc (NERL) has carried out an assessment of the proposal and its position is that it expects the development to cause an unacceptable impact on its operations and infrastructure.

Specifically, NERL expects the proposal to cause a degradation to its PSR/SSR radar located at Heathrow airport (known as 'H10'). NERL anticipates an impact in the form of a loss of low-level radar cover, as well as the generation of false aircraft targets due to signal reflections from the building. The potential also exists for an impact on air traffic operations in the London Terminal Manoeuvring Area (TMA) should any construction equipment rise above the height of 309.6m AOD causing an infringement of airspace. Following extensive work and engagement with affected stakeholders NERL is content that a technical solution has been identified allowing to mitigate the impact of the proposal.

While no agreement is in place yet, through engagement with the Applicant, NERL is satisfied there are the means to erect the building without impacting local airports or London airspace. A procedure for coordinating the erection of tall cranes, similar to that used for other City schemes, is being developed by the Applicant in collaboration with the affected aviation stakeholders. The procedure, will ensure that construction activities with the potential to affect aviation have been assessed, approved and implemented, and include any contingency measures that might be required.

While the details surrounding mitigation and construction are yet to be finalised, as with the previous planning application for the site, NERL is confident that with suitable measures in place, the scheme can be allowed to proceed without it compromising its infrastructure and operations.

Accordingly, should the City of London be minded to grant the scheme, NERL will not raise any objection to the Application provided that the standard aviation planning conditions are imposed on any consent.

Attention is drawn to the legal obligations of local authorities contained in The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) (Scotland) Direction 2003, in the event that any

	<p>recommendations (including those relating to conditions) made by NATS (En-Route) plc are not accepted.</p> <p><b>Officer Response: The recommended conditions have been included in the conditions schedule.</b></p>
Active Travel England	<p>In relation to this planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London.</p> <p><b>Officer Response: Transport for London and the Greater London Authority have been consulted on this application.</b></p>
Surveyor to the Fabric of St Paul's	<p>Offer no comment on the principle of the changes brought by the updated proposals. The Cathedral would want to understand more regarding the lighting design of the scheme.</p> <p><b>Officer response: Further details of the lighting proposals would be secured by condition.</b></p>
Lead Local Flood Authority	<p>Should planning permission be granted two conditions are recommended covering SUDS and measures to prevent flooding.</p> <p><b>Officer response: the recommended conditions have been included in the conditions schedule.</b></p>
District Surveyor	<p>The Fire Statement has been reviewed and there is no further comment. The proposal is therefore considered to comply with D5 and D12 of the London Plan.</p>
Environmental Health	<p>Previous comments in respect of the proposal remain valid. Conditions are recommended regarding the hours of operation of the screen and noise from the screen.</p> <p><b>Officer response: a management plan for the screen would be secured through the S.106 agreement. This would cover matters such as noise levels, content and hours of operation of the screen.</b></p>

City of London Cleansing	The proposed waste and storage collection facilities indicated in the Waste Management Strategy, comply with the City's requirements.
City of London Conservation Area Advisory Committee	The committee reviewed the proposed works in the thin sliver of the site that is in the St Helen's Conservation Area. The committee raised no objection.
City of London Access Group	<p>The revised scheme was presented to the City of London Access Group on the 26 November 2024.</p> <p>The group discussed the following:</p> <ul style="list-style-type: none"> <li>• Size, design and capacity of the proposed lifts. It was requested that the lift interiors include mirrors.</li> <li>• It was queried why escalators were not proposed up to the first floor lobby instead of stairs.</li> <li>• Wayfinding – it is essential that appropriate wayfinding is included within the development.</li> <li>• It is disappointing that drop off points are not proposed at street level in addition to on street accessible parking. More disabled parking should be included within the building.</li> <li>• Evacuation strategy and how people would move out of the building in an emergency.</li> <li>• The design of the oculus at podium level needs to be given careful consideration, with clear unobstructed space around it.</li> <li>• Contrast is needed between paving and bollards.</li> <li>• The design of the external seating needs to be given careful consideration and a mix of designs to meet different needs.</li> <li>• Consideration needs to be given to the management of any queuing.</li> </ul> <p>Officer Response: Details of the lifts, wayfinding, design of the oculus, paving, external seating and management of queuing would be required by the conditions covering Inclusion and Accessibility details, provision of an Access Management Plan and Public Realm details.</p> <p>Concerns around drop off and parking are covered in the Transportation section of this report.</p>

	The applicant advised the group that escalators were not proposed instead of stairs given that they are not always the best way to move people efficiently.
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*Letters of representation received in response to Local Planning Authority consultation undertaken in October 2024 (consultation responses received from earlier rounds of consultation, in conjunction with the original 2023 scheme are set out in a subsequent section of this report).*

66. One letter of support has been received from a member of the public in response to the latest round of consultation. The content of which can be summarised as follows:

- The addition of a screen and the changes to the public realm at ground floor level are a great improvement over the previous proposal.
- Creating a new communal space at the centre of the City cluster anchors the site as a local destination that would benefit workers and visitors alike.
- The developer should implement the green spaces at ground and terrace level as the inclusion of greenery would improve the space.

67. Three letters of objection have been received from members of the public to the latest round of consultation, the content of which can be summarised as follows:

- The proposal is objectionable on density grounds.
- The Crown of the building is uninspiring if the building is going to be the pinnacle of the City.
- If the development is to go ahead, please restrict construction so that there is no overnight working.

68. Letters of objection have been received from: The Wardens and Society of the Mistery or Art of the Leathersellers, Stone Real Estate Limited who act as the Development Manager for the Baltic Exchange Holdings Limited who own the long leasehold interest in the Baltic Exchange 38 St Mary Axe and Universities Superannuation Scheme Ltd (USS) who are the owner of Fitzwilliam House. The content of the objections is summarised in the following sections of this report.

69. The content of the objection from The Wardens and Society of the Mistery or Art of the Leathersellers was the same as that received in response to consultation carried out regarding the original 2023 scheme before the 2 July 2024 committee meeting, and can be summarised as follows:

The Leathersellers owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the application site:

- (a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;

- (b) 33 Great St Helens;
- (c) 52-68 and 88 Bishopsgate; and
- (d) 25-51 and 61 St Mary Axe

A review of the submitted information has been undertaken and there are substantial concerns over the potentially adverse effect of the proposal on available light to the above properties. There is concern that the amenity and natural light at these properties would be prejudiced. The detailed assessment of the scheme has not been concluded and therefore the position in relation to other issues is reserved.

The Leatherseller's property at 33 Great St Helen's (Daylight and Light Pollution), 30 St Mary Axe (Overshadowing) and 48 Bishopsgate (Daylight and Light Pollution) have been identified as sensitive receptors in Chapter 12 (Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare) of the Environmental Statement submitted with the application.

The Environmental Statement (Table 12-153) reports that at 33 Great St Helens, 5 windows (of a total of 19) and a total number of 0 rooms (of a total of 7) are expected to meet BRE Guidelines on daylight levels following the construction of the proposed development and any relevant cumulative schemes. As a consequence, a total of 14 windows and 7 rooms would experience a greater than 30% (with 6 rooms with an in excess of 40%) reduction in daylight as a consequence of the proposed development.

The Environmental Statement reports (Table 12-153) that at 48 Bishopsgate, 1 window (of a total of 11) and a total number of 3 rooms (of a total of 5) are expected to meet BRE Guidelines on daylight levels following the construction of the proposed development and any relevant cumulative schemes. As a consequence, a total of 10 windows and 2 rooms would experience a greater than 30% reduction in daylight as a consequence of the proposed development.

The Environmental Statement further reports that 30 St Mary Axe has been assessed for the purposes of establishing potential overshadowing by the proposed development. The wider assessment of the overshadowing impacts of the proposed development are summarised in the Environmental Statement submission and reference is made to a technical appendices that contains a set of overshadowing plans without any apparent detailed explanation of the assessed outputs. Similarly, reference is made to potential light pollution impacts at 33 Great St Helen's and at 48 Bishopsgate, but the Leatherseller's have been unable to identify a site specific assessment within Chapter 12 of the Environmental Statement. As a consequence, there is difficulty in review of further assessment and consultative advice is being sought on this aspect of the Environmental Statement submission. In turn, the position is reserved on these specific findings.

The identified cumulative effect of the proposed development and other development schemes within the vicinity of 33 Great St Helens and 48



Bishopsgate is of major concerns as the Leatherseller's have already experienced the detrimental impact upon the function, operation and amenity of their buildings due to overshadowing and the loss of daylight and sunlight. When considered cumulatively, at 33 Great St Helen's, over 70% of the windows are not expected to meet BRE Guidelines on daylight levels following the construction of the proposed development. The position is further exacerbated at 46-48 Bishopsgate where the cumulative impact of development will ensure that 90% of the windows are not expected to meet BRE Guidelines on daylight levels following the construction of the proposed development.

Specifically in relation to the rooms, all the rooms within 33 Great St Helen's are expected to experience alterations beyond 30% of current daylight levels and at 48 Bishopsgate, 40% of the rooms are expected to experience alterations beyond 30% of current daylight levels.

The detailed impact assessment of the proposed development is yet to be concluded and the position in relation to these issues is reserved. There is serious concerns that both 33 Great St Helens and 48 Bishopsgate will experience a significant adverse impact as a result of the construction of another tall building in this area. As a consequence, the findings in the Environmental Statement show a clear risk that our client's enjoyment of their property will be materially affected.

For the reasons set out above, there is objection to the scheme and it is requested that these concerns are brought to the attention of the Planning Committee.

**Officer response: A full analysis of the daylight and sunlight impact of the scheme is set out in the Daylight, Sunlight and Overshadowing section of this report.**

70. The objection from Stone Real Estate Limited covered the same matters raised in response to consultation undertaken in conjunction with the original 2023 scheme. Their grounds of objection can be summarised as follows:

There is concern that the proposed development would see a significant reduction in light amenity at The Baltic Exchange and would represent an infringement on our client's Right to Light. The Development proposals should be reduced in height, bulk and mass so as to avoid any infringement whatsoever. The proposed revisions make no improvement to the infringement and loss of light that will be suffered.

**Officer response: The Daylight and sunlight impacts of the scheme are assessed in the Daylight, Sunlight and Overshadowing section of this report. For the reasons set out in the relevant section of the report commercial properties are not considered as sensitive receptors and are not subject to the same daylight/sunlight test requirements as residential**

**properties. Rights to Light is not a material consideration in the determination of planning applications.**

71. The content of the objection letter from USS can be summarised as follows and raises similar concerns to those raised in response to consultation on the original 2023 scheme (details of USS's earlier objection is set out in a subsequent section of this report which summarises consultation responses received to consultation undertaken in conjunction with the original 2023 scheme):
72. The latest amendments do not address the fundamental objections raised in USS's previous objection letter. The content of the previous letter remains valid. The fundamental points of objection are as follows:

**Loss of public realm**

The original proposal significantly reduced the amount of open space proposed under the consented 2019 scheme. This is concerning as the Eastern Cluster has a need for open space. The proposed 'public realm' at level 11 does not provide accessible space that can easily be enjoyed by pedestrians and workers if security checks and pre booking is required to access the area.

This objection remains regardless of the revised scheme due to the substantial reduction in public realm that would result from the development.

**Design and Massing**

The original 2023 scheme is larger than the consented 2019 scheme. There is greater massing at all levels. This results in a building that is overly dominant and incongruous. Objections to the design and massing are maintained. The proposed massing is incompatible with the prevailing urban form and fails to contribute positively to the character and distinctiveness of the area.

**Daylight and Sunlight**

There would be a significant detrimental impact to surrounding buildings and spaces when considering the loss of daylight and sunlight. The originally proposed 2023 scheme and the revised 2023 scheme would have an adverse impact on daylight and sunlight. This is supported by the submitted Overshadowing Report which shows a substantial reduction in sun exposure to the ground level public realm. The Overshadowing Report does not include details of impact on the surrounding area outside of the site. The majority of rooms within Fitzwilliam House will result in a loss of light.

**Heritage**

The proposed scheme would negatively impact on the significance and setting of nearby heritage assets including the St Helen's Place Conservation Area, the Grade I listed churches of St. Helen's and St Andrew's Undershaft.

## Objection to the proposed digital screen

USS objects to the inclusion of the large digital screen proposed for the southern façade. The planning statement states that the introduction of the screen would require increased security measures around the public realm due to concerns regarding potential vandalism and misuse. The requirement for heightened security contradicts the principles of emerging Local Plan policy DE3 'Public Realm'. The policy emphasises the importance of maximising public access and minimising restrictive rules within public spaces. The need for such robust security measures creates an environment of surveillance rather than one of openness and accessibility, ultimately detracting from the desired character of a welcoming and freely accessible public space.

The screen contradicts the creation of high quality public realm. St Helen's Square should offer respite and visual contrast to the digital saturation of many workplaces. Introducing a large dominant screen detracts from the potential for a calm and engaging public space.

Furthermore, the introduction of a large screen in such close proximity to sensitive heritage assets including the Grade I listed St Andrew's Church and St Helen's Place Conservation Area, is considered inappropriate. The screen's size, scale and modern aesthetic are jarring within the historic context and fail to meet the requirements of emerging Local Plan Policy DE3, which calls for public realm schemes to be sensitive to the City's heritage and enhance its character.

The prominent position of the screen raises concerns regarding road safety and potential distractions to drivers and cyclists navigating St Mary Axe and Leadenhall Street. The visual distraction presents a clear risk to the health and safety of all road users, including pedestrians.

## Summary

USS maintains its strong objection. The revised design for the site does not comply with the Development Plan. Amendments to the scheme do not outweigh any of the material considerations included in this objection letter and the planning application should be refused.

**Officer response: These comments are addressed in the Design and Heritage (including Public Realm), Daylight and Sunlight and Highways and Transportation sections of this report.**

**In respect of security for the screen the Planning Statement addendum states: "Security for the public realm remains in line with the Original Submission regarding HVM. Due to the introduction of a digital screen on the southern façade and the public toilet on the western side of the building, additional security has been considered for these features. Both the screen and the public toilet requires a robust security management**

**process which includes video surveillance and patrols to monitor the space.”**

**Final details of security measures would be required by conditions and the S106 agreement which would require details of public realm management. In assessment of the details consideration would be given to emerging and adopted policy around the provision of security.**

*Local Planning Authority Consultation Original 2023 scheme*

73. Statutory consultation was carried out in respect of the originally submitted 2023 scheme. Representations and responses were received in response to the consultation which still need to be given consideration in relation the revised scheme given they have not been withdrawn or superseded. Furthermore, as set out above in some instances representations received in conjunction with the revised scheme (October 2024 statutory consultation) refer back to representations submitted in response to earlier consultation.
74. Following receipt of the application by the Local Planning Authority in December 2023, the original application was advertised on site and in the press. It was consulted upon twice as follows:
- On validation of the application in January 2024 for a period of 30 days.
  - Under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, for a 30 day period starting on 14 May 2024. This consultation covered the request for additional information in conjunction with the Environmental Statement and included some revisions to the design of the scheme, notably the Crown of the tower.
75. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the tables below and the following sections of this report. For clarity this summary covers the period between January 2024 and mid-October 2024 and covers representations included in the 2 July 2024 committee pack (addendum and main report) in addition to three letters of representation that were received post committee but prior to the submission of the October 2024 revisions. One letter received during this period was a further objection by CC land (details set out in the table below) and two were objections from members of the public (details set out following the table below).

<b>Consultation Responses</b>
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Greater London Authority (Stage 1 letter dated 04 March 2024 and email dated 20 June 2024 in response to the second round of re consultation)

Stage 1 Letter

Strategic issues summary  
Land use principles: The intensification of office floorspace would support the function of the Central Activities Zone and London’s position as a World City. Accordingly, the proposals are supported in land use terms.  
Urban Design: The City of London Eastern Cluster is identified as a suitable location for tall buildings in appropriate locations. Overall, the proposal represents high quality architecture and urban design.  
Heritage: Less than substantial harm is identified to a range of heritage assets including the Tower of London World Heritage Site. The harm is to be weighed against the public benefits of the scheme at the Mayor’s decision-making stage.  
Transport: Strategic transport modelling is required to assess the transport impact of the development including robust trip forecasts to identify necessary transport mitigation.  
Energy and Sustainable Development: Further information is required on the Energy Strategy, Circular Economy Statement, and Air Quality Assessment to comply with London Plan Policy.

Recommendation

That the City of London Corporation be advised that the application does not yet fully comply with the London Plan for the reasons set out. Possible remedies set out in this report could address these deficiencies.

**Officer response: These points are addressed in the Land Use, Design and Heritage, Highways, Transportation, Sustainability and Air Quality sections of the report.**

Email dated 20 June 2024

The updated and amended documents have been reviewed. The update on Stage 1 comments is as follows:

Affordable workspace – the applicant was encouraged to continue discussions to identify a suitable affordable workspace offer (to be confirmed in S106).

**Officer Response: 400 sqm of affordable workspace would be provided on the lower levels of the building as set out in the Land Use section of this report.**

Public access to the podium and the viewing gallery – should be subject to a management plan including commitments to following the Public London Charter (to be confirmed in S106).

**Officer Response: A public realm management plan would be secured through the S.106 agreement.**

Architecture and design – it is suggested the platform overhang, in particular its white colour, could benefit from being toned down as it could detract from the overall architectural quality of the scheme. This does not appear to have changed.

**Officer Response: The white and shiny colour of the podium garden soffit has been amended post submission. A lighter coloured and speckled tone terracotta is now proposed for the ceramic cladding of the soffit. More details are included in the Architecture section of this report and material details would be required by condition.**

Crown of the building – It is suggested the top of the building was not functioning as well as it could as a celebratory crown for the whole cluster. We welcome the design changes introducing colour and the dichroic glazing.

	<p><b>Officer Response: Noted</b></p> <p>Heritage – Public benefits test to be concluded on once final public benefits package is secured in S106. As suggested in our Stage 1, the harm identified is likely to be outweighed.</p> <p><b>Officer Response: The public benefits analysis is set out in the Assessment of Public Benefits and Paragraph 208 NPPF balancing exercise section of this report.</b></p> <p>Transport – It is understood that TfL are in liaison with the City directly regarding the Transport comments raised in the Stage 1 report. GLA Officers support TfL’s request for contributions towards the A10 corridor improvements from this scheme.</p> <p><b>Officer Response: Discussions are ongoing on this matter.</b></p> <p>Energy – There are some outstanding points to be addressed before compliance with London Plan energy policies can be confirmed. Liaison will take place directly with the Planning Agent on this.</p> <p><b>Officer Response: The GLA and planning agent are in liaison on the relevant matters.</b></p> <p>Whole Lifecycle Carbon – Was considered to be acceptable at Stage 1.</p> <p>Circular Economy – Comments to be provided in due course.</p> <p>Air quality – Concerns raised at Stage 1 have been addressed.</p>
<p>Transport for London (letter dated 11 April 2024)</p>	<p>As one of the most significant scale office led developments in the CAZ, this would result in a considerable uplift in trips across public transport and active travel modes. Further information and</p>

	<p>clarification is therefore required in respect of the following for a robust assessment and to ensure compliance with the London Plan:</p> <ul style="list-style-type: none"> <li>• Trip generation</li> <li>• Mode share</li> <li>• Modelling approach</li> <li>• Cycle parking</li> <li>• A Stage 1 Road Safety Audit for the service access point</li> <li>• How the public realm would function</li> <li>• The extent of the Hostile Vehicle Mitigation</li> <li>• Delivery and servicing arrangement</li> <li>• Active Travel Zone Assessment</li> <li>• Highways works and S278 agreement</li> <li>• Pedestrian Impact</li> <li>• Contributions to walking and cycling</li> <li>• improvements including the A10 corridor as well as to cycle docking stations are required.</li> <li>• A detailed construction logistics plan needs to be secured.</li> </ul> <p><b>Officer Response: These matters are addressed in the Highways and Transportation and the Planning Obligations and Community Infrastructure Levy sections of this report. Officers, the applicant and TfL have been in discussions in respect of the matters raised.</b></p>
<p>Historic England (letters dated 22 February 2024, 7 and 19 June 2024)</p>	<p>Summary:</p> <p>The tallest building in the City Cluster will act as its keystone, and its execution will affect the future of London-wide views, the experience of the City, and some of its most important historic buildings at its base.</p> <p>There is a good agreed solution for this site: an approved development which would create substantial new commercial floor space, an apex to the cluster and a coherent overall design, with</p>



high-quality public realm and improved sightlines to historic buildings at its base.

The scheme now proposed for this site would, by contrast, seriously degrade the scale and character of the public realm around it, casting the street into greater shadow and encroaching on three buildings of exceptional significance, whilst not removing harmful impacts in important longer-range views.

Our primary concerns in this case are about design and form, particularly as experienced from nearby streets, rather than overall height. Historic England consider that permitting this scheme would be a serious missed opportunity to achieve an exemplar building at the apex of the cluster, respecting the rich history of the City of London, and maintaining or enhancing the public spaces from where most people experience it. The scheme would not accord with national, or your own local, policies and guidance on design, heritage and public realm, and should therefore be refused.

Historic England objects to this scheme on heritage grounds.

**Historic England Advice:**

Historic context, local character and the significance of heritage assets

The City of London has a highly distinctive streetscape, characterised by the overlaying of successive periods of commercial development on the much earlier street pattern. The strength of the City is in its marrying of old and new and how a passer by can appreciate the layers of history when moving around the streets. The dense cityscape is punctuated with small open spaces – churchyards, squares and plazas which are an important part of City character. They give much needed space to pause.

St Helen's Tower is unlisted and benefits from a Certificate of Immunity from listing. The building did not meet the bar for listing, but the wider scheme of which it was a part (the 1960s Commercial Union and P&O development) won a Civic Trust Award in 1970 and the relevant Pevsner Architectural Guide notes that the "success of the pair owes much to the street-level plaza between them". St Helen's Square, within the site boundary at the south of the site, has provided an important streetscape function for over fifty years.

The site is adjacent to three exceptionally significant buildings: the rare surviving medieval churches of St Andrew Undershaft and St Helen's Bishopsgate, and Richard Rogers Lloyd's building. They are integral and outstanding elements of the City's built environment and are all listed Grade I.

The City Cluster is seen over extensive areas of London, including some very sensitive areas. In particular, the form of the cluster has already affected views from the Tower of London World Heritage Site, and key views from St James's Park.

The Tower of London World Heritage Site is internationally famous and a symbol of London. Its landmark siting, preserved through some separation from the City Cluster, is an attribute of its Outstanding Universal Value (OUV) as set out in the World Heritage Site Management Plan, and views from its inner ward and concentric defences give a powerful sense of its historic development and function.

St James's Park is a Grade I registered park and garden. Views from the Blue Bridge across its central lake are identified and protected as view 26A.1 in the London Views Management Framework (LVMF). They are characterised by the relationship between the designed landscape

and the historic buildings and treeline forming its boundary.

### Impact of the Proposals

The proposal would be the tallest building in the cluster. It would be much taller and bulkier than the existing building. The footprint would project notably further south than the existing tower, into the current open plaza of St Helen's Square. The upper sections would project in a staggered manner down to the podium garden level, creating a building which appears to bulge in the middle.

In the lower part of the building, vast structural columns would be planted into the street around the edges of the site. The use of terracotta, Corten steel and white ceramic would create a busy design unrelated to the context, which would be highly eye-catching. The large structural columns, in particular, would have an almost industrial feel, in sharp contrast to their surroundings.

The form of the building at its lower levels would have a clear and detrimental effect on the quality of public space around it, for several reasons. First, because of the increase in the footprint and the direct loss of a large section of the existing open plaza to the south. Second, because of the increased scale of the lower floors and their heavy dominance in views from surrounding streets, which is exacerbated by the massive columns and the proposed materials. Third, because of the vast oversailing podium garden, which would effectively roof over what remains of this open space, reducing openness and natural light.

The scheme would fundamentally compromise the character of the public space bounded by St. Mary Axe and Leadenhall Street. The scheme

would project into St. Helen's Square, and enclose it from above with an extensive terrace; thus shrunken and overshadowed, the space would no longer resemble a plaza. The building would degrade the public realm, hem in the buildings and streets around it, reduce sightlines, and thus directly compromise an appreciation of the setting of exceptional heritage assets and the broad experience of the City around them.

The above impacts would harm the appreciation of St. Andrew Undershaft. The west end and tower of the church are seen to best advantage across the square and in historic views along Leadenhall Street and St Mary Axe. Though uninterrupted views of the church would remain at some points under the high cantilevered terrace, the newly constrained open space and overshadowing caused by the building's projections and terrace would degrade the quality of the experience in this area and diminish the presence of the church. The projecting nature of the design, its radically contrasting forms and materials and its unconventional appearance would be overwhelming.

The scheme would have a similar effect on the experience of the Lloyd's building, designed to face onto St Helen's Square. Its clearly expressed lift and stair towers shape its exterior and give the building its distinctive and significant roofline. As well as the general effect on the quality of space in the reduced plaza immediately opposite it and the shrinking of the area from which it can be seen, the cantilevered terrace and greatly expanded building would obscure views of the Lloyd's building along St Mary Axe. This would cause harm. The podium garden may also cut off the roofline of Lloyd's when seen from in front of the new building, but this is unclear from current documents.

St Helen's Bishopsgate is tucked behind the existing building on the site, and though

overshadowed by the current building, that tower's simple glazed north facade allows the features and materials of the church to stand out. The building line of the current proposal would encroach notably on the church, closing it in. The multi-faceted forms and materials, and giant piers sitting close to the church would distract and detract from its architecture. Taken in isolation, the removal of the road ramp to its immediate south would be beneficial. However, the positive impact of this removal would be negated by the large and unsightly service entrance onto St Mary Axe proposed in its place. Overall, harm would be caused to the church, and this would mean some concurrent harm to the conservation area of which it is an important part.

In addition to these visual impacts, the degree of additional overshadowing a much bulkier building would cause on this site could potentially have an impact on the environmental conditions around these historic structures. This may eventually affect the condition and performance of their materials. This may be particularly likely for St Helen's church, which already appears to be suffering from some biological growth due to moisture.

The tower would be seen from multiple other highly sensitive locations across London, including from St James's Park, registered at Grade I, and from the Tower of London World Heritage Site. By virtue of its size and dominance, this would cause some harm to St James's Park by increasing the prominence of the Cluster, thus eroding its significance derived from the relationship between water, mature planting and historic Whitehall buildings in key views from the bridge over the lake (LVMF view 26A.1). It would also detract to a small degree from the OUV of the Tower of London World Heritage Site by increasing the presence of the Cluster in key views from Tower Bridge (LVMF view 10A.1), and in views from the Inner Ward,

thus cumulatively challenging the primacy of the site.

This site is the location of a previous proposal for a similarly tall building, consented in 2019. This scheme would have had similar effects on long-range views as the scheme now submitted, and Historic England identified some harm when consulted at that time. However, set against that were some heritage benefits: the scheme maintained and enlarged the existing public space of St Helen's Square, whilst remodelling it to include a sunken plaza, and increasing sightlines between the two medieval churches. Although not a heritage benefit, that scheme also placed this plaza against a tower of simple, elegant form. Historic England considered the thoughtful and responsive approach to public space and connectivity of this scheme were positive, preserving and enhancing the setting of adjacent heritage assets, despite some harmful longer-range impacts of the scheme. This scheme omits any such benefits and takes a radically different and notably more harmful approach at ground floor level, whilst maintaining the harm to the Tower of London and St James's Park.

#### Relevant Policy

The letter sets out relevant policy.

**Officer comment: the relevant policies are set out in the policy section of this report.**

#### Historic England's Position

The scheme as proposed would cause harm to the historic environment of the City and three Grade I listed buildings and a conservation area within it, as well to the Tower of London World Heritage Site, and to St James's Park through impacts on the designated LVMF view from the Blue Bridge. The harm caused would be consequential, multi-faceted, widespread, and to

assets of the highest significance. The increased harm compared with the consented scheme would stem from the increased bulk, contrasting and busy design, and the privileging of a raised terrace for a minority of visitors above the character of the everyday public realm for everyone. It would also stem from the lack of clear heritage benefits included in the previous scheme.

St Helen's Square currently functions as an important breathing space in the City, an identified open space enabling an appreciation of the quality of the buildings around it. Projecting the revised building south into the square, and building over the remainder of it with a raised terrace, would greatly compromise its character; it would reduce the scale of this public space, palpably loom over it, and limit the natural light that would reach it. Along St Mary Axe and Undershaft, the building would be notably bulkier, more eye-catching and contrasting in form and materials. The churches of St Helen's Bishopsgate and St Andrew Undershaft, and the Lloyd's building, would be diminished by their proximity to such a dominant and jarring built form and by the degradation of some of their best viewing locations. These impacts would not align with local plan policies.

The application presents as a benefit that this scheme would increase the overall public space available on the site, and afford new high-level views. Historic England questions this. Prioritising a raised public terrace as a destination (a dead end) whilst seriously disadvantaging the public realm at street level (through which people move) is clearly at odds with the National Design Guide and related national and local policy. The pavement level will always be more widely experienced by the general population, whereas a raised terrace could never function as an inclusive part of the public realm on the same terms. The three adjacent listed buildings were

all designed to be seen from street level, and whatever potential interest could arise from new viewing locations, this should not be at the expense of experiencing architecture as designed.

Historic England acknowledge the policy context and previous consents for a tall building in this area, and do not object in principle to a tall building on this site. However, the consented scheme for this site demonstrated a way in which a tall building could respond gracefully to its surroundings and the historic assets around it, weighing against some of the harmful long-distance effects. Historic England consider this scheme does not do this, and that its impacts contravene policy and guidance on heritage protection, design and public space.

This scheme would cause harm to multiple assets of the highest significance, through its approach to design, form and public realm. Although “less than substantial” in the terminology of the NPPF and not at a high level for any one asset, these harms across several heritage assets require clear and convincing justification. This harm should be given great weight (all the greater given the importance of the assets affected), and should not be permitted without being outweighed by public benefits. Historic England question whether a scheme with the design issues raised, which would diminish some of the City’s finest historic and modern buildings, could be considered to outweigh the harm. We therefore recommend the application should be refused.

As stated above, we do not have an in-principle objection to a tall building on this site, of a design which responds to and respects its context. Were this scheme refused or withdrawn, we would be glad to work with the Local Planning Authority and the applicants further on a development which balances the impacts of a very tall building



with a sensitive approach to public realm and historic setting.

#### Recommendation

Historic England objects to the application on heritage grounds, due to the harm it would cause to important heritage assets, including those of the highest significance. Historic England consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 135, 201 and 206. We consider it would contravene local plan policies CS10, CS12 and CS14, and London Plan policies HC1 and D8, in relation to heritage protection, design, and open space.

A further representation was submitted by Historic England on 07 June 2024 in conjunction with the additional information that was submitted as part of the second round of consultation. The comments should be read against previous advice.

#### Summary

It is considered that the amended scheme would not meaningfully reduce the harm previously identified, and therefore objection to the proposal would be maintained. The scheme would seriously degrade the scale and character of the public realm around the site, casting the street into greater shadow and encroaching on three buildings of exceptional significance.

New changes proposed to the upper levels of the building would appear to increase the potential for harm in wider views, including to and from the Tower of London World Heritage Site (WHS). An increase in the visual distraction of the proposals could result in greater harm to attributes of the Tower's Outstanding Universal Value (OUV).

In the context of heightened international scrutiny about this World Heritage Site and development

within its setting, alongside the obligations of National Planning Policy, it is urged that steps are taken prior to determination to minimise the identified harm by ensuring the design for the top of the proposed building is as visually recessive as possible. To this end, a meeting is requested with the City and the applicants to discuss this. It would not be supported that this aspect of the proposals could be resolved post determination via conditions.

#### Historic England Advice

Previous advice set out the wide range of assets with the potential to be affected by this scheme, in particular focusing on the nearby Grade I listed churches of St Helen's Bishopsgate and St Andrew Undershaft, and the Grade I listed Lloyd's of London. Sensitivities of St James's Park and the Tower of London World Heritage Site were also identified.

The impact of the proposals was particularly concerning in relation to the adjacent highly-graded buildings and their immediate setting. It is considered the much bulkier, eye-catching, and oversailing nature of the proposed scheme would seriously affect the streetscape and encroach upon very important assets. The busy design - including materiality - exacerbated some of those effects, but the root of the concerns lay in the building's overall form.

#### Amendments made and their impact

- a) The lower levels of the building have been changed from a darker terracotta to a subtler, paler finish, graded as it rises, which is more in-keeping with the surrounding historic materials. It is considered that the move towards some subtle, more contextual finishes is a positive step, but in the wider context of

the scheme, it makes only a marginal difference to the harm caused.

It was previously advised that the potential benefits of removing the service ramp in front of St Helen's would be negated by the visual imposition of the new vehicle lift onto St Mary Axe. Small changes have been made to the detailed design of this area and it is now proposed to be in a more contextual stone finish, though without any real change to the overall design. The lift would remain a large, very functional element seen in juxtaposition with St Helen's church, which will be even more prominent when in use. The harm would therefore largely remain.

- b) The design of the building has also been amended, with a proposed change to the geometry and framing of the upper levels. The very large windows of the uppermost level would now be picked out with broad, bright red framing. Beneath this, a dichroic treatment of the glazing is proposed. Both of these design changes would set the building apart from those already existing within the Cluster which have a certain commonality. The prominence of the crown of the proposed building would be accentuated in mid- and long-range views across London. From the Tower of London WHS the crown of the building would be seen from the Inner Ward above the roof of the Chapel of St Peter ad Vincula. The crown would also have the potential to stand out in kinetic views of the Tower of London WHS from Tower Bridge.

It is considered these changes would likely cause a greater visual distraction than previous proposals, diminishing the appreciation of the attributes which

convey the Tower of London World Heritage Site's Outstanding Universal Value, as set out in its management plan. The following attributes of the Tower's OUV as an internationally famous monument, its landmark siting, as a symbol of Norman power, its physical dominance and its concentric defences all rely on its setting to varying degrees.

The proposed crown treatment would likely be distracting in views to and from the Tower of London. This would increase the way in which the Cluster would dilute the dominance of the Tower and distract from an appreciation of the attributes listed above by drawing the eye away from them. Increased harm would also occur to listed buildings within the WHS, including St Peter ad Vincula, in particular.

A similar impact may also occur to views from St James's Park, depending on weather conditions and levels of night-time illumination.

#### Historic England's Position

The amendments have not sought to address concerns about this application, so Historic England's objection to it still stands. The scheme would seriously degrade the scale and character of the public realm around the site, casting the street into greater shadow and encroaching on three buildings of exceptional significance, including the churches of St Andrew Undershaft and St Helen's Bishopsgate, and the Lloyds Building. The proposals do not represent a high-quality contextual design as policy and the quality of the environment demands.

Concerningly, the amendments have the potential to increase harm to the integrity of the Tower of London WHS and the significance it

derives from its attributes of OUV as set out above.

The use of dichroic glass and red framing at the top of the proposed building to convey public accessibility are likely to make it more visually distracting in key views of and from the World Heritage Site as well as St James's Park, noting in particular the considerations that are set out in GPA3. The potential harm this would introduce would bring the proposals in clear conflict with London Plan policies HC2 and D9.

It is acknowledged that dichroic glass was part of the consented proposals and was not flagged as an issue previously. Since then, 120 Fenchurch Street has been built out and provides a real-world example of this material. The dichroic glass is highly conspicuous and subject to considerable variance - much more so than the provided visualisations are able to suggest.

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 tall building development within the Tower of London's setting. In the context of this heightened international scrutiny and your duty as set out in Paragraph 2, 201 and 205 of the NPPF, it is urged that urgent steps are taken to minimise harm to the WHS by ensuring the proposed design is as visually recessive as possible.

With that in mind, Historic England would like to meet with the applicants and City prior to determination to better understand the detailed design and consider possible changes to ensure that any additional harm to OUV is avoided or minimised, by using a different palette of materials and/or architectural treatment. It would not be supported that the detailed design of this

aspect of the proposals would be resolved post determination via conditions.

With that in mind, Historic England would like to meet with the applicants and City prior to determination to better understand the detailed design and consider possible changes to ensure that any additional harm to OUV is avoided or minimised, by using a different palette of materials and/or architectural treatment. It would not be supported that the detailed design of this aspect of the proposals would be resolved post determination via conditions.

#### Recommendation

Historic England continues to object to these proposals. In addition to the base of the building requiring further alterations to avoid and minimise harm to highly significant listed buildings, it is recommended that further discussion regarding the top of the proposed building is required in order to minimise harm to the Outstanding Universal Value of the Tower of London World Heritage Site and meet policy requirements.

The City should take these representations into account and seek amendments, safeguards or further information as set out in Historic England's advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

#### Further representation

A further representation was submitted by Historic England on 19 June 2024 in conjunction with the additional information that was submitted. The comments should be read against previous advice.

Historic England are thankful of the agreement to the request for clarifications and changes to the detailed design of the crown of the building, as per our most recent letter (dated 07 June 2024).

Further information has now been provided and the following advice is offered to assist with determining the application.

#### Historic England Advice

The proposed development would still seriously degrade the scale and character of the public realm around the site. It would cast the surrounding streets into greater shadow and encroach on three buildings of exceptional significance, namely the churches of St Andrew Undershaft and St Helen's Bishopsgate, and Lloyd's building. The proposals do not represent a contextual design as policy and the quality of the environment demands. We continue to object to the application on this basis.

In the last letter further clarification was sought along with changes to the revised detailed design of the crown of the building. The design team has responded with further information on the potential visual impacts of the design, alongside subtle changes to the colouration of the proposed materials which might mean that they appear slightly less stridently in views of the Cluster.

Historic England welcome the direction of travel, but consider that the proposed development would continue to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, as set out in our previous response. While Historic England do not formally object on World Heritage grounds, they are seriously concerned about the detailed design, which seeks to draw attention to the top of the building, at the expense of the Tower's own prominence.

Historic England intend to share their advice with the relevant international bodies. The concerns will also be reported in the State of Conservation Report, requested by UNESCO because of their concerns about the impact of development in the setting of the World Heritage Site on its Outstanding Universal Value.

The harm to the World Heritage Site would be simple to minimise through minor changes to the design, which more palpably tone down proposed colour and reflectivity of the cladding materials, and with an external lighting strategy that would not accentuate the impact of the necessary aviation lights. Historic England urge these amendments to be requested before the application is determined. Historic England do not think that this issue can be resolved through reserved matters.

#### Recommendation

Historic England objects to the application on the grounds of the harmful impact on the highly graded listed buildings adjacent to the development site. In addition, Historic England raise serious concerns about the harmful impact on the Tower of London World Heritage Site, which could be greatly reduced with minor changes, and urge the City to seek amendments to achieve this.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form, please treat this as a letter of objection, inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

**Officer response: The matters in the Historic England objections are addressed in the Tall Building, Architecture, Urban Design and**



	<p><b>Public Realm, Heritage and Strategic Views sections of this report.</b></p>
<p>Twentieth Century Society (letter dated 26 February 2024)</p>	<p>The society strongly objects to the proposed demolition of 1 Undershaft, which should be identified as a Non- Designated Heritage Asset (NDHA).</p> <p>Significance</p> <p>The Aviva Tower was built in 1964-70 by the architects Gollins, Melvin, Ward and Partners (GMW) to house the headquarters of the Commercial Union Insurance Company. GMW built the tower alongside their 122 Leadenhall Street (since demolished), which accommodated the Pacific and Oriental Steam Navigation Company, and the two shared a public piazza.</p> <p>GMW was a major architectural practice who perfected the art of American curtain-walled architecture in 1960s England. Listed works by GMW include the exceptional Grade II* library (1959) and arts tower (1962-5) at the University of Sheffield, and their Grade II former Wreake Valley Community College (1967-71) in Leicester.</p> <p>When constructed, Aviva Tower was widely published and appreciated, seen as setting a new standard for office design. Architectural critic J.M. Richards wrote in <i>The Times</i> of the delivery of ‘curtain-walled office blocks as stylish as the best in America.’ <i>The Architects’ Journal</i> described the visual ‘<i>tour de force</i> of a columnless, glass-enclosed lobby at piazza level.’ Architectural writer Kenneth Allinson has since reflected on the international significance of the building in popularising the piazza-and-tower system. In 1970 the design was awarded the Structural Steel Design Special Award and the scheme attained the Civic Trust Award for Townscape and Design Co-ordination.</p> <p>Two structural techniques are applied to create the distinctive architectural character. Firstly, the</p>

suspended structural system allows lower floors to hang from the top floor and service floor at the centre. This opens up lower levels – and particularly the ground floor, which leads onto the piazza. Secondly, the continuous glass curtain wall extends across the tower, showing significant inspiration from Modernist pioneer Mies van der Rohe – the practice’s inspiration, too, for their Grade II\* arts tower in Sheffield. As the architectural historian and *The Buildings of England* author Nikolaus Pevsner considered, ‘nor do its [Aviva’s] qualities seem to me inferior to Mies’s own buildings.’

The design is also of historical significance as a rare survivor of the 1960s City of London fabric, linking to the City’s post-war commercial boom. It has since been at the heart of historical events, most notably surviving an IRA bomb in 1992. The building subsequently featured in Patrick Keller’s 1994 film, *London*. As a result of bomb damage, the building was reclad with toughened, double-glazed glass. While reclad, its architectural character remains much as it was. As Kenneth Allinson has considered, the building remains architecturally ‘one of London’s more elegant tall buildings, even as reclad (much as before).’ The event itself, and the building’s recladding as a result, is part of its history and the broader recent history of this part of the City of London.

#### Assessment

As noted by the applicant, the Aviva Tower was turned down for listing and issued a Certificate of Immunity (COI) from listing which lasts until 2027. This decision was largely based on the extent of alteration to original fabric mostly as a result of the IRA bomb, which meant that the building just fell short of the extremely high bar for listing commercial buildings of this date. As John Allan notes in *Revaluing Modern Architecture: Changing Conservation Culture* (2022) the entire 20th century accounts for just

3.2% of all listed buildings in England and only 0.2% relates to buildings built after 1945. While unlisted, the building nonetheless has clear heritage significance as an important surviving example of the City of London's pioneering 1960s skyscrapers, designed in the then fashionable 'Miesian' mode by a major post-war architectural practice, and one which survived the devastation of the IRA bombing in the 1990s. The building clearly meets the criteria for identification as a Non-Designated Heritage Asset and urge the City to recognise the building as such. Policies at paragraphs 195, 203 and 209 of the NPPF apply.

Paragraph 157 of the NPPF should also be heeded. "The planning system should support the transition to a low carbon future in a changing climate [...] It should [...] encourage the reuse of existing resources, including the conversion of existing buildings".

The application would result in the complete demolition of the Aviva Tower, an iconic, historically important and irreplaceable building in the City. If it were to be an NDHA (which as stated above the Society believes it should be), then the assessment of scale of loss would be the highest level of loss as the entire building would be destroyed. We understand that the building is structurally sound and capable of adaption for continued use. With this in mind, there should be a strong presumption in favour of repurposing and reusing the building. Options for its retention do not appear to have been properly considered. As such, we maintain that there is no compelling justification for demolition.

The demolition of the building is also not necessary to deliver the few public benefits offered by the proposed office-led development – such benefits (such as the provision of public viewing platforms, public amenity and education and exhibition space, and public realm improvements) could be delivered by a scheme that retained and adapted the existing building.

	<p>To summarise, the Society strongly objects to the loss of the Aviva Tower, which should be identified as a Non-Designated Heritage Asset, and we urge the City to refuse planning permission.</p> <p><b>Officer response: The matters raised are addressed in the Heritage Section of this report, under Direct Impacts and Non-designated heritage assets. The public benefits assessment is set out in the Assessment of Public Benefits and paragraph 208 NPPF Balancing Exercise section of the report.</b></p>
<p>Historic England, Greater London Archaeological Advisory Service (letter dated 13 February 2024 and email 24.05.2024)</p>	<p>The proposed development is in an area of archaeological interest.</p> <p>The desk based assessment has indicated a potential for surviving Roman features and also, specifically in the north-east of the site, remains relating to the former medieval churchyard and Close of St Helen's which previously appears to have extended into the site. A good potential for medieval burials is also present.</p> <p>Although extensive basements are present across the majority of the site, there are two areas in the north-east and the west that are outside the current basement but will be incorporated into new basements. These new areas of excavation will have a high impact on archaeological remains. All archaeological remains within the current basement will have been removed already given the extensive depths.</p> <p>The development could cause harm to archaeological remains and therefore field evaluation is needed to determine appropriate mitigation – these would be secured by condition. Conditions are recommended relating to a written</p>

	<p>scheme of investigation and details of foundations and piling configuration.</p> <p><b>Officer Response: The recommended conditions are included in the conditions schedule. A full assessment of the archaeological implications of the proposal are set out in the archaeology section of this report.</b></p>
<p>Surveyor to the Fabric St Paul's Cathedral (letter dated 02.04.2024)</p>	<p>Chapter offers 'no objection' as the formal response based on the following understanding and considerations:</p> <p>Consultation To Date We thank the project team for engaging in pre-application consultation in a helpful and constructive way including a meeting in July 2023. Dialogue leading up to the meeting was also helpful, meaningful and purposeful.</p> <p>Comment on the Proposals It is understood that the height of the new proposals has increased from that previously consented, the revised scheme does not exceed the height originally proposed as part of the original planning application. Given the location of the building in the cluster, and the promise that this building alone would be the tallest amongst the new developments in the City, the Cathedral did not perceive a concern with the original height.</p> <p>We recall issues with the 20 Bishopsgate construction and them having to reduce the height of their consented building because of buildability issues with cranes infringing CAA limits. We have not yet heard confirmation that this technical concern has been addressed for the new Undershaft scheme: would it not be valuable to committee to have firm reassurance on this point.</p>

**Officer Response: Construction details would be resolved post consent should planning permission be granted. Multiple aviation conditions are recommended requiring details of crane location and operation.**

If we had prior concern over the revised proposals, this stemmed from the potential of an impact to the very sensitive setting of St Paul's - including views to and around the Cathedral - which might have been impacted by the enlarged massing of the scheme, especially as viewed from the Processional Way (Fleet Street and Ludgate Hill).

The indicative studies that the team prepared for pre-application discussion and the virtual walkover provided at the meeting indicated that the scheme would be entirely hidden from view behind existing development. Given the harmful changes wrought by schemes such as 6-8 Bishopsgate (and the consent for 100 Leadenhall), it is of the highest importance to recognise that further visual and heritage impact to this highly sensitive approach and route through the City would be unacceptable. We welcome the understanding that this sensitivity appears to have been acknowledged by the proposed design as a form of embedded design mitigation.

Reading the extensive application materials, it would appear that while there are changes to the appearance of the scheme when compared to the consented (i.e. height and massing), notwithstanding these changes would not depart from our comments previously offered in relation to the consented scheme. The Chapter does not wish to comment on other aspects of the scheme.

**Officer response: The comments from the Surveyor to the Fabric of St Paul's Cathedral are noted.**

<p>London City Airport (letter dated 25.01.2024 and letter dated 15.05.2024)</p>	<p>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 is of a mind to approve this application, then London City Airport suggests conditions relating to the following are applied to any approval:</p> <ul style="list-style-type: none"> <li>• Radar mitigation</li> <li>• Construction methodology with specific reference to cranes and scaffolding</li> <li>• Instrument Flight Procedures (IFPs)</li> <li>• Building obstacle lights</li> </ul> <p>This advice was reiterated as part of the regulation 25 consultation.</p> <p><b>Officer Response: The recommended conditions have been included in the conditions schedule.</b></p>
<p>Heathrow Airport (letter dated 26.01.2024 and 15.05.2024)</p>	<p>The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria. Heathrow Airport request for the following conditions to be applied to any subsequent planning permission:</p> <ul style="list-style-type: none"> <li>• H10 Radar Mitigation</li> <li>• Instrument Flight Procedures Impact</li> </ul> <p>Heathrow Airport would need to object to these proposals unless the above conditions are applied to any planning permission.</p> <p>Informatives are recommended covering CAA Building Notification and Crane Obstacle Lighting.</p> <p>The above advise was reiterated following the Regulation 25 re-consultation.</p>

	<p><b>Officer Response: The recommended conditions and informatives have been included on the conditions schedule.</b></p>
<p>London Gatwick Airport (letter dated 03 June 2024)</p>	<p>The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria. There is therefore no objection to the proposal.</p>
<p>NATS Safeguarding Office (letter dated 21 February 2024 and email dated 14.05.2024)</p>	<p>NATS (En Route) plc (NERL) has carried out an assessment of the proposal and considered that the development could cause an unacceptable impact on its operations and infrastructure.</p> <p>NERL expects the proposal to cause a degradation to its PSR/SSR radar located at Heathrow airport (known as 'H10'). NERL anticipates an impact in the form of a loss of low-level radar cover, as well as the generation of false aircraft targets due to signal reflections from the building.</p> <p>The potential also exists for an impact on air traffic operations in the London Terminal Manoeuvring Area (TMA) should any construction equipment rise above the height of 309.6m AOD causing an infringement of airspace. Following extensive work and engagement with affected stakeholders NERL is content that a technical solution has been identified allowing to mitigate the impact of the proposal.</p> <p>While no agreement is in place yet, through engagement with the Applicant, NERL is satisfied there are the means to erect the building without impacting local airports or London airspace. A procedure for coordinating the erection of tall cranes, similar to that used for other City schemes, is being developed by the Applicant in collaboration with the affected aviation stakeholders. The procedure, will ensure that construction activities with the potential to affect aviation have been assessed, approved and</p>



	<p>implemented, and include any contingency measures that might be required.</p> <p>While the details surrounding mitigation and construction are yet to be finalised, as with the previous planning application for the site, NERL is confident that with suitable measures in place, the scheme can be allowed to proceed without it compromising its infrastructure and operations.</p> <p>Should the City of London be minded to grant the scheme, NERL would not raise any objection provided that the standard aviation planning conditions are imposed on any consent.</p> <p>NATS Safeguarding confirmed that their position remains unchanged following the re-consultation and submission of additional documentation.</p> <p><b>Officer response: The relevant conditions have been included on the conditions schedule.</b></p>
<p>Environment Agency (letter dated 26.01.2024 and 21.05.2024)</p>	<p>Based on the information provided the application raises no environmental concerns. The Environment Agency therefore have no comments on the application. Advice is given in respect of water resources and water efficiency.</p> <p><b>Officer Response: The Environment Agency's advice in respect of water resources has been passed to the applicant.</b></p>
<p>Natural England (letter dated 19 February 2024 and 21 May 2024)</p>	<p>Based on the plan submitted, Natural England considers that the proposed development would not have significant adverse impacts on statutorily protected nature conservation sites or landscapes. No objection.</p>
<p>Lead Local Flood Authority (memo dated 12 February 2024)</p>	<p>The Lead Local Flood Authority has reviewed the Outline Drainage Strategy for the application and conditions are recommended relating to SuDS and measures to prevent flooding.</p>

	<b>Officer Response: The recommended conditions have been included within the conditions schedule.</b>
Transport for London (relating to Crossrail Safeguarding Direction letter dated 26 January 2024 and 17 May 2024)	The application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction. Therefore, Transport for London has no comments on the application in this respect.
Transport for London (Infrastructure Protection, letter dated 21 May 2024)	<p>London Underground/DLR Infrastructure Protection has no comment to make on this planning application.</p> <p>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.</p>
Active Travel England (email dated 29 January 2024 and 16 May 2024)	<p>In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time. However, ATE and TfL have jointly produced a standing advice note, which recommends that TfL is consulted on this application where this has not already occurred via a Stage 1 referral to the Mayor of London.</p> <p><b>Officer Response: TfL and the Mayor of London have been consulted on the application.</b></p>
Thames Water (letter dated 30 January 2024)	<p>Waste Comments</p> <p>The proposal should incorporate protection to the property to prevent sewage flooding, on the assumption that the sewerage network may</p>

	<p>surcharge to ground level during storm conditions.</p> <p>Measures should be taken to minimise groundwater discharges into the public sewer.</p> <p>The proposed development is located within 15 metres of a strategic sewer. A condition is recommended requiring a piling method statement.</p> <p>There are public sewers crossing or close to the site. Risk of damage to the sewers needs to be minimised.</p> <p>Petrol/oil interceptors should be fitted in all car parking areas. Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator.</p> <p>Water comments</p> <p>Thames Water are currently working with the developers to identify and deliver the off site water infrastructure needs to serve the development. A planning condition is recommended to ensure that the delivery of the development does not outpace the delivery of essential infrastructure.</p> <p>The proposed development is located within 15m of a strategic watermain. A piling method statement should be required by condition.</p> <p>An informative is recommended in respect of minimum pressure.</p> <p><b>Officer comments: The piling method statement conditions and water pressure informative are recommended in the conditions schedule.</b></p>
<p>City of Westminster (letter dated 09</p>	<p>The City Council has considered the proposals and does not wish to comment.</p>

<p>February 2024 and letter dated 22 May 2024)</p>	
<p>London Borough of Camden (letter dated 20 March 2024)</p>	<p>No objection to the proposal.</p>
<p>London Borough of Tower Hamlets (letter received 11 June 2024)</p>	<p>“The Council’s main consideration in respect of this application is the impact on the setting of the Tower of London World Heritage Site. Development within the existing tall building cluster of the City of London is clearly visible within the setting of this World Heritage Site as seen in the LVMF view 10A.1. The impact on the Tower must be given special attention commensurate to its important designation.”</p> <p>The Council’s response to the current application relates to the same singular issue of the proposed development’s impact on the setting of the Tower of London World Heritage site (the Tower).</p> <p>The differences between the 2016 proposal (2019 consent) and the current proposal relate to land use, layout at street level and interaction with public realm, massing of the tower and provision of outdoor amenity space, and an increase in height from 72 storeys to 73 storeys.</p> <p>In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment, the impact of the proposed building on different views of and from the Tower, is demonstrated.</p> <p>In View 22, it is shown that in the proposed scenario, the very top element of the proposed building would be prominent and visible above the roof parapet of the Grade I listed Chapel Royal of St. Peter ad Vincula, the background of which is currently unobstructed by development. Were the proposed building to decrease in height</p>

	<p>from the 72 storeys proposed in 2016, this could be avoided in View 22.</p> <p>The proposed building would result in the massing of the eastern cluster of buildings in the City of London being unified into a more solid mass with increased visual presence. In multiple views to and from the Tower, there is currently a prominent space between buildings that allows light and views of the sky to penetrate and break up the bulk and presence of the tall buildings of the cluster. The proposed development directly behind the Tower would affect setting of the Tower, causing some additional harm to its significance. This is clearly shown in views 18, 19 and 21 and 25 and to a lesser extent in view 24.</p> <p>In views 20 and 23 it is shown that the proposed building would result in a further increase of built form in the backdrop of the Tower causing some additional harm.</p> <p>It is considered that the proposed building will cause harm to the setting of the Tower of London World Heritage site, and in some instances this harm is possible to avoid.</p> <p><b>Officer response: These points are addressed in the Design and Heritage sections of this report.</b></p>
<p>London Borough of Richmond Upon Thames (letters dated 30 January 2024 and 26 February 2024)</p>	<p>An initial letter was received on the 30th January 2024. The letter sets out the context in respect of King Henry VIII's Mound to St Paul's Cathedral as a strategic view.</p> <p>It is clear that the proposed scheme will not be readily visible from the Mound as it would be obscured by vegetation. Whilst the proposed building is not shown to be readily visible within the Protected Vista as it would be screened by vegetation, the view post tree pruning / seasonally is likely to be more obvious. It is important that the limitations/restrictions imposed</p>

by both the Secretary of State and the Mayor of London are strictly adhered to and the impacts from Kings Henry's Mound to St Pauls Cathedral are fully considered in the final assessment and as part of a planning balance. The Corporation should take adequate steps to determine how the proposed development would when completed impact on the background of the view from King Henry VIII's Mound to St Pauls Cathedral and take all necessary steps and precautions to ensure that this is in accordance with the limitations imposed.

The Boroughs Urban Design Officer has been consulted and advised: "According to the Design and Access Statement the scheme aims to deliver the tallest building in the City of London, at the centre of the Eastern Cluster. The 74 storey building proposed is only slightly taller than the next tallest in the Cluster. It is a reworking of a previous approval for 73 storeys, the proposed building now having stepped massing.

The proposed building does not impinge on the Landmark Viewing Corridor or the Wider Setting Consultation area. From the vicinity of KH8 Mound, it is some distance from the Wider Setting and would be obscured by dense vegetation. The visualisations are given under ES vol.11.THVIA pt.22.

It is likely that there would be some visibility from elsewhere in Richmond Park, in particular from Sawyer's Hill. The contrasting view to the Metropolis from here is part of the established character, and the proposed building would form part of a cluster of very tall buildings in the distance around 10 miles away. The view from Sawyer's Hill is identified in the draft Local Views SPD- View E3.3. 'Long- distant view ...to the ever-changing city skyline'.

The proposal would not be visible within the threshold and would not have a harmful impact on LVMF and should not have a harmful impact on other views, nor on the significance of the Registered Park & Garden, conservation area and MOL”.

This borough acknowledges that the impact of a development of this scale on the wider cityscape in the heart of the city will by its very nature and position be the subject of intense scrutiny and subject of full and thorough consideration by both internal, external and statutory experts in conservation, heritage and design as part of the planning process and also by the Mayor of London and that the impacts on the view will need to be assessed as part of a planning balance.

It is clear that the Corporation are aware of their statutory duties in regards and the importance of the view in their assessment which has also been made clear to them by statutory bodies, notably Historic England. On that basis it is considered that the Borough whilst raising no specific objection, should do so with the proviso that the impact of the proposed development in the background of the view from Kings Henry’s VIII’s Mound to St Pauls, which will be incremental and permanent must be given due consideration as part of any planning judgement and as part of the overall planning balance and that the Corporation take adequate steps to determine how the proposed development would when completed impact on the vista, in accordance with the limitations imposed. A recommendation of no objection, with provisos is suggested with the following informative added to the recommendation advising:

*The Proposed development will not be readily visible from the protected view from King Henry's VIII's Mound to St Pauls Cathedral, which is subject to a Direction made by the Secretary of*

*State as part of strategic guidance and is one of eight such strategic views of St Paul's across London. The King Henry VIII's Mound to St Paul's is also listed within the Mayor of London - London View Management framework, within the Richmond Adopted Local Plan, within the Royal Parks' Management Plan (2019 - 2029) and under the Richmond Park Conservation Area. It is also clearly referenced in Richmond's Consultation Draft Local View Supplementary Planning Document as View E3.1.*

Whilst the proposed building is not shown to be readily visible within the Protected Vista as it would be screened by vegetation, the view post tree pruning / seasonally is likely to be more obvious.

It is important that the limitations/restrictions imposed by both the Secretary of State and the Mayor of London are strictly adhered to and the impacts from King Henry VIII's Mound to St Pauls Cathedral are fully considered in the final assessment and as part of a planning balance. The Corporation should take adequate steps to determine how the proposed development would when completed impact on the background of the view from King Henry VIII's Mound to St Pauls Cathedral and take all necessary steps and precautions to ensure that this is in accordance with the limitations imposed.

Recommendation: No objection, subject to provisos.

A subsequent letter was received dated 26 February 2024 stating:

That the City of London be advised that the London Borough of Richmond upon Thames raise no objection to the proposal.



Royal Borough of Greenwich (letter dated 23.04.2024)	Raise no objection.
London Borough of Lambeth	Raises no objection.
District Surveyor	The fire statement has been reviewed and there is no further comment. The proposal is considered to comply with policies D5 and D12 of the London Plan.
Environmental Health (Memo dated 08 March 2024)	<p>Conditions are recommended concerning noise, extraction and ventilation.</p> <p><b>Officer Response: The recommended conditions have been included in the conditions schedule.</b></p>
Air Quality (Memo dated 08.05.2024)	<p>The proposed development will be car free and heating will be through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment, and there are mitigation measures set out within the Air Quality Positive Assessment. There are impacts upon NO2 concentrations predicted during the construction phase, but not during the operational phase. Should the development be approved conditions are recommended covering any generators, combustion flues, Non-Road Mobile Machinery Register and NO2 monitoring strategy.</p> <p><b>Officer Response: The recommended conditions have been included in the conditions schedule.</b></p>
City of London Access Group (meeting 12 January 2024)	<p>The scheme was presented to the City of London Access Group. A summary of their comments is as follows:</p> <ul style="list-style-type: none"> <li>• Public realm materials need to be non slip.</li> <li>• Bollards need to be spaced to allow for mobility scooters to pass through.</li> </ul>

	<ul style="list-style-type: none"> <li>• It was queried whether the lifts would be fireproof and whether in the case of an emergency certain lifts could be designated for disabled people.</li> <li>• Wayfinding is needed within the building.</li> <li>• More disabled parking should be provided along with on street drop off and pick up points.</li> <li>• The proposed cycle entrance is in an area that would be well used by pedestrians. There could be potential accidents between pedestrians and cyclists.</li> <li>• Accessible cycle parking should be proposed.</li> <li>• Accessible toilet design needs to be given careful consideration.</li> <li>• At detailed design stage high quality glazing manifestation needs to be incorporated into the design of the scheme. Careful consideration needs to be given to internal furniture and reception/concierge desks.</li> <li>• When choosing planting, consideration should be given to visually impaired people and hypoallergenic species.</li> <li>• A range of different designs of seating should be incorporated into the public realm.</li> </ul> <p><b>Officer response: These matters are addressed in the Access and inclusivity section of this report. The detailed design of the public realm and the scheme from an accessibility perspective would be managed through the Inclusion and Accessibility, Access Management Plan, Landscaping and Public Realm conditions.</b></p>
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### Letters of Representation

76. Two letters of support were received from members of the public on the 2023 scheme, the content of which can be summarised as follows:

- The plans for 1 Undershaft are supported as they would deliver significant improvements to the area, including St Helen's Square.

- The Eastern Cluster requires a pinnacle less broad than 22 Bishopsgate, which the latest design at 1 Undershaft stands to provide: Being slightly taller than the consented tower (16/00075/FULEIA), it would create a more distinguishable summit beside 22 Bishopsgate's wide roof when seen from Primrose Hill, Greenwich Park or Canary Wharf. The excessive breadth of the cluster's current apex would thus be lessened from such vantage points.
- This building would add much-needed density and variety to the northerly and southerly views unaffected by the above problem. Consider, for example, the gap it would fill in the cityscape visible from the Thames Path by London Bridge Pier.
- Recent complaints that this proposal is insufficiently bold or imaginative are naïve. The exceptional cost of land and financing in the City render it increasingly unviable to erect the tapering, spire-topped forms commonly demanded. The design has been Value Engineered to use a larger footprint than its predecessor, but such additional mass is constrained to its lower floors and does not affect the vital soar of its crown. In today's economic circumstances, possibly present the following choice concerning this site: to build the skyscraper currently proposed, or to build nothing. For the sake of London's skyline, the former is recommended.

77. Ten letters of objection were received from members of the public on the 2023 Scheme, in addition to objection from the following. The content of the objections is summarised in subsequent sections of this report and the representations are appended in full to this report:

- CC Land
- Universities Superannuation Scheme Ltd (USS) advising in respect of Fitzwilliam House, 10 St Mary Axe which forms part of their commercial portfolio
- Stone Real Estate Limited who act as the appointed Development Manager for Baltic Exchange Holdings Limited who own the long leasehold interest in The Baltic Exchange, 38 St Mary Axe.
- London Oriental
- The Wardens and Society of the Mistery or Art of the Leathersellers
- Lloyds

78. The Churches of St Helen's Bishopsgate and St Andrew Undershaft have submitted a letter seeking to withdraw an earlier objection.

79. The content of these letters is summarised in the tables below:

<b>Objections from members of the public</b>
<b>Size and Design of the proposed building</b>

- Construction of the proposed size is not necessary and represents - overdevelopment.
- There are sufficient skyscrapers within the City and a number of them are not fully occupied.
- The scale of the building is overwhelming. It is too tall, of a chunky design and has no finesse.
- Foster (Gherkin), Rogers (Cheesegrater) and Piano (Shard) have all designed innovative buildings that are admired around the globe and have come to signify London. The proposals show a monolithic staggered tower block which is bulky and lacking any semblance of what a modern dynamic form might resemble. What is proposed will dominate and ruin the skyline of London and dwarfing the best examples of modern architecture. The scheme should be rejected and the Architects asked to resubmit a quality Architectural Design. The developer is trying to get a much saleable area for as little money as possible and is not interested in creating a loved addition to the skyline. If the proposal needs to be square take 33 stories off its height so that it does not obscure other buildings.
- The tower at street level is a mess, the podium will overshadow most of the square only offering a small halo of light. The design is far from what you would expect the tallest building in a globally city to exemplify.
- The crown is the defining feature of a landmark, its importance in grabbing attention and visual impacts cannot be understated.
- The proposal looks like it has been value engineered and has not been designed to respect London's ancient history.
- The building has been discussed online, where the majority of feedback is negative. There should be an aspiration to have a better design on a site of this significance.

**Officer response: The points raised are addressed in the Design and Heritage sections of the report.**

### **Sustainability**

- The existing building is distinguished and would be capable of renovation to modern standards.

**Officer response: This is addressed in the Sustainability section of this report.**

### **Loss of the area in front of the existing building**

- It is understood that ward councillors have an issue with the revised scheme.

- The 'plaza' area is precious given how few green areas and trees there are in the east of the City, and this proposal eats into that area.
- If workers are to be attracted back to the City they need accessible areas where they can pause.
- A private sky garden does not offset the loss of public space.

**Officer response: This is addressed in the Public Realm section of this report.**

### **Podium Garden**

- Having to que, go through security and take a lift to the podium garden removes the spontaneity of going for a walk or taking some fresh air. Existing roof top terraces are mostly visited by tourists/out of town visitors as workers and residents don't have the inclination to go through such measures.
- The protruding balcony is grossly out of scale with surroundings and will block a significant portion of sky. Currently St Helen's Square benefits from 30% visible sky. The Environmental Impact materials do not state how much sky would be visible after the proposed development, but it would be clear it would be very much reduced. It would have a dark gloomy underside which would be difficult to clean. The balcony would harm the quality of public open space at St Helen's Square.

**Officer response: These points are addressed in the Public Realm, Public Access and Inclusivity and Daylight, Sunlight and Overshadowing sections of this report.**

### **Comparisons with the consented scheme**

- There are more buildings going up and it will make the City seem like a continual building site which is not a pleasant experience, particularly for those who use the City on a regular basis.

**Officer response: Impacts of construction would be managed through Construction Management Plans and Schemes of Protective Works which would be secured by condition.**

### **Impact on Undershaft**

- Undershaft is currently quite wide, it has a broad pavement with seating and public art. Glimmers of sunlight are visible. In the

submitted proposals the width of Undershaft would be considerably reduced creating a dark canyon with no space for art or seating. The quality of the public realm would be considerably diminished.

**Officer response: This is addressed in the Urban Design and Public Realm including Impact on Open Space section of this report.**

80. Objections from third party organisations to the original 2023 scheme:

**Lloyds**

- There is concern over the loss of open space that would result from the proposed development. The current open space is an important convening space.
- The compensatory offer of the public amenity space on the 11th floor would not address this and the necessary security requirements would make the level 11 space significantly less attractive than the space that it would replace
- It is urged that the plans are rejected.

**Officer response: The impact of the scheme on the open space is assessed in the Design and Public Realm section of this report.**

**Stone Real Estate Limited**

There is concern that the proposed development would see a significant reduction in light amenity at The Baltic Exchange and would represent an infringement on Right to Light. It is asked that the development proposals are reduced in height, bulk and mass so as to avoid any infringement.

**Officer response: The Daylight and sunlight impacts of the scheme are assessed in the Daylight, Sunlight and Overshadowing section of this report. For the reasons set out in the relevant section of the report commercial properties are not considered as sensitive receptors and are not subject to the same daylight/sunlight test requirements as residential properties. Rights to Light are not a material consideration in the determination of planning applications.**

**USS**

Object to the application. Fitzwilliam House is located immediately east of the application site and is in office use. At its closest distance Fitzwilliam House is 17.9 m to the proposed scheme.

The objection sets out the differences between the extant consent and the proposed scheme in respect of height, size, quantum of public realm, features of public realm and design/massing.

The grounds of objection are as follows:

## **Public Realm**

The proposed scheme reduces the quantum of public realm at ground level in comparison to the extant consent.

The Local Plan (2015) sets out that the City is defined by the GLA as an area of 'deficiency in access to nature'. Paragraph 3.19.2 of the City of London Local Plan ('Local Plan') states that: 'Providing enough publicly accessible open space to meet the needs of the daytime population for both recreation and workspace in the densely developed City has long been a challenge (...) Publicly accessible open space provision needs to increase, especially in the eastern sector of the City, where current provision is lowest and the greatest increase in workers and density of development is expected.'

The Eastern Cluster, in which the proposed scheme is located, is noted within the City of London Open Space Strategy SPD (2015) as an area where there is 'particular need for public open space'. The SPD further notes that the 'Eastern Cluster areas have the lowest percentages of open space but face pressure from increasing employment growth.' In light of this, the SPD aims to 'increase the amount of high quality public open space in order to maintain the existing City-wide ratio of 0.06 ha per 1,000 weekday day-time population and focus efforts on creating additional public open space in the east of the City, particularly in the Eastern Cluster and the Aldgate area.'

This is reflected in Local Plan Policy CS19: Open Spaces and Recreation which seeks to increase the amount and quality of open spaces and green infrastructure while enhancing biodiversity. Part 1 echoes the SPD to maintain a ratio of at least 0.06ha of high quality, publicly accessible open space per 1,000 weekday daytime population and includes 'protecting existing open space, particularly that of historic interest, or ensuring that it is replaced on redevelopment by space of equal or improved quantity and quality on or near the site' (CS19 Part 1i). Part 3 seeks to increase the biodiversity value of open space. Local Plan Policy DM19.1 Additional open space, sets out that major commercial developments should provide new and enhanced open space where possible. This should be publicly accessible, provide a high-quality environment, incorporate soft landscaping and SUDS, have regard to biodiversity and the creation of green corridors. The proposed scheme results in a loss of public realm at ground floor and therefore contradicts the strategy set out within the SPD.

In reducing the public realm, the proposed scheme does not cater to the additional pedestrian trips to the site which would be generated. Nor is there

any mitigation in this regard. The extant 2019 consent provided mitigation for these additional trips as it was considered:

*'the new, step free, public realm would create and cater for important pedestrian desire lines that are currently unavailable or indirect thus enabling easier pedestrian movement around and through the site. As a result, it is envisaged that the pedestrian trips generated by the development and the nearby committed developments, would not have a significant impact on the pedestrian network surrounding the proposal site.'*  
(Source: Paragraph 436 of Committee Report 16/00075/FULEIA).

The proposed scheme does not mitigate these impacts, in that it does not provide enough public realm at ground floor level, and therefore fails to comply with Local Plan Policy DM16.2 (Pedestrian Movement). The Policy advises that the loss of pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided. Paragraph 135 of the NPPF (2023) also states that planning decisions should ensure developments 'optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks.' In lieu of the public realm at ground level, publicly accessible floorspace is instead proposed at level 11 and at levels 72-73 through the creation of a public viewing gallery. This approach is contrary to Local Plan Policy CS14 (Tall Buildings) which states tall buildings should provide high quality public realm at ground level (as per the extant consent).

It is unclear whether additional security checks would be needed to access levels 11, 72 and 73 and whether tickets would be required prior to accessing the space. The Planning Statement, submitted in support of the proposals, states that a Public Realm Management Plan would accompany the application. However, this document is not available to view on the City's Planning Application Register. USS request that this document is publicly shared to understand how access to level 11 is limited, what restrictions are in place for levels 72-73 and what viewing gallery offers that can't be provided at ground floor level.

Locating public realm on level 11 automatically reduces the accessibility of the space in comparison to public realm at ground floor level. Having to access the space via a lift and potentially security puts hurdles in place to access and for pedestrians to know it is available. This results in it not being accessible to workers and users of the City. The approach is also at odds with Local Plan Policies DM 10.8 (Access and Inclusive Design) which requires environments to be convenient, welcoming and inclusive and



Policy CS19 (Open Spaces and Recreation) which looks to improve access to new and existing open spaces.

The Planning Statement notes that with the S106 Agreement will likely include an obligation relating to Public Access and a Terrace Management Plan. Having an extensive management plan for the use of public space also fails to accord with emerging Local Plan Policy 10.4 (Public Realm) as the space does not provide unrestricted access which it does at ground. Policy 10.4 states 'it should be ensured that public access to the space is maximised and the rules governing the space are minimised to those required for its safe management, in accordance with the Mayor of London's Public London Charter.'

This does not accord with the Local Plan Policy CS7 (Eastern Cluster) which states that development should look to enhance public realm for pedestrians, providing new open and public spaces.

In the light of the above, the approach to public realm in the extant (2019) consent is a preferable solution. The public realm proposed as part of the extant consent would draw people to the area and continue to provide a well needed public benefit to the city which serves the needs of the people as noted in Paragraph 122 of the Committee Report: 'A key element of the public square is the Lower Court, a sunken oval in the centre of the square which is intended to be a vibrant hub with the possibility of a skating ring in winter, street markets, public art or a performance space for music etc. There is no such focus point within the City cluster of tall buildings and the space has the potential to provide that focus.'

The approach as set out in the extant consent would also contribute to the 'Key Areas of Change: City Cluster' (2021) prepared by the City of London which states: 'High quality public realm projects to improve pedestrian connectivity and providing a high-quality public space will make a strong contribution to the dynamism of the City Cluster. The key pedestrian route between St Mary's Axe and Leadenhall Street in particular creating a pedestrian core around key destination points.'

**Officer response to comments: These matters are addressed in the following sections of the report – Urban Design and Public Realm including impact on Open Space, Public Access and Inclusivity, Security and Highways and Transportation.**

**Design – Massing**

The proposed scheme is significantly larger than the extant 2019 consent, an increase of 31,266 sq m GIA. The increase in floorspace is predominantly at the lower levels (referred to within the submitted documents as Zones 1, 2 and 3) which results in the proposed scheme having a greater impact on its surroundings. USS considers that the massing and design of the lower levels of the proposed scheme is not appropriate to the character and setting of the surrounding urban landscape and is too bulky.

The building would be significantly larger than many of its neighbours (aside from 22 Bishopsgate). Local Plan Policy CS10 (Design) and DM10.1 (New Development) as well as emerging Local Plan Policy DE2 (Design Quality) all require development to promote a high standard of design, having regards to their surroundings. These policies note that development must ensure that the bulk, height, scale, massing, quality of materials and detail design of buildings are appropriate to the character of the City and the sitting and amenities of surrounding buildings and spaces. The proposed scheme is contrary to these policies.

Additionally, the proposed scheme includes a projecting podium, which forms a public terrace at Level 11 which is incongruous with the surrounding context. It overshadows the ground floor area reducing natural light to the street surrounding the proposed scheme and limits any views from St Helen's Square. This is not in accordance with Local Plan Policy DM10.3 (Roof Gardens and Terraces) which advises that terraces will be rejected if they impact on views.

USS considers that if the extant scheme were implemented it would be more fitting to the surrounding environment as noted in Paragraph 111 of the Committee Report which states:

'The design approach is simple and restrained, which is considered appropriate given the substantial scale of the building and its impact on the skyline. The tower is of a slender rectangular profile which subtly narrows as the building rises. The intention is to create an elegant, abstract form with a strong verticality to subdue and lighten its impact on the skyline.'

USS therefore objects to the proposal on the grounds that the massing of the proposed scheme is visually obtrusive and does not make a positive contribution to local character and distinctiveness. The application should be refused in line with Paragraph 203 Part C of the NPPF which states that 'in determining applications, local planning authorities should take account of: the desirability of new development making a positive contribution to local character and distinctiveness.'

**Officer Response to Comments: These matters are addressed in the following sections of the report Architecture, Urban Design and Public Realm, Strategic Views and Heritage and Sunlight within the Application Site.**

### **Daylight/Sunlight**

USS is also concerned that the increase in the size and massing of the building will have a negative and adverse impact upon Daylight, Sunlight and Overshadowing.

The extant consent was noted within Paragraph 312 of the Committee Report to already have, in some instances, 'minor adverse effects to some buildings' which would be a breach of planning policy in that tall buildings should not affect their surroundings adversely.

The proposed building which is much greater in size at the lower levels will have a greater impact on daylight and sunlight on the surrounding buildings and open space. This is contrary to London Plan Policy D9 (Tall Buildings) which requires tall buildings to carefully consider the proposed developments impact on daylight and sunlight to ensure it does not compromise comfort and the enjoyment of open spaces. It is also not in accordance with Policy DM10.7 (Daylight and Sunlight) of the Local Plan which states that development should be resisted which would reduce noticeably the daylight and sunlight available to nearby open space.

The Environment Statement Volume I Chapter 12: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare prepared by Aecom sets out the findings of their assessment on the likely significant effects of the proposed scheme. Within this document they assess the impact of the proposed development on a number of properties. Fitzwilliam House is not included within this assessment. Therefore, it cannot be determined how the proposed development impacts daylight, sunlight, overshadowing, light pollution and solar glare.

Whilst it is acknowledged that an office use is not a sensitive use, Fitzwilliam House's proximity to the proposed scheme would warrant it essential that the impact of the proposed scheme on the building is accurately assessed. USS therefore requests that the further assessments are undertaken to fully understand the proposed schemes full impact.

In addition it has been advised by Point 2, Right of Light Surveyors, that whilst it needs to be acknowledged that the Private Rights to Light are not a

planning consideration, it is clear that the Applicant's proposed development will result in not just 'actionable' loss of light within the majority of the rooms within Fitzwilliam House that overlook the Undershaft site, those losses will likely give rise to a prima facie claim for an injunction that will render the development undeliverable.

**Officer Response to Comment: These matters are addressed in the Daylight, Sunlight and Overshadowing sections of the report. Rights to light is not a material consideration in the determination of a planning application.**

### **Heritage**

USS raises concern on how the greater scale of the proposed building in comparison to the extant consent and building will impact on the surrounding

heritage assets. There are a number of heritage assets in close proximity to the proposed scheme. St. Helen's Place Conservation Area is located adjacent to its north, on the other side of Undershaft. The Grade I listed churches of St Helen's and St. Andrew's Undershaft lie immediately north and east of the Site respectively, and the Grade I listed Lloyd's building lies immediately to its south-west.

The Environmental Statement Non-Technical Summary prepared by Aecom, dated December 2023 states that: "The Proposed Development will be visible in the settings of highly graded and strategic heritage assets." It further notes: "There would be no effect on the significance or appreciation of the significance of any built heritage assets identified and scoped into the THVIA, other than the Church of St Andrew Undershaft and the Lloyd's Building for which there would be a minor neutral effect on the ability to appreciate heritage significance."

USS considers that the impact of the proposed scheme on nearby heritage assets as set out within the submission document should be assessed further and peer reviewed to ensure the height, bulk and massing is consistent with Local Plan Policy DM12.1 (Management change affecting all heritage assets and spaces) which notes that development should sustain and enhance heritage assets, their settings and significance. Furthermore, the proposed scheme reduces the public benefits in terms of loss of light, overshadowing, reduction in accessibility and pedestrian access, in comparison to the extant consent, which form a material consideration in the determination of the application by significantly reducing the public realm.

**Officer Response to Comments: These matters are addressed in the Heritage, Public Access and Inclusivity, Daylight, Sunlight and Overshadowing and Assessment of Public Benefits and paragraph 208 NPPF balancing exercise sections of the report.**

### **Summary**

In summary the proposed scheme does not comply with the Development Plan. This is not outweighed by any other material considerations and therefore the planning application should be refused.

**Officer Response to Comments: This matter is addressed in the Conclusion and Overall Planning Balance section of the report.**

### **CC Land**

A covering letter was submitted alongside a 162-page objection report in response to the first round of consultation.

Objection overview taken from the covering letter:

The fundamental objection to the redevelopment plans can be summarised by the resultant loss of St Helen's Square:

1. The loss of its existing character and scale as the primary public open space in the City Cluster.
2. The loss of a unique, unforgettable and internationally significant viewpoint of the City.
3. The loss of much needed respite to the City's workers, residents and visitors.
4. The loss of any beneficial/transformational role St Helen's Square can or could play in successful placemaking for the future City Cluster.

A direct comparison of the 2023 redevelopment plans with the 2019 consent details the disturbing impact the current 1 Undershaft proposals would have upon the surrounding environment, if progressed:

- The largest public open space in the City Cluster, the 2,433 sq m St Helen's Square, is shrunk by 710 sq m (-29.2%) to 1,723 sq m. Only 723 sq m (41.9%) continues to be open to the sky and elements. The 2019 consent would have increased the size and stature of St Helen's Square and remained un-covered.
- The destination sunken garden "Rockefeller" plaza offered as part of the 2019 consent is lost to a lacklustre and poor quality landscape design,

coming at a time when placemaking and bringing as much activity as possible into the streets and spaces of the City is vital.

- The new emphasis on creating a park and public offer in the sky, aims to draw pedestrian activity and visitors away from street level, further reducing its vitality and viability.
- By choosing to project over almost the entirety of St Helen's Square, the new scheme significantly lowers the quality of the environment at street level demoting a vitally important civic area to a secondary and transient space.
- The physical and visual connectivity between two Grade I medieval churches, a substantial heritage benefit of the consented scheme omitted from the 2023 proposals, is also lost.

The proposed scheme would not represent an improvement on the 2019 consent.

Given the deficiency in open space in the Cluster, the City Corporation should not countenance the loss of street level public open space as part of any redevelopment. Preserve and enhance public space must be the key principle.

The assertion that viewing platforms or access controlled public spaces are an adequate replacement for street level public open space is incorrect.

The idea that covering the public realm and the resultant loss of sky will have no effect on the use and enjoyment of the space at street level is falsehood. We know this from direct experience on the Leadenhall Building.

We recognise the significance of the 1 Undershaft site and the role it needs to play in the future of London. CC Land fully support the 2019 consent.

The 2023 redevelopment plans do not comprise the optimum solution for this site. They do not comply with key design and public open space policy objectives or the draft City Plan 2040. There is serious harm to the public realm, townscape and setting of heritage assets. Our representations evidence why and set out where the proposals are not policy compliant.

The materially detrimental impact of the proposals to St Helen's Square and damage to the unique environment surrounding 1 Undershaft is unnecessary and completely avoidable, were the Applicant to adopt a different approach to bulk, massing and aesthetics.

We strongly believe that a beautiful building of outstanding architectural quality, and considerable stature, providing a variety of depth of floor plates,

a range of working and leisure experiences with world class street level public realm, could be created on the 1 Undershaft site. We request that revisions are made to the 2023 redevelopment plans for 1 Undershaft which deliver:

- a) No loss of street level public open space from the existing situation
- b) Preserve and enhance St Helen's Square as a vitally important civic space and focus for placemaking in the City Cluster for workers, residents, and visitors
- c) No harmful townscape or heritage impact
- d) Architectural excellence within the City Cluster

If no material changes are progressed, CC Land believe Officers would be unable to support the 2023 redevelopment plans and the Planning Applications Sub Committee should refuse the application until the material issues outlined in this document are resolved.

**Officer Response to Comments: The key matters raised are addressed in the following sections of this report Architecture, Urban Design and Public Realm, Strategic Views and Heritage, Public Access and Inclusivity and Daylight, Sunlight and Overshadowing.**

Key extracts from the CC Land supporting report are set out below:

**(Officer response is provided to each extract below.)**

*Substantive Loss of Existing Street Level Public Open Space*

- The existing area of St Helen's Square is 2,433 m<sup>2</sup>. It is all open to the sky and elements. A substantial 29.6% (721 m<sup>2</sup>) of that area will be lost because of the increased ground level footprint.
- This loss is the equivalent of approximately 7% of publicly accessible open space in the eastern cluster. The eastern cluster already has, by far, the lowest proportion of open space in The City, and there is a recognised need for more open space.
- The development proposal with its over-hanging structure and protruding tongue will leave just 29.7% (723 m<sup>2</sup>) as open space open to the sky. Most of the space will be covered.
- Viewing platforms and access controlled areas are an acceptable addition, but not an equivalent replacement for street level public open space.
- The proposals will adversely impact workers, residents and visitors ability to access and enjoy "impromptu" amenity in the City Cluster.

**Officer response: These comments are addressed in the Public Realm including impact on Open Space and Access and Inclusivity sections of this report.**

*Detrimental Impact on Existing Public Amenity*

- The emphasis on creating a park and public offer in the sky will draw pedestrian activity and visitors away from street level, reducing its vitality and viability at a time when bringing as much activity as possible into the streets and spaces of the City is crucial.
- The proposals lower the quality of the environment at street level and demote St Helen’s Square from the largest public open space in the City Cluster to a secondary, covered and unwelcoming transient area.

**Officer response: These comments are addressed in the Public Realm including impact on Open Space section of this report.**

*Negative Impact on Existing Townscape and Heritage Assets*

- The combination of medieval Churches and outstanding modern architecture viewed against the skyline from an outdoor open piazza makes the environment surrounding 1 Undershaft one of the most powerful and unforgettable experiences of the City.
- The proposals stacked massing and alien Level 11 tongue, which overhangs most of the public realm, brutally undermines the beauty, character and attraction of the existing environment.
- The loss of connectivity between the two Grade I medieval churches (a substantial heritage benefit of the consented scheme omitted from the 2023 proposals).

**Officer response: These comments are addressed in the Architecture, Design and Heritage and Architecture, Urban Design and Public Realm sections of this report.**

*Inferior Architectural Design*

- The City Cluster is renowned for its architectural excellence, hosting some of the most recognisable and iconic tall buildings in the world. The overbearing and oppressive 2023 redevelopment plans fall objectively short of beauty.
- The proposals would conflict with policies relating to design, tall buildings, heritage and public realm.
- There is serious harm to the public realm, townscape and setting of heritage assets. Considerable weight should be given to the harm arising from the conflict with the Development Plan.
- The proposals would have a detrimental impact on occupiers of the eastern half of the Leadenhall Building in terms of overlooking, loss of daylight and loss of views.

**Officer response: These comments are addressed in the Architecture, Design and Heritage, Architecture, Urban Design and Public Realm, Strategic Views and Heritage, Heritage and Daylight, Sunlight and**



**Overshadowing sections of this report. The loss of a view is not a material consideration in planning terms. The current local plan and draft City Plan assess residential amenity and not the amenity of office occupiers.**

*St Helen's Square and Leadenhall Plaza*

-St Helen's Square is a vitally important civic space and focal point for the cluster. It attracts people to meet in an iconic setting, the sky above is framed by the Gherkin, St Andrew Undershaft Church (grade I listed), the Lloyd's Register (Grade I listed), and the Leadenhall Building. It is at the centre of an area planned for the growth of tall buildings and therefore needs to be protected.

-St Helen's Square enjoys a high standard of sunlight and daylight, which lifts the quality of light and comfort levels in The Leadenhall Building's adjacent covered open space.

**Officer response: These comments are addressed in the Urban Design and Public Realm including Impact on Open Space section of this report.**

*Comparison of 1 Undershaft Proposals*

The proposed scheme has been compared to the existing site conditions and the consented 2019 proposal. The analysis highlights the following:

-The 2023 proposal results in fragmentation and loss of coherence, particularly affecting the connection between St Helen's Church Bishopsgate and St Helen's Square. In contrast, the 2019 scheme improved connectivity and integration of public spaces, with the whole of St Helen's Square retained and a net-gain in area with its undercroft and lower ground plaza.

-The scale and massing of the 2023 proposals encroach upon St Helen's Square and fail to adequately compensate for the loss, diminishing the quality and vitality of the public realm, whereas the 2019 scheme avoided building into or over St Helen's Square beyond the existing footprint of the Aviva building.

-The 2023 proposal's podium and massing limit sky visibility, sunlight, and privacy for neighbouring buildings and streets. Conversely, the 2019 scheme's generous undercroft integrates seamlessly with adjacent buildings, connecting St. Helen's Square with St Andrew Undershaft Church, enriching pedestrian experience in the City Cluster.

-The 2023 proposals project significantly further south, obscuring the iconic profile of The Leadenhall Building, diminishing its character and presence

in views from Leadenhall Street and St Mary Axe in the east. Comparatively, the 2019 scheme tapered inwards at higher levels to maintain The Leadenhall Building's aspect onto St Helen's Square and views from the square of the Gherkin, St Andrew Undershaft Church, and Lloyds Building.

-The proposals reduce the area and depth of St Helen's Square when compared to the existing and consented scenarios. The projecting podium garden overshadows St Helen's Square, reducing areas of visible sky from street level. The level 11 terrace would not compensate for the loss of street level public realm.

-The lower middle massing and increased upper middle floorplate of the building has increased and also encroaches onto St Helen's Square causing over shadowing.

**Officer response: These comments are addressed in the Architecture, Design and Heritage, Architecture, Urban Design and Public Realm, Strategic Views and Heritage, Heritage and Daylight, Sunlight and Overshadowing sections of this report.**

#### *Impact on St Helen's Square*

-The 2023 proposals for an amended scheme that covers or overhangs most of the public realm undermines the beauty and benefits of the consented 2019 design.

-The amended building would no longer be slender and elegant, fitting gracefully into the composition of the cluster.

-The generous civic space which opens to the south of the building is largely replaced by built form and overhang.

-Midday summer sunshine no longer reaches most of the street and square. Reflected morning and evening light is blocked from the centre of the space.

-The rare urban moment of generous open sky, framed by fine buildings from the street level is removed.

-The viewing platform at the eleventh floor as a replacement for street level public square does not compare in terms of welcome, easy access and equitable public realm.

-The 'comfort and quality of the user experience' at ground level (prioritized by the City Strategy) is fundamentally compromised.

-The pivotal junction of Leadenhall and Lime Streets with St Mary Axe is pinched rather than opened and the connection between St Helen's and St Andrew Undershaft churches is blocked.

-In contrast to the consented proposal, the development proposal with its over-hanging structure and protruding tongue will leave just 29.7% (723 m<sup>2</sup>) as open space open to the sky. Most of the space will be covered.

-Given the uplift in the scheme there will be an increase in pedestrian footfall in the area, more people would be using St Helen's Square and its area would be reduced. The proposals reduce the area for pedestrian routes through and around the new development because of the reduction in St Helen's Square.

-The development would not provide an alternative public pedestrian route of at least an equivalent standard across the area of St Helen's Square which would be lost to the development. Space gained to the north would not be equivalent to what is lost on St Helen's Square.

-The area for recreation, sitting, quiet enjoyment, play and reflection and hosting events would be reduced because of the loss of street level public open space.

**Officer response: These comments are addressed in the Architecture, Design and Heritage, Architecture, Urban Design and Public Realm, Daylight, Sunlight and Overshadowing and Public Access and Inclusivity sections of this report.**

#### *Sunlight and Overshadowing*

The overshadowing assessments provided in both the submission documents and post-submission stakeholder report, demonstrate that there will be a noticeable and detrimental impact to the amount of direct sunlight received to St Helen's Square as a result of the proposal. St Helen's Square will experience a significant reduction in direct sunlight received during summertime when the space is most frequently used for sitting out, resulting in what should be considered unacceptable harm to a unique external space within the eastern cluster. The space would be less attractive for sitting out.

**Officer response: This comment is addressed in the Public Realm and Daylight, Sunlight, Overshadowing sections of this report.**

### *Heritage Appraisal*

-Unlike the consented 2019 scheme the proposal would not provide a direct physical or visual link between the two churches.

-The significance of St Helen's Square as a positive component in the setting of a number of highly significant listed buildings is considerably underplayed within the submitted Built Heritage and Townscape Reports. The report suggests the proposals will result in no harm after undertaking the balancing exercise. Although the historic setting of St Andrew Undershaft Church and St Helen's Church Bishopsgate has been severely eroded, this does not provide sufficient justification for further harm. The fact their setting has been eroded necessitates a more carefully considered approach ensuring that cumulative impacts do not further erode the ability to appreciate the significance of these Grade I listed buildings.

-It is evident the 2023 redevelopment plans will cause harm through both physical loss of the square and through the indirect impact to the settings of nearby heritage assets of exceptional significance, including: St Andrew Undershaft Church (Grade I), St Helen's Bishopsgate (Grade I) and the Lloyds Building (Grade I). This harm is most prevalent in views across St Helen's Square, in which the distracting and stark materiality of the current design juxtaposes that of other contemporary forms and dominates street level views, rather than allowing St Andrew Undershaft Church to remain as the focal point.

**Officer response: These matters are addressed in the Heritage section of the report and specifically under the assessment of St Andrew Undershaft, St Helen's Bishopsgate and Lloyds Building.**

### *Design and Townscape Impact*

The revised 2023 design proposal for 1 Undershaft presents a jarring and alien element in its current context and its encroachment on the settings of nearby listed buildings is inappropriate and most importantly, avoidable. The protruding tongue together with the enlarged footprint, have eroded the character and ambience of the open space. Attempts to provide free, high-level public access present challenges for permeability and engagement. These high-level public spaces lack the casual or momentary engagement that is currently prevalent within the accessible, ground level space provided by St Helen's Square. Instead, reaching these higher levels requires a deliberate investment of time and effort, placing an obligation on the participant.

The consented scheme is more architecturally appropriate for the site as a dignified and elegant response. The proposal is aggressive, forceful and unrestfully brutal.

Even with the design rationale of the present proposal, the tongue does not flow from the elemental form but is planted in ungainly superposition on already incoherent and disparate axis. This has not only eliminated the element of altruistic intent, also has no meaning as an essential contribution to the setting of a tall building.

The revised proposal gives rise to identifiable harm through inappropriate design, bulk and character. It would therefore be contrary to policy. While the scheme would bring about public benefits these could be achieved with a different scheme that avoids harm.

**Officer response: These comments are addressed in the Design and Heritage, Architecture, Urban Design and Public Realm, and Public Access and Inclusivity sections of this report.**

#### *Policy Critique*

The 2023 redevelopment plans conflict with the 10 key policies relating to design, tall buildings, heritage and public realm in the Development Plan which comprises the London Plan 2021 and the City of London Local Plan 2015. In addition, the 2023 proposals also conflict with aspects of the National Planning Policy Framework, 2023 and the emerging Draft City Plan 2040.

#### **The City of London Local Plan 2015**

- Core Strategic Policy CS7 Eastern Cluster
- Core Strategic Policy CS10 Design
- Policy DM10.1 New Development
- Policy DM10.7. Daylight and Sunlight
- Policy DM12.1 Managing Change Affecting all Heritage assets and Spaces
- Core Strategic Policy CS14 Tall – Buildings
- Policy CS19 Open Spaces and Recreation
- Policy DM19.1 Additional Open Space

#### **The London Plan 2021**

- Policy D8 Public Realm
- Policy D9 Tall Buildings

#### **City Plan 2040 – Revised Proposed Submission Draft**

- Draft Policy S12 Tall Buildings

-Draft Policy S21 City Cluster

-Draft Policy S14 Open Spaces and Green Infrastructure

-Draft Policy OS1 Protection and Provision of Open Space

The draft policies of the new draft City Plan 2040 apply an even higher test for the loss of existing open space than the existing Policy CS19 of the 2015 adopted plan.

The proposals also conflict with aspects of the National Planning Policy Framework.

There is serious harm arising from the loss of part of St Helens Square, and impact on the remaining area of the Square and related public realm; and to the and townscape of St Mary Axe and Leadenhall. The proposals would result in clear and avoidable harm to the setting of two Grade I listed buildings.

This harm was not identified in the accompanying Planning or Heritage reports and thus the proposals were not adequately assessed against paragraph 208 of the National Planning Policy Framework ('the NPPF' or 'the Framework').

In its current form the application conflicts with the Development Plan. It should not be approved unless material considerations strongly indicate otherwise.

There are no material considerations that indicate otherwise taking into account both the harm and benefits of the proposal.

The fact that there is an alternative scheme in the form of the 2019 consent, and, there are likely to be other options, which would deliver similar benefits, and not cause any material 'harm' to the setting of designated heritage assets, and enhance the streetscape and public realm, is a very important material consideration.

In conclusion, it is recommended that the 2023 application is re-designed. If it is not redesigned, particularly at the base of the building, it should be rejected to avoid unnecessary harm to the built historic environment, and to protect and enhance the public realm of St Helen's Square, and the townscape of St Mary Axe and Leadenhall.

As stated within para.206 of the NPPF (2023), 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing

justification'. It is asserted this justification in respect of settings has not been provided within the submitted reports.

It is therefore strongly recommended that the proposals are reconsidered in order to avoid harm to built historic environment.

Whilst it is recognised the 2023 proposals for 1 Undershaft will bring about a number of public benefits, it is clear these benefits could be achieved with an alternative scheme which could avoid any harm to heritage assets. The 2019 consented proposals were considered appropriate in this regard and a scheme has been granted that would not cause harm.

**Officer response: These points are addressed throughout the report but particularly Architecture, Design and Heritage, Architecture, Urban Design and Public Realm, Daylight, Sunlight and Overshadowing, Public Access and Inclusivity, Urban Greening, Assessment of Public Benefits and Paragraph 208 NPPF Balancing Exercise and Conclusion and Overall Planning Balance sections of this report.**

#### *Conclusion*

As a stakeholder in the City of London, CC Land object to the 2023 redevelopment plans for 1 Undershaft on the following grounds:

- The proposals would result in the loss of a significant area of St Helen's Square, because of the enlarged footprint.
- The remaining area of St Helen's Square would be seriously harmed by the protruding tongue, and the overhang of office structure.
- The area for pedestrian movement would be reduced, even though there will be a significant increase in pedestrian flows.
- The area for recreation, sitting, quiet enjoyment, play and reflection, and hosting events, would be seriously reduced because of the loss of street level public open space.
- The quality of the remaining area of public open space would be dramatically reduced, it would be almost entirely covered, with the experience of the sky and being open to the elements lost by the overhanging structures which would extend almost as far as Leadenhall Street itself.
- The spatial qualities and robust character of St Helen's Square would be lost.
- The unique experience of the skyline framed by outstanding examples of 16th, 20th and 21st Century architecture would be lost.
- The sunlight enjoyed from spring to the autumn, and the setting of two Grade I Listed buildings would be seriously harmed by the projecting and overhanging office structure and white tongue of the terraced gardens.

– The proposals do not deliver a beautiful building in an area of architectural excellence.

**Officer response: These comments are addressed in the Architecture, Public Realm and Heritage sections of this report.**

#### *Alternatives*

CC Land believe there are two alternative approaches for the redevelopment of 1 Undershaft which would overcome the concerns identified in this report, and achieve the aims of all parties, and the City of London, in the interests of the wider community.

The first is the 2019 planning consent, which is extant and is an exemplary building, slender and brilliantly designed from street level up. This building delivered an enhancement to the quality and area of St Helen's Square by two major interventions:

- The refurbishment of St Helen's Square, including the creation of a lower ground level plaza; and
- An extension of the public square under the new building in a full height space that would have connected the Grade I Listed churches visually, a significant indirect benefit of the proposals.

The second alternative approach is to reduce the massing of the protruding blocks and lower sections of the proposed redevelopment, and to pull the footprint back to reduce, if not avoid the loss of any public open space at street level and remove the projecting tongue which overhangs the open space.

**Officer response: These comments are addressed in the Architecture, Public Realm and Heritage sections of this report.**

#### **CC Land Representation in response to re consultation May 2024, letter dated 14 June 2024**

CC Land submitted an additional representation in response to the re consultation that was carried out in May 2024. The CC Land representation included a covering letter and addendum pack.

#### **Covering Letter**

The applicant has chosen not to amend the public realm design and no aspect of the amendments presented in the 10 May 2024 submission attempt to address any of the concerns detailed in the 23 April 2024 representations. Consequently, CC Land's position is unchanged and they



continue to strongly object to the current proposals, which are fundamentally flawed.

The concerns detailed in CC Land's 23 April 2024 consultation response are not unique to CC Land. As well as statutory bodies such as Historic England, these worries are widely shared by workers, residents, businesses, industries and property owners in the local area. Some have formally shared their concerns and engaged in the consultation process. Others have not, in the belief that voicing any un-supportive opinion will have no effect on the City's decision making process for this planning application.

CC Land consider disregarding known legitimate concerns raised by those who will be directly affected by the 1 Undershaft proposals to be extremely ill advised.

CC Land re-iterate their support for the principle of redevelopment of 1 Undershaft, but not at any cost.

The materially detrimental impact of the proposals on St Helen's Square, heritage assets of the highest importance, and the permanent loss of irreplaceable street level public open space to private commercial use is wholly unacceptable and entirely avoidable.

The harm to St Helen's Square and the immediate environment largely results from the massing/footprint of the proposed building from Ground Floor up to Level 11 and could be resolved, were the Applicant to adopt a different approach to bulk, massing and aesthetics for the lower third of the building. The resultant loss of floorspace would be less than 4%.

The Applicant has not demonstrated that alternative designs have been explored to avoid harm, and there is clearly an urgent need and justification for this exercise to be undertaken (in accordance with the requirements of the Planning (Listed Building and Conservation Areas) Act 1990 and the NPPF).

CC Land again request that revisions are made to the application scheme for 1 Undershaft which deliver:

- a) No loss of street level public open space from the existing situation
- b) Preserve and enhance St Helen's Square as a vitally important civic space and focus for placemaking in the City Cluster for workers, residents, and visitors
- c) No harmful townscape or heritage impact
- d) Architectural excellence within the City Cluster

When previously pursuing the utmost increase in height (+171.9m) and floor area (+100,007m<sup>2</sup> or +203.7%) on 1 Undershaft, there was a determined effort by the Applicant to compensate through material improvements to the existing street level public realm.

This time around, in seeking another significant increase in floor area (+31,266m<sup>2</sup> or +21.0%) above the 2019 consent (149,100m<sup>2</sup>), the Applicant has degraded the existing street level public realm, both in size and status, in favour of additional private commercial floorspace.

A raised viewing terrace, promoted by the City on previous projects, has been plonked into the design, erroneously portrayed both as an adequate replacement for the loss of everyday street level public realm and a significant public benefit.

The Applicant appears to be progressing on the assumption that providing the City with certainty over the redevelopment of 1 Undershaft trumps all other concerns and therefore the poorly articulated design and non policy compliant proposals will have to be accepted by everyone, warts and all.

CC Land's position is that this is not a planning application where the perceived benefits can tip the scales and overcome the very significant harm that would arise were the 2023 application to be progressed without further revision.

The 10 May 2024 design changes are cosmetic and make no sincere attempt to overcome concerns raised by a range of objectors, including CC Land.

Indeed in their 7 June 2024 letter, Historic England believe that these design changes actually increase the harm to the built historic environment, putting the Outstanding Universal Value ("OUV") of the Tower of London World Heritage Site at grave risk.

CC Land continue to consider that officers, on any proper assessment of the scheme against the development plan and other material considerations, should find themselves currently unable to support the 2023 redevelopment plans.

CC Land believe that their concerns with the 2023 application to be shared by other stakeholders, clear, fully justified and thankfully resolvable by the applicant pursuing further revisions to the design.

It is clearly premature for the application to be determined by the City in the absence of serious consideration of alternative designs, at the very least for the base of the building, to avoid demonstrable harm to interests of acknowledged importance.

The applicant is urged to reconsider their position and CC Land would happily meet with City officers and the Applicant's project team to assist the progression of any revisions which resolve the stated concerns.

If no material changes are progressed, CC Land's formal objection to the proposal remains and CC Land will invite the Planning Applications Sub Committee to refuse the application or defer a decision pending further scheme revisions to address concerns. CC Land trust that City officers will act to address the concerns detailed within our 23 April 2024 representations.

**Officer response: These points are addressed in the Architecture, Design and Heritage, Architecture, Urban Design and Public Realm, Daylight, Sunlight and Overshadowing, Strategic Views and Heritage, Public Access and Inclusivity, Urban Greening, Assessment of Public Benefits and Paragraph 208 NPPF Balancing Exercise and Conclusion and Overall Planning Balance sections of this report.**

CC Land Addendum report 14 June 2024

The full objection addendum is appended to this report. The main points include:

The applicant's revised material dated 10th May 2024 effectively proposes only cosmetic alterations to the top of the building, cladding to the podium levels and soffit and the vehicle lift enclosure. As confirmed by the DAS Addendum, no changes are proposed to the public realm, merely further justification provided for the proposed scheme which in CC Land's view (as stated in our detailed objection of 23rd April 2024) is fundamentally flawed. The detrimental impact of the proposal on St Helen's Square, heritage assets and the loss of open space is unacceptable and avoidable.

The addendum refers to the Historic England letters:

Historic England letter 22 February 2024: These concerns mirror that presented in the representations on behalf of CC Land made by Stephen Levrant Heritage Architecture, with the loss of heritage benefits and increased levels of harm to the setting of Grade I listed buildings forming the basis of our concerns.

Historic England letter 7 June 2024: As evidenced within the representations made by CC Land and in the two letters submitted by HE, the principle of a tall building on this site is accepted, however, CC Land share the same view that the 2023 design, with or without the 10th May 2024 design changes, is not of a sufficient standard to be considered 'good design' in accordance with the National Design Guide, and presents a 'missed opportunity' on what should be the pinnacle of exemplar design for the Eastern Cluster.

CC Land's April 2024 objection was formulated by its own experts independently of Historic England: Stephen Levrant Heritage Architecture, dMFK Architects, JDA Planning Consultancy and Kim Wilkie Landscape Architecture. It therefore stands as an independent assessment of the issues raised by the 2023 application. The objection was mounted at a time when HE's own February 2024 objection had not been brought to CC Land's attention.

However, it is striking that CC Land's own objection is entirely consistent with that being put forward by Historic England in their two letters.

Especially when taken together with the expert analysis which supports the objection by CC Land, we respectfully suggest that the City must give significant weight to the advice of Historic England as an expert national agency with specialist expertise in the sphere of historic environment conservation. Although the City may lawfully depart from such advice, it must have cogent reasons for doing so. However, in CC Land's view, these reasons do not exist.

#### The Urgent Need for Alternative Designs to be Considered

Overall, for the reasons set out in our April 2024 representation and in this latest representation, it is clearly premature for the application to be determined by the City in the absence of serious consideration of alternative designs for the base of the building to avoid demonstrable harm to interests of acknowledged importance.

It is also noted that Historic England object to the design of the middle and top of the building and state that there would be harm to the Tower of London WHS, which is a very serious matter.

To address this concern, alternative designs for the middle and top of the building are now also required, as well as for the base. In the absence of a serious attempt to reduce, if not avoid the harm, the application should be refused.

### The Balance of Harm v Benefits

Therefore, as set out in our April 2024 representation, there remains extensive conflict with policy arising from the 2023 planning application. The harm is widespread, multifaceted and affects heritage assets of national importance and public space of the highest significance London-wide. St Helen's Square is the primary civic space within the Eastern Cluster of the City of London. Our position is now reinforced by the two HE letters.

In CC Land's view, this is not a planning application where the benefits can tip the scales and overcome the very significant harm that would arise. If the harm cannot be overcome, the application should be refused.

### The Need to Demonstrate that Efforts Have Been Made to Avoid Harm to Heritage Assets

The 2023 proposals for 1 Undershaft are in direct conflict with the policies contained within the Planning (Listed Buildings Conservation Areas) Act 1990 and the NPPF (2023) and policy D9 (Point D) of the London Plan 2021.

The applicant has not demonstrated that alternatives have been explored to avoid harm to heritage assets. It therefore fails the test in Policy D9. This is just one example of the policy conflicts outlined more broadly in the April 2024 representations. The requirement to demonstrate that alternatives have been explored is in addition to demonstrating clear public benefits that outweigh that harm. Irrespective of the benefits that may or may not exist, and CC Land comment on these in Appendix C of their objection, the application does not pass the first central test of the policy because alternatives have not been explored.

The only alternative that currently exists is the 2019 consent, and there are likely to be other options which would deliver similar benefits, and not cause any material harm to the setting of designated heritage assets, or to St Helen's Square. HE's proposal to engage with the applicant on alternative designs to arrive at a more appropriate scheme is welcomed.

The existence of the 2019 consent is a very important material consideration.

The applicants have not provided evidence that the 2019 consent is not viable.

dMFK have reviewed the proposal on CC Land's behalf and conclude that:

- The removal of the floorspace and elevated terrace on the tongue above St Helen's Square, pulling the building line back to the existing boundary of the Square, would protect the function and character of the public open space.
- The need for public open space at the upper levels would be reduced.
- The need for vertical circulation to serve the public terraces and amenity would be reduced, allowing a reconfiguration of the lifts at ground floor level, avoiding the loss of any space in St Helen's Square.
- The removal of the floorspace and elevated terrace on the tongue above St Helen's Square, pulling the building line back to the existing boundary of the Square, would protect the function and character of the public open space.
- The need for public open space at the upper levels would be reduced.
- The need for vertical circulation to serve the public terraces and amenity would be reduced, allowing a reconfiguration of the lifts at ground floor level, avoiding the loss of any space in St Helen's Square.

#### Overall Conclusion Following The Submission of Revised and Additional Information

The benefits flowing from the 2023 application are described on pages 58 to 60 of the Planning Statement by the applicant's planning consultant, DP9. CC Land comment on these benefits and do not consider that they can be afforded weight given the conflicts with policy. The issues that CC Land have identified in their public benefit analysis should be taken into account by CoL in its planning balance exercise.

Additionally, CC Land also note that City officers' assertion in our recent meeting that the podium garden is a benefit in line with its Destination City programme. Whilst CC Land support the aims of the programme, it should not be delivered at any cost. In this case, the cost is overwhelming.

As CC Land explained in their April 2024 representation, in relation to another key site in the Eastern Cluster, 20 Bury Street ('The Tulip'), a tall visitor attraction was proposed and ultimately refused by the Secretary of State. The Mayor of London's report (which also recommended refusal) stated that "*opportunities for activation at street level are essential for the area to remain competitive as a world class destination*". CC Land consider a similar principle applies here. Existing and enhanced street level public

realm (through which people move and enjoy spontaneously) has a greater intrinsic value in terms of the Destination City programme than an upper level visitor attraction (a dead end, only accessible after security checks and a lift ride). This factor should also be considered by the City in its planning balance.

Therefore, as set out in CC Land's April 2024 representation, there remains extensive conflict with policy arising from the 2023 planning application. The harm is widespread, multi-faceted and affects heritage assets of national importance and public space of the highest significance London-wide. St Helen's Square is the primary civic space within the Eastern Cluster of the City of London. CC Land's position is now reinforced by the two Historic England letters.

In CC Land's view, this is not a planning application where the benefits can tip the scales and overcome the very significant harm that would arise. If the harm cannot be overcome, the application should be refused.

**Officer response: These points are addressed in the Architecture, Design and Heritage, Architecture, Urban Design and Public Realm, Daylight, Sunlight and Overshadowing, Strategic Views and Heritage, Public Access and Inclusivity, Urban Greening, Assessment of Public Benefits and Paragraph 208 NPPF Balancing Exercise and Conclusion and Overall Planning Balance sections of this report.**

#### **CC Land letter dated 16 August 2024**

A further representation was received from CC Land in August 2024 following the 2 July 2024 City of London Planning Application Sub Committee meeting where the scheme was deferred.

The covering letter explained that harm to St Helen's Square and the immediate environment results from the massing/footprint of the proposed building from ground floor to level 11 and this could be resolved were the Applicant to adopt a different approach to bulk, massing and aesthetics for the lower third of the building.

The 14 June 2024 letter from CC Land introduced an alternative design approach where Ground to Level 11 could be cut back and reconfigured to avoid the damage to St Helen's Square.

This 15 August 2024 addendum letter develops the alternative design approach introduced as part of the 14 June 2024 representations and details an approach where Ground to Level 11 could be cut back and reconfigured to avoid damage to St Helen's Square.

The resultant loss of floorspace would be circa 5,425 sq m equivalent to 3%.

The objective in providing reconfigured Ground to Level 11 floor plans is to evidence what could be achieved and assist the Applicant in identifying adjustments to the 2023 application which CC Land believe would address stakeholders concerns over the ground floor public realm.

The covering letter was supported by a design pack that further worked up the alternative design which can be summarised as follows:

1. The south elevation would be cut back to align with the face of the existing building to avoid any reduction in street level public open space to St Helen's Square.
2. Additional area has been added to the west of the site from ground to level 11.
3. The proposed position of the main core has been moved. The southern segment of core projecting into St Helen's Square has been relocated with 11nr lifts added to the west side of the core.
4. The public lifts serving the Level 11 Terrace have been relocated to the north side of the building.
5. The level 11 terrace projection has been reduced but still provides an 11m cantilever over St Helen's Square.
6. The building outline from Levels 14-74 remains unchanged, there is scope to provide additional area on west side of building as per the 2019 consent envelope.

CC Land note that further consideration needs to be given to the following as part of the suggested design:

- a) Plans are indicative, internal layout of each floor to be replanned to take into account the illustrative structural solution being suggested, further work is required by the Applicant.
- b) Lift capacity has been reduced by 2 lifts due to the reduction in floor area on Levels 1-11, detailed assessment of lift capacity should be undertaken.
- c) External superstructure From Ground to Level 11 Terrace has been amended, detailed structural assessment will be required.
- d) No assessment of fire engineering has been done.
- e) Assessment of fire fighting & evacuation lifts will be required.
- f) Landscaping & planting of St Helen's Square & Level 11 Terrace will be required.



- g) Assessment of the arrangement of teaching spaces etc on Levels 11-13 will need to be undertaken.
- h) The public entrance would be relocated to Undershaft benefiting from the amenity provided by St Helen's church.

**Officer response: These points are addressed in the Architecture, Design and Heritage, Architecture, Urban Design and Public Realm sections of this report.**

#### **London Oriental**

Having reviewed the proposals, London Oriental would not be supportive of the current scheme. The scheme represents an overdevelopment of the site and has a detrimental impact, in particular on the highly valued St Andrew Undershaft and St Helen's Bishopsgate and the visual connectivity between these two assets appears to be lost. In addition, the current public open space, the largest in the Eastern Tower Cluster, immediately in front of the existing 1 Undershaft is reduced by approximately 30% and a large portion appears to be deprived of clear access to the sky. One of the key points that was discussed during lengthy discussions on London Oriental's consented scheme at 100 Leadenhall was the importance of placemaking and activity at street level. The newly proposed scheme seems to reduce the effectiveness of both of these key objectives. Creating an internal park and offer in the sky will take away connectivity to the street and discourage the public from entering the proposed new space, in exactly the same way that the public are discouraged from 22 Bishopsgate even though they have every right to enter the building at certain times. In our view the design is inarticulate and will not contribute positively to the Eastern City Cluster. The elegant 2019 consented scheme, is supported.

**Officer report: These points are addressed in the Architecture, Public Realm and Heritage and Access and Inclusivity sections of this report.**

#### **The Wardens and Society of the Mystery or Art of the Leathersellers**

The Leathersellers owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the application site:

3, 5, 6, 7, 15, 16 and 17 St Helen's Place;

(b) 33 Great St Helens;

(c) 52-68 and 88 Bishopsgate; and

(d) 25-51 and 61 St Mary Axe

A review of the submitted information has been undertaken and there are substantial concerns over the potentially adverse effect of the proposal on available light to the above properties. There is concern that the amenity and natural light at these properties would be prejudiced. The detailed

assessment of the scheme has not been concluded and therefore the position in relation to other issues is reserved.

The Leatherseller's property at 33 Great St Helen's (Daylight and Light Pollution), 30 St Mary Axe (Overshadowing) and 48 Bishopsgate (Daylight and Light Pollution) have been identified as sensitive receptors in Chapter 12 (Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare) of the Environmental Statement submitted with the application.

The Environmental Statement (Table 12-153) reports that at 33 Great St Helens, 5 window (of a total of 19) and a total number of 0 rooms (of a total of 7) are expected to meet BRE Guidelines on daylight levels following the construction of the proposed development and any relevant cumulative schemes. As a consequence, a total of 14 windows and 7 rooms would experience a greater than 30% (with 6 rooms with an in excess of 40%) reduction in daylight as a consequence of the proposed development.

The Environmental Statement reports (Table 12-153) that at 48 Bishopsgate, 1 window (of a total of 11) and a total number of 3 rooms (of a total of 5) are expected to meet BRE Guidelines on daylight levels following the construction of the proposed development and any relevant cumulative schemes. As a consequence, a total of 10 windows and 2 rooms would experience a greater than 30% reduction in daylight as a consequence of the proposed development.

The Environmental Statement further reports that 30 St Mary Axe has been assessed for the purposes of establishing potential overshadowing by the proposed development. The wider assessment of the overshadowing impacts of the proposed development are summarised in the Environmental Statement submission and reference is made to a technical appendices that contains a set of overshadowing plans without any apparent detailed explanation of the assessed outputs. Similarly, reference is made to potential light pollution impacts at 33 Great St Helen's and at 48 Bishopsgate, but the Leatherseller's have been unable to identify a site specific assessment within Chapter 12 of the Environmental Statement. As a consequence, there is difficult in review of further assessment and are consultative advice is being sought on this aspect of the Environmental Statement submission. In turn, the position is reserved on these specific findings.

The identified cumulative effect of the proposed development and other development schemes within the vicinity of 33 Great St Helens and 48 Bishopsgate is of major concerns as the Leatherseller's have already experienced the detrimental impact upon the function, operation and

amenity of their buildings due to overshadowing and the loss of daylight and sunlight. When considered cumulatively, at 33 Great St Helen's, over 70% of the windows are not expected to meet BRE Guidelines on daylight levels following the construction of the proposed development. The position is further exacerbated at 46-48 Bishopsgate where the cumulative impact of development will ensure that 90% of the windows are not expected to meet BRE Guidelines on daylight levels following the construction of the proposed development.

The detailed impact assessment of the proposed development is yet to be concluded and the position in relation to these issues is reserved. There is serious concerns that both 33 Great St Helens and 48 Bishopsgate will experience a significant adverse impact as a result of the construction of another tall building in this area. As a consequence, the findings in the Environmental Statement show a clear risk that our client's enjoyment of their property will be materially affected.

For the reasons set out above, there is objection to the scheme and it is requested that these concerns are brought to the attention of the Planning Committee.

**Officer response: A full analysis of the daylight and sunlight impact of the scheme is set out in the Daylight, Sunlight and Overshadowing section of this report.**

#### **St Helen's Bishopsgate and St Andrew Undershaft**

On the 23 February 2024 an email was received from Washbourne Consulting Limited on behalf of their client, St Helen's Bishopsgate and St Andrew Undershaft on 23 February 2024. The email objected to the scheme and expressed concern about the implications of the development in terms of the practical consequences for the two churches both during the construction phase and thereafter.

The position of / impact on the churches and how to take account of, protect and safeguard the interests, amenities and ministry of the churches, as well as the buildings themselves and their settings, their precious fabric and the contribution they make to the city townscape needed to be discussed.

On the 1 July 2024 one additional representation was received from St Helen's Bishopsgate. The representation content can be summarised as follows:

- The Churches wish to withdraw their objection to the scheme following constructive discussions between the churches, the applicant and

development managers regarding measures to mitigate the likely impacts of the development.

- Measures to minimise the impact of the proposal on the churches would be secured through a Neighbourly Matters Agreement (NMA) (this sits outside of the planning process and is an agreement between the applicant and the Churches).

- Notwithstanding the above, the Churches request conditions in respect of the following are attached to any permission or obligations are added into the section 106 agreement:

- Management protocols for the education centre need to be enhanced to ensure that large school groups do not lead to excessive noise during the church's quiet period.
- Use of an appropriately quiet road surface for Undershaft and a traffic management system to minimise traffic.

The letter refers to an email from Washbourne Consulting. A further email was received on 01 July 2024 from Washbourne Consulting (the Church's planning agent) requesting the following in order manage the impacts of the development:

- Insertion of new condition: to ensure that the composition and surface treatment for Undershaft shall be composed of the quietest material available and so maintained in the future (suitable wording required – this is a departure from the 'standard reference' to the Corporation's Highways department's materials palette).
- Insertion of new condition: to ensure that effective traffic management proposals are drawn up and agreed with the objective of seeking to minimise traffic movement along Undershaft (suitable wording required).
- Amended wording to condition 5: Wording broadened (suggested amendments in bold):

#### 5 Amplified Music Page

"No amplified or other music, **speeches or any noise** shall be played on the roof terraces, balconies or Level 11 Podium Garden. **Further, noise levels on the roof terraces, balconies or Level 11 Podium Garden shall be limited so as not to cause the noise level inside St Helen Bishopsgate to exceed the current noise level.** REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan **and to protect St Helen Bishopsgate from possible adverse impact:** DM15.7, DM21.3.

- Additional wording to condition 46: “Arrangements for accessing, navigating and managing the ground floor lobby entrances to the podium terrace, public garden walkway, education and cultural attractions and the public viewing gallery and how these aspects of the development will handle visitors, site servicing, signage and wayfinding, group bookings, and people congregating, queuing, arriving and exiting such facilities will be carefully managed, especially to limit noise impacts and disruption e.g. from queues of people waiting outside and in proximity to St Helens Bishopsgate and St Andrew Undershaft”.
- Involvement in the following heads of terms:
  - a) Public viewing gallery management plan;
  - b) Level 11 public podium strategy;
  - c) Education and Museum Space Management and Promotion Plan; and
  - d) Delivery and Servicing Management Plan (including Consolidation).

St Helen’s Bishopsgate have requested that arrangements for accessing the public spaces in the building, including signage/wayfinding, queuing and booking arrangements, should be managed in a way to limit noise impacts and disruption to St Helen’s Bishopsgate and St Andrew Undershaft. These matters will be dealt with in the relevant management plans listed above. These management plans will also require ongoing monitoring and review of the operation of these spaces and an ability for the City to request amendments to the relevant management plan if necessary.

**Officer comment: Management plans for the level 11 podium, viewing gallery and education space would be secured through S.106 obligation, the Churches would be engaged in the formulation of the plans. The management plans would cover noise management. Through the section 278 agreement officers would seek to achieve surface materials that minimise noise.**

### **Policy Context**

81. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
82. The City of London (CoL) has prepared a new emerging plan, the City Plan 2040, which was published for regulation 19 consultation in the Spring of 2024.

During consideration of this application, the Plan has been submitted to the Secretary of State for Examination public. Emerging policies are considered to be a material consideration with limited weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

83. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
84. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”. Other relevant sections of the NPPF are set out in the following paragraphs.
85. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
86. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development”. That presumption is set out at paragraph 11. For decision-taking this means:
  - a) approving development proposals that accord with an up-to-date development plan without delay; or
  - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
  - c) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  - d) (ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
87. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
  - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

88. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
89. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
90. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
91. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
92. Paragraph 103 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
93. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.
94. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
95. Paragraph 117 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.
96. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better

places in which to live and work and helps make development acceptable to communities.”

97. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.
98. Paragraph 136 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...’
99. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
100. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 157 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
101. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
102. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 of the NPPF advises that Local Planning Authorities



should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

103. Paragraph 203 of the NPPF advises, "In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
  - c) the desirability of new development making a positive contribution to local character and distinctiveness."
104. Paragraph 205 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
105. Paragraph 206 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
106. Paragraph 208 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".
107. Paragraph 209 of the NPPF states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset".

108. Paragraph 212 of the NPPF states “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

### **Considerations**

109. The Corporation, in determining the planning application has the following main statutory duties to perform:

- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
- To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

110. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990.

111. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990); (a small sliver on the northern edge of the site is in the St Helen’s Place Conservation Area).

112. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses.

113. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.

114. The principal issues in considering this application are:

- a) The economic benefits of the proposal.
- b) The appropriateness of the proposed uses, including the site’s cultural offer.

- c) The appropriateness of the site to accommodate a tall building.
- d) The appropriateness of the architecture and urban design of the proposals.
- e) The impact of the proposal on existing public realm and the acceptability of the proposed new public realm.
- f) The impact of the proposal on the Tower of London World Heritage Site.
- g) The impact on strategic views in the London Views Management Framework and on other strategic local views.
- h) The impacts of the proposal on the setting and significance of heritage assets.
- i) The potential impacts of the development on buried archaeology.
- j) Whether the scheme is accessible and inclusive.
- k) Transport, servicing, cycle parking provision and impact on highways.
- l) The environmental impacts of the proposal including wind microclimate, daylight, sunlight and overshadowing, air quality, building resource efficiency, energy consumption and sustainability.
- m) Security and suicide prevention.
- n) The outcome of the Health Impact Assessment.
- o) Ensuring that fire safety has been designed into the proposal.
- p) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
- q) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010).
- r) The requirement for financial contributions and other planning obligations.

### **Economic Considerations**

115. The National Planning Policy Framework places significant weight on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development. Significant weight is given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to economic benefits will depend on the nature and extent of those benefits in light of other planning considerations.
116. The City of London, as one of world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
117. The City is home to many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology,

media and communications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from economies of scale and in recognition that physical proximity to business customer and rivals can provide a significant competitive advantage.

118. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way that encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The newly launched Small and Medium Enterprises Strategy (2024) includes the City's strategy to attract and support the growth of SMEs. The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
119. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
120. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
121. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-orientated financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

122. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
123. In terms of the Local Plan 2015 Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
124. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.
125. The application site is located within an area identified as the Eastern Cluster in the Local Plan 2015 and within the City Cluster Tall Buildings area identified in the emerging City Plan 2040. The Cluster Policy area is defined by an illustrative diagram and on the Policies Map in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements.

126. Despite the uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporation's 'Destination City' vision for the square mile.

127. The proposed scheme would deliver on the City's strategic economic objectives and support the City's economic role by providing a superlative and strategic contribution of 153,602sqm (GIA) of flexible office floorspace, perhaps the largest of any single Cluster scheme and so of extraordinary strategic importance, alongside a complementary retail and cultural offer and enhanced public realm.

### **Land Use**

128. This section of the report provides an overview in respect of the layout and proposed mix of uses on the site before appraising the acceptability of the proposed uses:

- A public terrace would be provided on level 11 of the building
- A public viewing gallery and educational space is proposed at levels 72 and 73 of the building.
- Flexible cultural space and retail/food and beverage is proposed across levels 2, 3 and 11, this would include an element of affordable cultural provision.
- Office space is proposed on the remaining floors of the building including an offer of affordable workspace.

### **Provision of Office Accommodation**

129. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply and range of office accommodation to meet varied needs of City occupiers. Policy DM1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized business and office designs which are suitable and flexible and adaptable to allow for subdivision to meet the needs of businesses. Similar objectives are carried forward into policies S4 and OF1 of the emerging City Plan 2040.

130. The predominant use of the proposed development is as office space, comprising of 153,602sq.m (GIA) of commercial/office floorspace (Use Class E(g)). This is uplift of 104,509sq.m (GIA) of office floorspace on this site compared to the existing building.
131. Adopted Local Plan policy CS1 seeks to deliver 1,150,000sqm of additional office floorspace between 2011 and 2026. Between 2011 and 31 March 2022, 959,190sqm of additional floorspace was delivered, leaving a requirement for a further additional 190,810sqm over the plan period (up to March 2026). The site would be unlikely to be completed by 2026; demand for future years is discussed below. The adopted local plan also seeks a pipeline of at least 750,000sqm gross office floorspace with permission but not yet commended. As of 31 March 2023, there as 431,340sqm of gross office floorspace with permission but not commenced – including the previously approved 1 Undershaft application.
132. The emerging City Plan 2040 seeks to deliver a minimum of 1.2million sqm of additional office floorspace between 2021 and 2040. This is based on evidence derived from a study conducted by ARUP/Knight Frank for the City Corporation, which identified a demand for 1.2million sqm on a 'hybrid peak' model of workplace attendance, and demand for 1.9million sqm where there was a 'return to in-person'.
133. The Offices Topic paper as part of the evidence base for the emerging City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'City Cluster' category, which is modelled at being able to achieve an office floorspace uplift of 630,000-770,00sqm. The proposed development would deliver an uplift 104,509sqm (GIA) of Grade A office space, a significant amount. The emerging City Plan identifies the need for a minimum of 1.2 million square metres NIA of office floor space; which approximately equates to 1.6 million square metres GIA. As such the proposed development would contribute approximately, 6.53% square metres of GIA.
134. The proposed office space is designed to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with options which offer a range of interior environment amenity, floor area, and choice of outlook. This would accord with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.
135. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space.
136. Policy OF1 of the emerging City Plan 2040 states that office developments should where appropriate, provide a proportion of affordable workspace suitable

for micro, SMEs. The proposed affordable workspace offer is for 400 sqm of space, equating to 50 desks, to be located within the podium levels 4 – 10 (details of exact location are to be agreed) of the building and to be leased at 50% discount to market rent. The S106 agreement would include an obligation to secure and require further details of such provision.

137. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a substantial uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

#### *Proposed Retail/Food and Beverage*

138. The proposed scheme would provide 1,400 sqm of flexible retail space at levels 2 and 11. The retail space would be accessed from the prominent ground floor entrance on the south west facing facade of the building. It is located at the upper levels of the building to complement the proposed public and cultural uses across these levels.

139. The site is not within a Principal Shopping Centre or along a Retail Link as defined by the City of London Local Plan 2015 and the emerging City Plan 2040.

140. The provision of an active retail offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that “The City Corporation will seek to make the City’s retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City”. The supporting text to policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City’s growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.

#### *Cultural Offer and Strategy (including the viewing gallery/education space)*

141. Policy CS11 of the Local Plan seeks to maintain and enhance the City’s contribution to London’s world-class cultural status and to enable the City’s communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation’s Visitor Strategy by:

- Providing, supporting and further developing a wide range of cultural facilities.



- Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
- Protecting existing cultural facilities where they are need.
- Providing visitor information and raising awareness of the City's cultural and heritage assets.
- Allowing hotel development where it supports the primary business or cultural role of the City.

142. The emerging City Plan 2040 under policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.

143. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.

144. A cultural plan was submitted for the proposed 2023 scheme and a Cultural Statement addendum has been submitted in conjunction with the revised version of the 2023 scheme, in accordance with policy CV2 of the emerging Local Plan 2040. The original 2023 plan analyses the City's existing cultural infrastructure and sets out how the proposal would provide three cultural anchors to support the City's continued role as a destination, these are set out below.

145. As part of the 2024 revisions there has been some changes to the cultural offer as set out in the addendum plan including:

- The introduction of a double height screen facing onto St Helen's Square.
- Reconfiguration of the cultural/public spaces in terms of location within the building as set out in the planning history section of the report. In the 2023 submission the cultural spaces were located on levels 10, 11, 12, 72 and 73. As part of the revised scheme the cultural offer would be located on floors 1, 2, 3, 11, 72 and 73.
- Enhanced landscaping and public realm design.

146. The proposed cultural offer is set out in detail in the following sections of this report.

## *The Crown*

147. A two level education (level 72) and publicly accessible viewing destination (level 73) (viewing gallery and education space 3,134 sqm sui generis use) operated in partnership with the London Museum. The applicant has been in discussions with the London Museum, as a preferred partner for this space. A potential layout has been developed for the education space It will include a variety of learning rooms, breakout spaces and presentation areas designed to accommodate high volumes of students. From the education space students would gain an insight into the City's history and apply learning while observing panoramic views of the capital with easy access to nearby heritage and cultural sites.
148. The London Museum would work in partnership with the applicant to define the educational and cultural programme for the upper levels. It would encompass school classes, interactive workshops, research and cultural programming. The activities would align with the Museum's educational commitments and complement the exhibit focused activities that would take place at the new London Museum in Smithfield.
149. The space could contribute towards delivering learning programmes as outlined in the Mayor's London Curriculum. This is an education programme designed to help teachers bring national curriculum to life inspired by the capital and covering subjects including art, English, geography, history and music. Curriculum resources support learning inside and outside the classroom and showcase the educational offer of a wide range of supporting London institutions including the London Museum.
150. The proposed viewing gallery would be London's highest publicly accessible observation point providing sweeping views of the City. Precise operation of the viewing gallery is still being developed and would be defined in the S.106 agreement. Notwithstanding, it would be jointly managed by the landlord and the London Museum. Media screens and freestanding exhibit areas, curated by the London Museum, would be scattered through the space to support the educational offer at level 72 in addition to allowing self-guided exploration by visitors. The gallery would primarily be used by members of the public and school groups, outside of opening hours it could be used for private functions and events and pop-up events.
151. The viewing gallery and education space would be accessed via the public entrance on the south west corner of the building. Users would go up to the level one public lobby, where lifts would take people directly to the viewing gallery and education space. An area for security checks would be incorporated into the level one lobby area.

152. The provision of the viewing gallery and education space would accord with Local Plan policy DM10.3 and emerging City Plan 2040 policies S8, S21 and DE4 which seek to secure the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City. The proposal would contribute towards the network of free viewing galleries across the City.

### Cultural Spaces

153. A multilevel destination is proposed, across levels 1, 2, 3 and 11 of the building (sui generis) accommodating a diverse range of cultural spaces and a 360 degree elevated open air garden.

154. Within the podium garden at level 11, cultural areas are proposed and a food and beverage tenancy to enliven the space and support wider cultural activity across the site. In the revised scheme the cultural areas at level 11 are slightly smaller than those proposed at level 11 under the original 2023 scheme. This is so that there is more useable garden space around the perimeter of the garden. The cultural space has been redistributed to level 2. Furthermore, a garden room is now also proposed at level 11 for use by the public to enhance enjoyment of the garden.

155. Given the anticipated duration of construction works the fit out and operational requirements of these spaces is still under development. Notwithstanding, the applicant envisages from research that has been undertaken that potential functions for the level 11 cultural rooms could include:

A Wellbeing Hub – A flexible storage and class space at garden level exclusively dedicated to health, fitness and wellbeing initiatives such as hireable space for meditation, yoga and exercise classes, therapy and health consultation this would be in response to the need to support wellbeing amongst City residents and workers.

Makerspace – A creative production facility offered for use by local creative organisations and priority groups, on a fee paying or subsidised basis. Such a venue would address a shortfall of such creative space within the City and could potentially be operated in partnership with the City's livery and guilds and this could have strong connections with the cultural space on levels 2 and 3.

Diverse Community Hub – A flexible community space suited to use by community groups for culturally significant holidays or for community outreach supported by appropriate booking and management protocols.

156. Operation of the podium level cultural spaces could include joint management of the cultural space on the lower levels of the building and the garden rooms by a single operator, or independent management by one or more operators, or direct management by building management.

157. It is envisaged that the podium cultural space at levels 2 and 3 would complement the food and beverage offer on level 2. As with the level 11 cultural rooms, given the duration of construction work the fit out and operational requirements for levels 2 and 3 are still in development. Notwithstanding, research shows that functions of the space could include:
- London Collections – An interactive exhibition space used to showcase the City's diverse Guilds, Liveries and Archival collections, featuring guest curation. This function would support increased prominence and cultural relevance of these unique institutions.
  - Creative Canvas – An acoustically suitable space accommodating small-scale live performances, audio visual installations, and art exhibitions and related seminars and training. This would provide local artists and performers a platform to connect with audiences in the City, drawing inspiration from venues like HQI The Rotunda.
  - Maker Market – A curated area for London artists and creatives to showcase and sell their creations, comparable to UAL Not Just a Shop (unique gifts, homeware, artwork and fashion created exclusively by students and graduates from University of the Arts London).

158. Fit out could be tailored to support exclusive use as above or adapted to allow for a more fluid rotating use of the space including:

Educational/Creative Workshops and Seminars – Workshops and skill sharing activities which relate to the agreed programme and occupier of the space.

Community and Youth Engagement – Initiatives which target underrepresented groups enabling them to engage with the broader City community.

159. An affordable cultural offer would be provided at levels 2,3 or 11 comprising 30 sqm of floor space (the space could be subdivided) that would potentially be let at 50% market rent. Details of the provision, location and management of this space would be secured through the S.106 agreement.

#### Ground level Public Realm

160. A flexible programmable ground floor public realm space is proposed that could accommodate curated small scale cultural activity such as performances and public markets. The revised scheme has enhanced the public realm through the introduction of a double height screen onto St Helen's that would activate and enliven this area. Landscaping on the western side of the building has also been improved with new seating and planting areas.

161. The enhanced public realm would connect people with the cultural uses within the building. Further details on the operation of the public realm would be secured through the cultural strategy and the public realm management plan.

162. It is considered that the proposal would deliver a compelling new cultural offer for the City that would align with the Destination City agenda. Final details of the operation of the cultural spaces would be secured through the S.106 and as part of the Cultural Implementation Strategy. The proposal would therefore accord with policy CV2 of the emerging City Plan 2040 and policy CS11 of the Local Plan 2015.

### **Design and Heritage**

163. The relevant local policies for consideration in this section are S10, DM10.1, DM10.3, DM10.4, DM10.8, CS12, DM12.1, DM12.2 (only relevant for the public realm works in the northernmost part of the site), CS13, CS14, CS16, DM16.2, CS19, DM19.1, DM19.2 of the Local Plan policies and HL1, S8, DE1, DE2, DE3, DE4, DE8, S10, AT1, S11, HE1, HE3, S12, S13, S14, OS1, OS2, OS3, OS5 of the emerging City Plan 2040, and London Plan policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4, GG1-3, GG5, GG6, NPPF(Design) and the National Design Guide.

### **Principle of a Tall Building**

164. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), >75m AOD) and London Plan D9 (A).

165. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (policies CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).

166. The application site is at the heart of the Eastern/City Cluster and as such is identified in these Plans as a suitable location for a tall building. In this respect the proposal would be in accordance with London Plan D9 B (3) which stipulates that tall buildings should only be developed in locations identified as suitable in Development Plans.

167. A tiny part of the application site overlaps with the boundary of the St Helen's Place Conservation Area immediately to the north. The area of land in question is the merest sliver, and the proposals here are only for relandscaping in connection with the scheme. The tall building proposed would be located well south of the conservation area boundary and clearly outside of it. As such, for the purposes of D9 B, officers consider that this exceedingly minor overlap between the

northernmost site boundary and that of the conservation area would not conflict with CS14 (2) (which includes a stipulation that tall buildings should be refused in conservation areas).

168. At 309.6m AOD, the proposal would exceed the highest of the proposed City Cluster contour lines (300m AOD) set out in the emerging City Plan 2040, rising instead to the limit set by the Civil Aviation Authority. While this would represent a conflict with policy S12 (3) of the emerging City Plan 2040, the additional 9.6m of height is not considered to have any negative consequences in respect of the settings of the Tower of London, St Paul's Cathedral or the Monument (the contour lines were modelled in relation to the settings of these three strategic heritage assets) or any other strategic views; the proposal is intended to be the highest building in the Cluster and as such to form its apex.
169. The proposed height would be consistent with this aim and would clearly set it apart from the next higher buildings including 22 Bishopsgate, and the suitability of this height in relation to the Cluster as a composition is set out in the relevant sections below. Notwithstanding this acceptability of the proposed height, the breach of the highest 300m contour line would conflict on the matter of height with policy S12 (3) of the emerging City Plan 2040.
170. The proposal is in the City Cluster Key Area of Change as set out in the emerging City Plan 2040 and emerging policy S21 would apply. While the proposal would satisfy most relevant parts of this policy, it would conflict to a degree with S21 (5) due to the impacts identified on heritage assets. While the Plan has been submitted for Examination in Public (EiP), it does not yet have the same weight in decision-making as the adopted 2015 Plan and consequently its provisions can be afforded only limited weight as a material consideration.
171. The site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant office functions, in line with London Plan Policy D4. It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel. The site is central to the City's growth modelling, the significant majority of which will be accommodated in a consolidating City Cluster of tall buildings and would deliver 153,602sqm, (an uplift of 104, 50 sqm) which is almost 6.53% of the required commercial space to meet projected economic and employment growth demand until 2040. This strategic quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.
172. Officers consider the principle of a tall building on this site is appropriate. The proposal is supported by adopted policies CS1 and CS7 (1,2, 4-7), which seek to

ensure the Cluster can accommodate the Plan's significant growth in office and employment floorspace, whilst drawing support from CS14 (1) (Tall Buildings), which seeks to consolidate tall buildings where they are least impactful on the strategic heritage and character of the CoL and London. This overarching balance is at the heart of the design-led optimisation of site capacity when assessing this against wider heritage and design policies.

173. The GLA Stage 1 Letter states *“the principle of a tall building on this site is considered to be in accordance with the locational requirement set out in London Plan Policy D9 (Part B) by virtue of the City of London Local Plan Policy CS7, which states that new tall buildings are expected to be located within the Eastern Cluster in appropriate locations, and Policy CS14 and accompanying figure N, which shows that the site does not fall within any of the zones identified as being inappropriate for tall buildings.”* It continues that *“The proposed tall building still needs to be fully assessed for its visual, functional, environmental and cumulative impacts in accordance with London Plan Policy D9 (Part C).”*

174. An assessment against London Plan Policy D9 (C) and (D) is made below, with reference where relevant to other sections of this report for more detail. It is found that the proposal would largely satisfy the criteria in (C) and (D).

175. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 (A, B, C and D), Local Plan Policy CS7 (1,2, 4- 7), CS14, emerging City Plan 2040 S12 (1,2, 4-10), S21 (1-4, 6-15). There is some conflict with Local Plan policy CS 7 (3) and emerging City Plan 2040 S21 (5) due to impacts on two designated heritage assets. These impacts are addressed in detail in the report below. As mentioned above, there is also a degree of conflict with emerging policy S12 (3) on the matter of height. These conflicts with Development Plan policy are addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

### Tall Building - Impact

176. This section assesses the proposals against the requirements of policy D9 C (1-3) and D of the London Plan. The visual, functional, and environmental impacts are addressed in turn. Further assessment of the architectural approach and design details follow on below.

### *Visual Impacts:*

177. The site is in the centre of the City Cluster, a carefully curated collection of tall buildings which serves as the heart of the City and London's financial and insurance industry. The City Cluster is an established part of the City's and London's skyline and its long-term consolidation and curation is anticipated under the emerging City Plan 2040. The relationship of the proposal to the composition

of the City Cluster has been carefully considered in a range of long, mid-range and immediate views.

178. At 74 storeys (309.6m AOD), the proposal would be the tallest building in the City Cluster. In comparison, other existing and consented tall buildings in the Cluster are given here for reference (in descending AOD height order):

- 1 Undershaft: 304.9m (2016 consent)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate 284.68m
- 100 Leadenhall 263m
- 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
- Heron Tower: 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- 30 St Mary Axe (the 'Gherkin'): 195m
- Leadenhall Court: 182.7m
- 20 Fenchurch Street: 160m
- 85 Gracechurch Street: 155.70m
- 70 Gracechurch Street: 155m
- 50 Fenchurch Street: 149.6m

179. The impact of the proposals upon the City and wider London skyline has fundamentally informed the design-led optimisation of the site and officers support the overall form and massing strategy. This represents an efficient use of the site, that would form part of the heart of a dense, consolidating cluster of tall buildings including 122 Leadenhall Street (the Leadenhall Building), 22 Bishopsgate, 55 Bishopsgate, 100 Bishopsgate, 100 Leadenhall, 30 St Mary Axe and Tower 42.

180. In relation to long range views D9 C (1; a; i), these have been tested in the THVIA December 2023 Views 1 to 6, 9, 10, 12, 15 to 18 and THVIA Addendum May 2024 Views 7, 8, 11, 17.1 and 19, including LVMF views 1-6, 26, 10, 11, 13, 15-17, 19, 25 and 26. Additional LVMF views have been incorporated within the Appendices A and B, including LVMF 9, 18 and 23. Some of the comments from statutory consultees, including Historic England and GLA relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report. Views from neighbourhood boroughs, including Islington, Westminster, Tower Hamlets, Lambeth and Southwark have also been included within the THVIA December 2023 and THVIA Addendum May 2024.

181. The proposal would be the tallest building in the City and the totemic centrepiece of the City Cluster. Its height would act as a focal point for and would consolidate the existing Cluster of the tall buildings, responding to the existing



skyline where building heights step down from the centre (the application site) to the periphery.

182. The tallest element of the proposal would be on the northern part of the site, framed with the neighbouring buildings at 22 Bishopsgate and, in the cumulative, 100 Leadenhall, further reinforcing the existing shape of the Cluster. This is evident in baseline and cumulative panoramic views, where the proposed tower would be an anchoring presence for and compactly integrated within the spatial composition of the City Cluster. In this crucial consolidatory role, the proposal would result in a number of minor enhancements to the LVMF Panoramic views.

183. In riparian views including from Waterloo Bridge, Golden Jubilee/Hungerford Bridge and from St James's Park, the proposal would preserve the setting of St Paul's Cathedral as the Important Landmark as well as the composition, features and characteristics of the LVMF views. The impacts would be similar to the 2016 consented scheme. In relation to long range views, the development would comply with Policy D9 C (1 a; i).

184. In relation to mid-range views, and consideration of London Plan D9 C(1a;ii), the impacts are largely demonstrated in THVIA December 2023 Views 13, 14, 18, 20-45, with the updated Views 21, 22, 23, 26 and 36 included in the THVIA Addendum May 2024. Some of the comments from statutory consultees, including the GLA and the LB Tower Hamlets, relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.

185. In both baseline and cumulative scenarios, in mid-range views from all directions, the proposed development would compatibly integrate into the Cluster and would be intrinsic to reinforcing and defining its overall silhouette and form. In views from the south-east, including from Tower Bridge and The Queen's Walk, it would be seen as part of the emerging Cluster, consolidating its distinctive presence and providing a clear apex, slightly taller than 22 Bishopsgate. From the east, including from Whitechapel Road and Commercial Road, the development would also be perceived as part of the Cluster, appearing in front of 22 Bishopsgate at a slightly increased height, while in views from the north, including from Shoreditch High Street and Finsbury Square, it would appear to the left (north) of 22 Bishopsgate.

186. From the south-west, including from Tate Modern and London Bridge, the development would appear fully incorporated into the Cluster, at a similar apparent height to 22 Bishopsgate.

187. The development would be mostly screened in views from the west, with the very top being visible from areas including St Paul's Cathedral Churchyard and Bank Junction, stepping down from 22 Bishopsgate in the context of existing

buildings in the Cluster. In views from Fleet Street, the development would be almost completely screened by existing buildings in the Cluster, to maintain the primacy of St Paul's Cathedral.

188. From Finsbury Circus the development would be appreciated in closer proximity. The mid to upper elements of the building would be visible next to 22 Bishopsgate and at a lower apparent height, with existing interposing vegetation partially obscuring the development in some views. The lower elements of the proposals would remain occluded from view by a combination of the lower scale development which already exists around Finsbury Circus as well as some of the buildings that form the City Cluster. In the cumulative scenario, most of the proposed development would however be screened by 55 Bishopsgate.

189. From these mid-range distances, the observer would begin to experience the elegant and dynamic form of the proposals with its striking mega-grid framework of natural zinc vertical piers and horizontal parapet beams, creating a rhythmic pattern. Terraces at Levels 30 and 40, where visible, would add interest to the tower and aid in successfully breaking up the overall mass. The highly distinct façade of the building would calmly stand out from the rest of the fully glazed buildings in the Cluster, but overall harmonise with the distinct high-tech commercial character of the surrounding towers.

190. Therefore, in relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).

191. In relation to immediate views, (London Plan D9 C (1; a; iii)), THVIA December 2023 Views 46, 47 and 54, and updated Views 48-53 and 55-64 in the THVIA Second Addendum October 2024, illustrate the closer range views of the building and how the building would be experienced at street level from St Helens Place, Undershaft, St Mary Axe, Leadenhall Street, Mitre Street, Bury Street and Lime Street. Historic England, the GLA and third-party representations identify harm to a number of immediate townscape views particularly views around St Helen's Square, including St Helen's Church, St Andrew Undershaft and the Lloyd's Buildings. In some views of St Helen's Church, Officers acknowledge harm. These views are addressed through the report, specifically within the Heritage Section.

192. Within this immediate environment, the proposed building would be seen in the context of other modern and contemporary tall buildings with a landmark status, including The Leadenhall Building, 30 St Mary Axe and 22 Bishopsgate. Immediate views would change, as the proposed building would be larger and wider than the existing, without however affecting the primacy and appreciation of the other tall buildings. The proposed development would introduce another contemporary building of striking architectural and landmark quality which would sit comfortably in between its iconic neighbours in a way that further strengthen

and enhance the local townscape. The immediate neighbour, The Leadenhall Building, in particularly its defining form, silhouette and detailing would continue to be seen and appreciated from surrounding streets; views of it would not be detracted from as alleged by an objector. The proposed podium garden would introduce a new interesting and playful feature which, due to its elegant form, would add interest, without obscuring any views.

193. The proposed development has been designed to activate the ground floor and optimise inclusive public realm at grade but also in the elevated podium garden at Level 11. The new building would provide new, interactive frontages on all sides, designed to address each respective street scene; a calmer approach to the north and east with more interactive facades to the south and west. In all cases the proposed frontages would be of pedestrian scale and would generate engagement and interaction with passing visitors. Active frontages and high-quality architecture would invite people to the site as a destination, place to linger or connection routes through the heart of the Cluster. In relation to immediate views the proposals would comply with D9 C (1; a; iii).

194. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would be the Cluster's totemic centrepiece, key in reinforcing the Cluster's skyline form, along with the neighbouring 22 Bishopsgate in the local and wider context. It would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital, where the Cluster identifies the original commercial heart of London since Roman times. And with its distinctive, civic crown, it would trumpet how the uppermost parts of both the proposal and many buildings in the Cluster incorporate elevated public spaces at their peaks.

195. As assessed elsewhere in this report, at a macro character and identity level, the consolidation of the Cluster achieved by the proposal would allow the observer of strategic views to better orientate themselves, assisting in a recognition and appreciation of other strategic London landmarks as part of a more coherent whole. In local views the proposal will assist in consolidating the Cluster form so that its form can be further reinforced. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).

196. In relation to D9 C (1; c), the architectural quality and materials are exemplary and would be maintained through its life span. The tower would be visually split into four main parts: the ground floor podium, of 10 storeys and various set-backs and podium garden that extends to the south and (to a lesser extent) the east,

west and north; two middle sections projecting southwards to varying degrees; and the upper, slender element of the tower, including its 'crown'. The stepped massing of the proposed tower would offer a greater variety of workspaces and is enhanced with urban greening and external spaces around the building offering visual, public and occupiers' amenity. The facade design and material choice respond to the prevalent glass-clad appearance of contemporary City buildings and would distinguish this totemic centrepiece from the more glazed towers surrounding.

197. Above the podium, the facades are organised in an expressive mega-grid format. To achieve a lighter, whitish appearance, the design employs a conventional double-glazed unitised facade with external brise soleil for solar gain control. Natural zinc was chosen for its performance, sustainability suitability for large-scale construction. Weathering steel would be used for key external structural elements, such as the mega-columns (tridents). The crown would be a subtle array of colourful dichroic glass rippling to red expressed picture windows to signal the civic spaces within. Overall, the architecture is clearly well-considered in the round and of a high quality, would be visually distinctive and an attractive addition to the skyline in of itself.

198. In relation to D9 C (1; d), a full assessment of impact with regards to heritage assets is detailed in the Heritage section of the report. Officers have identified the following adverse impacts (indirect, via setting):

- Low level of less than substantial harm to the Church of St Helen's Bishopsgate (Grade I)
- Slight level of less than substantial harm (at the lowest end of the spectrum) to the St Helen's Place Conservation Area.

199. The GLA identified the proposed development to cause less than substantial harm to a number of heritage assets. They state that "*the harm identified must be weighed against the public benefits, which will be undertaken at the Mayor's decision-making stage. If robustly secured by condition and/or S106 obligation, GLA officers consider it likely that the harms identified would be outweighed by the public benefits of the proposal. The public benefits package could be further supported by an affordable workspace offer.*"

200. Historic England's primary concerns for this scheme are about the design, digital screen, and form of the proposed development, particularly as experienced from nearby streets, rather than overall height.

201. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for the proposed development. The development optimises the capacity of the site and not least would deliver an important site in the long-term consolidation of the City Cluster and an essential contribution to the

provision of required office space as is set out in the office section of this report. The proposed development would deliver 6.53% of this remaining floorspace target.

202. To optimise the site, while minimising harm, alternatives have been explored including the previous 2019 scheme and different iterations of lower levels of the massing now proposed (being the proposed site of the tallest building in the Cluster, the overall proposed height has remained the maximum possible). The form of the development would have a slender, tapering profile in its upper part with the mass extending southwards, where it is screened by surrounding development in strategic views. The cascading form would increase the usable floorspace while integrating the development to its surroundings.

203. Different design iterations were explored, following the deferral of the scheme in July 2024, to maximise the retained portion of St Helen's Square, as illustrated on pages 9, 10, 15 and 16 of the DAS Addendum October 2024. These included relocating the public lifts from the south to the west or north-west at ground level. However, such alternatives would have obstructed views of St Helen's Church, disrupted pedestrian flow and failed to provide a clear and intuitive public entrance from the main approach and elevation on St Helen's Square. Consequently, the preferred solution was to establish a single main public entrance at the south-western corner of the building, featuring a generous staircase and accessible lifts leading to Level 1 and the main public circulation area.

204. In their letter on 14<sup>th</sup> June 2024, CCL and option suggested alternative options which would redistribute the massing of the podium levels (Ground to Level 13) to the northwest of the site to retain the public realm at St Helen's Square. These options were considered by the design team and were not taken forward for the following reasons:

- They could not deliver a rational and efficient structural and core arrangement which would incur increased embodied carbon;
- They would reduce the ground footprint to a degree that could not accommodate the entrances and servicing needed for a tower of this size;
- The suggested location of the core to the north (not axially) would create a less efficient structure, unfeasibly long lift lobbies and poor office floorplates above;
- They would block the primary pedestrian and visual link between Leadenhall Street and St Helen's Church;
- The suggested slender and elongated columns in St Helen's Square would have a greater impact on St Andrew Undershaft as they would support an unmitigated massing above; and
- The suggested omission of the southern, sunniest section of the podium garden would lose much of the public benefits and biodiversity gains and the

application's calculated transition of visual horizons from street scaled buildings to the towers.

205. Following consultation responses, the design of the crown of the tower has been amended to provide a distinctive 'top' while remains coherent and integrated to the rest of the tower. To mitigate impacts to St Helen's and provide a calmer background to the surrounding development, a lighter palette of materials was introduced at podium levels. The design of the servicing entrance has been amended to create an interesting moment in the junction of St Mary Axe with Undershaft.
206. While the adverse heritage impacts are not entirely mitigated, they have been minimised by a design-led approach which has included the exploration of alternative forms of development; the proposal is considered to strike the right balance between conservation and growth in optimising the site and clear public benefits flow from the development to outweigh the harm identified. This is detailed in the planning balance section of the report. As such the proposal is considered to comply with D9 C (1; d).
207. In respect of D9 C (1; e) the proposal would be visible in relation to the Tower of London WHS as demonstrated by Views in the THVIA December 2023 and Addendum May 2024. The proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the ability to appreciate it. This is by reason of its strategic siting within the long established and consolidating Cluster backdrop, the intervening distance and height when viewed from in and around the Tower of London. The development would comply with D9 C (1; e).
208. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. Rising slightly higher than the neighbouring 22 Bishopsgate, it would read as the pinnacle of an established cluster of tall buildings, reinforcing their group and shape. Due to its location in the centre of the cluster, its distance and intervening built fabric layering, as well as its strategically driven height aiming to consolidate the cluster, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).
209. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered at its worse to be minor adverse but the effects are not significant, as discussed in the relevant section in this report. Further details would be requested as a S106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if

considered necessary). The proposed development would comply with Policy D9 C (1; g) of the London Plan.

210. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development would comply with Local Plan policy D9 C (1; h).

### *Functional Impact*

211. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants, these issues have been covered in more detail in the architecture and public access and inclusivity section of the report, and are considered to be in accordance with London Plan Policy D9 C (2; a).

212. The proposed servicing strategy would move the Undershaft carriageway north and eliminate the existing basement ramp access. Two vehicle lifts for servicing and deliveries would be positioned near the northeast corner of the site, providing direct access from St Mary Axe to the building's loading bay at Basement Level B2. This arrangement would prevent additional servicing traffic on the already busy Undershaft and minimise the impact on the Church of St Helen's. The proposed Framework Delivery and Servicing Plan includes significant consolidation. The FDSP would ensure that deliveries are managed and time-limited for safety. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). Further details in respect of the servicing approach are set out in the Transportation section of this report.

213. Visitors would ascend from St Helen's Square to the dedicated public lobby on Level 1 via a broad Yorkstone staircase with a gentle gradient or two fully accessible lifts, each accommodating up to 17 people. Both routes converge at the same entry point and lead into the Level 1 public lobby. From this lobby, lifts provide access to the building's elevated public spaces, including the restaurant (Level 2), cultural spaces (Levels 2, 3, and 11), podium garden (Level 11), and the education centre and viewing gallery (Levels 72 and 73). The public lobby is generously sized to comfortably accommodate visitors for events and exhibitions,

facilitating internal queue management and security checks. This design ensures peak-time usage is handled efficiently, avoiding overcrowding and maintaining a welcoming environment. This arrangement aligns with policy D9;C;2;c. Accessible entrances and spacious lobbies are also planned for the building's northwest and east sides. A dedicated cycle entrance would be located at the northwest corner, accessible via glass sliding doors from Undershaft. Five drum doors would provide entry to the office lobby from St Mary Axe. Final details of all entrances would be provided in the Access Management Plan to be secured by condition.

214. As discussed in the transport section of the report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as a result of the development. The impact will require some interventions to the highway which will be developed in detail as part of the S278 agreement. The S106 agreement will require the developer to enter into a S278 agreement with the City of London to undertake any works to mitigate the impact of the development in accordance with (D9;C;2;c).

215. The provision of affordable workspace, cultural space, office floor space and the education floorspace/viewing gallery will promote the creation of jobs, services, facilities and economic activity will act as a catalyst for future growth and change in the locale in accordance with (D9;C;2;e).

216. With the imposition of conditions, no adverse effects have been identified on the operation of London's aviation navigation and the proposals have also been found to avoid significant detrimental effect on solar energy generation on adjoining buildings (D9;C;2;f).

#### *Environmental Impact:*

217. In regard to D9 C (3; a) the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions are appropriate for the public uses across the site, including the public realm at ground floor and podium garden. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report. It is considered the proposal would meet the environmental considerations of Policy D9 C (3).

#### *Public Access:*

218. The top two floors of the building would be dedicated to educational spaces and a viewing gallery, in collaboration with the London Museum. These spaces would



be accessible and free of charge to the public, offering unique views across the City, London, and beyond, in addition to the elevated podium garden. Access would be provided through a spacious dedicated lobby at Level 01 which would be accessed via a broad Yorkstone staircase and two fully accessible lifts, leading visitors from St Helen's Square. The proposal would also deliver a free and publicly accessible elevated podium garden at Level 11. This external public space, along with associated public amenities would be offered in addition to a newly landscaped and improved public realm at ground level. Additionally, publicly accessible spaces cultural and food spaces are proposed on Levels 02, 03 and 11, all of which would be accessed from the lifts at the lobby at Level 01. This offer would be in accordance with D9 D.

*Tall Building, Principle, Conclusion:*

219. Overall, Officers considered the site to be clearly appropriate for a tall building and a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 (A-D), Local Plan Policy CS 14, CS7 (1,2 4-7) emerging City Plan 2040 S12 (1,2, 4-10) S21 (1-4, 6-15). There is some conflict with Local Plan CS 7 (3) and emerging City Plan 2040 S21 (5) due to impacts on two designated heritage assets. As mentioned above, there is also a degree of conflict with emerging policy S12 (3) on the matter of height. These conflicts with Development Plan policy are addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

**Architecture, Urban Design and Public Realm**

Architecture

220. The proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate the significant growth of core CAZ, providing employment and complementary commercial, cultural and educational uses. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-3,5,6: growth which is socially, economically and environmentally inclusive. The proposal is at the heart of the strategic function of the City Cluster, to accommodate substantial growth in accordance with Local Plan Policies CS7 and London Plan Policies SD4, SD5 and E1. The design response for the new building has been carefully considered with multiple contexts, including at street level, close views, relationships with nearby buildings, greater distance views from outside the City, and in relation to the conservation areas, listed building and other heritage assets surrounding the site.

221. The proposed development would provide nearly 6.53 % of the projected demand for office floor space in the City, and the proposals sought to optimise

this delivery in a Plan-led approach which seeks to consolidate the City Cluster, to reduce pressure on more sensitive environments elsewhere. This long-term approach has created an evolving character and context of tall buildings, to which the proposal has been designed to respond. The GLA acknowledge the intensification of office floorspace would support the function of the Central Activities Zone and London's position as a World City, and the proposals are supported in land use terms. The GLA also acknowledge the location of the site in the City of London Eastern Cluster as a suitable location for tall buildings and that the proposal represents high quality architecture and urban design, despite some conflict with impacts on heritage.

222. The proposal would accord with the design-led approach of London Plan Policies D3 and D8, delivering a design solution making effective use of limited land resources, in accordance with strategic Local Plan Policy CS10 and emerging City Plan Policy S8. Various alternatives have been explored including the 2016 consented scheme and different iterations of the massing at the lower levels (being the proposed site of the tallest building in the Cluster, the overall proposed height of the scheme has remained the maximum possible).

223. The site is part of a dynamic, densely urban townscape, fundamentally characterised by its proximity to other tall buildings, as well as being a pivotal site central to several pedestrian routes connecting key landmarks and destinations across the Square Mile. The site is at the heart of the Cluster with numerous completed tall buildings in the vicinity including the Leadenhall Building (No. 122 Leadenhall Street), 22 Bishopsgate, the Heron Tower (No. 110 Bishopsgate), 52-54 Lime Street, 6-8 Bishopsgate, 100 Bishopsgate and 40 Leadenhall Street. These large and tall modern commercial buildings are contrasted with characterful pockets of historic townscape: the defining 'genius loci' ('spirit of the place') of the Cluster. This contrast gives the City Cluster a charisma which is unique in London and possibly Britain.

224. The immediate historic townscape includes two medieval churches and rare survivals in the City, St Helen's Church (Grade I), to the north, and St Andrew Undershaft (Grade I), to the east. To the south, the Lloyd's Building (Grade I), by Richard Rogers Partnership, a late 20th century High Tech office building contributes to the high quality, varied and diverse architecture of the Cluster. Further east, 30 St Mary Axe (non-designated heritage asset), by Foster and Partners, continues the late 20th/early 21st century tradition of exemplary office buildings of the highest architectural quality. The proposal would be consistent with this existing character of rich and striking juxtapositions and would comprise a pivotal new addition to them.

*Main design differences when compared to the 2019 consent (16/00075/FULEIA)*

225. While of a similar height to the previous scheme on the site, the proposals represent a new design approach. Although the proposal must be considered on its own merits, officers consider it useful to set out the key differences between the consented scheme and the proposal, and a commentary on the design evolution:

- The consented scheme is of 73 storeys and 304.94 m AOD while the proposed is 74 storeys and 309.6 m AOD.
- The consented scheme took the form of a singular, rectilinear block with a 'backpack' of lift cores on the west elevation; the proposal comprises a series of stepped forms with the lift cores fully integrated.
- The consented scheme was cantilevered over the ground floor plane at a height of approximately 10m to 17m, while the proposal comes to ground.
- The consented scheme was of a different elevational design, characterised chiefly by substantial Cor-Ten steel diagonal bracing that created a dramatic series of crosses up the elevations; the proposal is, in the main, of a much calmer architectural approach, utilising an elevational grid of zinc and white enamel panels, interspersed with elevated gardens, arising to a crown of subtly rippling colour.
- Structurally different, the consented tower is of a different floor plate arrangement with the office floors and upper viewing gallery having less usable space.
- The consented scheme would have remodelled St Helen's Square, creating an opening in the ground level public realm to a basement below. This was considered a benefit of the scheme at the time, however, the proposed design in the current application is considered to be superior. This application would provide a slightly smaller space at ground floor level (addressed in more detail later in the report), but with a significantly improved design regarding both the existing condition and the previously consented scheme, there would be an overall increase the amount of publicly accessible space across the site, providing a large, new podium garden at level 11; apart from its topmost viewing gallery, the consented scheme provided no elevated, publicly accessible space like this.
- The consented scheme established a visual link between St Helen's Bishopsgate and St Andrew's Undershaft when viewed from St Helen's Square. As part of the consented scheme there was also a direct pedestrian route between these churches. Historically, the churches were not visually connected or linked in any way, and this co-visibility and direct route did not contribute to their heritage significance. Currently, there is no visual connection or direct pedestrian route between the churches. The new proposals would preserve the existing route between the churches, enhancing it through public realm improvements.

*The 2023 scheme - Changes since original submission December 2023 and Deferral on 2<sup>nd</sup> July 2024*

226. In May 2024, following initial consultation comments from the GLA and Historic England and subsequent discussions with Officers, the design of the proposal was revised and improved. These revisions and improvements include:

- The design of the top of the building – the design has been amended to create a distinctive, civic crown for the building, and the Cluster, which is better integrated with the rest of the building;
- The cladding to the podium levels – the previous palette of red fired and glazed terracotta would be replaced with a lighter, speckled glaze. This lighter version creates a contrast with the tridents while allows for a more lightweight and ‘calmer’ podium and background to the surrounding listed buildings, and in particular mitigates (though does not remove) the impact of the proposals on the setting of St Helen’s Church;
- The podium soffit – the proposed surface treatment was amended, from being white and reflective to a less bright and matter colouration creating a ‘softer’ appearance that compliments the colour and glazes for the podium façade. It also integrates smoother with the surrounding townscape; and
- The design of the vehicle lift enclosure – the revised design would have a quieter but thoughtful appearance with a natural stone masonry wall to be sculpted into a ‘curtain wall’ with plinth bases. This option would bring the same attention to detail which characterises the rest of the proposals to this more utilitarian and functional element and, in particular, would mitigate (but not remove) the impact of the proposals on the setting of the Church of St Helen.

227. As also mentioned earlier in the report, in the Relevant Planning History and Background to the Proposal section, following the deferral of the scheme in the July 2024 at the Planning Applications Sub-Committee, changes to the proposal have been made. The changes relevant to the architecture and design of the proposal are included below:

- Reconfiguration of the building footprint: The south elevation of the building is set back to preserve a larger portion of St Helen’s Square. This adjustment reduces the footprint by 10m at ground level. This results from the relocation of the public lift core to the level 11 terrace, the level 11 terrace lifts have been moved to the west elevation. The footprint of the building to the west would extend by 3.3m westwards, to the north of the external entrance staircase.
- Reconfiguration of the entrance arrangements and layout of the ground floor: the change in the shape of the footprint of the building has necessitated amendments to the entrance arrangements, the layout of the ground floor and the lift core. Instead of the two public entrances proposed in December 2023 (to the south and northwest), a single main entrance is introduced at the building's south-western corner. This entrance features a broad staircase and two public lifts leading to the Level 1 lobby. From the lobby, visitors can

access elevated public spaces via lifts, including the restaurant (Level 2), cultural spaces (Levels 2, 3, and 11), the podium garden (Level 11), and the education centre and viewing gallery (Levels 72 and 73). The cycle hub is moved from the west elevation to the building's north-west side, providing direct access from Undershaft and eliminating overlap with the western public space (Undershaft Square).

- Amended location and layout of the public uses across the lower floors – as described in the sections above.
- Amended facade design through the incorporation of a digital screen and new public entrance - The new public entrance would be located at first floor level on the south-west side of the building. A new lift portal and external stone staircase are proposed that would take people between ground and first floor level. A digital screen (two-storey high) would be added to the south elevation facing St Helen's Square to foster public engagement and serve as a focal point for gatherings and events.
- Amended landscape and public realm design at ground floor level – More of St Helen's Square would be retained, the landscape design has been amended to create more accessible and flexible public realm. The relocation of the cycle entrance has enabled the formation of an enhanced area of public realm to the west of the site, named 'Undershaft Square' in the application documentation.
- Amended level 11 podium garden design - the layout of the podium garden has been revised and the shape and layout of the internal spaces has been reconfigured. The public entrance to the garden would be located on its west side (south side previously) and flexible outdoor seating and a 'garden room' would be located on the south side of the garden
- Basement structure revisions - Minor adjustments were made to the basement design to accommodate deeper planting zones for increased urban greening and enable all refuse collection providers to enter the building for waste collection.

228. An analysis of how these changes relate to the public realm design and the impact on the loss of open space in St Helen's Square have been discussed in more detail in the public realm section of the report later on in this report.

#### *Assessment of the Proposal (the revised 2023 scheme)*

229. Fundamentally shaped by the local distinctiveness of the City Cluster, the proposal has been designed to respond to the site's varied context with a tall building of a striking design, which was developed to optimise the tall building structure, facades and MEP systems for embodied and operational carbon savings and longevity, including opportunities to incorporate urban greening and biodiversity. It would be attractive from different viewpoints and from varied

distances and would integrate unique civic experiential offerings in the form of the podium garden, and topmost levels in the building in support of the City's wider 'Destination City' initiative, providing a rich mix of public uses which would enliven the City Cluster as a vibrant, 24/7 destination.

230. The height of the proposed development (at the Civil Aviation Authority limit) would be consistent with the long-term evolution of the City Cluster, which has sought to influence development so that a considered, coherent overall shape and composition to the skyline presence of tall buildings is achieved. The proposal would be the tallest building in the City and as such would act as the pivotal centrepiece of the City Cluster's heart. It would be of the utmost importance to the composition of the Cluster in providing a clear apex and central 'totem' for the existing group of tall buildings which rise to differing heights around the application site.
231. Being the result of a careful curation, shaped by a range of constraints, including heritage and design constraints, the height of the proposed building would complement and highlight the City skyline in strategic and distant views, maintaining a wider pleasing and iconic townscape character. The taller peak is essential to establish and reinforce the familiar pattern of buildings stepping up towards the centre, making the Cluster a distinct and striking feature of the City's skyline.
232. The proposed development would transform the site into a vibrant hub for the community, with a focus on accessibility and connectivity. At the heart of the scheme is the creation of inviting and engaging publicly accessible spaces at the top of the building, offering opportunities for learning and education that appeal to Londoners and visitors alike. Additionally, the development would offer flexibility to workspaces and cultural areas, as well as reimagined and new public realm. The latter would include the provision of a new public space at Level 11, providing comfortable outdoor seating. Flexible retail/food and beverage (Class E(a)-(b)) spaces would also be incorporated further enriching the building's amenities.
233. The massing is a direct response to townscape and microclimate analysis, optimisation of the site and to strategic and local constraints. The form of the building is arranged in a single tower, with stepped silhouette, cascading down to the podium garden. Below the podium garden, the massing levels follow a reverse cascading order, reducing in size as they approach the ground, where the building is now set back to create a larger public space (in comparison to the December 2023 scheme).
234. This massing has evolved to maximise the opportunity to deliver optimal microclimatic conditions. The aerodynamic shape responds to site-specific

challenges and constraints. The 'wedge-like' plan form of the middle and lower parts of the tower, that sets back in steps along the height of the southern elevation, combined with an organic plan form at ground level was formed to avoid the formation of strong corner vortexes at street level, and minimise the impact of downdrafts at street level, particularly under the prevailing winds. The landscaping strategy as well as the fully integrated wind mitigation design measures across the public space at the podium garden Level 11 have been finely tuned and informed by the wind tunnel testing to maximise the potential of this external space for the public to enjoy. Wind mitigation measures would be incorporated in a well-designed and seamless way, details of their design and location would be secured via a condition.

235. The main body of the tower (above the podium garden) would comprise three distinct parts. The upper part (24 storeys), elegantly composed with a simple square plan with a gentle vertical taper that enhances the visual slenderness and proportion of the building's summit when viewed in strategic and long-range views. The middle part (16 floors) would extrude the square plan but introduce a southward extension featuring a narrowing trapezoidal shape enhancing the building's sense of proportion. The lower part (16 floors) would extend further southward, echoing the design of the middle stage. The floor plates, composed of conventional concrete slabs, would be supported by external perimeter columns, and the central core, with minimal internal columns to maximise the usable space and allow for flexibility.
236. The façade design would be calm and aesthetically pleasing, underpinned by a strong sustainable approach. The main body of the building, encompassing the upper, middle, and lower parts of the tower above the podium garden, would feature a grid framework of natural zinc vertical piers and horizontal parapet beams, creating a rhythmic pattern. This grid divides the façades into bays, each containing three windows, with solid spandrel panels and vitreous enamel brise soleils. This design results in an engaging and distinctive façade that harmonises with the hi-tech commercial character of the surrounding modern towers.
237. The façade is designed to achieve a light or whitish hue using a conventional double-glazed unitised system. External brise soleils control solar gain and provide shade, allowing the glass to have a light coating. Combined with low iron glass, this minimises the glass's tendency to appear green, subtly differentiating it from the strong greenish hue of many contemporary City buildings.
238. On the western side of the middle and lower parts, levels 13-48 a rectangular volume known as the 'west elevation oriel and hanging garden' would project from the main tower. The hanging garden would create a vertical urban landscape, contributing to the building's visual and functionality layering. Custom engineered terracotta planting boxes and plant species arranged to adapt to changing altitudes, would create a striking visual element amidst the

predominantly glass, surrounding façades. The biophilic design of this garden would add greenery and visual interest to the views of the proposed building's western elevation, as seen from the surrounding areas, including Undershaft Square. Additionally, it would enhance the outlook from neighbouring buildings, especially from the Leadenhall Building and 22 Bishopsgate towards the development site, while also providing privacy for the building's office spaces. Convenient access to the planters, as detailed in the façade access and maintenance strategy, would ensure the easy and ongoing upkeep of this element of the proposed development.

239. To create visual breaks in the building's overall mass and provide external office amenities, recessed floors are introduced at Levels 48-49 and 30-31 of the proposed building. These sections would be distinctly highlighted by an exposed external steel structure made of weathering steel, which includes two-storey belt trusses placed in front of the recessed amenity floors. These trusses would act as transitions between the upper, middle, and lower parts, offering visual relief and enhancing the building's cascading form. The office amenities would take the form of external garden spaces at Levels 30 and 48, offering more opportunity for greening, and providing an opportunity to the tenants of each floor to furnish and plant them, creating a direct connection between the occupants and the building.

240. The amenity terraces and west elevation oriel and hanging garden have been designed with adopted policy DM 10.3, and emerging policy DE4 in mind, utilising the form of the building and integrated in its mass, would avoid any adverse impacts on identified views. The podium garden, designed to be an attractive and enticing feature of the building would offer a unique piece of public realm with views of surrounding landmarks, including views of St Paul's Cathedral.

241. The top four floors of the proposed development have been designed as a distinct but fully integrated 'crown' to the building. This would be an innovative new London destination and accommodate a series of elevated public spaces curated by the London Museum. On the upper two levels, set within the zinc cladding of the tower's mega-frame, four large windows on each side of the tower would afford panoramic uninterrupted views. The windows would feature expressed frames that project to the cladding line highlighted in red to symbolise the civic use of these space, inspired by London's iconic pillar boxes, telephone boxes, and the Corporation of London's livery and street bollards. Directly below the public offer (Levels 70 and 71), dichroic coating would be incorporated to the facade, adding colour and interest to the crown in a subtle way, reflecting the ever-changing temporal conditions, to further complement the design of the top of the building on the skyline at the apex of the City Cluster.

242. The proposed development would incorporate aviation safety lights to delineate the profile of the tall building, as required by current guidelines, with specifics secured via a condition. These lights would be integrated into the overall lighting



strategy, also secured via a condition. At the topmost Level 73, external lighting would prioritise safety, while interior lighting would be dimmed to optimise the outward nocturnal view experience. The red aviation lights would be functional but compatible with the red framed panoramic windows. This combined with low level internal lighting would result in a unified crown design and ensure no disruption to strategic or panoramic views.

243. Creating an eye-catching moment and offering accessible public space at a raised level, the floating podium garden, would be raised 42m above ground level (to the underside of the soffit), the terrace would wrap around the building with an organic, sculptural form, extending and narrowing to its southern tip facing Leadenhall Street. This would be accessible to a range of people as an elevated public garden space to perambulate at the heart of the Cluster, offering opportunities to linger and views to the surrounding townscape including St Paul's Cathedral to the west. The cantilevered garden terrace would include an oculus with a walk-on glass floor as an interactive visual connection from the street to the raised garden. This would be an engaging way of highlighting the new landscaped area. Overall, the podium garden has the potential to be an exciting and playful moment in the Cluster that supports the landmark quality of this site, aligning with Destination City and complementing the wider cultural experiences within and beyond the building.

244. The podium garden structure and tower above would be anchored by 10 CorTen external columns. These robust square profile mega-columns, spaced approximately 30.5 meters apart, would rise from the ground and branch around Level 6 forming a striking trident shape. A vertical taper on the main columns and branches, along with a 45-degree rotation of the branches, would refine the geometry, accentuating slenderness and elegance. The tridents would express their engineering functionality in grounding the building while also providing a thrill of monumental scale and interest at street level.

245. Below the podium garden, the podium levels are designed with a distinct architectural approach, clearly differentiated from the upper parts of the tower. Arranged on a wider plan, the podium levels would be a suave inversion of the stepped mass above, gradually reducing in size as they descend toward the ground. The podium's structure would combine hangers from Level 11 and columns extending to the foundations. This design would allow for more light and public space while using less material, which helps reduce the building's embodied carbon footprint.

246. Materials and finishes are contextual and intrinsic to the architecture. The podium Levels 04 to 10 would be encased in terracotta cladding with glazed spandrel panels and vertical fins. The light-coloured terracotta would include a speckled glaze for added texture to highlight and differentiate from the weathered steel materiality of the tridents as prominent structural features. The terracotta

would exert a calmer background to the surrounding buildings particularly the historic churches. The terracotta fins bring vertical emphasis complemented by intervening scalloped spandrel panels which inject subtle depth and light modulation. These lower levels of the building would have a visual connection with the podium garden soffit above which would be dressed in ceramic cladding of a light and warm speckled terracotta but with the speckle density graded vertically up the façade and continuing and fading into the soffit's springing point.

247. This design would create an engaging and interactive podium that provides a solid functional foundation for the tower while adds an intriguing architectural element to the townscape, offering both visual interest and depth.
248. To create an inviting and interactive street-level presence, the building's base would feature large glass panels (Level 1 through Level 03) with some more solid, dark stone elements incorporated at ground floor level. Three clearly defined entrances, supported by wayfinding and signage, the detailed design of which would be secured via conditions, would make the different uses of the building legible and inclusive to a range of people. The public spaces, education and cultural offers would be outwardly expressed within the architecture of the building, strongly evident from the public realm and underscoring the strongly civic, cultural qualities of the scheme.
249. Central to the southern façade, facing St Helen's Square, is a public digital screen measuring approximately 12.5m wide by 7m high integrated to levels 01-03 of the building. This would contribute to the development's distinct identity, further activating the lower floors of the building. The screen rising above a dark solid stone plinth, which defines the ground floor, would offer a range of programming, including live broadcasts of sporting events, outdoor cinema, public art installations, and City of London information as well as a quiet nighttime setting. This is considered to be a positive evolution from the previously simple glazed ground floor facades of the December 2023 submission, as the integration of architecture and technology contributes to a more dynamic building, blending form, function, and digital creativity and supporting opportunities for public engagement and interaction.
250. The main public entrance to the building amenities would now be prominently located at the south-western corner, featuring a generous staircase and two accessible lifts, directly connecting St Helen's Square to the building. The public staircase, crafted from Yorkstone, would ascend alongside the defining dark stone horizontal architectural plinth feature which starts beneath the public screen and continues coherently around the west and north elevations. This single public entrance, in comparison to the previous south and north-west public dual entrances (December 2023 submission) provides a much clearer and legible entry to the extensive public, cultural spaces within the building. Expressive red accents would enhance, accentuate and add visual interest to the public entry

point, echoing the red frames of the crown to the tower; a colour with a civic character and affinities with established elements of the City's and London's streetscape.

251. Glazed internal facades around the public stair and lifts would incorporate digital signage and wayfinding features, which would guide visitors vertically across the various public elements, creating active facades with a contemporary, open feel. Continuing the discrete but dynamic red theme, the ground floor lift entrance would be punctuated by red accents, with red soffits in front of the lifts entrances and clear signage. The public lift doors would also be framed in red with glazed panels, making the lift journeys visible between ground floor level and Level 1. The glazed nature of the entrance experience would allow for the multi layered spaces and public offering to visually appeal to pedestrians and users and create visual 'shop window'.
252. The dark stone plinth which would extend across the south, west and north elevations of the building, which would act as a visual anchor of the welcoming and inclusive public spaces on Level 1 and above. The plinth would be treated with a range of durable textured materials ranging from polished and reflective finishes that would be robust but add visual richness to the public realm backdrop. This would be a departure from the fully glazed ground floors of the 2023 December submission. The use of stone would provide presence at street level through its more solid and impactful materiality while the many openings would still create an interactive and inviting experience.
253. On the west elevation, large transparent openings are welcoming in this solid base would reveal the dynamic activity of the Cycle Hub, while three niches at the podium lift shafts, are designed to accommodate sculptural displays. These niches are constructed with long-term flexibility in mind, allowing for potential future modifications to provide direct lift access to public amenities from ground level.
254. The Cycle Hub, now more practically located at the western part of the north elevation, would be accessed directly from Undershaft, without the need for cyclists to dismount and use the public realm in order to enter and exit the building (December 2023 submission), reducing conflicts with pedestrians.
255. Adjacent to the Cycle Hub, at the north-eastern corner of the building, a solid enclosure for two vehicle lifts would provide servicing to the building. A bespoke design approach has been taken to mitigate visual impacts, respond to context and elevate the design quality of this part of the development. Inspired by the materiality, solidity and architecture of St Helen's Church, the servicing entrance would of a sophisticated design and although functional, it would create an interesting moment at street level. It would incorporate a robust stone base –

continuing from the south, west and north elevations and feature a smoothly carved, computer-modelled stone curtain, forming a monolithic veil with tightly fitted stone blocks. Fabricated metal gates, finished in a mid-tone metal to complement the stone would rise during lift operation.

256. The east elevation of St Mary Axe is designed with an open, glazed façade, facilitating a seamless flow of occupiers and visitors into the office tower. Six drum doors would be situated between a series of projecting glazed façade bays below a storey-height metal canopy to provide a human scale experience at pavement level. The doors would be positioned to optimise flow while inset entrances maximise pavement widths. Yorkstone paving would lead into a double-height reception space comprising ground and Level 1 lift lobbies with access to lifts providing direct-to-floor access to all office levels throughout the building.

257. The careful interplay of architectural finishes, materials, textures, and design detail at ground would create a visually striking, expressive and highly functional base. The soffits would include reflective surfaces to mirror movement and animate the space. Yorkstone paving would seamlessly extend from the public realm and the grand staircase into the lobbies, inviting people into the building, in spacious lobbies with dedicated lifts, leading visitors and occupiers to the wide range of available uses.

258. Facade maintenance and cleaning have been carefully considered. High level access from the main roof and intermediate terraces would be via permanently installed Building Maintenance Units (BMU). Two BMUs would be located at roof level, and two (one each) at the office amenity garden terraces at Levels 48 and 30. When not in use, the BMUs would be parked inboard and would not be visible. Along with the BMUs there would be four monorail systems with suspended cradles working from each monorail and cradle dedicated parking location at plant spaces. The monorail systems would be located at soffit Level 11 to access the stepped façade of the podium down to Level 4, and at the soffit Levels 47 and 29 within the Hanging Gardens. Areas where hands-on access is required and cannot be provided from a suspended cradle, access would be provided using Mobile Elevating Work Platforms (MEWP) and/or Aerial Work Platforms (AWP) from ground or terraces levels. The low-level facades would be accessed using a combination of water-fed pole and AWP positioned within the public realm. Regular cleaning of the public podium garden glass balustrade would be facilitated with bespoke long-reach cleaning equipment safely from the inside of the 2.5m tall balustrade. The systems are designed to be visually integrated into the architectural form when non- operational. This is in accordance with Local Plan Policy DM10.1 (bullet 7) and emerging Policy S8 (21).

259. Mechanical and electrical plant rooms would be distributed throughout the building, better servicing the different parts of the building and avoiding a big plant area. The main plant levels would be located in the basements and below the external terraces at the podium garden and office amenity floors. These would be integrated in the main part of the building. In-floor air handling units would be provided complete with thermal wheel heat recovery and integral cooling and heating coils for tempering outdoor air. There would be limited plant on the roof of the building which has been designed to be very neat and of very low height and well-integrated to the design of the building. This would be in accordance with DM 10.1 (bullet 6) and emerging Policy S8 (21).

### *Conclusion on Architecture*

260. Overall, the proposed development would be a rich and humane tall building, strongly inspired by the unique and charismatic architecture found in the Cluster and in this sense a strongly contextual proposal. It would consist of a sophisticated interplay of geometry and functionality, combining office, public and cultural spaces within a visually cohesive and engaging form, responsive to microclimate and employing high quality materials. The design throughout integrates public amenities and green spaces, contributing to the landmark qualities of the building and befitting the pivotal location of the site at the heart of the City Cluster; above all, a strong and compelling civic quality would be woven throughout the proposal, defining and setting it apart as the Cluster's totemic centrepiece. As such, in its design excellence, the proposal would accord with London Plan policies D3 (A, B and D) and D4(B), City Plan policies CS10 and DM 10.1, and emerging City Plan 2040 policies S8 and relevant NPPF design policies, including paragraph 135 and the National Design Guide.

### *Urban Design and Public Realm including Impact on Open Space*

#### *Policy Context*

261. In the City of London, particularly the City Cluster, the public realm plays a key role in promoting wellbeing, accommodating the needs of workers and attracting visitors to the City. There are various forms of public realm in the City, this includes public squares, elevated viewing galleries, streets, Churchyards, pocket parks and more traditional open spaces, each of these types of spaces perform a different role and function. Several of these types of spaces form part of the application proposals.

262. Some of the most successful pieces of the City's public realm are elevated spaces and viewing galleries, these are particularly important in the Eastern Cluster, where the density of development is increasing as a result of the need to accommodate substantial amounts of office floorspace. These spaces are hugely popular destinations; for instance, the Sky Garden at 20 Fenchurch Street averages over 3,000 visitors per day, while the nearby 'Garden at 120', is closing in on 1,500,000 visitors since opening, including over 4,000 school children. The

viewing galleries at 22 Bishopsgate and 8 Bishopsgate have exceeded half a million visitors since opening. The success of these spaces shows how tall buildings in the City not only provide high quality office floorspace, but also benefit the wider community and boost the Square Mile's appeal. These spaces are a key draw to the City, and the proposed development would contribute to this tapestry of high quality public attractions, whilst also providing improvements to the ground level streets and spaces which surround the application site.

263. In the City Cluster, a range of types of public space are necessary to provide for the varied needs of residents, visitors and workers. Proposals that impact on the public realm must make effective use of the constrained land and be of the highest design quality, to maximise benefits for the public whilst accommodating high density development.

264. The following policies are relevant when assessing the design and provision of the proposed public realm in this instance, London Plan (2021) D3 (Optimising site capacity through the design led approach), D8 (Public Realm), T1 (Strategic approach to transport), T2 (Healthy Streets), T4 (Assessing and mitigating transport impacts). Local Plan (2015) policies, DM 3.3 (Crowded Places), CS7(5) (Eastern Cluster), CS10 (Design), CS14 (Tall Buildings), CS16 (Public Transport Streets and Walkways), DM16.1 (Transport Impacts of development), DM10.1 (New Development), DM10.4 (Environmental Enhancement) and DM10.8 (Access and Inclusive Design), and, Draft City Plan (2040) Policies, S10 (Active Travel and Healthy Streets), AT1 (Pedestrian Movement, Permeability and Wayfinding), S8 (Design), DE2 (Design Quality), DE3 (Public Realm), DE4 (Terraces and Elevated Public Spaces) and S21 (City Cluster). Further guidance on the design of the public realm is contained within the City of London Public Realm SPD, the City of London Open Space Strategy SPD, and the City Public Realm Toolkit. These policies seek to:

- a. Create new public realm where appropriate. Public realm should be well-designed, safe, accessible, inclusive, attractive, well connected, related to the local context, and easy to understand, service and maintain.
- b. Improve landscaping. Materials and street furniture should be of high quality, fit for purpose, durable and sustainable and the environment should not be cluttered. Opportunities should be sought to enhance biodiversity and greening. With greening and appropriate shade and shelter, seating should be incorporated along with drinking fountains.
- c. Encourage active travel. The design of the public realm should encourage active travel, desire lines for walking and cycling should be a particular focus. The loss of routes and spaces that enhance the City's function, character and interest will be resisted, enhancements to existing routes should be delivered.

- d. Stimulate activity. There should be an understanding of how the public realm functions and designs should create a sense of place, and encourage activity during different times of the day, days of the week and at different times of the year. Buildings should activate, define and provide natural surveillance over the public realm.
- e. Consider microclimate. Careful consideration needs to be given to optimising microclimatic conditions for publicly accessible spaces.

265. The public realm includes publicly accessible space between and around buildings, including streets, squares, forecourts, parks and open spaces. Some internal or elevated spaces can also be considered as part of the public realm such as sky gardens and viewing platforms, this is acknowledged in the London Plan (2021) Policy D8 (Public Realm), paragraph 3.8.1;

*“The public realm includes all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces, including the Thames and London’s waterways. Some internal or elevated spaces can also be considered as part of the public realm, such as markets, shopping malls, sky gardens, viewing platforms, museums or station concourses. Such forms of public realm are particularly relevant in areas of higher density.”*

266. In addition to the public realm policies there are policies that relate specifically to open spaces. Open spaces provide amenity value and can provide opportunities for relaxation and greening for workers, residents and visitors to enjoy and they promote wellbeing. The City’s growing workforce, increasing visitor numbers and the limited amount of open space in the Square Mile, means there is a need to provide more open spaces, and to improve and protect those that exist. Relevant policies include, London Plan policy G4 (Open Space), Local Plan 2015 policies CS19 (Open Spaces and Recreation), DM19.1 (Additional open space), draft City Plan 2040 policies OS1(Protection and provision of open space), S14 (Open Spaces and Green Infrastructure) and S21 (Green Infrastructure).

267. The open space policies are relevant in this case, as St Helen’s Square is identified as a Civic Space within the Open Space Strategy SPD, Civic Spaces are defined in the SPD as “Primary Civic Space - Provides open space amenity. Includes civic and market squares and other hard surfaces designed for pedestrians.”

268. The City of London Local Plan (2015) and the emerging City Plan 2040 have no explicit definition of public realm, the intent of delivering high quality public realm is articulated through several policies regarding open space, public realm,

viewing galleries and elevated spaces. There is however a definition of open space in both versions of the plan, which states;

*“Land which is not built on and which has some amenity value or potential for amenity value. Amenity value is derived from the visual, recreational or other enjoyment which the open space can provide, such as historic and cultural interest and value. This includes open spaces in public or private ownership.”*

269. The London Plan 2021 defines open space as: “All land in London that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use.” The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.

270. The City of London Open Space Strategy SPD states that the City as a whole is deficient in open space, the Eastern Cluster offers a small proportion of open space to the City’s total, roughly 4% overall. The SPD seeks to maintain a ratio of 0.06Ha of Open Space per 1000 occupants, but recognises that this is particularly difficult in the City Cluster where the current provision is well below that target, the existing amount of open space is low and the current occupancy is very high. The SPD sets out aims, objectives and a strategy for improving access to open space (which, for the purposes of the SPD, excludes sky gardens) , but it recognises the need for Atria and Sky Gardens in tall buildings, suggesting that the lack of public space in densely built areas can be counteracted by the provision of sky gardens and terraces in paragraph 3.3.39, as long as full public access to these spaces is maximised through legal agreements.

271. Elevated spaces can be considered to be appropriate forms of public realm on the basis of London Plan Policy D8. Elevated spaces can also be considered as open space for the purposes of Local Plan Policy CS19 (on the basis of CS19 1(v)) as long as they are of equal or greater quantity and quality as any open space they are replacing .and this is supported by the Tulip decision where the Inspector had regard to elevated space as open space. . Elevated spaces are suited to high density urban environments, particularly the City Cluster, where a close concentration of tall buildings can create challenges to providing some types of public space at ground floor level. Tall buildings present an opportunity to offer dramatic views of the London Skyline and elevate the public from the base of tall towers, up towards areas where views and microclimatic conditions are optimised. The design, function and ‘nature’ of these elevated spaces reflects the intended use and the reason for visitors choose to go to them.

*Introduction and assessment of the proposal in terms of impact on public realm and open space*



272. The proposals would radically transform the public realm within and around the site. A dramatic and iconic, free to access elevated public space would be delivered at level 11 of the building. This would constitute a new, unique offering of public realm, befitting of a building that would be one of the tallest buildings in Western Europe. The elevated space would embody the aspirations of 'Destination City' by creating a public offer that would appeal to a broad demographic of users seven days a week. It would have a symbiotic relationship with the public realm at ground floor level both within and around the site boundary, which would be transformed into an inclusive, welcoming, well designed, safe and functional environment with due consideration given to how people would use the space.

273. Furthermore, the elevated viewing gallery at the level 72 and 73 of the building would offer panoramic views of London numerous landmarks at a high level, providing 3,942sqm of cultural floor space for educational and recreational purposes. This free to access space would make a vital contribution to publicly accessible space within the cluster, it is considered to form part of the public realm proposals of the application, in accordance with London Plan Policy D8 which recognises the vital role that elevated publicly accessible space can play in high density urban environments.

274. Improvements to the existing public realm in and around the site at ground floor level would include:

- a. A re-designed 'St Helen's Square', towards the south of the site;
- b. A new public garden in the 'Western Public Space', the area between 22 Bishopsgate, 120 Leadenhall Street and the proposed building; and,
- c. A series of improvements to St Mary Axe and Undershaft which would mitigate the impact of the development, these would include measures to enhance pedestrian priority, consequently improving the function and the appearance of the streets.

275. Each of these three ground floor spaces would have a unique character and the designs for each space have been optimised to support their context and function. Further details on each of these public spaces is set out in subsequent sections of this report.

276. It is considered that the proposals represent high quality placemaking. They would offer additional amenity to workers within the City but would also attract visitors and tourists to the heart of the cluster, exploiting the site's central location and would offer additional opportunities for the public to interact and engage with the cluster's iconic architecture.

## **Public Realm revisions following committee deferral of the original 2023 scheme**

277. Objections were received to the original 2023 scheme relating to the impact that the scheme would have on the loss of space in St Helen's Square. This was also discussed at the July committee in detail. There was concern that the ground level public realm would have been reduced in an area and that some space could be saved through minor amendments. The amendments in the revised 2023 scheme retain more of St Helen's Square.

278. Revisions have been made to the design of the proposed public realm in response to the Planning Application Sub Committee's decision to defer the application. The reason for deferral related the loss of public realm in St Helen's Square. Officers consider the changes put forth by the applicants remedy the issues Members raised. The changes can be summarised into several key moves for the public realm;

### **1. The repositioning of the Level 11 terrace entrance**

The applicants have moved the level 11 terrace entrance to the west of the building from its previous location on the southern elevation. This results in moving the southern façade building line back by approximately 10m when compared to the 2023 scheme. The square would now be reduced in size by 505sqm when compared to existing, from 2450sqm to 1945sqm. Under the 2023 scheme, the square would have been 1752 sqm, representing a 698sqm loss. This area change will be discussed in more detail later in this section of the report.

### **2. A new public entrance**

For the revised 2023 scheme, an alternative entrance position for the publicly accessible areas is proposed, the L11 terrace would instead be accessed by a dedicated entrance on the west of the building. On the southwest corner, grand public stairs would lead visitors up to level one, paired with prominent lifts, this would, as a result of its prominent siting, generous dimensions and welcoming appearance, be a public entrance on a truly civic scale which is considered to surpass the previous arrangements in the original 2023 scheme. These stairs and lifts would take people into a large lobby area for the elevated publicly accessible spaces within the building. A bank of lifts at level 1 would take people up to the Level 11 terrace and the restaurant and public amenity/cultural spaces at levels 2 and 3. A separate bank of lifts in the level 1 lobby area would also take people up to the L72 and L73 viewing gallery.

### **3. Changes to the layout of the level 11 terrace**

To accommodate the change in the entrance arrangements for the level 11 terrace, the layout of the terrace itself has been altered. The previous lift lobby at level 11 would be a garden room in the revised scheme, which would be flexible public and cultural space, this area would be free to use and publicly accessible, the details of this space would be secured through the Culture Plan. This space would act as a supplementary social and meeting space, it would contribute to the year round success and programming of the terrace, enabling activation and use of the terrace by a broad demographic of people.

#### 4. A repositioned cycle entrance

The cycle entrance would be moved from the western public space to the north elevation, underneath the public lobby for L11, L72 and L73. As highlighted later on in the report, the area to the west of the building has high levels of pedestrian movement, this change has been intended to minimise this conflict between pedestrians and cyclists. Cyclists would enter the building from the north into a lobby, then lifts and stairs will take people down to a cycle parking hub at basement level.

#### 5. St Helens Square

The southern elevation of the building would host a large, 12.5m wide by 7m tall screen to frame the southern edge of the square. This screen would be curated as part of the Cultural Plan and could be used for a wide range of purposes, including providing news and information, showing sport or other significant events, for hosting public events, or showing curated audio/visual experiential media, it would provide an opportunity for the public to engage with the City in a wholly different way, it would create a unique space, befitting of its location at the heart of the cluster. Minor adjustments to the landscaping approach have been made, including the positioning of trees and seating, the square is intended to accommodate a large amount of temporary and flexible seating which would work with the programming and displays on screen.

#### 6. Western Public Space

All of the positive aspects of the 2023 scheme would remain, these are discussed in more detail below, as a brief summary, the existing clutter in this space would be removed and replaced by high quality landscaping and improved materials. This area would function much more effectively as a public space as a result of the proposals, the area is currently a 'back of house' or servicing area access route for 1 Undershaft's neighbours. The revised 2023 scheme would take the positive aspects of the 2023 scheme further, the proposals would transform this space into a tranquil garden, the space has been meticulously designed with a wholly compelling 'concept', curated to the extent that it would be a piece of public realm quite unique in the City cluster.

The 'concept' has been to create a space akin to the forest floor, an interesting 'play' on the built character around the space, where adjacent tall buildings reproduce the microclimatic context of a forest floor, in this space, less light meets ground level due to adjacent tall buildings, the proposed species selection of the planting responds to this condition, as does the intended character of the public space, the inclusion of water and the overall look, feel and function are an urban re-interpretation of the forest floor. The building line on the west of the building would expand outwards when compared to the 2023 scheme, however this space would still continue to be able to handle the anticipated levels of pedestrian movement. The quality of this public space is considered by officers to represent public realm design of the highest standard.

279. These changes will be discussed in more detail in subsequent paragraphs of the report as part of a more detailed assessment of each area of proposed public realm.

### Proposed Public Spaces

280. This section of the report assesses each area of public realm in detail, including the amendments to the proposals since the deferral. The revised 2023 scheme is considered by officers to fully address the concerns set out at the previous committee, the amendments to the dimensions of St Helen's Square and the proposed building convincingly strike a balance between maintaining more of St Helen's Square and accommodating a substantial amount of office floor space on the site. Most notably, the portions of St Helen's Square which are most well used and have the best microclimatic conditions remain, the revised proposals re-imagine how St Helen's Square could be activated and generally improve its design to a significant degree. The now smaller loss of open space occur in a part of the square which is least used. The amended designs successfully optimise the sites capacity for growth by providing a substantial amount of office floor space towards the City Clusters overall office floor space demand. This necessity of this office floor space provision is considered to outweigh minimal losses to parts of the St Helen's Square which serve relatively little purpose.

### St Helen's Square

281. The site currently has an existing public space at ground floor level towards the south of the site, referred to as 'St Helen's Square'. It is a well-used dwell space in the cluster during summer. However, it suffers from challenging microclimatic conditions in winter. It has seating and greening arranged around the periphery of the space, with some openings for pedestrian movement on the edge. Its existing design is considered satisfactory, although it has much greater potential, there are several issues with the design of the space.

282. The proposals would alter the design, function and character of the existing public space in a positive way by remedying its current issues. Currently, the square is deliberately fragmented, with planters and steps used to segregate areas, creating gaps and routes through.

283. The proposals would change the fundamental style and design concept of the space, opening up the space as a whole through the removal of steps and hard edges, blending the greening with new seating to create a central 'dwelling' area surrounded by unobstructed pedestrian routes. The proposals would represent an improvement on the existing public space through the following design interventions:

- a. Reconciliation of existing level differences - The square would be resurfaced and the ground plane would be altered to provide level access across its entire area, creating a gentle slope across the extent of the space. The site currently addresses the level difference with steps and a slope to the west. A large portion of the existing square, the central stepped area, does not provide step free access or ramps and the entrance to the space from the northeast on St Mary Axe only has stepped access. The proposed levelling and removal of the steps is positive in access and inclusivity terms, it would stitch in seamlessly with the adjacent pavements and Leadenhall building, improving the existing condition.
- b. Optimisation of the layout and the removal of excessive street clutter - The removal of the existing planters and consolidation of the street furniture paired with the removal of the steps and stairs, would allow the space to be used more efficiently, creating a larger proportion of accessible space in a smaller footprint when comparing the existing space and the proposed layout. Creating a gently ramped ground plane would remove the steps and hard boundaries of the space allowing it to be opened up, increasing usability and allowing greater pedestrian movement, legibility and visibility. The benches under the grove of the trees have been designed to be HVM compliant, this allows for the removal of the existing bollards and the large walls on the edge of the planters thus reducing street clutter. The proposed square strikes a balance between creating an attractive environment for people to dwell and catering for high levels of pedestrian footfall. The space has been arranged to respond to pedestrian desire lines, removing street clutter and opening up the movement routes for pedestrians. Alongside this, the grove of trees and seating has been concentrated in the centre of the space away from these desire lines, creating a natural separation between movement and dwelling. The seating layout would foster social interaction by pointing people towards one another. As a result of the optimisation of the public realm layout, the space would be capable of accommodating flexible and programmable events, such as sports screenings and food markets, this would help to

enhance the squares status as a destination space in line with the Destination City agenda.

- c. **Enhanced Materiality** - In relaying the surface treatment, the materiality of the square would be rationalised. Currently the stepped area is finished in York stone, but the adjacent sloped area, and much of the surrounding surfaces are finished in dark concrete paving. In the proposed scheme the entire surface would be finished in York stone, in accordance with the City of London Public Realm SPD, stitching the site into the wider context of the area by creating a continuous palette of materials, re-enforcing the character and appearance of the city. The public space design would be aesthetically restrained, appropriately responding to the character of the city through limiting the range of the palette of materials and harmonising the space with its context. The existing public space design uses a wide range of materials, and it doesn't effectively relate to the character and appearance of the city. The s278 proposals for St Mary Axe and Undershaft, to be discussed in more detail later in the report, would re-pave the surrounding pavements in York stone and the streets granite setts, thus enhancing the character and appearance of the streets and public spaces through a consistency of materials.
- d. **Enhanced Greening** - The proposed trees would have improved planting conditions and would be positioned more centrally within the space. The existing trees have struggled to mature and some are beginning to tilt and fall, particularly on the east of the square. These existing trees are mainly isolated within individual tree pits and planters (apart from a few trees towards the southeast of the space). The proposals would allow people to sit up close, underneath the trees and enjoy being sat under the canopy, offering shade and shelter in summer. The new, gently sloped terrain would allow for the creation of a deep continuous tree pits underneath the square, creating optimal below ground conditions for tree planting. Connecting tree pits allows for nutrient sharing and substantial root ball growth, allowing the trees to thrive. The indicative species selection, including British native species Oak and Common Beech and 'naturalised' Norway Maple, all are broad leafed species which are shade tolerant which would be suited to growing in shade and partial sun, with final species to be agreed through condition, this would provide trees of a substantial size upon maturity, they would be planted as roughly 5m tall, reaching up to 30m in height, the conditions attached to the application would ensure the tree pits have a state of the art irrigation and watering system to ensure the success of the tree planting. The conditions for the application include replanting if any of the trees die within the lifetime of the development.
- e. **Enhanced Seating** - The proposals would maintain a high level of seating in the square. The proposed seating has been arranged to foster social

interaction, the benches would be orientated to face one another, encouraging people to sit, dwell and use the space. The benches to the south and east side of the space would be PAS rated and HVM compliant, to minimise the amount of bollards needed in the public realm. The proposals accommodate safety measures more sensitively than the existing condition. The revised 2023 scheme has made minor amendments to the proposed seating layout, in the revised proposals, there would be 5 more trees than the 2023 scheme, 17 in total, and seating for 350 people in total, up from 268 in the 2023 scheme. There is currently space for 200 people to sit in St Helen's Square at present.

- f. Provision of drinking fountains - The proposals would incorporate 2 free drinking water fountains in the public realm, the locations and detailed design would be agreed through condition. There are currently none on the site at present, and no drinking water fountains in the immediate vicinity of the site.
- g. Active Frontage - The proposed plaza would benefit from improved activation, the entrance to the publicly accessible would be prominent and visible from St Helen's Square, located on its northwest corner, an improvement on the existing condition where the office lobby fronts onto the square, no active and publicly accessible units in the existing building face outwards onto the streets and spaces around the building. The proposals in question would prioritise the presence of publicly accessible uses within the space. As previously discussed, in the revised 2023 scheme the introduction of a large screen fronting onto St Helen's Square would further activate this area.

284. The proposed level 11 terrace would cantilever over the space at a very high level, 42m above ground, there are objections relating to this point, stating the quality of the ground level public realm would be diminished as a result, particularly as the terrace would reduce the amount of light that St Helen's Square would receive. Officers find that the objections downplay the sheer height above ground level of the level 11 terrace; it would be so elevated and so far removed that officers strongly consider that this space would still feel 'open' as a result allowing daylight into the space, the oculus (9m by 6m) would also help with the incursion of light, in addition, the cantilevering terrace would offer spectacular and dramatic views of the underside of the soffit.

285. Careful consideration has been given to the microclimatic conditions of St Helen's Square resulting from the proposals. A full assessment of the wind, daylight and sunlight and thermal comfort conditions for the space are set out in the Environmental Impact of the Proposals on the Surrounding Area section of this report. Overall, it is considered that under the proposed conditions St Helen's Square would be suitable for its intended use and that, subject to mitigation which would be secured by condition the proposed development would not have a detrimental impact on its microclimate.

286. For the previous iteration of the application, objections expressed a preference for the proposals for St Helen's Square shown in the previously consented scheme. The current proposals are considered to be a significant improvement on that consented 2019 application, where a sunken space was proposed in the centre of the existing square. The previous application proposed an oval opening with steps from ground level into a subterranean space. Whilst acceptable by the standards of that time, these proposals are today considered to be suboptimal in comparison to what is proposed in this application. The consented scheme had an awkward geometry and it would have left lots of undefined, awkward and impractical space on the periphery of the plaza. The existing application is considered by officers to be preferential to the consented scheme by proposing a design which more effectively and efficiently responds to the geometry of the space.

287. Objections were raised to the 2023 scheme regarding the building line encroaching on St Helen's Square thus reducing the amount of available open space. As part of the revised 2023 scheme this encroachment of the building line would still occur, but to a lesser degree. The building line would move southwards by approximately 18m into St Helens Square. The 2023 scheme would have moved into St Helen's Square by 28m. This 'pushing back' of the building line would occur at ground level to level 4 (up to c.15m above ground level), the placement of the digital screen underneath this space is considered to work well with the cantilever of the building, the cantilever would provide shelter from inclement weather and would minimise glare which may interfere with the screens operation.

288. The majority of the extension of the building line into St Helen's Square would occur in an area which is used the least at present, towards the northern end of the square, this area is currently paved. It is a part of the public square that sits outside the existing office lobby, it has limited relationship with the existing building, adjacent ground floor uses don't activate or interact with the space. This area doesn't align particularly well with any adjacent pedestrian desire lines, a small amount of east-west pedestrian movement occurs in this part of the space, the more direct desire lines are elsewhere. This area isn't a portion of the square that is particularly usable for dwelling, or currently filled with seating or planting.

289. Objections express preference for the consented scheme, however, the consented application removes a significant proportion of the square from ground floor level by lowering the space down to basement level. The building line in the proposed scheme moves outwards in this area to 'free up' the west of the building from servicing activity, and to accommodate pedestrian movement along the western side of the building where pedestrian footfall is much higher. Furthermore, this re-arrangement of the core from the consented scheme results in a more efficient building structure, reducing the embodied carbon impact of the scheme by providing a 'leaner' structure. It is a necessary part of the building



design which does result in a small loss of open space, but it has been proposed for good reason. Without this loss of space, there would be other detrimental impacts to pedestrian movement, servicing, the western public space and embodied carbon. The proposed ground floor public realm design is considered to use the space in St Helen's Square more efficiently than the consented scheme and the existing condition, this incursion of the building line and loss of some of the public realm in this location is considered to be acceptable. (A full policy based analysis of this change in quantum of open space is set out in a later section of this part of the report.)

290. Overall, the proposals are considered by officers to represent an improvement in the quality of the public realm across the site, in line with Policy CS19 and DM19.1 of the Local Plan (2015), emerging City Plan 2040 policies OS1, S14 and S21, the Open Space Strategy SPD and London Plan policy G4.

### The Level 11 Terrace

291. In addition to the improvements to the ground level public space, a large publicly accessible terrace (2,515sqm) at level 11 is proposed in the revised 2023 scheme, it has increased in size by 56sqm when compared to the 2023 scheme, the terrace would wrap around the building enabling a 360 degree perambulation. Cantilevering boldly from the south elevation, the terrace would introduce a unique feature into the townscape, adding to the architectural drama of the cluster. The terrace would appear enticingly in views from Lime Street to the south. It would jostle compatibly for attention amongst other bold architectural statements, such as, the Lloyd's building and the Gherkin, sitting amidst the City's rich tapestry of historic buildings in a layering of the City's architectural history. The elevated terrace would add to and capitalise on the City's characteristic juxtaposition of old and new, by prioritising public access and offering new views of the Cluster's architectural jewels at mid level, views currently unseen by the public. It would continue to reveal the City's surrounding architectural assets, enabling unexpected vantage points and enhance visitors' ability to appreciate the neighbouring buildings including Lloyd's Building, St Andrews and Church of St Helen's, becoming a key memorable attractor to the City for visitors.

292. The proposals embody the 'Destination City' initiative and would create a significant public attraction in the City of London, the layering of public uses, from ground level to the top of the building, representing an unrivalled offering of public access. The entrance to level 11 and the publicly accessible areas would be prominently placed to be visible to pedestrians, it would be able to accommodate any check in facilities, security measures (if required) and it would be paved in yorkstone, to highlight a continuation of public access. This position would play a positive role in activating the proposed ground level public space. Public access to the terrace would be maximised, it would be free to enter. No such space was proposed in the 2019 consented scheme.

293. The terrace has been designed to accommodate a variety of uses, the external area would be an attraction in itself, a garden with both access to views, and enclosed areas with dense landscaping and intimate seating areas. The cantilevered terrace would include a glazed oculus, it would be a captivating and playful feature of the terrace that would allow visitors to observe views of the ground level and the activity happening beneath, it is approximately 6m by 9m. It would diffract light through to ground level, which would rotate throughout the day, creating an ever changing visual connection with the ground level public realm.

294. The southern end of the terrace would benefit from enhanced microclimatic conditions over the existing ground level space, with good levels of direct sunlight particularly during the summer months, it would have much better microclimatic conditions than the existing ground level public space by being raised significantly, elevating the space out of the shadows of other adjacent tall buildings. The terrace has been carefully designed to create an optimal climate for dwelling, 2.4m glass balustrades and tree planting with large canopies that would create an environment comfortable for dwelling.

295. As has been set out previously, the level 11 terrace would result in some obscuring of daylight to the ground level, however, the podium has been shaped and sculpted to narrow towards the south. Furthermore, given its position at level 11, it is some way above the existing public space, it is 42m high. For context, the height of the soffit on the adjacent building, 122 Leadenhall St, is 16.7m. 'The oculus' would also allow light through to ground level, the base of the cantilever would be finished in light materials to reflect as much light as possible.

296. On the northeast and northwest shoulders, an external sculpture garden and sensory garden are proposed, which would add to the variety of the function of the spaces at level 11, each of these spaces would respond to their context and views. The revised 2023 scheme includes a large internal space referred to on the plans as a garden room, to replace what would have been the lift exit, this space would be a free to enter 'flexible cultural public space', which would help to activate and animate the terrace.

297. The 2023 scheme received objections which made reference to the level 11 terrace not being as accessible as ground level public realm. The hours of opening for the terrace would be 7am-11pm, to be secured through the s106, this extends beyond the City's standard conditions for elevated spaces which typically stay open until 7pm or nautical dusk, whichever is the later. Furthermore, security upon arrival would be minimised to maximise the perception of public access. These measures are considered to promote public access, in conjunction with its high quality design and ability to provide new views of the City, it is considered

that the level 11 terrace would be a benefit to the public realm offer of the City, in accordance with Local Plan, emerging City Plan and London Plan Policies.

### Undershaft Square

298. To the west of the building, the existing space to the rear of 22 Bishopsgate and 122 Leadenhall would be improved, both in relation to the existing condition, the previously consented scheme and when compared to the original 2023 scheme. 'Undershaft Square' was previously referred to as "the Western Public Space" in the original 2023 scheme.

299. Since the deferral, the landscaping design for this space has changed, Undershaft Square would be transformed into a landscaped space with an abundance of planting and greening, shade tolerant species would be specified through condition. The layout of the space would help shield the space from the carriageway, creating a more attractive environment for pedestrians, this space accommodates a large amount of pedestrian movement, it has been organised to continue to allow for this, whilst also accommodating an improved, tranquil environment for dwelling, a dramatic green wall would rise above the space climbing up the building column. In the 2023 scheme, the cycle parking entrance was located here, for the revised scheme, the cycle entrance is positioned on the north of the building, reducing the conflict between pedestrian and cycle movement.

300. At present, this space has a ventilation shaft which is an unattractive obstruction with a dated utilitarian appearance occupying a fairly large area (in the context of the overall space). This would be removed and replaced with in ground ventilation grilles, freeing up space. The proposed surface materials (York stone) would replace the existing low quality concrete paving creating a visually seamless link with the wider area, where the surfaces are finished in York stone. The entrance to the publicly accessible uses would flank this space, the entrance for these uses would be positioned on the southwest corner of this space, with the glazed corridors, lobbys and lifts above, its active and engaging façade would provide visual interest.

301. The consented 2019 scheme proposed a servicing bay and vehicle lifts in the space, which severed views through and restricted the potential use of the space. The proposed scheme would enhance the appearance of the space and prioritise the needs of pedestrians over vehicles insofar as possible. The site has been reconfigured to maintain accessibility for the high levels of pedestrian movement along the west side of the building. At present, approximately 1800 pedestrians move through this space per hour at peak times, in the future scenario (the 2030 baseline) with the proposed development, this would increase to approximately 2200 pedestrians per hour. The proposed design and layout of the building in this application has sought to open up this pedestrian route, making it wider, more

accessible and more attractive in order to accommodate this increase in movement.

### St Mary Axe Pedestrian Priority Scheme and Undershaft Improvements

302. The proposed scheme would have an impact on the appearance and function of St Mary Axe, it would generate a significant amount of pedestrian footfall in particular, as addressed in the Transport section of this report and Strategic Transport Report. Cycle movement is also expected to increase in the vicinity of the site. There would be a loss of public realm and a reduction in walking space on site, as well as an impact on the townscape and heritage assets, as well as some microclimatic impacts.

303. The application would include a s278 Highways Act 1980 agreement which covers the whole extent of St Mary Axe and the junction with Leadenhall Street to mitigate these impacts, furthermore, it would also include a re-design of Undershaft, in accordance with Policy VT1 of the emerging City Plan 2040 and T4 of the London Plan 2021. This s278 agreement would include alterations to the physical infrastructure on the street, extending the pavement kerb lines and upgrading the surface materials in accordance with the City of London Public Realm Toolkit and its palette of materials. It would also explore the feasibility of tree planting and implement trees where feasible, to create a pleasant environment, provide high quality walking infrastructure and help to offset the loss of public realm.

304. These works would be an intervention that is in accordance with the Healthy Streets Approach, rightly prioritising the needs of pedestrians whilst still accommodating the necessary level of vehicular traffic. St Mary Axe is currently below the standards of neighbouring streets, the paving materials are inconsistent and low quality, and the carriageway is wider than necessary. There are two City of London Transport and Public Realm Strategies, the City Cluster Vision 2019 and the City Cluster Healthy Streets Plan, both set out the aspirations for this stretch of street, which the proposed s278 agreement would accord with and deliver whilst mitigating the impact of the development. Furthermore, the application would include a wayfinding and signage strategy to aid pedestrian movement. This is all considered to be a significant benefit of the scheme which would mitigate the impact of the development and enhance the surrounding area.

### Level 73 & 73 Terrace

305. The viewing gallery at level 72 and 73 would provide 3,134sqm of floorspace, it would be London's highest publicly accessible view point, providing dramatic, sweeping views of the City. There would be facilities to support an educational offer, it is intended the space would be used by members of the public and school

groups, it could also accommodate pop up events. Further details covering the design and management of this space have been covered in the Land Use section of this report. It is considered to be a significant offer and benefit of the proposals, adding to the significant layering of publicly accessible spaces across the building. As previously stated, the Open Space Strategy SPD and the London Plan Policy D8 both identify these sorts of spaces being appropriate forms of public realm in high density of urban environments, because of the amenity value they can offer.

#### Overall Provision of Public Realm and Open Space

306. This section of the report looks at the overall quantum of proposed public realm and open space.

307. As set out above, there has been objections relating to the loss of open space at ground floor level, particularly in St Helen's Square. The application is considered to comply with Policy CS19 of the City of London Local Plan 2015 and Policy OS1 of the emerging City Plan 2040 for the reasons set out below.

308. The assessment of this policy has been broken into two parts, part 1 considers the change in quantum of open space in St Helen's Square, part 2 considers the change in quantum of open space around the site overall. For each part consideration has been given to the existing condition, the previous 2019 consented application and the proposed application. The previous paragraphs in this section of the report identify the improvements in the quality of the design of the proposed public realm.

309. Policy CS19 Part 1 states: "To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open space and green infrastructure, while enhancing biodiversity, by:

- Seeking to maintain a ratio of at least 0.06 hectares of high quality, publicly accessible open space per 1,000 weekday daytime population:

"...(i) protecting existing open space, particularly that of historic interest, or ensuring that it is replaced on redevelopment by space of equal or improved quantity and quality on or near the site. ...

(v) encouraging high quality green roofs, roof gardens and terraces, particularly those which are publicly accessible, subject to the impact on the amenity of adjacent occupiers."

310. This policy indicates that open space should either be protected or replaced by space of equal or improved quantity and quality, the policy also encourages the provision of publicly accessible roof gardens and terraces. There would be some loss in quantity of open space at ground floor level, but this loss in quantity at

ground floor level would be offset by gains in quantum of public realm elsewhere, particularly the level 11 podium garden. Increases in quality at ground level, plus the substantial provision of high quality, elevated public realm at level 11 and the publicly accessible spaces at level 72 & 73 would represent compliance with the policy on the whole as is set out below.

The change in quantity of publicly accessible space and open space

311. The existing space, 'St Helen's Square' is currently 2,450sqm (total area). The revised 2023 scheme would see this decrease to 1,945sqm (a loss of 505sqm) of public space in St Helen's Square, against decrease to the 1,752sqm (a loss of 698sqm) in the previous 2023 scheme. The amendments in the revised scheme would preserve and additional 193sqm, by pushing the southern elevations façade line back by 10m.
312. This reduction in quantity is considered by officers to be offset by increases in quantity of publicly accessible space elsewhere in the scheme and the increase in quality of the existing and proposed publicly accessible spaces across the development.
313. Officers consider that the loss of 505sqm is offset by the provision of the publicly accessible terrace at level 11, which is 2,515sqm, and the viewing gallery at level 72 & 73, which is 1,064sqm (this figure does not count the education space), this equates to 3,579sqm of public realm being provided at the upper levels of the building.
314. Officers further consider that the improvements in the quality of the public spaces across the scheme offset the loss of 505sqm at ground level. The improvements to quality of the ground level public space include; the provision of level access across the ground plane which results in the site being more inclusive, consolidating the street furniture, improved usability of the space and the provision of more direct pedestrian desire lines, more efficient use of the space, reduction of street clutter including a simpler and a more sensitive HVM solution, capacity and flexibility for programmable events, harmonised surface materials which follow the City's established palette of materials, improved tree locations and in ground planting conditions, provision of drinking water fountains, better and more efficient layout or 'geometry' than the consented scheme and improved activation from adjacent ground floor uses.

The change in quantum of public realm across the whole site

315. The existing site has 4,669sqm of public realm at ground floor level, excluding the existing building footprint and the carriageway of 1 Undershaft. This includes some detracting built features which would be removed by the proposals, for example, the existing unsightly vehicle ramp on Undershaft, the fenced off ventilation shaft to the west of the building and the inaccessible, stepped, public realm to the south.

316. The previously consented 2019 application had 4,862sqm of public realm at ground floor level. A significant proportion of this space would have been underneath the proposed tower, the location of the stair cores, vehicle lifts and staircases would have prohibited potential active uses and would have resulted in little amenity value being derived from this space. The height of the soffit in this space would be approximately 9m, very low when compared to the level 11 terrace which is 42m high.

317. The current application would provide 3,976sqm at ground floor level, whilst this represents a reduction in public realm across the site of 702sqm, this is 146sqm more than the original 2023 scheme. This loss is offset by the provision of 3,579sqm of elevated publicly accessible places elsewhere. The L11 podium garden is 2,515sqm and the upper level viewing gallery is 1,064sqm, both of these types of spaces are considered to be appropriate forms of public realm in high density urban environments. In addition, the quality of the design of the ground floor would be improved, and the quality of the elevated spaces is considered to be exemplary. When including the proposed podium garden at level 11 (2,515sqm), and the provision of the viewing gallery at level 72 & 73 (1,064sqm) the provision of public realm on the site is 7555sqm. This is an increase of 2886sqm, when compared to the existing amount of 4669sqm of public realm on site. Furthermore, the s278 works which would mitigate the impact of the development would dramatically enhance the quality of St Mary Axe and Undershaft through the provision of new surface treatments which would match the aesthetics of the City's other streets, this would represent a further improvement in quality to the public realm in and around the site, this area has been excluded from the calculations.

318. Policy CS19 requires that any loss of open space be offset by the provision of space of equal or improved quantity and quality. While there would be some loss in quantity of open space at ground floor level, it is considered that this would be decisively offset by gains in the provision of publicly accessible space, most significantly at the podium garden at level 11, and improvements in quality throughout the scheme, in accordance with the policies, definitions and explanatory paragraphs relating to the types of public realm and open space in the City of London Local Plan 2015, the London Plan 2021, the Open Space Strategy SPD and the emerging City Plan 2040.

319. City of London Local Plan (2015) Policy DM19.1 'additional open space', identifies that major commercial developments should provide new and enhanced open space where possible, and where on site provision is not available, it should be provided near the site or elsewhere in the City. It states new open space should be publicly accessible, provide a high quality environment, incorporate soft landscaping and have regard to biodiversity. The proposed development is considered to satisfy this policy for the reasons set out above, in summary, the

delivery of high quality elevated public spaces in a high density urban environment is considered to be an appropriate provision.

320. Policy OS1 of the emerging City Plan 2040 is similar to policy OS19 of the City of London Local Plan (2015), stating existing open space will be protected and enhanced, loss of existing space should be wholly exceptional and it must be replaced on redevelopment by open space of equal or improved quantity and quality on or near the site. An assessment of these requirements has taken place in the previous paragraphs and apply to this aspect of the policy. There is further provision stating that the loss of historic open spaces will be resisted, the existing square is not a designated as a heritage asset, it was heavily altered in 2019, previously the space was a feature of the original 1 Undershaft building design, but it is not considered to be a historic open space. Part 2 of the policy states additional publicly accessible open space will be sought in major developments, the level 11 terrace would constitute the provision of additional publicly accessible open space.
321. There is further detail in policy OS1, suggesting open spaces must be designed to meet the requirements of all the City's communities. They should be free, accessible, welcoming and inclusive. The design of open spaces should consider their context and how their use could contribute positively to the life of the Square Mile. This should include consideration of how seating, planting, lighting, and routes are designed and located; the potential for water features and noise attenuation; and opportunities for play, sport, recreation and leisure, taking into account likely users of the space. The proposed public spaces are considered to comply with this policy for the reasons set out above.
322. Policy S14, S21 of the emerging City Plan 2040 and City of London Local Plan CS7 (5), DM10.1 and CS14 make similar prescriptions regarding the quality and quantity of public realm and publicly accessible spaces to be provided by major developments and tall buildings including within the Cluster. The proposals are considered to comply with these policies for the reasons set out above in this section.
323. Paragraph 103 (b) of the National Planning Policy Framework (NPPF) states that existing open space should not be built on, unless the loss resulting from the proposed development would be replaced by equivalent or better provision both in terms of quality and quantity in a suitable location. The proposed development is considered to comply with this policy for the reasons set out above, despite the loss of some open space at ground floor level, the provision of a substantial amount of publicly accessible space across the development would provide an increase in quantum in a suitable location. It is considered that elevated spaces are appropriate form of provision in a high density urban environment, where space is limited. This is considered to be in accordance with the NPPF. The NPPF glossary refers to open space as being "all open space of public



value....which offers important opportunities for sport and recreation and can act as a visual amenity” The elevated terrace meets this description. The City of London Open Space Strategy 2015 does not include skygardens as open space for the purposes of the advice in the SPD (paragraph 1.9) but it does not have the policy status of Local Plan Policy CS19 which includes roof gardens and terraces . In addition, London Plan Policy D8 (Public Realm) paragraph 3.8.1, identifies the appropriateness of elevated spaces in high density urban environments.

324. London Plan Policy G4 part B states that development proposals should: (1) not result in the loss of protected open space, and (2) where possible create areas of publicly accessible open space, particularly in areas of deficiency. The structure and intent of this policy is very similar to the City of London Open Space policies in the existing 2015 Local Plan and the emerging 2040 City Plan. The assessment of the change in Open Space in the paragraphs above is also considered to satisfy this policy, whilst there would be some loss of space in St Helen’s Square, this would be offset by an increase in the amount of publicly accessible space across the site, including the provision of accessible public space at higher levels, this would create ‘new areas’ of open space which would satisfy part B (2). This type of publicly accessible elevated space is defined as a particularly relevant type of public realm in high density urban environments by the supporting text of London Plan Policy D8 Public realm in paragraph 3.8.1.

325. The City of London Public Realm SPD (2016), sets out 10 aims for the delivery of public realm in the City of London. The proposed development is considered to accord with these aims and the SPD as a whole. The key topics of the SPD include public space design, historic character, tall buildings, sustainable streets, harmonised palette of materials, street furniture, lighting, accommodating street life, soft landscaping and safety. The proposed development would improve the design quality of the ground level space, offer new publicly accessible elevated spaces with views of the City’s architectural landmarks, deliver improvements to the pedestrian environment in line with the healthy streets approach, provide high quality street furniture and materiality to harmonise the character of the public realm with its context with high quality urban greening and tree planting in ground, and, provide improvements to accessibility for pedestrians. The assessment of the design of the public spaces in the above paragraphs explains compliance with the City of London Public Realm SPD The City of London Public Realm SPD (2016) advises public space should ordinarily be provided at ground level (paragraph 8.2.2) but it does not have the status of development plan policy as in the more recent London Plan 2021 which recognises that public realm can include elevated areas (Policy D8)

#### Other Public Realm Considerations

326. The following paragraphs outline some further considerations of public realm design and assesses how the proposed development would perform against them.

#### Active Frontages

327. The proposals would have a viewing gallery entrance, the museum entrance, and the cycle hub entrance as active frontages at ground floor level. The mixed-use nature of the proposals would stimulate activity in the public realm at different times of day and on different days of the week, appealing to a range of audiences and attracting a diverse range of users to the site. The existing building currently offers no activation at ground floor level, similarly, the consented scheme had little in the way of active ground floor entrances and uses from the ground plane, only lifts, stairs and escalators that connected the basement and first floor level of the building to the ground. The proposals represent an improvement in this regard. The provision of improved ground floor public realm, alongside these active and 'destination' uses, would create an environment and a ground plane where opportunities for people to meet, dwell and socialise are enhanced.

328. The entrances to the publicly accessible spaces would be prominent and visible to passersby, access and circulation to the level 11 terrace would be positioned at the north west corner of St Helen's Square, visible and prominent from Leadenhall Street. The Level 11 terrace would have suitable publicly accessible uses internally, activating the terrace and providing amenity for visitors. The viewing gallery and exhibition space entrance, and cycle storage have been thoughtfully positioned to be obvious and legible to users, whilst being appropriately located to be accessible for adjacent routes, segregated from servicing vehicles where possible, with appropriate signage and wayfinding measures to ensure entrances are clearly legible, the details of which are reserved for condition.

329. The natural passive surveillance offered by the orientation of these uses, paired with the proposed lighting, would contribute to making a safe environment for all. Furthermore, the additional mix of proposed uses would generate activity on evenings and weekends to put 'eyes on the street', encouraging safety through community stewardship. As a result, the proposals would create an engaging piece of public realm, suitable and welcoming for those of all ages.

#### Public realm, management, cultural and programmable events

330. The publicly accessible uses at ground and upper levels would complement the public realm, which would include cultural curation and programming secured via the Cultural Implementation Strategy, the St Helen's Square Strategy and the Level 11 Public Podium Strategy, building on the City's range of inclusive and accessible buildings. London Plan (2021) Policy D8 and emerging City Plan 2040

Policy DE3 suggest public access to publicly accessible spaces should be maximised. In order to make the level 11 terrace as accessible and attractive as possible to the public, the hours of opening for the terrace would be 7am-11pm, to be secured through the s106, this extends beyond the City's standard conditions for elevated spaces which typically stay open until 7pm or nautical dusk, whichever is the later.

331. An appropriate management, curation and programming of the public realm, both internal and external, for more detailed aspects of the management of the publicly accessible spaces would be ensured via the S.106 agreement. This would include; security, allowed activities in the space, the amount of ticketed events (all access to the terrace would be free despite ticketing to manage crowd numbers), cleaning and maintenance, and allowable uses. The St Helen's Square Strategy, the Level 11 Public Podium Strategy and Cultural Implementation Strategy will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8 and guidance in the LPG (London Plan Guidance) 'the Public London Charter'.

332. Overall, the proposals appear to maximise public access through the provision of publicly accessible internal and external spaces, this is a positive aspect of the proposals.

#### Transport related urban design considerations

333. The existing servicing vehicle ramp would be removed and replaced with a servicing bay which is integrated into the design of the building, the current servicing ramp is unsightly and is an unattractive feature of the existing streetscape on St Mary Axe and Undershaft. In the previously consented application, the service vehicle lift was located to the west of the building, on the busy pedestrian desire line from Bishopsgate and St Helen's Place through to Leadenhall Street, it would have resulted in the loss of a view between Leadenhall Street and the Church of St Helens Bishopsgate. The proposal integrates this into the design of the building in a less impactful way than both the existing building and the previously consented scheme. For the revised scheme, the cycle hub has been re-positioned to be on the north of the building to minimise conflict between pedestrians, it was previously accessed from the west of the building. The proposed location is considered to be optimal when considering the ground floor layout of the building.

334. New and improved cycle routes will be considered and reviewed as part of the highways design, under the Section 278 works, in accordance with London Plan (2021) Policies. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality,

without disturbance or inconvenience of the surrounding public realm, in accordance with London Plan (2021) Policies D3 (4) and D9.

335. Hostile Vehicle Mitigation (HVM) has been sensitively incorporated in the public realm, through the use of a mix of “softer” measures such as a HVM compliant street furniture alongside a limited number of bollards. The HVM strategy has changed slightly since the 2023 scheme, the revised 2023 scheme proposes a HVM approach in Undershaft Square which is more subtly integrated into the landscaping. The proposals are considered to be in accordance with City of London Local Plan (2015) Policy CS3. Overall, the proposals would be accessible and welcoming to all, and would provide streets and public spaces which would dramatically improve the urban environment. Walking and cycling are the most sustainable transport modes, the proposals rightly prioritise them, the proposed development would enhance the streetscape in terms of attractiveness and functionality for those users, it is reachable from numerous public transport interchanges on foot, with good cycle lane provision in the vicinity and high-quality cycle facilities with prominent and legible entrances. The provision of cycle storage in the public realm and a legible cycle access lift and cycle ramps to the parking in the basement would prioritise the needs of active travellers and provide high quality facilities to support and encourage active travel.

#### Materials

336. The proposed material approach would seamlessly stitch the site into its wider urban context. The use of York stone paving at ground level and complementary materiality for seating and other built surfaces would harmonise the aesthetic of the public realm with its adjacent context, this would be particularly helpful in re-enforcing the character of the pedestrian desire lines through the wider area, the Eastern Cluster has a distinct character and identity, the appearance of the public realm on the application site would coordinate the site with its surroundings much more effectively.

337. At ground floor level, the use of York stone paving would create a consistency in the design and appearance of the adjacent streets and the public spaces. This would suggest to pedestrians that the space is publicly accessible in a welcoming manner. This continuity of materials continues into the proposed level 11 terrace entrance, and on the level 11 terrace itself, to continue to highlight public access to the public. The new public realm would be a seamless extension of the City’s continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Public Realm Toolkit, with final detail reserved for condition. The proposals would also rationalise and minimise street clutter. The materiality of the public realm and all associated furniture is considered to be acceptable, it is in accordance with Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.

## Lighting

338. Lighting would play a key role in the success of the development, to keep people safe and secure, to contribute to placemaking and to enhance heritage. Initial concepts have a multifaceted approach, cognisant of visual amenity and sustainability to minimise obtrusive light as much as possible. The final proposals will develop the positive impacts of the lighting strategy, to realise social and ecological benefits. A final detailed Lighting Strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with the City of London Lighting Supplementary Planning Document (SPD) 2023, Local Plan Policy DM 10.1 and emerging City Plan Policies S8, DE3 and DE9, and with regard to impacts on heritage assets. The final design will deliver low level and architectural illumination which enhances the pedestrian experience.

## Conclusion

339. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. It would improve the site's interfaces with and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 Policy DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6. The proposed development would be a sophisticated interplay of design and functionality, combining office, public and cultural spaces within a visually cohesive and engaging form. The design throughout integrates public amenities and green spaces, contributing to the landmark qualities of the building and befitting the pivotal location of the site at the heart of the City Cluster; above all, a strong and compelling civic quality would be woven throughout the proposal, defining and setting it apart as the Cluster's totemic centrepiece. This is in accordance with London Plan policies D3 City Plan policies S10 and DM 10.1, and emerging City Plan 2040 policies S8, relevant sections of the NPPF and National Design Guide.

340. The proposed development will provide inclusive, inviting, and animated spaces, with extensive urban greening in the heart of the City Cluster for people to pass through or linger. The elevated space would embody the aspirations of 'Destination City' and would be a landmark for the whole of London by delivering an elevated high quality public space, in addition to the improvements at ground floor level, the public realm would be inclusive, welcoming, well designed, safe

and functional, due consideration has been given to how people would use the space.

341. In terms of design and provision of public realm the proposals represent compliance with Policies D3, D4, D8, G4, T1 and T2 of the London Plan 2021, as well as CS3.3, CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies OS1, S10, S14, AT1, S8, DE2 and DE3 of the emerging City Plan (2040), and, The City of London Open Space Strategy SPD and the City Public Realm SPD. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm aspect of the proposals are considered by officers to be a benefit of the scheme.

#### Delivering Good Design and Design Scrutiny

342. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design. In respect of D4 A, the applicant's evolution of site development including amendments to the deferred scheme was design-led to deliver high quality design and place making and this is detailed in the Tall Building, Architecture and Urban Design section of this report. With regard to D4 B, the pre-application process including formal meetings, workshops using visual tools and site visits applied a holistic lens to the design analysis to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.

343. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. At an early stage, transport and pedestrian data informed options for the service route layout, cycle routes and public realm development officers. Environmental microclimate, daylight and sunlight analysis informed the massing and design treatment as well as the public realm and landscaping. Wider engagement by the applicant is set out elsewhere in the report.

344. Part D4 C has been met and a detailed design and access statement has been submitted.

345. In respect of D4 D, the proposals have not been referred to an independent design review but have undergone a rigorous local "borough" process of design scrutiny as required by the policy. In addition, the applicants undertook preapplication engagement with the GLA, Historic Royal Palaces and Historic England. The City of London Access Group also scrutinised the application and detailed feedback is provided in the relevant section of the report.

346. In relation to D4 E, parts 1-6, there has been a “City” level of scrutiny comprising extensive officer topic-based reviews over multiple pre-applications; external input has been provided by other experts as set out above; feedback has been recorded and provided to the applicants; the evolution of the proposals is summarised in the DAS; and within the Committee report.

347. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity and avoid deferring large elements of the development to the conditions. The recommendation is also supported by a robust relevant condition to ensure the scheme is implemented to an exemplary standard. F (4) an informative is attached to encourage the retention of the application design team or a future team to be of an equal quality and experience to be employed through to construction and completion stage. Overall, the application process has adhered to the intentions of London Plan D4 Delivering Good Design.

#### Overall Architecture, Urban Design and Public Realm Conclusion

348. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. It would improve the site’s interfaces with and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City’s modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, emerging City Plan 2040 Policy DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF including paragraph 135, and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.

349. The proposed development would be a sophisticated interplay of design and functionality, combining office, public and cultural spaces within a visually cohesive and engaging form. The design throughout integrates public amenities and green spaces, contributing to the landmark qualities of the building and befitting the pivotal location of the site at the heart of the City Cluster; above all, a strong and compelling civic quality would be woven throughout the proposal, defining and setting it apart as the Cluster’s totemic centrepiece. This is in accordance with London Plan policies D3 City Plan policies S10 and DM 10.1, and emerging City Plan 2040 policies S8, relevant sections of the NPPF and National Design Guide.

350. The proposed development would be accessible for a range of users, inviting, and animated spaces, with extensive urban greening in the heart of the City Cluster for people to pass through or linger. The elevated space would embody the aspirations of ‘Destination City’ and would be a landmark for the whole of

London by delivering an elevated high quality public space, in addition to the improvements at ground floor level, the public realm would be inclusive, welcoming, well designed, safe and functional, due consideration has been given to how people would use the space.

351. In terms of design and provision of public realm the proposals represent compliance with Policies D3, D4, D8, G4, T1 and T2 of the London Plan 2021, as well as CS3.3, CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies OS1, S10, AT1, S8, DE2 and DE3 of the emerging City Plan (2040), and, The City of London Open Space Strategy SPD and the City Public Realm SPD. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm aspect of the proposals are considered by officers to be a benefit of the scheme.

### ***Strategic Views and Heritage***

352. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and CS14 emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. The Strategic Views referred to London Plan policies HC3 and HC4 are listed in Table 7.1 (pp. 293-4 of the London Plan). The Mayor's London View Management Framework (LVMF) SPG (the SPG) provides further guidance on the management of views designated in the London Plan. The City's Protected Views SPD gives further guidance on the implementation of policies relating to protected views.

353. A Townscape, Built Heritage and Visual Impact Assessment (THVIA) has been prepared and submitted as part of the application documents which includes a total of 119 views in the assessment and supplementary appendices to this THVIA dated December 2023. Two THVIA Addendums, dated May 2024 and October 2024, were submitted to assess the effects of post-submission and deferral design amendments to the 2023 planning application (23/01423/FULEIA). 19 verified views were updated in the THVIA Addendum May 2024, including Views 7, 8, 11, 17.1, 19, 21, 22, 23, 26 and 36, while 16 verified views were updated in the THVIA Second Addendum October 2024, including Views 48 to 53 and 55 to 64.

354. The views selection was informed by consideration of the viewpoints within the previous THVIA for the consented scheme on the site and extensive views testing during the design development and pre-application stages. All of the viewpoints were agreed in pre-application consultation with officers. The split of assessment and appendix views, of verified and non-verified views, and of render, wireline



and computer modelled representation, is based on the proximity and sensitivity of the views.

355. With reference to the consultation section of the report, objections and comments largely relate to local views and designated heritage assets. Historic England note the consented scheme tower for the site and the application proposals would have similar effects on long-range views, but they have additionally raised concerns about the detailed design of the crown, including the proposed use of red colour. The GLA, para 30, note the development would be prominent in long range views: LVMF 1A-6A LVMF London Panorama, LVMF 10A, 11B, 13B, 15B, 16B and 17B; River Prospect and Townscape Views 25A and 26A across London. The GLA acknowledged the height and bulk of the tower would be located in the centre of the Eastern Cluster and all but its uppermost third would be obscured by surrounding tall buildings. In terms of height and form, the GLA do not identify any conflicts between a proposed tower in the proposed location and the LVMF view management guidance for the above views.

356. For clarity, the implemented scheme at 100 Leadenhall Street has been included in the cumulative scenario for Strategic Views and Heritage impact assessments (rather than the baseline scenario). Although implementation means the planning permission is now valid in perpetuity, the building does not exist, construction hasn't yet begun, and therefore it is considered most logical to assess this scheme as part of the cumulative scenario. On a similar point, in July 2023 the Planning Applications Sub Committee considered 55 Bishopsgate (22/00981/FULEIA) and was minded to grant permission for the application subject to planning conditions and conclusion of a Section 106 agreement. The Mayor has issued a Stage 2 letter and is content for the City of London to determine the application, the S106 has been agreed and the decision will be issued imminently. Therefore 55 Bishopsgate has also been considered in cumulative scenarios.

### **Tower of London World Heritage Site**

#### OUV and Relationship to Setting:

357. The impact of the proposal on the World Heritage Site (WHS) has been assessed against the seven attributes, and their components, of Outstanding Universal Value (OUV) contained within the adopted Statement of OUV. It is considered that all attributes of OUV draw on the contribution of setting for significance and an appreciation of it, but in particular the attributes: i.) an internationally famous monument ii.) landmark siting iii.) symbol of Norman power and iv.) physical dominance (of the White Tower); and to a lesser extent v.) concentric defences vi.) surviving medieval remains and vii.) physical (historical) associative evidence.

358. Whilst the ToL comprises a scheduled ancient monument, and various listed buildings and is in a conservation area (LB of Tower Hamlets), it is considered proportionate and robust, on the circumstances of the case, to consider the impact on OUV in order to draw a conclusion on the impact on these assets.
359. The WHS Management Plan establishes a 'local setting area', 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Fig. 4 of the WHS Management Plan) but is located in the wider setting. The Local Setting Study (LSS) identifies those most representative views and/or viewing areas to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints overlap with some LVMF viewing locations and these are assessed together here for clarity.
360. It is important to note that the WHS Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It recognises that the Cluster has an emerging distinct identity and the relationship between the ToL and the Cluster is long established, having existed for over half a century, forming a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. At para 7.3.27, the Management Plan states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider (i) their effect on the established Cluster (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.
361. The intervisibility between the ToL WHS and the commercial core of the City, over which it was intended to command and defend from the river approach, is an integral part of, in particular, the attributes I.) landmark siting (and the component: the Tower's relationship with the City) ii.) symbol of Norman power iii.) the physical dominance (of the White Tower) and iv.) the concentric defences (including the component: visual linkage with the surrounding cityscape, demonstrating use and function). Officers are strongly of the view that, per se, intervisibility, or the evolution of the relationship between the City and the Tower through the consolidation of the plan-led Cluster, is not inherently harmful, and could even be a positive facet, requiring case-by-case consideration.
362. Whilst being proportionate, this impact assessment uses the assessment framework in the Mayor's 'London World Heritage Sites: Guidance on 'setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.

Impact on OUV/Significance:

363. The proposal would have an indirect impact, via change in the wider setting of the WHS.
364. Historic England allege the 1 Undershaft development would detract to a small degree from the OUV of the Tower of London World Heritage Site by increasing the presence of the Cluster in key views from Tower Bridge (LVMF view 10A.1), and in views from the Inner Ward, thus cumulatively challenging the primacy of the site. They did not raise any objections to the approved scheme on this basis, which in the relevant views of the WHS was of a similar form and height to the proposal.
365. Historic England have commented that they are concerned that the proposed colourful treatment of the crown of the building has the potential to exacerbate the level of harm they identify to the World Heritage Site. They have, however, confirmed that they do not formally object to the scheme on World Heritage Site grounds.
366. The GLA have identified a low level of less than substantial harm to the setting of WHS where there is a backdropping of the Church of St Peter as Vincula detracting from the prominence of its cupola in the view. In addition, a nonspecific low of less than substantial harm is identified to the Tower of London WHS, Scheduled Monument, listed buildings and conservation area referencing THVIA December 2023 Views 20, 23, 24, 25, A11 and Addendum THVIA May 2024 Views 19, 23, 26. As with Historic England's unexpected change of position, the GLA did not identify harm to the World Heritage Site, listed buildings or conservation areas in relation to the 2016 approved scheme.
367. The London Borough of Tower Hamlets comment the proposed building would cause harm to the setting of the ToL WHS and in some instances this harm is possible to be avoided by reducing the height of the building. The LB Tower Hamlets do not specify the level of this harm and do not raise an overall objection to the proposals. Reference is made to View 22 (THVIA Addendum May 2024), noting the proposed building's top would be visible above St. Peter ad Vincula (grade I), LB Tower Hamlets state that reducing the building's height from the 72 storeys proposed in 2016 could avoid this issue. In addition, the proposal would consolidate the Cluster increase its visual presence noting in views to and from the ToL there are gaps between buildings that allow light and sky views which break up the Cluster's bulk. The LPA allege the new development directly behind the Tower would cause additional harm to the setting, as shown in Views 18 (THVIA December 2023), 19, 21 (both THVIA Addendum May 2024) and 25 (THVIA December 2023) and to a lesser extent in View 24 (THVIA December

2023). In Views 20 (THVIA December 2023) and 23 (THVIA Addendum May 2024) would increase the built form in the tower's backdrop, causing additional harm. The LB Tower Hamlets made no objection to 16/00075/FULEIA but highlighted LVMF 10A.1 (THVIA December 2023 View 19) and the need to give special attention to the impact on WHS due to its designation.

LVMF 10A.1 – River Prospect, Tower Bridge (North Bastion, looking Upstream):

368. This viewpoint is also identified as a Representative View in the Local Setting Study (LSS) (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge) in the LSS (Addendum THVIA May 2024 View 19).

369. The LVMF SPG recognises this as a fine, broad river prospect, its character derived from its significant depth and width. It is the only designated River Prospect in which there are two Strategically Important Landmarks (SILs), St Paul's and the ToL. It allows the ToL, perhaps better than anywhere else, to be read as a significant part of the rich tapestry of London, where there is an acknowledged prominent relationship with the backdrop of tall buildings in the CoL (para 182).

370. The SPG states that an understanding and appreciation of the ToL is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. Other prominent buildings or structures in the background include the Canon Street Station towers, BT Tower, Centre Point and Tate Modern, which all combine to draw and hold the attention of the observer.

371. The visual management guidance anticipates the consolidation of the Cluster which, it is said, will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (para 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground, applying particularly to the Monument (para 185). The visual management guidance states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).

372. In this view, the proposal would appear as the centrepiece of the City Cluster. While the middle section of the tower would be glimpsed behind and between the Scalpel 52 Lime Street and 40 Leadenhall Street, the upper section would rise

assuredly to the highest point of the Cluster. Its calm and sophisticated rectilinear detailing, in a grid of zinc and white enamel panels, subtle, everchanging dichroic glazing would terminate in a delicate flourish of understated, rippling colour and accent of red-framed picture windows to trumpet the civic, democratic spaces proposed at the apex of the tower (and the wider Cluster). The office sky gardens at levels 30 and 48 would also be visible, the urban greening adding visual interest to the character of the City Cluster and the position of the sky gardens emphasised by the weathering steel belt-trusses. Overall, the proposed development would be an essential, affirming addition, reinforcing the Cluster's existing and aspirational composition and character in a positive manner.

373. Historic England allege that the proposals would 'detract to a small degree from the OUV of the Tower of London World Heritage Site by increasing the presence of the Cluster' in this view (and from within the Inner Ward; see below); they assert that the proposed colour in the dichroic glass and red window frames could be more visually distracting from the WHS.

374. The GLA have made a table of harms in their Stage 1 report where a low level of less than substantial harm to the WHS is identified in this view, although no further explanation is given as to why.

375. The LB Tower Hamlets state that the proposed development would result in a further increase of built form in the backdrop of the Tower in this view causing some additional harm to the WHS but do not object.

376. Officers robustly disagree with Historic England, GLA's and the LB Tower Hamlets assessment on the proposal and arising impacts. Officers conclude that there would be no harm to OUV as captured in this view (THVIA Addendum May 2024 View 19) for the reasons set out below.

377. Strategically sited inside the Cluster, the proposal would preserve the skyline of the White Tower and its primacy would be unchallenged in baseline and cumulative scenarios, whilst preserving visual separation of the White Tower from the Cluster, in accordance with para 186.

378. Indeed, the proposal would appear at a considerable distance to the west from the focus of the ToL in the foreground, and the WHS would not be obscured, distracted from or dominated. The proposal would be the summit of Cluster, set well away from its lower eastern edge in the baseline and the more pronouncedly stepped edge in the cumulative created by 100 Leadenhall Street to the east, positioned closer to the ToL (and to which neither Historic England nor the GLA objected).

379. In baseline and cumulative scenarios, through its siting, height, silhouette, architecture, materiality and colouration (and in particular that of the crown), the

proposal would be clearly understood as being at the core of the modern city and completely distinct from the historic ToL, from which it would not distract. The development would be entirely consistent with the existing character of the view, preserving the primacy and legibility of the ToL, other landmarks and skyline features. The proposal would thereby accord with paras 183 and 186 of the LVMF SPG.

380. The proposal would, like the approved scheme, act as a characterful foil to the more glazed, ethereal forms of 22 Bishopsgate and the next higher Cluster towers and would form the totemic centrepiece of the Cluster around which the lower towers (including 1 Leadenhall, 50 Fenchurch Street and 40 Leadenhall) would appear to gather, positively reinforcing the Cluster's dense and cascading composition. As such, it would be perhaps the single most important act of consolidation of the Cluster, aligning with para 187 of the LVMF SPG which anticipates this; and further to para 187, officers consider that the proposal would add considerably to character and stature of the view.

381. The same would be true of the cumulative scenario, with the consented scheme 100 Leadenhall curated to reinforce the cascading silhouette of the Cluster to the east stepping down to the tower. This would be further reinforced by the lower towers of 55, 70 and 85 Gracechurch Street collectively further consolidating the Cluster around the proposal at the centre.

382. The consolidation of the Cluster into a more coherent, clear and discreet form, contrasting with the preeminent tower in the foreground setting of the river would reinforce and make more legible the relationship between two related skyline identities. This is important to an understanding and appreciation of OUV. The tower, and its concentric defences, would still read as a powerful defensive structure strategically sited presiding over the river, controlling access to and defending the commercial core of the City, which was its core function, while the openness of the Liberties, reenforcing a sense of being set apart, and not lost in, the City will continue to be reinforced, in particular via development stepping down to the scale of the Liberties and a large open expanse of sky around the tower.

383. As such, officers consider that the proposal, in both baseline and cumulative scenarios, would preserve OUV, and in particular the specific attributes captured in this view: i.) landmark siting (and the component: the Tower's relationship with the City) ii.) symbol of Norman power iii.) the physical dominance (of the White Tower).

384. The Monument is also within this view and situated at a distance from the orientation 'pivot' of the view. The proposal would leave undiminished the Monument as an important landmark element and would not affect the skyline presence or pre-eminence of those other landmark elements: City Hall, HMS

Belfast or a recognition and appreciation of St Paul's as a Strategically Important Landmark (SIL). It would preserve their strong group value with other elements and allow for an appreciation of the scale and geography of London, in accordance with para 185 of the LVMF SPG.

385. Thus, it is considered that the proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3) emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and the CoL Protected Views SPD.

#### LVMF 25A.1-3 – Townscape View, Queen's Walk:

386. This view is also identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower and is also Representative View 10 in the LSS. The focus of the view is the ToL and a Protected Vista from 25A.1 focuses on axis with the White Tower, which also benefits from a dynamically protected sky silhouette between the Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as a core aspect of the view (para 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflects over 900 years of London's development (para 410). The juxtaposition of the WHS with the modern city and of built elements from a variety of eras is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.

387. No objections have been received in relation to this LVMF view. The development would step up to the right of 22 Bishopsgate (THVIA December 2023 Views 17.2 and 17.3 and THVIA Addendum May 2024 View 17.1) at greater apparent height forming the defining pinnacle for the City Cluster. The height and location would relate well to the existing lower Cluster buildings stepping down to 52 Lime Street, the Willis Building and the Leadenhall Building and collectively these reinforce the complex and intricate massing of the overall Cluster. Most of the upper stages of the tower would be seen clearly against the sky forming a confident silhouette with the rippling soft accents of red colour and subtle ever changing dichroic glazing of the crown signalling the civic public viewing terrace and educational uses.

388. The proposal would respond positively to the neighbouring tall buildings 22 Bishopsgate and 1 Leadenhall and be clearly distinguishable as the apex of the Cluster, both through its height and its distinctive slender rectilinear geometry and expressive, gridded facades. In cumulative experiences 162 Leadenhall Street

would appear to the east, stepping down in height towards the WHS and reinforcing the contained, arcing composition of the Cluster to the east. The consented schemes at 55, 70 and 85 Gracechurch Street would further consolidate the Cluster around the proposal at the centre.

389. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL, it is considered that the proposal would not undermine the composition or characteristics of the view, or of the landmark elements.

390. The observer would continue to recognise and appreciate the ToL as the Strategically Important Landmark, set away from the City and not lost in it.

391. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57).

392. As with LVMF 10A.1, the proposal would be central to the consolidation of the Cluster, contrasting with the preeminent ToL in the foreground setting of the river. In this respect, the proposal would help to reinforce and make more legible the relationship between two related skyline identities. The proposal would not affect the fore/middle grounds of the views, or the close relationship with the River Thames and principal setting of this iconic view (SPG paras 416-417). It would not appear in the background of the ToL preserving the sky-backed Protected Silhouette of the ToL between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct, juxtaposed urban forms, in accordance with the visual management guidance (SPG paras 418-422) and relevant parts of the LSS. The proposal would preserve the relevant attributes of OUV and their associated components preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower.

393. In nighttime experiences, the lighting would appear with a different distribution to other buildings due to its mega-grid exterior and regular module, such that it would be readily distinguishable but compatible with other towers. The crown would be emphasised by distinctive lighting, differentiating the public use of the top two floors from the office floors below and creating a celebratory summit. In baseline and cumulative scenarios no single development within the Cluster would dominate the nocturnal skyline and the cluster would remain distinct of the prominence of the ToL and the darkness of the river would be preserved.

394. Overall, in baseline and cumulative views the proposal would preserve characteristics and composition of the view as a whole, as well as the landmark elements, and the recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly, or prominent to the



detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment. Thus, it is considered that the proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3), emerging City Plan Policy S11, HE1, HE3, London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

LVMF 11B.1-2 – River Prospect, London Bridge (Downstream):

395. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark whilst Tower Bridge and HMS Belfast are identified as other landmarks and provides views to the rising ground of Greenwich and the cluster of towers at Canary Wharf.

396. The proposal (THVIA December 2023 View 16) would appear at the centre of the view behind the Leadenhall Building and 20 Fenchurch Street, and to the east of 22 Bishopsgate. The uppermost storeys and defined public uses and gridded facades and materiality of subtle accents of rippling red and ever changing discreet dichroic glazing would be set against sky clearly distinguishing the proposal as an architecturally confident expression within the wider Cluster. The apparent height would be similar to that of 22 Bishopsgate in this view, such that the two buildings would act as engaging architectural counterpoints to one another forming the joint pinnacle for the City Cluster. Together with 8 Bishopsgate, the Leadenhall Building and 22 Bishopsgate, the proposal would form a tightly defined quartet of tall buildings at the heart of the City Cluster.

397. In the cumulative scenario, the proposal would be very slightly occluded by 55 Gracechurch Street but the impact would otherwise be as for the baseline. The cumulative developments of 100 Leadenhall and 55 Bishopsgate would reinforce the existing character of the view, with the City Cluster continuing to appear distinct and separate above foreground riverside development.

398. Given the pre-eminence of the River Thames in the foreground, and the significant intervening distance between the ToL and the proposal, sited as it is in the centre of the Cluster, it is considered that the proposal would not undermine the composition and characteristics of the view, or its landmark elements. In both the baseline and cumulative scenarios, it would preserve the observer's ability to recognise and appreciate the ToL as well as Tower Bridge and HMS Belfast within the LVMF SPG.

399. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57).

400. The consolidation of the Cluster into a more coherent, clear and discreet form, contrasting with the preeminent tower in the foreground setting of the River will, in principle, reinforce and make more legible the relationship between two related skyline identities. Given its distant siting from the WHS, the proposal would not affect the clear sky backdrop of the White Tower's four turrets and castellations, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components including the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. It would not be harmful to the view, setting or significance of the ToL WHS or its OUV.

401. Overall, in baseline and cumulative views the proposal would preserve characteristics and composition of the view as a whole, and landmark elements, as well as the recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly, or prominent to the detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment. Thus, it is considered that the proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3), emerging City Plan Policy S11, HE1, HE3, London Plan Policy HC2, HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

#### Other World Heritage Site Views:

402. The THVIA has assessed additional views identified within the LSS. Section 7 identifies Representative Views which are deemed to best exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. The proposal would impact on views from: the Inner Curtain Wall (South) LSS View 4 (THVIA December 2023 View 25); Curtain Wall (North) LSS View 2 (THVIA Addendum May 2024 View 23); Byward Tower Entrance LSS View 5 (THVIA Addendum May 2024 View 26); and Royal Mint LSS View 8 (THVIA December 2023 View A11). The LSS Section 5 includes Approaches and Arrivals along identified routes which offer the potential for pedestrians to appreciate the OUV of the Tower from varying distances and provide intuitive legibility of the WHS. The THVIA December 2023 includes Route 14, assessed above and the approach and arrival from St Katherine's Dock Approach Route THVIA December 2023 View A11. Section 6 of the LSS further identifies pedestrian experiences within the immediate local setting (The Liberties) and the Tower Bridge Approach Route 6 is assessed in THVIA

December 2023 View 20. Historic England with reference to views from the Inner Ward comment the development would detract to a small degree from the OUV of the ToL. The GLA have identified less than substantial harm to the WHS with reference the above views. LB Tower Hamlets have also identified (unspecified) harm to the WHS with reference to some of the above views. These are assessed in turn below.

*Inner Ward (LSS View 1):*

403. The LSS states there is a range of views from within the Inner Ward and the identified Representative View 1 is the Scaffold Site. These have been assessed in a three-dimensional model, in addition to the submitted THVIA Addendum May 2024 Views 21 and 22.

404. The LSS Inner Ward views are deemed to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls, where the relationship between the scale of individual buildings can be appreciated. Under 'key issues' it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings. The associated 'Objectives and Guidance' states that development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.

405. The Chapel of St Peter ad Vincula (Grade I listed) is within the Inner Ward and reflects these attributes. This was originally built as a parish church of the City of London and was taken within the castle walls by the extensions of Henry III in the 13th century. The current chapel was built in 1519-20 in early Tudor style, and restored in 1876-77, when the west tower was rebuilt and the north-east vestry built. It is significant as a rare example of an early 16th century chapel. The southern elevation of the chapel enclosed part of the northern edge of the Inner Ward and good views from which to appreciate its historic architecture may be had from all parts of Tower Green. The representative LSS View 1 from the Scaffold Site is a good position from which to view the chapel, but other good views are available from the path through the centre of Tower Green, where the Scaffold Site memorial is located, and the path to the east of Tower Green.

406. Historic England claim that the development would detract to a small degree from the OUV of the Tower of London World Heritage Site by increasing the presence of the Cluster from the Inner Ward, thus cumulatively challenging the primacy of the site; they have further concerns about the colouration of the proposed crown which they suggest would be a distracting presence. The GLA identify a low level of less than substantial harm to the setting of the WHS in

THVIA Addendum May 2024 View 22 where 'there is a backdroping of the Church of St Peter ad Vincula detracting somewhat from the prominence of its cupola in the view' as well as THVIA Addendum May 2024 View 21 and THVIA December 2023 View 22A, although in their latest letter they have welcomed the proposed crown design including the colour and dichroic glazing.

407. As remarked upon in relation to the Tower Bridge view, the conclusion of harm represents a change of position of both organisations from their neutral stance on the previous scheme. LB Tower Hamlets comment the development would be prominent and visible above the parapet of St Peter ad Vincula in THVIA Addendum May 2024 View 22 and that reducing the height would avoid impacts officers note this change in position from 2016 and additionally reference Addendum May 2024 View 21 identifying harm to the ToL setting though the additional solid mass and increased visual presence of the cluster.

408. As before, officers robustly disagree with the new positions of these organisations; not least because, in respect of overall height and mass, the proposal would have similar presence to the previously approved scheme in these Inner Ward views, but the proposal's more understated elevational treatment, with the zinc and white enamel grid ascending to the red accents of the crown and discreet dichroic glazing now proposed instead of weathering steel diagonal bracing, would result in the proposal having a quieter presence in these views compared with the previous approved scheme (assessed by officers as harmless to the WHS and to which, as mentioned, Historic England, the GLA and LB Tower Hamlets did not object).

409. THVIA Addendum May 2024 View 21 is also from the Inner Ward, not one of the identified viewing locations but relating to the approach to Representative View 1 of the LSS (THVIA View 22). From THVIA Addendum May 2024 View 21 the tallest buildings within the cluster are visible beyond the roofline parapet of St Peter ad Vincula including: 22 Bishopsgate, 8 Bishopsgate, the Willis Building, the Leadenhall Building, 52 Lime Street, 40 Leadenhall Street and 30 St Mary Axe. The top of 20 Fenchurch Street is also visible above the foreground brick Georgian buildings. Whilst within the setting of the WHS, the existing tall buildings within the City Cluster are understood as a coherent group and as a distinctly separate from the historic foreground.

410. In baseline scenarios, the elegantly proportioned uppermost storeys and crown of the proposal would appear to the right of 22 Bishopsgate rising to form the elegant apex of the Cluster silhouetted against clear sky. The proposal would be readily understandable and individually legible as the totemic centrepiece of the modern City Cluster distant and disassociated from the Inner Ward and the ToL complex and its appearance in this location would be consistent with the existing character of the overall view. In cumulative scenarios 100 Leadenhall Street would expand the Cluster to the east reinforcing the Cluster as a family of

distinguished architectural forms which would continue to coherently step and spiral upwards to the proposal as the apex.

411. From LSS View 1, the Scaffold Site (THVIA Addendum May 2024, View 22), in views north-west in the Inner Ward, the crown of the proposal would just be seen above the parapet of the Chapel Royal of St Peter ad Vincula alongside the upper storeys of 22 Bishopsgate. There would be no backdropping of the cupola which would remain unblemished. The amount of development compared with the approved scheme would be similar but the proposal's subtler but distinct crown treatment would result in a quieter impact, a discreet and unobtrusive glimpse of the proposal that would not disturb, detract or distract from the sense of place of the Inner Ward, the Chapel and adjoining historic buildings, which would remain the prominent elements in this view and the relevant attributes would be preserved.
412. This visibility of the proposed development would be experienced as part of a progression of views in which visibility of the proposed development and the rest of the City Cluster would vary from considerable visibility (THVIA Addendum May 2024, View 21), to some visibility (THVIA Addendum May 2024, View 22), to no visibility (THVIA December 2023, View 22A). The well-established modern high-rise commercial character of the background setting of the WHS would be preserved and the buildings surrounding the Inner Ward, including the Chapel, would remain the focus of the view.
413. The development would assist in establishing the further consolidation of the Cluster as a singular backdrop form, set away from the unique sense of place in the tower foreground. The consolidation of the Cluster into a more coherent, clear and discrete form, contrasting with the preeminent tower in the foreground setting of the River will, in principle, reinforce and make more legible the relationship between two related skyline identities.
414. Given its siting, the proposal would not affect the clear sky backdrop of the White Tower's four turrets and castellations, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components including the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower. The elegant silhouette and neutral palette of materials of enamel zinc and discreet dichroic glass, culminating in a crown of subtly accented red, would be distinct from the WHS, relating to the modern more distant city remote from the historic immediate context.
415. In cumulative scenarios 100 Leadenhall would appear to the right stepping down and framing the proposed apex, further consolidating and defining the identity of the modern City Cluster and its distinct separation from the WHS ToL. The emerging expansion to the west would be glimpsed but largely screened by

50 Fenchurch Street (under construction) prominently positioned in the foreground backdropping St Peter ad Vincula (I) bell tower.

416. It is considered, then, in accordance with the guidance in the LSS, that the proposal would (i) respect the unique sense of place and the pre-eminent stage in which those rich traditions would continue to take place and (ii) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is further considered that the iconic, strategic landmark siting and dominance of the White Tower would be unchanged, in terms of the overarching attributes of OUV and their components, while the relationship between the ToL and the City beyond would be maintained, the proposal being an integral and proportionate addition to the emerging Cluster as a distinct, long established backdrop entity, set away from the ToL. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

*Inner Curtain Wall (North) (LSS View 2) and Devereux Tower:*

417. The LSS View 2 acknowledges that this is a 360-degree experience and demonstrates a 'clear contrast between the historic Tower and the modern city outside its walls'. The identified aim is to (i) maintain views that reveal the relationship between the Tower and the City and (ii) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' the LSS recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting, stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the ToL and the City to the north and that clear views of the concentric curtain walls should be preserved.

418. In baseline scenarios, in the THVIA Addendum May 2024 View 23, the proposal would appear in the background centre of the emerging City Cluster east of 22 Bishopsgate, rising to form the pinnacle of the Cluster silhouetted against clear sky. The GLA identifies a low level less than substantial harm to ToL in this view and the LB Tower Hamlets comment there would be a further increase of built form in the backdrop to the ToL. As before, officers robustly disagree with the new positions of these organisations. The proposal would increase the mass of the cluster and be readily understandable as the totemic centrepiece of the modern City Cluster distant and disassociated from the Inner Curtain Wall north and the ToL complex and its appearance in this location would be consistent with the existing character of the overall view. The elegant silhouette and neutral palette of materials of enamel zinc and discreet dichroic glass, culminating in a crown of subtly accented red, would be distinct of the WHS, relating to the modern more distant city remote from the immediate historic context and sense of place.

419. In cumulative scenarios 100 Leadenhall would frame the proposal to the right and further define and containing the cluster's cascading silhouette to the east. The cluster would also expand to the west, reinforcing the Cluster as a family of distinguished architectural forms which would continue to coherently step and spiral upwards to the proposal as the apex.

420. The development would maintain the existing relationship of the City Cluster with the ToL and preserve the pre-eminence of concentric curtain wall defences in these views, all in accordance with the guidance. The experience from Devereux Tower not an identified view in the LSS (THVIA December 2023 View 24) is positioned further to the west along the Inner Curtain Wall would be similar in baseline and cumulative scenarios. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

*Inner Curtain Wall (South) (LSS View 4):*

421. The LSS View 4 also recognises that these views are a 360-degree experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River and, whilst under the associated guidance, seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.

422. In baseline scenarios THVIA December 2023 View 25, the elegantly proportioned uppermost storeys and subtler distinct crown of the proposal would appear to the right of 22 Bishopsgate rising to form the pinnacle of the Cluster silhouetted against clear sky. The GLA identifies a low level less than substantial harm to the ToL in this view and the LB Tower Hamlets comment the development would add to the solid mass increasing the presence of the cluster directly behind the ToL and would cause some additional harm. As before, officers robustly disagree with the new positions of these organisations. The proposal would increase the massing of the cluster but would be readily understandable and individually legible as the totemic centrepiece of the modern City Cluster distant and disassociated from the Inner Curtain Wall South and the ToL complex and its appearance in this location would be consistent with the existing character of the overall view. The southern and eastern facades of the elegant sky etched silhouette and neutral palette of materials of enamel zinc and discreet dichroic glass culminating in a crown of subtly accented red would be distinct of the WHS, relating to the modern more distant city remote from the immediate historic context.

423. In the cumulative scenario, 100 Leadenhall would be positioned immediately to the right framing the proposal and defining and containing the cascading

silhouette of the cluster to the east. The emerging expansion to the west would be screened by 50 Fenchurch Street (under construction), prominently positioned in the foreground. Overall, the identity of the Cluster as a family of distinguished architectural forms would be reinforced and would continue to coherently step and spiral upwards to the proposal as the apex.

424. The proposal would assist in the consolidation of the Cluster of a singular backdrop form, set away from the unique sense of place in the WHS foreground and the White Tower which would continue to dominate that part of this 360-degree viewing experience, with the Cluster a distant subservient entity beyond. The proposal beyond would not intrude into the other vantages of this viewing experience. The development would preserve the existing relationship of the City Cluster with the ToL and preserve the pre-eminence of concentric defences in this view, in accordance with the guidance. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

*Byward Tower Entrance (LSS View 5):*

425. This view is taken adjacent to the Byward Tower entrance, marking the formal entry into the Tower of London for visitors arriving from the west. It corresponds to view 5 in the Local Setting Study (THVIA Addendum May 2024 View 26) which acknowledges 360 – degree views from this bridge which reveal the Tower’s relationship to the River Thames and the City of London. The identified aims are to maintain the views which reveal the relationship between the Tower, the river to the south and the City to the north and enhance the appreciation of the medieval military architecture of the Tower.

426. In the baseline scenario, the elegantly proportioned uppermost storeys and subtly accentuated crown of the proposal would appear to the right of 22 Bishopsgate, rising to form the pinnacle of the Cluster silhouetted against clear sky. The GLA identifies a low level less than substantial harm to the ToL in this view and as before, officers robustly disagree with this new position. The proposal would be readily understandable as the totemic centrepiece of the modern City Cluster distant and disassociated from the Byward Tower Entrance, the ToL complex, river setting and its military architecture; the proposal’s appearance in this location would be consistent with the existing character of the overall view. The elegant silhouette would be set against clear sky and neutral palette of materials of enamel zinc and discreet dichroic glass culminating in a crown of subtly accented red would be distinct of the WHS, relating to the modern more distant city remote from the historic immediate context.

427. In the cumulative scenario, 100 Leadenhall would be positioned immediately to the right framing 1 Undershaft and defining and containing the cascading



silhouette of the cluster to the east. The emerging expansion to the west would be largely screened by existing riverside development and 50 Fenchurch Street (under construction) prominently positioned in the foreground. Overall, the identity of the Cluster as a family of distinguished architectural forms would be reinforced and would continue to coherently step and spiral upwards to the proposal as the apex.

428. The proposal would assist in the consolidation of the Cluster of a singular backdrop form, set away from the unique sense of place in the tower foreground including the lawns, the former moat, the Liberties and the causeway. In both scenarios, the WHS would remain the focus of the view. It would continue to dominate that part of this 360-degree viewing experience, with the Cluster a distant subservient entity beyond; whilst the proposal would not intrude into the other vantages of this viewing experience, preserving the essential relationship between the ToL and the River and an appreciation of it as a historic gateway and bridge.

429. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

#### *The Royal Mint LSS View 8:*

430. This representative viewpoint is from outside the Royal Mint (THVIA View A11) – an area which once had strong connections to the Tower. The Tower's defences are visible as a symbol of its prominent military architecture and an outstanding example of concentric castle design. The view also reveals its role as a riverside gateway. It illustrates the relative dominance of the Tower in its local setting and provides opportunity to appreciate the Tower silhouetted against the skyline without backdrop intrusions. The aim is to maintain the ToL as the dominant feature of the view, standing within a high quality setting reinforcing ToL as a recognisable landmark and ability to appreciate the symbol of national identity, and military architecture.

431. In the baseline scenario, the elegantly proportioned uppermost storeys and crown of the proposal would appear to the right of 22 Bishopsgate, rising to form the pinnacle of the Cluster silhouetted against clear sky. The GLA identifies a low level less than substantial harm to the ToL referencing this view and as before, officers robustly disagree with this new position. The proposal would be readily understandable as the totemic centrepiece of the modern City Cluster distant and entirely disassociated from the ToL complex and its appearance in this location would be consistent with the existing character of the overall view preserving its national identity, military architecture and landmark status. The elegant silhouette would be set against clear sky and the neutral palette of enamel zinc and discreet dichroic glass culminating in a crown of subtly accented red would be distinct of

the WHS, relating to the modern more distant city remote from the immediate historic context.

432. In the cumulative scenario, 100 Leadenhall would step down and partially occlude the eastern elevation of 1 Undershaft but maintain visibility of the subtly distinct civic crown and southern elevation. The expansion west of the proposal would partially be occluded by 50 Fenchurch Street (under construction). Overall, the cluster as a family of distinguished architectural forms would continue to coherently step and spiral upwards to the proposal as the apex.

433. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

*Tower Bridge Approach (LSS Route 6):*

434. This route is part of the A100 road and is a major Thames crossing point and for pedestrians, the route offers an elevated panoramic view of the river, the Tower, the Wharf and the moat. The LSS seeks to preserve the significant potential to facilitate appreciation of the OUV of the Tower, particularly its defences and its strategic riverside location as appreciated in this kinetic route.

435. The proposed development (THVIA December 2023 View 20) would appear in the background of elements of the Tower of London, the wider City Cluster already does so, and buildings such as 52 Lime Street, 50 Fenchurch Street all lie closer to the Tower of London in the view. The GLA identifies a low level less than substantial harm to ToL in this view and the LB Tower Hamlets comments there would be a further increase of built form in the backdrop to the ToL. As before, officers robustly disagree with the new positions of these organisations. The proposals would increase development within the backdrop entirely consistent with the existing character of the view, including in relation to the ToL and the ability to appreciate the form and layout of the WHS, including its concentric defences. As in other visual experiences in baseline scenarios the elegantly proportioned sky etched uppermost storeys and subtly accentuated crown including colouration and materiality of the proposal would appear to the right of 22 Bishopsgate, rising to form the pinnacle of the Cluster silhouetted against clear sky with lower tower cascading down in the foreground. The proposal would be readily understandable and individually legible as the totemic centrepiece of the modern City Cluster distant and disassociated from the ToL complex and its appearance in this location would be consistent with the existing character of the overall view.

436. In the cumulative scenario, 100 Leadenhall would step down to the right of 1 Undershaft. The expansion west of the proposal would be largely concealed and occluded by 50 Fenchurch Street (under construction). Overall, the cluster as a

family of distinguished architectural forms would continue to coherently step and spiral upwards to the proposal as the apex.

437. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

438. Butlers Wharf (THVIA December 2023 View 18) is not an identified view within the LSS. The LB Tower Hamlets comment there would be a further increase of solid mass and the visual presence of the cluster in the backdrop to the ToL. As before, officers robustly disagree with the new position of the organisation. The proposals would increase development within the backdrop of the ToL entirely consistent with the existing character of the view, including in relation to the ToL and the ability to appreciate the form and layout of the WHS, including its concentric defences. As in other visual experiences in baseline scenarios the elegantly proportioned sky etched uppermost storeys and subtly accentuated crown including colouration and materiality of the proposal would appear to the right of 22 Bishopsgate, rising to form the pinnacle of the Cluster silhouetted against clear sky with lower tower cascading down in the foreground. The proposal would be readily understandable and individually legible as the totemic centrepiece of the modern City Cluster distant and disassociated from the ToL complex and its appearance in this location would be consistent with the existing character of the overall view.

439. In the cumulative scenario, 100 Leadenhall would step down to the right of 1 Undershaft. The schemes along Gracechurch Street, west of the proposal, would be largely concealed and occluded by 50 Fenchurch Street (under construction). Overall, the cluster as a family of distinguished architectural forms would continue to coherently step and spiral upwards to the proposal as the apex.

#### *Conclusion – Impact on the Tower of London World Heritage Site*

440. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF.

441. It is acknowledged that Historic England and GLA conclude that the proposal would cause a low level of less than substantial harm to the WHS and LB Tower Hamlets identify unspecified harm; to reiterate, Historic England have confirmed that they do not formally object to the scheme on WHS grounds. While giving substantial weight and due deference to their expert views, officers fundamentally disagree, not least because the proposal would have similar form and subtler architectural presence compared with the previous approved scheme, which HE, the GLA, LB Tower Hamlets and City officers considered caused no harm to the WHS, and to which these organisations did not then object.

442. In their letter of 19 June 2024, Historic England suggest that the harm could be *'simple to minimise through minor changes to the design which more palpably tone down proposed colour and reflectivity of the cladding materials, and with an external lighting strategy that would not accentuate the impact of the necessary aviation lights'*. While the details of these matters would be secured via condition to ensure they are as refined as possible, officers fundamentally disagree that the proposed colour and materials would be harmful to the WHS.

443. While Historic England, GLA's and LB Tower Hamlets' new positions are duly noted, for the reasons set out in the detailed assessment above, there is a clear difference in the application of professional judgement with City officers. In all instances, officers consider that the proposal would not harm the attributes of the OUV, the authenticity or integrity of the WHS, and to preserve its significance; indeed, so pivotal is this proposal to the overall Cluster composition, officers consider that it would accord with the underlying philosophy of the LVMG SPG in anticipating the future consolidation of the Cluster as a presence relative to the WHS. It would be the latest and one of the most fundamental elements of the Cluster, a long-established backdrop to the ToL ensemble which has been curated by consistent decision-making on behalf of the strategic and local planning authority for the best part of half a century.

444. Officers conclude that the proposal would not harm the setting or significance of the ToL, whether in relation to the WHS or any of the component heritage assets which comprise it. The proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with Local Plan Policy CS12, CS13 (3), emerging City Plan 2040 Policy S11, HE1, HE3 London Plan Policy HC2 and HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.

445. Although Officers conclude that the proposal would not harm the setting or the significance of the WHS, for good practice, DCMS would be notified about the scheme (see paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention).

446. To date Historic Royal Palaces (HRP) have not responded.

*Other London View Management Framework Impacts:*

447. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.

448. The site is in the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital (paras 57 / 87 / 129 / 130 / 144 / 146 / 187). It is considered that the Cluster aids the observer's appreciation of the wider geography of London as a recognisable and important landmark. Officers consider it symbolises the historic commercial and economic heart of the capital, important in reading the wider socio-economic and cultural topography of London.

449. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul's and the Tower of London (ToL). However, it would be visible from several identified views, in particular the River Prospects.

450. The development would not be visible from the other following LVMF views: LVMF 8A.1 Westminster Pier; LVMF 9A.1 Kings Henry's Mound; LVMF 12A.1 Southwark Bridge; LVMF 18A 1-2 Westminster Bridge; LVMF 20 A-B Victoria Embankment; LVMF 21A-B Jubilee Gardens; LVMF 22A Albert Embankment; LVMF 23A Serpentine Bridge; LVMF 24 Island Gardens; LVMF 27A 1-2 Parliament Square. These views are not therefore assessed.

### London Panoramas

451. Due to the height the proposal would be visible, from all the London Panorama Assessment Points.

452. In all instances the City Cluster, or component elements of the Cluster, which the guidance seeks to consolidate (para 57, for example), is either identified as a landmark element or other feature of the view.

### 1A.1-2, Alexandra Palace Viewing Terrace London Panorama:

453. This is an iconic broad and deep panorama from the northern suburbs back across the Thames basin and towards Central London. The visual management guidance (para 85) identifies the Cluster as a distant focal point allowing for orientation. The proposed development (THVIA December 2023 View 1 and A1) would be the tallest tower at the heart of the City Cluster, appearing to the immediate left of the 22 Bishopsgate building, and providing a new central focus for the Cluster. Parts of the northern and western elevations of 1 Undershaft would be visible from this direction, and the upper storeys would be particularly legible, appearing as a distinct and elegant silhouette against the sky hosting the capital's tallest public viewing gallery and educational centre. In this long distant view, the accent of red to the crown and dichroic glazing would be subtly distinctive.

454. In the cumulative scenario, the City Cluster would expand quite considerably to the east and west of the proposed development preserving 1 Undershaft as the new centre point at 75 storeys. New tall buildings would step down from this pinnacle to the east and west of the site reinforcing the symmetry and compositional quality of the Cluster and 1 Undershaft would be slightly occluded by 55 Bishopsgate. The proposed development would retain its central and largely unobscured position within the cluster.

455. In baseline and cumulative scenarios, the proposal would support the aim of para 87 that new tall buildings consolidate and improve the composition of existing clusters of tall buildings, sharpening the distinction between lower density residential of the mid-ground and the background higher density character of central London. In consolidating this townscape element, in line with para 90, the proposal would manage the transition down to St Paul's Cathedral as the SIL, releasing growth pressure on the intervening unspoilt distant horizon of the Kentish and Surrey hills (South London) and on a clear day, the North Downs, thus preserving and enhancing the viewer's ability to recognise and appreciate St Paul's. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG.

456. The proposal would preserve the characteristics and composition of the identified landmark elements: the London Eye, BT Tower and The Shard. It would also leave unaffected views of other identified features: the Caledonian Market Tower, Canary Wharf, Broadgate Tower, the London Bridge Cluster, St Pancras Station and the Euston Tower. It would create a new feature of interest in its own right.

457. The proposal would result in a minor enhancement to the view overall.

#### 2A.1-2 and 2B, Parliament Hill London Panorama:

458. Parliament Hill from the summit and east of, is another famous strategic panorama of London from one of its best-known peaks. As at Alexandra Palace, given the wide span and depth, the consolidation of significant tall buildings into clusters assists the viewers orientation, understanding and ultimately appreciation of the view.

459. In HTVIA View 3 baseline scenarios the proposal would be located well to the left of the Protected Vista of St Paul's described in the LVMF SPG, and would have no effect on the ability to recognise and appreciate St. Paul's, in accordance with the LVMF. It would be the tallest tower at the heart of the City Cluster, appearing partially occluded by 22 Bishopsgate. The northern and eastern elevations would be visible from this direction and would be particularly legible, appearing as a distinct and elegant volume. 1 Undershaft would add positively to

the distant skyline variety of this broad urban panorama. In this long distant view the accent of red to the crown and dichroic glazing would be subtly distinctive.

460. In the cumulative scenario the proposal would form the apex of the composition and assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. Development would step down from 1 Undershaft as the summit, which would contain London's highest public viewing gallery and educational centre for the London Museum. The distinct public realm in the 'crown' of 1 Undershaft would just remain visible, partially obscured by 55 Bishopsgate its distinct silhouette allow it to harmonise visually into a familial, singular cluster form. It would reinforce the central axis of the Cluster, from which it would fall away on all sides, creating a legible and attractive skyline form.

461. In baseline and cumulative scenarios, the siting of the proposal in the City Cluster means there would be no impact on the protected vistas towards the two SILs, St Paul's and the Palace of Westminster. It is a good place to appreciate the City Cluster's emerging conical form, both picking out the individual silhouettes and as part of a consolidating singular identity and coherent urban skyline form. Para 96/106 recognises the contribution of the City Cluster demarcating the financial district and governmental centre of London. As identified (para 97), like the Shard on the opposite side of London Bridge, the Cluster assists the observer in recognising and isolating St Paul's, whilst the consolidation of tall buildings allows for an appreciation of it in its wider backdrop of the rolling Surrey/Kent hills and its prominent place in the wider Thames basin, which the guidance identifies as framing the silhouette of the city (para 96). The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG.

462. The proposal would preserve the characteristics and composition of the identified landmark elements: the BT Tower and the Shard. It would also leave unaffected views of other identified features: the Caledonian Market Tower, Canary Wharf, Broadgate Tower, the London Bridge Cluster, St Pancras Station, 30 St Mary Axe, Heron Tower, Tower 42 and the Euston Tower. It would create a new feature of interest in its own right.

463. The proposal would result in a modest enhancement to the view overall.

### 3A.1, Kenwood at the viewing gazebo London Panorama:

464. This is another Hampstead Heath view from one of the finest historic homes in North London. Given the pre-eminence of the gentle and verdant fore and middle ground of the Heath, an appreciation of the great depth of an otherwise framed view of central London is dependent on tall built form breaking the distant North Downs. As such, the City Cluster is an eye-catching strong orientation point and complementary feature in an appreciation of the composition and characteristics

of the view. The siting of proposal in the City Cluster means there would be no impact on the protected Vista towards St Paul's, or on a recognition or appreciation of the Palace of Westminster as the other SIL.

465. In baseline experiences the proposed development (THVIA December 2023 View 3) would be a noticeable addition to the visual experience from the location of the former viewing gazebo, the slender form of the tall building would be the tallest tower at the heart of the City Cluster, appearing partially behind and to the left of the 22 Bishopsgate building, and appearing as a new central focus for the Cluster. Parts of the northern and western elevations of the proposed development would be visible from this direction, and the top of the upper stage would be particularly legible, appearing as a distinct and elegant volume. The Proposed Development would add positively to the distant skyline variety of this broad urban panorama would increase or decrease dependent on the viewpoint although the individual forms of each building would remain clearly legible as part of an overarching whole. In this long distant view, the accent of red to the crown and dichroic glazing would be subtly distinctive.

466. There would be no impact would be no impact on the protected vistas towards the two SILs, St Paul's and the Palace of Westminster. It is again a good place to appreciate the City Cluster's emerging conical form, both picking out the individual silhouettes and as part of a consolidating singular identity and coherent urban skyline form. Like the view from Parliament Hill in cumulative scenarios the proposed development would remain legible in the view as it is located in the centre of the cluster and the upper part of the building's northern elevation would remain unobscured.

467. The proposal would assist the consolidation of the emerging conical City Cluster as a distinct and coherent urban skyline form, assisting in drawing out that arresting contrast between the semi-rural parkland and the modern commercial core of central London rising above and beyond, as identified in the visual management guidance (para 116). The consolidation of tall buildings here frees the wider backdrop hills to accentuate an appreciation of St Paul's and its strategic location in the wider Thames Basin (para 121). The distinction of a singular Cluster form avoids the visual confusion caused by ad-hoc tall buildings which undermines the recognition and appreciation of the Palace of Westminster (para 118).

468. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to step down from the intended summit at 1 Undershaft, which would contain London's highest public viewing gallery and would be partially obscured by 55 Bishopsgate within the foreground. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG.



469. The proposal would preserve the characteristics and composition of the identified landmark elements: the London Eye, BT Tower and the Shard. It would also leave unaffected views of other identified features: the Broadgate Tower, 30 St Mary Axe, Guy's Hospital, Centre Point and Euston Tower. It would create a new feature of interest in its own right.

470. The proposal would result in a minor enhancement to the view overall.

4A.1-2, Primrose Hill summit, London Panorama:

471. This a small foothill in the initial climb up the North London hills, it is a popular destination just north of Regent's Park affording a spectacular panorama of central London seen in close detail. The siting of proposal in the City Cluster means there would be no impact on the two Protected Vistas towards St Paul's and the Palace of Westminster, the SILs.

472. The Proposed Development (THVIA December 2023 View 4) would be located well to the left of the Protected Vista of St Paul's described in the LVMF SPG, and would have no effect on the ability to recognise the Cathedral. 1 Undershaft would be the tallest tower at the heart of the City Cluster, partly concealed by 22 Bishopsgate and appearing as a new central focal point for the Cluster. The uppermost storeys would be the most visible part of the proposed development, appearing as a distinct and elegant volume and adding positively to the distant skyline variety of this broad urban panorama. The development as the tallest component would consolidate the conical compositional quality of the Cluster on skyline. In this long distant view, the accent of red to the crown and dichroic glazing would be subtly distinctive.

473. The City Cluster is identified as a complementary feature of the view, where it is identified as somewhat screened by towers at Euston (para 129), standing in contrast to the lack of order or coherence of the mix of larger commercial and residential buildings in the middle ground (para 128). The scale of the development would be compatible with the composition of the view and would consolidate the City Cluster of tall buildings as an existing landscape feature in accordance with para 130 of the SPG. This would assist in differentiating it from the consolidating Isle of Dogs Cluster in the background, assisting in an appreciation of the scale and depth of London. Due to the location within the cluster would not change or affect an appreciation of St Paul's in the view from Primrose Hill.

474. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. 1 Undershaft would contain London's highest public viewing gallery and the distinct public realm in the 'crown' of would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into

a familial, singular cluster form. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG.

475. The proposal would preserve the characteristics and composition of the identified landmark elements: the BT Tower and the Shard. It would also leave unaffected views of other identified features: Canary Wharf, University College Hospital, Centre Point, Westminster Cathedral and the Euston Tower. It would create a new feature of interest in its own right.

476. The proposal would result in a minor enhancement to the view overall.

#### 5A.1-2, Greenwich Park General Wolfe Statue London Panorama:

477. This is a seminal London view of great historical significance allowing one of the most comprehensive views of the capital. The siting of proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (5A.2).

478. The proposed development would be a noticeable addition to the view from Greenwich Park (THVIA December 2023 View 5), the upper half of the building appearing against a clear sky background within the central part of the City Cluster. The new building would provide a clear and legible centrepiece to the Cluster. The Gherkin and lower towers to the east of the site create a transition in scale down from the proposed development, creating a more legible conical composition of buildings viewed against the skyline. The development would be clearly defined from other towers within the Cluster, whilst assisting in consolidating the Cluster as a distinct, singular skyline form. In this long distant view the accent of red to the crown and dichroic glazing would be subtly distinctive.

479. In the cumulative scenarios, 55 Bishopsgate would appear behind the proposed development and 100 Leadenhall Street would appear in front of it, with the latter obscuring part of its form. Both cumulative schemes would appear at a lower apparent height than the proposed development, such that it would remain the tallest building in the City Cluster and a new focal point for the Cluster. The proposal would be essential in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would be the intended summit, which would contain London's highest public viewing gallery. The distinct public realm in the 'crown' of would remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular cluster form. It would reinforce the central axis of the Cluster, from which it would fall away on all sides.

480. This is a broad and rich panorama allowing a full appreciation of London as a great historic port city focused on the River Thames, with the exceptional foreground formal classical landscape of the Royal Naval College in dramatic juxtaposition with the consolidating Docklands Cluster beyond. The SPG recognises that this offers layering and depth to the view (para 144). The Thames meanders back to central London, announced by the City Cluster, which is an important orientation point for the observer in the recognition of St Paul's. The proposal would assist in consolidating the singular Cluster skyline form, whilst preserving the ability to appreciate St Paul's, Tower Bridge and the Monument, experienced in part against the distant Highgate/Hampstead ridgeline. In the cumulative scenario the proposal would assist in cementing further the consolidation of a clear, conical form of the Cluster.

481. The proposal would accord with para 146 of the SPG, which recognises that the composition would benefit from the further incremental consolidation of the City Cluster of tall buildings, consistent with the general want to consolidate tall buildings at para 57, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London.

482. The proposal would preserve the characteristics and composition of the identified landmark elements: the Monument, Tower Bridge, Millenium Dome and the Greenwich Observatory. It would also leave unaffected views of other identified features: Canary Wharf. It would create a new feature of interest in its own right.

483. The proposal would result in a minor/modest enhancement to the view overall.

#### 6A.1 Blackheath Point, London Panorama:

484. This panoramic viewpoint is on high ground of historic strategic importance on a historic route from the Kent coast and the continent and would have been the first sighting of the skyline of the capital. The siting of the proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL. Tower Bridge and The Old Bailey (6A.1).

485. The proposed development (THVIA December 2023 View 6) would be a noticeable addition to the view from Blackheath Point, the building appearing against a clear sky background within the central part of the City Cluster. The building would be clearly distinguished from 22 Bishopsgate. The new building would provide a clear and legible transition in scale stepping up at the centre of the cluster. The Gherkin and lower towers to the east of the site would create a transition in scale stepping down from the proposed development, creating a more consolidated and coherent composition of buildings. The elegant and slender skyline profile would be appreciated as part of a more coherent Cluster

form. In this long distant view, the accent of red to the crown and dichroic glazing would be subtly distinctive.

486. In the cumulative scenarios the proposed development would be partly obscured by 100 Leadenhall Street. The proposal would assist in cementing further the consolidation of a clear, attractive conical form of the Cluster. It would continue to be visible as the defined intended summit and would contain London's highest public viewing gallery. The distinct public realm in the 'crown' remain visible, as would its distinct silhouette, whilst the architectural expression and appearance would allow it to harmonise visually into a familial, singular cluster form.

487. As at Greenwich, the development would assist in the consolidation of the City Cluster as a coherent skyline form assisting the composition and characteristics of the view overall and would contribute positively to the conical form and family of very tall buildings. The proposal would be consistent with the general want to consolidate tall buildings at para 57, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London.

488. The proposal would preserve the characteristics and composition of the identified landmark elements: Tower Bridge, the Old Bailey and the Shard. It would also leave unaffected views of other identified features: St Paul's Church (Deptford), Guy's Hospital and Canary Wharf.

489. The proposal would result in a minor/modest enhancement to the view overall.

### Linear Views

#### LVMF 9.1 A King Henry VIII's Mound

490. This is a unique and historic distant view within Richmond Park from a single Assessment Point, and a Protected Vista focussed entirely on the Cathedral as the Strategically Important Landmark. The view of St Paul's Cathedral is fully framed by trees, the aperture changing in size and form owing to the seasons and pruning management. Very little intervening development can be seen in the foreground. Development around Broadgate and Liverpool Street Station can be seen in the background beneath the springing level of the dome. Also in the background, partially hidden by trees on the left but discernible by the viewer, is the vertical edge of the Broadgate Tower and to the right the City Cluster. The Manhattan Lofts Gardens 2016 in Stratford now backdrops the Cathedral and significantly diminished the former pristine silhouette of the Cathedral.

491. The proposed development would not be within any part of the Protected Vista including the Landmark Corridor, Wider Setting Consultation Area or Background

Consultation Area (THVIA December 2023 View B1). The position of the proposed development within the city cluster is well to the right of the view and screened by dense vegetation and trees. There would be no impact on the appreciation of the Cathedral and that the clear sky background profile of the upper part of the dome remains. The proposal would be consistent with the general want to consolidate tall buildings at para 57, avoiding more sensitive aspects of the wider view and allowing for greater understanding of the wider landscape setting of London.

492. The proposal would preserve the characteristics and composition of the identified landmark element St Pauls' Cathedral and would preserve an appreciation of those the other identified feature Broadgate Tower.

493. The proposal would preserve the linear view of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 176 and 57 of the SPG.

### LVMF River Prospects

#### LVMF 13A.1- B.1: Millennium Bridge and Thames side at Tate Modern

494. This stretch of the river has a distinct character being directly opposite the St Paul's Cathedral as the Strategically Important Landmark and is one of best places to appreciate the Cathedral at close quarters. The Cathedral dominates the middle ground of the view where the architectural details and embellishment and cornice line can be enjoyed. The monumental silhouette rises above a low horizontal skyline relieved by the wider 'Wrenscape' skyline of steeples and spires. The City cluster is peripheral to the right of the view where Tower 42 is just visible.

495. From 13 A,1 (A7) and 13 B.1 (THVIA December 2023 View 15) in baseline and cumulative scenarios the proposal would be on the periphery of the panorama from the assessment points but experienced tangentially in views looking east as a part of the wider cluster. The development would appear behind 8 Bishopsgate and the Leadenhall Building, and to the east of 22 Bishopsgate. Most of the proposal's uppermost storeys would be visible, and from this vantage point further east than the previous views from the riverside and river bridges, it would stand clear of 22 Bishopsgate. The development would have a slightly lower apparent height than that of 22 Bishopsgate in these views, such that the two buildings would form a joint peak for the City Cluster, with clear sky space between them. Together with 8 Bishopsgate and the Leadenhall Building, the proposal and 22 Bishopsgate would also form part of a tightly defined quartet of tall buildings at the heart of the City Cluster in this view. The proposal would be clearly within the City Cluster and detached from the context of the Cathedral. There would be no impact on the skyline character, elements within the view and

the Cathedrals dominance and details would be preserved. The upper levels of the elegant silhouette would be set against clear sky and the neutral palette of enamel zinc and discreet dichroic glass, culminating in a crown of subtly accented red, would be distinct to the modern City Cluster and detached from identified landmarks and features with the composition.

496. In the cumulative context, the City Cluster expands and consented tall buildings on the eastern side (100 Leadenhall), western side (55 Bishopsgate) and southern sides of the Cluster serve to bridge the visual gap between the main body of the Cluster and the 52 Lime Street and 20 Fenchurch Street. The emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels remain unobscured and the distinction between the low scale of old historic City and the modern City Cluster would be maintained.

497. The proposal would preserve the characteristics and composition of the identified landmark elements, St Pauls' Cathedral and Millennium Bridge and would leave preserved an appreciation of those other features Unilever House Faraday House, 200 Aldersgate Barbican Towers Church of St Benet Paul's Wharf, Church of St Mary Somerset, St Nicholas Cole Abbey, Church of St Mary le Bow Church of St Mary Aldermanbury, Church of St James Garlickhithe, Church of St Michael Paternoster Royal : It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.

498. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 228-237 and 57 of the SPG.

#### 15B.1- 2: Waterloo Bridge: The Downstream Pavement

499. This viewing experience comprises two assessment points, 15B.1 and 15B.2 and encompasses the kinetic experience in between. It is an iconic London view with important views east towards St Paul's Cathedral and the City of London. St Paul's Cathedral is identified as the SIL. There is a clear, long established relationship between the Cathedral and the City Cluster as two distinct forms with space between them which is integral to the composition as a whole. The Cathedral the pre-eminent monument with clear sky around it, rising above, atop Ludgate Hill, a lower riparian setting of historic buildings and landscapes. The modern tall buildings of the City Cluster form the background to the right, demarcating the central financial district. An important characteristic of the City Cluster in these views is it rises gradually in height from its left edge in deference to the Cathedral.

500. In the kinetic experience, 15B.2 (THVIA Addendum May 2024 View 11) and LVMF 15 B.1 (THVIA December 2023 View A4) in baseline scenarios, the upper stories and crown of the development would appear behind 22 Bishopsgate and at a similar height, forming the apex of the cluster with 8 Bishopsgate and the Leadenhall Building stepping down to the east and south. Together with the three aforementioned existing buildings, the development would appear as part of a tightly defined group of the tallest buildings within the City Cluster in this view, set at the heart of the cluster, and with other tall buildings - such as Tower 42 and the Heron Tower to the north and 52 Lime Street and 40 Leadenhall Street to the south stepping down in height from this central group. In doing so, the proposed development would consolidate the appearance of this group of the tallest buildings as the central focal point of the Cluster and defining its arced, cascading silhouette.

501. The LVMF guidance states that new development should not dominate the Cathedral or compromise its relationship with the clear sky backdrop. The guidance also states that development in the Cluster should be of an appropriate height and of high architectural merit (para 263).

502. The development's palette would be lighter than the buildings in its immediate foreground, and its form would be different, such that it would be readily distinguishable from them. The upper levels of the elegant silhouette would be set against clear sky and the neutral palette of enamel zinc and discreet dichroic glass culminating in a crown of rippling subtle accents of red would be embedded in the modern city. The City Cluster would read as a distinctly separate and distant urban form from St Paul's Cathedral, consistent with its existing setting and leaving it unharmed. The viewer's ability to recognise and appreciate the Strategically Important Landmark of St. Paul's Cathedral and characteristics and composition of the view would be left undiminished. The proposal would not affect St Paul's clear sky silhouette, or draw tall buildings closer to the Cathedral and would comply with para 264/66/67 of the LVMF SPG.

503. 5 In the cumulative context, the City Cluster is expanded and new tall buildings on the eastern side 100 Leadenhall, western side 55 Bishopsgate and southern sides of the cluster serve to bridge the visual gap between the main body of the cluster and the 52 Lime Street and 20 Fenchurch Street. The emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels remain unobscured and the distinction between the low scale of the historic City and the modern city cluster would be maintained.

504. The essential character of LVMF 15B.1- 2 would be retained at nighttime, with the contrast between the modern towers within the City Cluster and the illuminated dome and peristyle of St Paul's Cathedral. The river itself provides a layer of darkness animated with pockets of light which contrast with the geometric forms of the buildings as they rise above the riverbank. The lighting would appear

with a different distribution to other buildings due to its mega grid exterior and regular module, such that it would be readily distinguishable. The top of the building and the public viewing gallery would be distinctively expressed at night, providing a celebratory crown to the centre of the City Cluster. The proposal has been designed to minimise light pollution from internal and external lighting including the roof top conservatory, which is inherent in the façade, and will be secured in detail via condition, including aviation lights. There will be no other form of external lighting that will be visible in these views. The development has been designed in accordance with the details and technical requirements of the draft Lighting SPD and the Corporate Lighting Strategy. Overall, lighting will be managed to ensure the development would not command the focus in the City Cluster or distract unduly from other elements of the composition.

505. Otherwise, the proposal would preserve the characteristics and composition of the identified landmark elements, Somerset House and the Shard, and would preserve an appreciation of those other features: Temple Gardens, St Bride's Church, the Barbican Towers, The Old Bailey, Tower 42, St Mary Axe, Heron Tower, the Tate Modern, IPC Tower, ITV Tower and the Royal National Theatre. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting (Temples, Victoria Embankment, the Monument and Wren Churches), and those other key landmarks so that they could still be appreciated in their London context.

506. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 262-264, 265 and 57 of the SPG.

#### 16B.1-2: The South Bank: Gabriel's Wharf viewing platform

507. The view (THVIA December 2023 View 12) comprises two Assessment Points located close together on the viewing platform both orientated towards St Pauls Cathedral. The Cathedral is identified as the Strategically Important Landmark (SIL) and the guidance identifies the City Cluster as a group of tall buildings in the east of the composition. The Oxo Tower is a landmark in the view and Unilever House, St Brides Church, Tower 42, 30 St Mary Axe and Heron Tower are also in the view. There has been a third-party objection to the proposed height and bulk and the impact on this view.

508. In baseline scenarios the proposal would contribute to the City Cluster, introducing a distinctive and elegant new tall building assisting in the long-term consolidation of the Cluster composition as a more singular skyline set piece. Impacts would be similar to Waterloo Bridge in baseline scenarios, the upper stories and crown of the development would appear behind 22 Bishopsgate and at a similar height, forming the apex of the cluster with 8 Bishopsgate and the Leadenhall Building stepping down to the east and south. Together with the three



aforementioned existing buildings, the development would appear as part of a tightly defined group of the tallest buildings within the City Cluster in this view, set at the heart of the cluster, and with other tall buildings - such as Tower 42 and the Heron Tower to the north and 52 Lime Street and 40 Leadenhall Street to the south stepping down in height from this central group. In doing so, the proposed development would consolidate the appearance of this group of the tallest buildings as the central focal point of the cluster and defining the arced cascading silhouette of the cluster. In this more distant view the neutral palette of enamel zinc and discreet dichroic glass, culminating in a crown of subtly accented red, would be distinct to the modern city cluster and detached from identified landmarks and features with the composition.

509. In the cumulative context, the City cluster expands and new tall buildings on the eastern side 100 Leadenhall, western side 55 Bishopsgate and southern sides of the cluster serve to bridge the visual gap between the main body of the cluster and the 52 Lime Street and 20 Fenchurch Street. The emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels remain unobscured and the distinction between the low scale of old historic City and the modern city cluster would be maintained.

510. The proposal would also preserve the characteristics and composition of the identified landmark elements, and those key landmarks so that they could still be appreciated in their London context St Paul's Cathedral and The Oxo Tower. It would leave preserved an appreciation of those other features: Temple Gardens, St Bride's Church, Unilever House, Tower 42, 30 St Mary Axe, Heron Tower and IPC Tower. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting so that they could be appreciated in their London context. It would create a new feature in its own right.

511. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 280-281,283 and 57 of the SPG.

512. LVMF 17B.1-2 – River Prospect, Golden Jubilee/Hungerford Footbridges (Downstream):

513. LVMF view 17B.1 (THVIA December 2023 View 10) and 17 B.2 (THVIA December 2023 View A2) is a kinetic viewing experience between the two Assessment Points from the Golden Jubilee / Hungerford Footbridges looking downstream with St Paul's the Strategically Important Landmark the centrepiece of the view. The footbridge provides enhanced viewing experiences to the east owing to the elevated viewing location. The LVMF guidance identifies the setting of St Paul's Cathedral within the view as the singular most important structure which should be preserved or enhanced. Para 300 of the LVMF SPG identifies clusters of tall buildings either side of the Cathedral including the City Cluster and

para 302 states new development should strengthen the composition of the existing Clusters.

514. In baseline scenarios the proposal would contribute to the City Cluster, introducing a distinctive and elegant new tall building assisting in the long-term consolidation of the Cluster composition as a more singular skyline set-piece. Impacts would be similar to Waterloo Bridge in baseline scenarios, the upper stories and crown of the development would appear behind 22 Bishopsgate and at a similar height, forming the apex of the cluster with 8 Bishopsgate and the Leadenhall Building stepping down to the east and south. Together with the three aforementioned existing buildings, the development would appear as part of a tightly defined group of the tallest buildings within the City Cluster in this view, set at the heart of the cluster, and with other tall buildings - such as Tower 42 and the Heron Tower to the north and 52 Lime Street and 40 Leadenhall Street to the south stepping down in height from this central group. In doing so, the proposed development would consolidate the appearance of this group of the tallest buildings as the central focal point of the cluster and defining the arced cascading silhouette of the cluster. In this more distant view, the neutral palette of enamel zinc and discreet dichroic glass culminating in a crown of rippling subtle accents of red would be distinct to the modern city cluster and detached from identified landmarks and features with the composition.

515. In the cumulative context, the City Cluster would be expanded and new tall buildings on the eastern side 100 Leadenhall, western side 55 Bishopsgate and southern sides of the cluster serve to bridge the visual gap between the main body of the cluster and the 52 Lime Street and 20 Fenchurch Street. The emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels remain unobscured and the distinction between the low scale of old historic City and the modern city cluster would be maintained.

516. Otherwise, the proposal would preserve the characteristics and composition of the identified landmark elements: Somerset House, Cleopatras Needle, Waterloo Bridge, St Bride's Church, Royal National Theatre, Royal Festival Hall and the Shard. It would preserve an appreciation of those other features: the Shell Mex House, Brettenham House, the Fleche of the Royal Courts of Justice, Barbican Towers, Dome of the Old Bailey, Tower 42, 30 St Mary Axe, Heron Tower and IPC Tower. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.

517. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 301/302/304/305 and 57 of the SPG.

LVMF 19A.1-2 River Prospect, Lambeth Bridge (downstream):

518. This is a kinetic sequence between the two Assessment Points, with the focus of the view the Palace of Westminster, the SIL, alongside other landmarks including Westminster Abbey, Victoria Tower Gardens, Whitehall Court, the London Eye, Westminster Bridge and Lambeth Palace, whilst 30 St Mary Axe (the Gherkin) and Tower 42 in the City Cluster as also identified as positive features. The visual guidance describes the juxtaposition between the greater intensity of buildings north of Westminster Bridge and in the CoL as secondary to the 'semi-pastoral' setting of the World Heritage Site (para 332), while the distant Cluster makes for a deep view (para 333), allowing for a strong appreciation of the geography of London, and a juxtaposition between the political and commercial centres of the Capital.
519. The proposed development (THVIA December 2023 View 9) in baseline scenarios is a noticeable feature in the view, rising beyond the Leadenhall Building and to the east of 22 Bishopsgate. 1 Undershaft would appear as the tallest building within the City Cluster and would form a new focal point for it with clear sky space and separation from 22 Bishopsgate. The overall City Cluster would appear as a separate urban form, distinct from the buildings in the foreground and the heritage assets within it and the Proposed Development would positively consolidate the form of the Cluster. The most visible part of the Proposed Development would be the upper stage, which would have a slender silhouette on the skyline and a distinctive crown. Although some distance from the viewpoint the neutral palette of enamel zinc and discreet dichroic glass, culminating in a crown of rippling subtly accented red, would still be distinct to the modern city cluster and detached from identified landmarks and features with the composition. The proposal would assist in the consolidation of the City Cluster into a coherent skyline form with a stronger identity, in accordance with the aim to consolidate existing clusters in the visual guidance (para 57).
520. In the cumulative context, the City cluster is expanded and new tall buildings to the right 100 Leadenhall and to the left 55 Bishopsgate and to the foreground of the cluster infilling between the body of the cluster and the 52 Lime Street and 20 Fenchurch Street. The emerging new tall buildings would not change the extent of visibility of the development, of which the upper levels remain unobscured and the distinction between the low scale of the old historic City and the modern city cluster would be maintained.
521. The proposal would preserve the characteristics and composition of the identified landmark elements, The Palace of Westminster, Towers of Westminster Abbey Whitehall Court, The London Eye, Westminster Bridge and Victoria Tower Gardens and would leave preserved an appreciation of those other features: the BT Tower, Centre Point Embankment Place Shell Mex House, County Hall, St

Thomas's Hospital, Tower 42, 30 St Mary Axe, Heron Tower and IPC Tower. It would still allow for the juxtaposition between important elements, such as the Cathedral and the historic riverside setting and those key landmarks so that they could still be appreciated in their London context.

522. The proposal would preserve the townscape setting of The Palace of Westminster whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 334-338 and 57 of the SPG.

#### Townscape views LVMF 26A.1 Townscape St James Park Bridge:

523. LVMF View 26A.1 is a single Assessment Point from just south of the centre point of the 'Blue Bridge', orientated towards Horse Guards Parade and the central foreground fountain and the Foreign and Commonwealth Office between the 'pivot' of the central 'Duck Island'. Historic England argue that *"the tower would be seen from multiple other highly sensitive locations across London, including from St James's Park, registered at Grade I, and from the Tower of London World Heritage Site. By virtue of its size and dominance, this would cause some harm to St James's Park by increasing the prominence of the Cluster, thus eroding its significance derived from the relationship between water, mature planting and historic Whitehall buildings in key views from the bridge over the lake"*.

524. This view is quintessentially picturesque and derives its character from the high-quality landscaped setting of St James's Park relative to the groups of buildings. The foreground and middle ground are dominated by the lake and surrounding parkland. The densely foliated Duck Island is in the centre of the view with two groups of buildings with distinct architectural characters either side experienced between trees. To the left is the skyline of spires and pinnacles of Horse Guards and Whitehall Court (grade I and II\*), identified as landmarks in the view, as well as the Old War Office (grade II\*, although not identified in the view). The Foreign and Commonwealth Office (grade I) and the Shell Centre are also landmarks, alongside the London Eye, and have a more geometric form and a larger scale. This juxtaposition of these elements characterises this historic parkland in an important city location where no single building dominates.

525. Beyond the tree line of Duck Island to the east, the forms of modern tall buildings are discernible, including 22 Bishopsgate and the Leadenhall Building in the City Cluster, and Southbank Tower and One Blackfriars (LB Southwark). The latter two buildings are heavily filtered by the mature trees and are not a prominent or noticeable feature of the view. 22 Bishopsgate is more prominent, appearing beyond the tree canopy and above the roofline of the Old War Office, albeit obscured by the pre-eminent foreground landscape setting. The presence

of the tall buildings has the effect of bringing the wider urban context closer to the view, and a greater sense of awareness of the wider London context.

526. Consistent with their consultation response in 2016 Historic England conclude that the proposed development, by virtue of its size and dominance, would cause some harm to St James's Park, exacerbated by the crown colour, by increasing the prominence of the Cluster, thus eroding its significance derived from the relationship between water, mature planting and historic Whitehall buildings in key views from the Blue Bridge over the lake (LVMF view 26A.1).

527. In summer, the proposed new development would be concealed by the branches and foliage of the trees on Duck Island. In winter, as illustrated in THVIA Addendum May 2024 View 7, the upper part of it would be visible as a distant form filtered through the branches of the trees on Duck Island with the top of 22 Bishopsgate immediately to its left, and not rising above the top of the tree canopy. To the limited extent they would be seen together, the 1 Undershaft and existing 22 Bishopsgate would create a new focus to the view of the distant City of London commercial core, their combined forms adding positively to the already varied skyline character beyond St James's Park.

528. The visual management guidance anticipates background development, which is now a clear part of the view and the principal groups of Victorian buildings either side of the Duck Island are read in juxtaposition with backdrop clusters of taller buildings: the City Cluster, the Blackfriars Cluster (LB Southwark) and the Waterloo Cluster (LB Lambeth). At the core of managing the Townscape Views, London Plan Policy HC4, seeks development which allows buildings or groups of buildings of architectural/cultural significance, to be seen in conjunction with the surrounding environment, including distant buildings, as is the case here. New development should be of a high standard of execution (LVMF SPG, para 75), and should preserve or enhance the characteristics and composition of the view. Indeed, the guidance is explicit that development should not breach the tree canopy profile of the Duck Island, which the proposal would not, and that new buildings should appear as part of the existing groups which 1 Undershaft would.

529. The form of the proposed development would be more distant and elegant than the South Bank Tower and One Blackfriars which are to its right in this view and closer to the viewing position. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and still subservient to, the pre-eminent Whitehall composition. The location within the heart of the Cluster sited with other tall buildings would not encroach on the principal sky-etched silhouette of Whitehall Court and or the ensemble of Horse Guards and the Old War Rooms, with particular regard for roofline, materials, shape and silhouette. Although some distance from the viewpoint the neutral palette of enamel zinc and discreet dichroic glass culminating in a crown of rippling subtle accents of red would still be legible but clearly detached from identified

landmarks and features within the composition. The proposed development would be consistent with the existing character of the view, and would appear distinct and separate from the buildings immediately surrounding it in the foreground landscape, water and middle ground elements of the view. The development would be consistent with the SPG para 431.

530. The views are equally enjoyed in night-time (THVIA Addendum May 2024 View 7 and THVIA December 2023 View 8N). The essential character of LVMF 26A is retained at nighttime, with the historic buildings at Horse Guards Parade, Whitehall Court and the Foreign and Commonwealth Office experienced in the verdant water setting. Mature trees filter the elevations of the buildings, creating pockets of light and dark across the water. The distinct built forms within the view are identified by different lighting schemes. The most prominent is the London Eye, identified by the bright lighting against the background of the view. The listed buildings within the view are largely in darkness although the illuminated clock face of Horse Guards is a bright feature. Tall buildings in the wider urban context are visible in the background of the view, noticeable beyond the mature trees on Duck Island which have a screening effect. Their lit-up forms reinforce awareness of the central London location, although these do not form a focal point of the view, and neither would the proposal.

531. In cumulative scenarios 55 Bishopsgate would appear to the north of the proposed development, left of it in this view, and 100 Leadenhall Street would appear to its east, right of it in this view, both at a lower apparent height than the Proposed Development. 55 Bishopsgate would be considerably more visible than the proposed development but would still be no higher than the trees on Duck Island. 100 Leadenhall Street would be screened to a significant extent by trees, even in winter. To the limited extent that they would be appreciated together, 55 Bishopsgate, 100 Leadenhall Street and the Proposed Development would form part of a background layer of development, together with existing tall buildings such as 22 Bishopsgate, One Blackfriars and the South Bank Tower, distinct and separate from St. James's Park and the buildings surrounding it in the foreground.

532. The proposal has been designed to minimise light pollution which would be filtered by foreground foliage from internal and external lighting including the roof top public viewing terrace, which is inherent in the façade, and will be secured in detail via condition including aviation lights. There will be no other form of external lighting visible from here. The development has been designed in accordance with details and technical requirements of the draft Lighting SPD and will be in accordance with the Corporate Lighting Strategy. Overall, lighting will be managed to ensure the development would not command the focus in the view or distract unduly from other elements of the composition.

533. The proposal would preserve the characteristics and composition of the identified landmark elements, The London Eye, the Foreign Office and the Shell Centre tower, whilst also allowing for the juxtaposition between picturesque landscape and historic features, by day and night, so that they could still be appreciated in their London context.

534. The visibility and impacts of the proposals in the view would be consistent with the 2016 approval. Officers reach different professional conclusions to that of Historic England and conclude that there would be no harm to the character or composition of the view.

### Summary of LVMF Impacts

535. The proposal would preserve St Paul's Cathedral, as the Strategically Important Landmark and the composition and characteristics of the LVMF views. The impacts would be very similar in respect of overall form and mass to the approved application 16/00075/FULEIA. There would be some minor enhancement to the London Panoramas through the consolidation of the City Cluster. Lighting will be managed to ensure the development would not command the focus within these views or distract unduly from other elements of the composition and after dark the development would be overall less impactful and prominent. The proposal would comply with London Plan Policy HC4, Local Plan Policy CS13 and emerging City Plan 2040 Policy S13.

### City of London Strategic Views

536. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development. The proposed development site is located within the eastern periphery of the City of London, and as such falls outside of the St Pauls Heights policy area.

537. Kinetic views from the Southbank and the river bridges are identified in the SPD. Heritage significance of relevant historic City landmarks is considered below within the section on indirect impacts to heritage assets.

## **Monument**

### Monument Views

538. In support of Local Plan policy CS13, the Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposals have been designed, in terms of

siting, height and appearance, to preserve views of and from the Monument.  
Views from the Monument.

539. The proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.

540. Para 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye, respectively, into the Bank Conservation Area and western fringe of the City Cluster.

541. The proposal would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall and clearly be a distinct addition to the Cluster (THVIA December 2023 View 44). The proposal would appear to the east of 22 Bishopsgate and north of the Leadenhall Building, at a similar apparent height to the former. It would positively reinforce the central group of the tallest buildings in the City Cluster as seen in this view. The proposal would read as part of the consolidating Cluster, enhancing an appreciation of the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would enhance the view; albeit in the cumulative scenario, the proposal would be obscured by the consented forms of 55 and 70 Gracechurch Street.

#### Views of and Approaches to the Monument

542. The proposal would not be in the 'Immediate Setting' of the Monument, as defined in the Protected Views SPD (Figure 8), leaving it preserved in accordance with the guidance at paragraphs 4.16-17 of the SPD. The proposal would be in its near setting and visible in some of the identified 'Views along Street Axes'.

543. In views on approach from Princes and King William Streets, the proposal would be peripheral to the viewing experience of the Monument, situated at a distance to the north-east of the principal (semi-formal) orientation of the view SE along King William Street. No harm would be caused and the proposal in accordance with paragraphs 4.19-21 of the SPD.

544. In views from Tower Bridge (along Monument Street axis, the proposal would be viewed as part of the consolidating Cluster and largely screened by existing and emerging tall buildings. The orientation of the view along Monument Street in which the skyline setting of the Monument rising out of the Custom House would be unaffected and the proposal would be peripheral to that experience. From Monument Street itself, the proposal would not be visible, allowing adequate



space to recognise and appreciate the Monument. No harm would be caused and the proposal in accordance with paragraphs 4.22-23 of the SPD.

545. The SPD identifies the approach to the Monument from Gracechurch Street, from the junction with Lombard Street in particular down to the junction with Eastcheap. From this section the proposal would be behind the observer with no direct intervisibility. From further back up Gracechurch Street / Bishopsgate, the proposal would be located to the east in the heart of City Cluster and at no point would it obscure or otherwise detract from the emerging kinetic view of the Monument. No harm would be caused and the proposal in accordance with paragraphs 4.24-25 of the SPD.

546. In views north from Queen's Walk, on the original alignment of the Old London Bridge, the upper storeys of the proposal would appear as part of the Cluster to the north-east and at a similar height to 22 Bishopsgate, firmly part of the modern development in the background largely screened by 20 Fenchurch Street. The proposal would leave the Monument's skyline presence undiminished and the proposal would be in accordance with paragraphs 4.26 of the SPD.

#### *Conclusion on Monument views*

547. In summary, the proposal has been designed to protect and enhance significant local views of and from the Monument, thus protecting their contribution to the overall heritage of the City, in accordance with Local Plan Policy CS 13, emerging City Plan 2040 S13 and associated guidance in the Protected Views SPD.

#### St Paul's Viewing Points:

548. The proposal would not be visible and would be out of scope of many of the Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3). It would be visible in the kinetic riparian sequences along the Thames bridges and from Tower Bridge to Hungerford Bridge, in particular in those orientated towards the Cathedral between Hungerford and Tower Bridge.

549. On a strategic level, the height and form of the proposal has been shaped around the strategic heritage consideration of the Processional Route to the Cathedral from Fleet Street and to further consolidate a coherent Cluster form as a counterpoint to the Cathedral in these strategic riparian views.

550. From the Processional Route the envelope and been designed to avoid any erosion of sky silhouette and space around the Cathedral, thus ensuring pre-eminence in this viewing experience of state and royal significance. The proposal would be almost entirely concealed by 22 Bishopsgate and 122 Leadenhall along Fleet Street and Ludgate Hill and there would be no challenge to the primacy of the Cathedral. (THVIA December 2023 Views 28, A12, B7-11).

551. From the Thames Bridges, Tower Bridge to London Bridge and along the South Bank (Butlers Wharf THVIA December 2023 View 18), Queens Walk (THVIA December 2023 Views 17.1-17.3) the proposal would be visually prominent as the totemic centrepiece of the Cluster, with the east and southern elegant facades of the upper storeys prominently visible as the Cluster's apex, surrounded by cascading lower development. Moving westwards the proposal, like the Cluster to which it would be central, would appear to the right of the Cathedral, would not intrude into its backdrop and a clear gap would be maintained on the skyline between Cluster and Cathedral.

552. Similarly, from Blackfriars Bridge (THVIA December 2023 View B20) and along the South Bank (THVIA December 2023 View A6) the City Cluster appears as a counterpoint to the Cathedral. In these visual experiences the proposal would contribute to the consolidation of the Cluster defining a new apex often with 22 Bishopsgate which would appear as a similar height. Moving further west towards Hungerford Bridge, in baseline and cumulative scenarios, the proposed development would provide a strong new visual core as a pivot to the lower cascading towers, defining the composition of the Cluster.

553. In all instances when viewed from the Thames banks or bridges, the proposal would consolidate the Cluster, tighten its overall composition and reinforce its separation from the Cathedral on the skyline. In these views, further west, the development would be further concealed by lower taller buildings although the summit and upper storeys would often be visible maintaining the primacy of the proposal in the Cluster. It would not encroach towards the Cathedral or challenge its primacy from Waterloo Bridge Golden Jubilee/ Hungerford Bridge. In other views along the South Bank the Cathedral would remain prominent and distinct due to the south bank orientation and how the skyline composition is experienced.

554. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral although largely concealed by 22 Bishopsgate (THVIA December 2023 Views 29 and B9). The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral and the proposal would not affect these.

555. The Dean and Chapter of the Cathedral have been consulted and raise no objection. Overall, the proposal has been designed to protect and enhance local views of St Paul's Cathedral, its setting and backdrop. As the apex of the City Cluster the proposal would consolidate and tighten the modern City Cluster reinforcing its separation from the Cathedral. There would be no erosion in the setting of the Cathedral and the proposals would be consistent with Local Plan Policy CS 13(2), emerging City Plan 2040 S13 and associated guidance in the Protected Views SPD and LVMF SPG.

556. Views from other publicly accessible elevated viewing area, in particular the “The ‘Sky Garden’ at 20 and 22 Bishopsgate, New Change, Tate Gallery, 120 Fenchurch Street
557. The Sky Garden is a popular public viewing gallery and visitor attraction offering 360-degree views of London. This public benefit was integral to the planning balance in the Secretary of State’s decision on the 20 Fenchurch Street planning application. The impact on it as a public attraction and sensitive receptor is a material consideration. The viewing experience offers a unique, 360-degree experience over different levels along a perimeter walk, with a large south-facing external terrace. Due to its siting to the north, the proposals would not impact the open experience of the south terrace, or the quality of the microclimate. The impact would be to northerly views (THVIA December 2023 View 45) of the Cluster. From this view point the building would sit tightly and prominently as a dynamic and confident addition to the Cluster at the centre slightly stepping up from 22 Bishopsgate and partially screened by 1 Leadenhall. The cumulative scenario would show the cascading stepping down from 100 Leadenhall. The proposals are considered to preserve the public enjoyment in views from the Garden.
558. From 1 New Change southwest of the site. St Paul’s Cathedral (THVIA December 2023 View A14) is the primary viewing experience, and the city cluster is more peripheral. The proposed development would be concealed by 22 Bishopsgate.
559. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated to the right of 22 Bishopsgate. In baseline and cumulative scenarios, (THVIA December 2023 View 14) the proposed development creates a transition down from the tallest building in the collection of towers. The proposal would not affect an appreciation of other key aspects of the skyline from here, including St Paul’s. The visual amenity of the viewing gallery is therefore considered to be preserved.
560. From 6-8 Bishopsgate, there would be no visual impact due to the orientation of the viewing terrace positioned with views directly south and to the west. 511 From 120 Fenchurch Street (THVIA December 2023 View B21) a mid-rise terrace the development would be entirely concealed by surrounding buildings.
561. From 22 Bishopsgate public terrace (THVIA December 2023 View B22) the proposed development would be in close proximity and partially would conceal part of the eastward view in a similar manner. The development would preserve a 180-degree experience taking in Broadgate, views towards Alexandra Palace and the Hampstead/Highgate Ridge and across the City to the west and south This would offer the viewer an immersive experience within the City Cluster and a

thrilling sensation of almost being able to touch surrounding tall buildings. The viewing experience would be preserved.

#### Other Borough Strategic Views:

##### *London Borough of Lambeth:*

562. Adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD. The Local Views of relevance here are: Ci) Views NNW from Brockwell Park to (a) Lambeth Town Hall's tower and (b) St Matthew's Church tower; and (c) views N and NNE to the city ii.) View NNE from Norwood Park (across LB Southwark) to the city iii.) View N from Gipsy Hill (across LB Southwark) to the city iv.) View N from Knights Hill (across LB Southwark) to the city viii.) View N and E from Royal National Theatre terraces to the North Bank of the Thames including St Paul's Cathedral and D xvi.) View NE from the Queen's Walk to St Paul's Cathedral between Waterloo Bridge and borough boundary with Southwark.

563. In the distant panorama views (Ci-iv) the distant City is seen as a positive orientation point, whilst St Paul's Cathedral and the City Cluster are identified as positive landmark elements, where the consolidation of tall buildings in the centre is deemed to likely enhance the view by adding to the richness of the cityscape. Their importance in understanding the physical and cultural topography of London is acknowledged in the statement that further distant tall buildings will reinforce the landmark status of the distant city. This importance is recognised in the approach to prevent development in the foreground or middle ground from blocking views of St Paul's and the City Cluster. From here the logic of the strategic siting of the Cluster is clear, with sufficient distance between it and the Cathedral, allowing for their appreciation on the skyline as core compositional elements. The visual guidance is at ease with the juxtapositions of the old and new, and at the core of view (iv) is the striking juxtaposition of the Church tower of St Luke's and the distant City Cluster beyond, which is deemed at the core of the interest in the view, seeking to protect this essential visual contrast. The proposal would assist in consolidating the clear conical form of the Cluster, adding to the richness of the cityscape and its visual juxtaposition in these views and would be a minor enhancement.

564. In all these Lambeth views the proposed development (December 2023 THVIA Views A24, A25, A26, A27, B16 and B17) would be visible as the uppermost point to the cluster and would provide structure and definition to the cascading composition with 1 Undershaft as the apex. The development would assist in consolidating the overall Cluster form and would reinforce its compositional

contrast to the Cathedral, which would retain its prominence. The proposal would thus preserve and be a minor enhancement to these views.

565. From Panorama View ix from Queen Elizabeth Hall Roof Garden the proposal and from View x) Level 4 Royal Festival Hall Terrace the development would not be visible.

566. Overall, it is considered the proposal would protect and enhance the general composition and character of Local Views SPD: C.i) Views NNW from Brockwell Park to (a) Lambeth Town Hall's tower and (b) St Matthew's Church tower; and (c) views N and NNE to the city ii.) View NNE from Norwood Park (across LB Southwark) to the city iii.) View N from Gipsy Hill (across LB Southwark) to the city iv.) View N from Knights Hill (across LB Southwark) to the city.

567. London Borough of Lambeth raises no objections.

*London Borough of Southwark:*

568. Adopted Southwark Plan Policy P22 seeks to preserve and enhance Borough Views of significant landmarks and townscape, enhancing the composition of the panoramas across the Borough and central London as a whole. This comprises five designated views, four of which are towards the CoL and three of which are focused on St Paul's Cathedral. The proposal would not be visible in View 2 (the linear view of St Paul's Cathedral from Nunhead Cemetery), View 3 (the linear view of St Paul's Cathedral along Camberwell Road). The development would; be behind the viewer in View 5 (the townscape view south from the centre of Millenium Bridge). These would be preserved.

569. In terms of the panorama from View 1 (One Tree Hill), THVIA December 2023 View A21 it is deemed one of the best views of Southwark in the context of London from one of its highest points. St Paul's is the Strategically Important Landmark (SIL), benefitting from a Protected Vista. The description/visual guidance at Appendix 4 of the Southwark Plan, identifies the north London hills framing the silhouette of the city, with other prominent complementary elements being the tall buildings at Blackfriars Road, the Elephant, the City of London and at London Bridge, where it finds the Shard assists in the viewers orientation and in their recognition of St Paul's in the wider panorama. The other CoL landmarks include the City Cluster and the Barbican, whilst the framing of the North London hills is a positive feature. The strategic siting of the City Cluster would maintain the view of St Paul's and not compromise the Wider Setting Area, the space between them preserving an appreciation of the important backdrop North London hills which benefit an appreciation of its strategic siting and silhouette, and an attractive compositional feature in its own right. It would preserve a recognition and appreciation of Barbican tower trio silhouetted in composition against those backdrop hills, demarcating one of Europe's premier cultural

centres. In baseline and cumulative scenarios the development would be centrally positioned at the apex would assist in consolidating the cluster and providing structure, and definition to the cascading composition.

570. View 2 (Nunhead Cemetery) The linear view from Nunhead Cemetery provides a tight, focussed view of St Paul's Cathedral from one of Southwark's most historic locations that is fully framed by mature trees. The development would not be visible in this view.

571. View 3 (Camberwell Road) The linear view from Camberwell Road provides a northward view along Camberwell Road with St Paul's Cathedral as focal point at the centre of the view. The development would not be visible in this view.

572. View 4 (King's Stairs Gardens, River Prospect) THVIA December 2023 View A22 is identified as a characterful view of some of London's most famous landmarks including Tower Bridge, St Paul's Cathedral and the River Thames. This is amongst other contributing landmarks including 20 Fenchurch Street and the City Cluster in an undulating skyline with a clear narrative demonstrating London's development as an internationally important mercantile city of commerce. The proposal would be visible stepping up to the right of 22 Bishopsgate as the apex of the cluster providing definition and would assist in consolidating the City Cluster as a strategic landmark element, demarcating the historic commercial core of London, reinforcing its influence in the composition, alongside the London Bridge cluster, in framing the viewers orientation on those key landmarks, Tower Bridge and St Paul's (and to a degree, the Monument), enhancing their recognition and appreciation in the composition as the 'gateway' to a great historic riparian city. It would reinforce that prevailing historic pattern and scale of buildings either side of the River, stepping up to the centre and historic and commercial core of London with tall buildings clusters set back from the Thames in line with the visual guidance. Overall, the proposal would preserve and be a minor enhancement to the composition of the view, and of significant landmarks and townscape, ensuring the River Thames and its frontage, Tower Bridge and St Paul's are maintained in the view in accordance with P22.

573. In summary, the proposal would preserve Borough Views 1-5 and enhance Views 1 and 4, in accordance with Southwark Plan Policy P22 and the visual management guidance contained in Appendix 4.

574. London Borough of Southwark have responded and make no comment.

*London Borough of Islington:*

575. Adopted Islington Development Management Policies Policy DM2.4(B) identified local protected views of St Paul's Cathedral and St Pancras Chambers and Station, which it seeks to protect and enhance. These comprise Views LV1-

LV8. The proposal would not be visible in views LV1, 2, 3, 6, 7 or 8, which would be preserved.

576. From Views LV 4-5, THVIA 9 December 2023 View A23 from Archway Road/Bridge, provide good panoramas of central London from an elevated position on rising hills along a principal artery and historic arrival point to London. The strategic siting of the City Cluster is clear, set away from St Paul's which would not be impinged upon. Where the Cluster is visible behind the rich foliage framing these views, it draws the attention of the viewer to the location of the City and commercial core of London, assisting in their recognition of St Paul's within the wider panorama. Where visible, (more prominently in Winter) the Proposed Development is seen as a subtle addition to the existing buildings which comprise the City Cluster, to the right hand side of the frame. The development would be centrally positioned at the apex and would assist in consolidating the cluster providing structure, and definition to the cascading composition.

577. Overall, the proposal would not impact on 1, 2, 3, 4, 6, 7 and 8, while protecting LV View 4 and 5 in accordance with Policy DM 2.4 and there would be a slight enhancement of LV 5.

578. To date there has been no response from the London Borough of Islington.

#### *City of Westminster:*

579. Adopted Westminster City Plan 2019-2040 Policy 40(F) (Townscape and Architecture) states that new development affecting strategic and local views (including views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views where possible. Whilst in draft, the Metropolitan Views SPD (2007) is understood to contain those local metropolitan views. Of the 45 identified, the proposal would be prominent from V42(A) (Waterloo Bridge, downstream) and V43 (A)(Hungerford Bridge, downstream), V25 (Lambeth Palace from Lambeth Bridge) and V34 (Horse Guards and Whitehall Court from St James' Park) and these views are assessed in the Strategic View section of the report.

580. View V21 from Victoria Embankment looking east along the embankment is an unusual view of the dome of St Paul's, un-encumbered by other structures, which are screened out by the tree canopies. The draft SPD notes the background of this view is sensitive to the impact from high buildings in the Bishopsgate, Shoreditch and Spitalfields areas. To the right of the dome is the City Cluster which has expanded and is now part of the composition postdating the draft WCC SPD. The development would be centrally positioned at the apex to the right of 22 Bishopsgate and would assist in consolidating the cluster providing structure, and definition to the cascading composition.

581. View 22 from Somerset House Terrace is a historic view rediscovered by the re-opening of the River Terrace, which was a popular venue for promenading during the mid-19th century. The fact that it is now directly accessible from Waterloo Bridge is an added attraction. The elevated terrace is on a level with the canopies of the Embankment plain trees and these, together with Chamber's façade, lead the eye towards the dome of St Paul's, which is the focal point. This draft guidance identifies the whole of the terrace of Somerset house as the viewing area and these have been tested in THVIA December 2023 View 22.

582. The original clear sky setting of the Cathedral identified in the draft guidance has evolved. Although the dome remains visible and the focal point from places within the viewing area, Heron Tower appears behind the peristyle and lower part of the dome. The proposals for 55 Bishopsgate are set to the right of this and would bring a very tall building closer to the dome. The proposed development would appear in the background of the view within the western part of the City cluster. The upper third of the tower appears above the roofline of Tower 42. Its lower levels are wholly obscured by the surrounding building forms of the cluster. The new building is seen in conjunction with the existing buildings of the City Cluster well to the right of the Cathedral filtered through the riverside tree canopy and is legible as part of this tall building context. The development would not detract from the clarity and primacy of the Cathedral in this view.

583. In summary, the proposal would preserve views V21, V22, V25 V34, V42 (A) and V 43 (A) the characteristics, composition, and significance of the local views of metropolitan importance, in accordance with Policy 40 and guidance contained in the draft Metropolitan Views SPD.

584. Westminster City Council have responded and make no comment.

*London Borough of Camden:*

585. Other than those relevant LVMF pan-London views from Parliament Hill, Primrose Hill and Kenwood, addressed elsewhere in this report, Camden have not designated strategic local views of relevance to the City of London.

586. London Borough of Camden have responded and raised no objections.

*London Borough of Hackney:*

587. LB Hackney have not identified any strategic local views of relevance.

588. To date there has been no response from the London Borough of Hackney.

*London Borough of Tower Hamlets:*



589. Adopted Tower Hamlets Plan 2031 Policy D.DH4 (c) and Figure 6 identifies designated local views of which View 2V (THVIA December 2023 A20) from the Wapping Wall bridge at the entrance to the Shadwell Basin is relevant. The Shadwell Basin provides a clear space over which the historic church spires of St Paul's and St George in the East can be viewed. The City Cluster is visible to the west of the view detached from the context. In baseline and cumulative scenarios the proposed development would be prominent as the apex and would serve to better to define the cascading form of the cluster on the skyline and be a slight enhancement. There would be no impact on the key elements defined in the view St Pauls Church (I), St Pauls Church Conservation Area, St Georges in the East (I), London Hydraulic Pumping Station (II\*) or Canary Wharf.

590. The proposal would preserve and slightly enhance local designated view 2V and would accord with Policy D.DH4.

591. LB Tower Hamlets Officer Report, sent on 11th June 2024, identified harm to the ToL WHS, due to the further consolidation of the Cluster which would be unified into a more solid mass with increased visual presence. They state that the proposed development directly behind the Tower would affect setting of the Tower, causing some additional harm to its significance. These points, and specific views mentioned in their report, are dealt in the Strategic Views section of this committee report. In their letter on 18<sup>th</sup> November 2024, they confirmed that their comments in the June letter are maintained.

#### *London Borough of Richmond*

592. London Borough of Richmond's Adopted Plan Policy includes LP5 View from King Henry VIII's Mound, this is within the Royal Parks' management Plan (2019 – 2029) and under the Richmond Park Conservation Area and referenced in the Consultation Draft Local View SPD 2022 as View E3.1. This is an identified Linear Views within the Mayors LVMF SPD also LVMF 9 and impacts are addressed elsewhere in the report. The LB Richmond have issued the officer report to CoL which comments whilst the proposed building is not shown to be readily visible within the Protected Vista as it would be screened by vegetation, the view post tree pruning / seasonally is likely to be more obvious (THVIA December 2023 View B1). The LVMF Management of the Viewing location para 172 states trees should be pruned to preserve the narrow view of St Paul's Cathedral while also obscuring the existing tall buildings in the City of London and this would be the responsibility of Royal Parks. If the pruning did reveal more of the proposed development would be positioned to the right of 22 Bishopsgate within the heart of the cluster and the upper storeys and the summit revealed. It would sit within and consolidate the existing city cluster preserving the established character of the view composition.

593. The development would also appear within Adopted Local Plan urban design Study: view 16, Sawyers Hill within the Royal Parks' management Plan (2019 – 2029) and under the Richmond Park Conservation Area and referenced in the Consultation Draft Local View SPD 2022 as View E3.3. The draft document notes the long distance views and the ever-changing skyline to the east. The development would be seen at some distance and in baseline and cumulative scenarios would be integrated into an already established city cluster of towers and from this orientation would be largely screened by 22 Bishopsgate.

594. LB Richmond officer report received 26 February 2024 concludes the development would not have a harmful impact on LVMF and should not have a harmful impact on other views, nor on the significance of the Registered Park & Garden, conservation area and MOL.

595. The separately issued LB Richmond formal consultation response dated 26 February 2024 states no objection is raised.

#### *Conclusion on Neighbouring Borough Local Views:*

596. The proposals would result in the preservation and, on the occasions set out above, an enhancement, of neighbouring and other Borough strategic local views including: LB Tower Hamlets 2V; LB Islington LV 5; LB Southwark and LB Lambeth Views Ci - iv.

#### City Landmarks and Skyline Features, Views Of:

597. The proposal has the potential to affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2) and emerging City Plan 2040. These are addressed individually below:

#### *St Pauls Cathedral*

598. The impact on St Pauls Cathedral and its setting is identified in the SPD Protected Views and assessed in detail in the LVMF above and also under Indirect Impacts to Listed Buildings section.

599. St Paul's Cathedral has metropolitan presence in London along the riparian views from the Thames, its embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. The unblemished visibility of the Cathedral along the Processional Route of Fleet

Street and Ludgate Hill is of metropolitan historic and ceremonial interest. (THVIA December 2023 Views 28, A12, A13, B7-B11).

600. In wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations (THVIA December 2023 Views 1-6, A1)

601. In baseline and cumulative scenarios officers consider that while visible, the siting of the proposals within the heart of the Cluster, scale, design, materiality, and colouration would not diminish an appreciation of St Paul's Cathedral as a skyline landmark and there would be no encroachment on or erosion of the ability to appreciate its defining silhouette. Thus, the skyline presence of this City Cathedral is considered preserved.

*Cannon Street Station (Towers):*

602. The proposals would be seen as part of the wider backdrop behind the Station Towers in views from the South Bank (THVIA December 2023 View 15). There would be no intervisibility with the towers and the development scale, design, materiality, and colouration would not detract from the presence or contribution of the Station Towers within this view, with the distance of this viewpoint from the site allowing the Station Towers to remain distinct. Thus, views of this City Landmark are considered preserved.

*Former Port of London Authority HQ:*

603. The proposals would be visible in views to the Former Port of London Authority, forming part of a backdrop of tall buildings within the City Cluster from Tower Hill (THVIA Addendum May 2024 View 19). Officers consider in baseline and cumulative scenarios that while visible as the apex of the cluster, the proposals would not diminish an appreciation of the listed building's silhouette or decorative detail. Therefore, the former Port of London Authority HQ is considered to retain its prominence and visual strength. Thus, the skyline presence of this City Landmark is considered preserved.

*Lloyd's of London:*

604. The Lloyd's building is a celebrated high-tech 1980s office designed by Richard Rogers, and one of the most well-known post-war buildings in the country. It is clearly expressed lift and stair towers shape its exterior and give the building a distinctive roof line. The Lloyd's Building has an existing urban setting of tall and very tall buildings, and its skyline presence is most evident from public terraces,

for example Tate Modern, 120 Fenchurch Street and 20 Fenchurch Street. In these experiences there would be no diminishment of the distinctive hi tech characteristics of the Lloyd's Building and the development scale, design, materiality, and colouration would be a compatible addition in skyline experiences. (THVIA December 2023 View 14 and 45) There would be a partial concealment of the Lloyd's Building in the approach from St Mary Axe towards Leadenhall Street but this is momentary and the overall silhouette is soon revealed closer to the landmark. In other approaches there would be no visual impact (THVIA Second Addendum October 2024 View 61). Thus, the skyline presence of this City Landmark is considered preserved.

*Royal Exchange:*

605. The proposal would be seen together with Royal Exchange (THVIA December 2023 View 30) but almost entirely screened by 22 Bishopsgate in views east from Bank junction. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. Thus, the skyline presence of this City Landmark is considered preserved.

*St Botolph Aldgate:*

606. The proposal as part of the city cluster would be seen in approaches from the east and there would be some intervisibility with the brick tower and obelisk spire of this George Dance 19th century church. However, in both the baseline and cumulative scenarios tested through digital tools, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. Thus, the skyline presence of this City Church are considered preserved.

*St Giles Cripplegate:*

607. The proposal would be glimpsed in the east from St Giles Terrace. However, in both the baseline and cumulative scenarios tested through digital tools, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings which is detached and contained from St Giles Cripplegate and its stone and brick tower stone. Thus, the skyline presence of this City Church is considered preserved.

*Tower Bridge:*

608. The proposal would affect viewpoints towards Tower Bridge along the South Bank of the River, located to the east and looking west. From Butler's Wharf (THVIA December 2023 View 18), in the baseline scenario, the proposal would be partially visible in the City cluster, appearing in the centre of the cascading

cluster in this view and there would be no intervisibility with Tower Bridge. In cumulative scenarios the development would be bookended by 100 Leadenhall. Thus, views of this landmark outside the City are considered preserved.

#### *Tower of London:*

609. The proposals will be seen in views from and towards the Tower of London, specifically identified and assessed in detail elsewhere in the report. This assessment acknowledges the longstanding relationship of the City Cluster with the setting of the WHS, appreciated as a distinct and separate, but historically associated, element. This assessment has found the proposals would be seen with the Tower of London in views from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London (THVIA December 2023 Views 22 A, 24 and 25 and Addendum May 2024 Views 17.1, 19, 21, 22, 23 and 26). Within these views it has been found that the proposals have a limited visual impact and would not obscure, distract from or dominate the Tower of London due to the intervening distance, siting, scale, form, colouration appearance of the proposals, which will assist in consolidating the Cluster form. Thus, views of this Landmark outside the City are considered preserved and impacts are further discussed in the ToL section of the report.

#### Conclusion on City Landmarks and Skyline Features:

610. The proposal would preserve views of all relevant City and Non-City Landmarks and Skyline Features and comply with of CS 13 (2) and emerging City Plan 2040 S13 and associated guidance in the Protected Views SPD and LVMF SPG.

#### Conclusion on Strategic Views:

611. The proposal would be sited in the heart of the City Cluster which is central to the strategic growth balance in the City. The Cluster seeks to consolidate strategic growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of the City and London. The proposal would be the totemic centrepiece of the Cluster and fundamental to its composition and consolidation. In so doing, the proposal would preserve strategic views of and from the Tower of London World Heritage Site and the Monument, and of St Paul's Cathedral and its setting and backdrop.

612. In its central role in consolidating the Cluster, the proposal would be a minor enhancement of the composition and characteristics of LVMF London Panoramas 1A -2, 2A, 3A, 4A, 5A and 6A.

613. The proposal would enhance the composition and characteristics of a number of neighbouring borough views, which draw some benefit as a material consideration.

614. Overall, the proposal would comply with Local Plan policy CS13, emerging City Plan Policy S13, London Plan Policy HC4, GLA LVMF SPG, City of London Protected Views SPD and neighbouring local view policies and guidance.

## **Heritage**

### **Designated Heritage Assets:**

615. Objections to and comments on the impact of the scheme on settings of heritage assets have been received from Historic England, the Twentieth Society as well as other third parties. The GLA have not objected but have identified harm to numerous heritage assets. Officers have considered these representations carefully and afforded them considerable importance and weight. Where officers disagree with views expressed by statutory consultees, clear reasoning has been provided in this report.

## **Direct Impacts**

### **Non-designated heritage asset:**

616. As part of the consultation process the Twentieth Century Society have raised an objection to the proposed demolition of the building, and suggest 1 Undershaft should be considered a non-designated heritage asset (NDHA).

617. A detailed assessment of the architectural and historic interest of the existing building on the Site was undertaken to inform the proposed redevelopment of the Site and as part of an application for the Certificate of Immunity from Listing (COI). A COI was granted for St Helens Tower, 1 Undershaft on 27th September 2022 by Historic England, confirming that the existing building is not of sufficient special architectural or historic interest to meet the criteria for statutory listing in a national context.

618. Officers have assessed the existing building and its adjacent plaza against the criteria Historic England suggest for selecting non-designated heritage assets, contained in 'Local Listing: Identifying and Conserving Local Heritage Advice Note 7'. The criteria comprise: assets type; age; rarity; architectural and artistic interest; group value; archaeological interest; historic interest; and landmark status. The assessment is summarised below.

### *Asset type, age and rarity:*

619. In terms of asset type and age, 1 Undershaft is one of a number of purpose built commercial towers/buildings with landscaped forecourts, and is therefore a relatively common building typology. Built between 1963-1969 it is also

comparatively young. Overall, the building and plaza are not considered to be particularly rare.

*Architecture and artistic interest:*

620. 1 Undershaft, alongside 122 Leadenhall Street (now redeveloped), were designed and developed as part of a composition of two commercial 20th century buildings by Gollins, Melvin, Ward and Partners (GMW), a well-regarded architectural practice of the period. At the time of development, the pair of towers received a positive reception in the architectural press for setting 'a new standard of office accommodation' and its pioneering structural design. However, the form and composition, is one of several 1960s developments in the UK to arise and be informed by American commercial architecture, such as the highly influential Seagram building New York. This wave included Library and Arts Tower University of Sheffield Grade II\* listed 1993. In addition to the loss of its paired tower at 122 Leadenhall, the building has also undergone significant alteration including extensive changes to its external elevations due to IRA bomb damage, resulting in the need to entirely re-clad the building. These changes are considered to have degraded the building's original character and aesthetic quality. This is also true of the designs of the plaza which has been recently refurbished (2018). As a result, the building is not considered to be of sufficient architectural or artistic quality to meet the criteria to be considered a heritage asset.

*Group value:*

621. While the composition alongside the plaza is retained, the loss of 122 Leadenhall – its paired tower – significantly diminishes its group value, leaving the building as an isolated moment of 20th century architecture within its local townscape. Owing to its age, scale, height, appearance, and orientation, it also holds no group value with any of its immediate townscape, which is characterised by historic buildings of worship, and contemporary commercial tall buildings of considerably greater scale. Due to this, officers do not consider that the building draws any interest by virtue of group value.

*Historic interest:*

622. Some historic associative interest is found as the site was a location of an IRA bombing in 1992, which was indicative of the wider political context of the time. A limited degree of historic interest is also found by virtue of the building architects Gollins, Melvin, Ward and Partners (GMW), a well-regarded and prolific architectural practice of the period. However, overall, the building is considered to possess a very limited degree of historic interest.

*Archaeological interest:*

623. The building also holds no archaeological interest of past human activity, due to the extensive basement excavation at the time of construction. There is some archaeological potential beyond the footprint of the building to the north-east and west which is addressed within the archaeology section of the report.

*Landmark status:*

624. Officers do not consider the building benefits from landmark status within the context of its current townscape, given its proximity to significantly larger, more sculptural, and popularly recognisable towers, such as the Lloyd's Building (Grade I), Cheesegrater (122 Leadenhall) and the Gherkin (30 St Marys Axe), which have come to define the City's Skyline, and the centre of the Cluster. At a smaller scale, defining the historic, finer-grained, and more human-scaled experience of this area are the City churches of St Helen Bishopsgate and Church of St Andrew Undershaft, which are juxtaposing local focal fonts. Between these two contrasting townscape elements, the existing building at 1 Undershaft is not experienced as a focal point within the local area, and therefore is not considered to hold any landmark quality.

*Conclusion:*

625. In conclusion, the building and its plaza meet, to a limited extent, one of the seven criteria suggested by Historic England for identifying non-designated heritage assets.

626. As such, they are considered to fall short of the criteria for identification as a non-designated heritage asset, and the demolition of the building and works to the plaza are not objectionable from a heritage perspective.

Indirect Impacts

Church of St Helen (Grade I)

*Significance:*

627. The Church of St. Helen's at Bishopsgate (Grade I) is a rare survival of a medieval building in the City of London. Uniquely, it combines a nunnery church and a parish church side by side. The Church dates back to a Benedictine priory for nuns which was founded in 1210 and features an unusual rectangular layout with a southeastern arm and two parallel aisles; the northern aisle was historically used by a nearby priory, while the southern aisle served the local congregation. A 14th-century arcade, likely screened before the Dissolution, divides the two churches, featuring four bays to the west and two arches to the east. While most of the outer structure dates from the 13th century, there are elements from the



12th, 14th, 15th, and 16th centuries. The church is of outstanding architectural, historic and archaeological significance.

628. It is built of partly rendered rubble, brick and ashlar. In 1992 and 1993, IRA bombs caused damage to the church. Despite some reordering of the interior many internal fixtures and decorative elements installed in the 15th to 19th centuries have survived and contribute to the building's historic interest and significance. The historic importance of the church is closely tied to its position as one of the few medieval buildings – and only one of two churches – in the City of London to have survived damage inflicted on London's buildings as a result of events such as the Fire of London and Second World War. The use as a parish church and by the nuns from the priory and the second nave to be used exclusively by them is a noteworthy aspect of the history of this City church.

629. Much heritage value in the building's architectural interest lies in the age of the fabric, the oldest parts of which date to the 13th century, with additions and alterations of the 14th century onwards. St Helen's contains medieval and early modern monuments and tombs of a number of notable individuals, which adds to its historic associations. St Helen's was also the parish church of William Shakespeare when he lived in the area in the late 16th century. Much architectural interest lies in the age of the fabric and the fact that it is one of only two surviving gothic churches in the City of London.

630. A modest timber tower at the west end, extending inside the church, includes a rusticated clock stage, arched belfry, and open lantern with a shaped, lead-covered roof and weathervane. The interior is notable for its fittings, especially monuments, some of which came from the demolished Church of St Martin, Outwich.

*Setting:*

631. The setting of the church has changed dramatically. The only remnants of its original setting of the church includes the churchyard and the medieval alignment of Great St Helen's to the west. These are important elements of its setting and contribute positively to the church's significance as surviving, albeit altered, elements of its original setting.

632. The setting of the church also includes, to the northwest, a collection of fine-grained Victorian, Edwardian, and recent buildings surrounding the church and churchyard, reflecting how the setting was experienced until the late 20th century and are included in the St Helen's Place Conservation Area. These elements of the setting make a varied contribution to the significance of the church with the more historic buildings and areas making a positive contribution and the more recent buildings in the conservation area, a neutral contribution.

633. Attached to the church's southern frontage is a three-storey brick building, constructed as church offices between 1955 and 1957, which faces Undershaft and partially obscures the view of the historic church. This is a neutral contributor to significance.

634. Due to its location within the City Cluster, the setting of the church has changed considerably in more recent years. There is a pronounced contrast between St Helen's Church and the modern tall buildings of the City's Eastern Cluster, which lie in close proximity to the church. This includes, Aviva Tower, the Leadenhall Building, Tower 42 - and 100 Bishopsgate and 22 Bishopsgate, to the north and south. The setting of the church today is characterised by these long-established contrasting modern buildings that characterise this part of the City of London townscape. The juxtaposition between the historic church and the surrounding tall commercial buildings emphasises the venerable historic character of the church, albeit in a way unrelated to heritage significance and setting.

635. The vehicle service ramp on Undershaft to the east of the church negatively impacts its setting, visually detracting from its architectural and historic interest and creating an uninspiring 'back of house' character to frame its southern elevation.

*Impact:*

636. The proposed development would change the setting of the church by replacing an existing 28-storey building on the development site with a taller 74-storey building. It would also include reconfiguration in the public realm, such as removing the service ramp and railings, realigning and resurfacing the Undershaft road, rationalising hostile vehicle mitigation (HVM), and redesigning the public realm in the western part of the site. Views 57, 58, 59, 60, 62 and 63 of the THVIA Second Addendum (October 2024) demonstrate the effect of the proposed development in relation to the Church.

637. The realignment of the road layout and the removal of the servicing ramp and other clutter would be improvements to the setting of the church, albeit in a way unrelated to heritage significance. The new building would be taller and wider than the existing structure on the site, bringing the northern building line closer to the Church. Although the taller building would in character be consistent with the existing setting of the church, characterised by tall buildings like the Aviva Tower and 30 St Mary Axe, the increased width and proximity of the podium (THVIA Second Addendum October 2024 View 59) would have an overbearing presence in relation to the church, particularly in views from the churchyard and St Helen's Place, from the west. This impact has been mitigated to a small extent, but not entirely, by revisions to the facing terracotta panels so that they are lighter in colour.

638. The realignment of Undershaft, bringing the carriageway closer to the Church, would be mitigated by resurfacing in accordance with the City of London Technical Palette of Materials and creating a smooth, level surface from the site towards the Church. Since Undershaft, a post-war addition, does not reflect any historic roads or patterns, its realignment is not considered to affect the church's significance. The historic cannon embedded in the paving would be salvaged and retained for future use, and this would be dealt with via condition.

639. Historic England conclude that the proposals would cause less than substantial harm to the church, due to the closer building line and more complex elevation design. Although they concur that the removal of the access ramp would be beneficial, they assert it would be negated by the presence of the servicing entrance at the junction with St Mary Axe which they regard as a functional and unsympathetic presence, even though its design has been revised to address HE and GLA concerns so that it would be a far more elegant presence, clad in sophisticated stone 'drapery' on plinth bases. This updated design is considered to be a high quality and interesting new feature within the church's setting, albeit in a neutral way unrelated to heritage significance and setting.

640. Historic England suggest that the additional overshadowing of the proposed building could potentially have an impact on the environmental conditions around these structures, which may affect the condition and performance of their materials. *"This may be particularly likely for St Helen's church, which already appears to be suffering from some biological growth due to moisture."* This point is not pursued further in their advice, however.

641. GLA have identified less than substantial harm to this asset, with the extent of harm being middle within the less than substantial harm scale. They state in their letter *"The very tall building requires a substantial externally expressed structure to reach the ground taking the form of very large weathered-steel columns. In Views 57 and 58 these impact upon the setting of St Helen's Church where the columns are highly prominent in the view."*

642. More details and extracts of the consultation responses are included in the relevant section of this report and are attached in full and appended to this report.

643. As mentioned above, to mitigate the visual impact of the proposals on the church, and address comments from Historic England and the GLA, the colour palette of the cladding of the podium levels has been revised to a lighter colour to provide a calmer background to the church, enhancing the contrast and separation with the structural tridents. Additionally, the podium garden soffit has been modified to be less shiny, contributing to a more subdued background when viewed alongside the Church. Officers consider this to be a positive change to the scheme. Historic England, in their letter dated 7th June 2024, consider this to be *"a positive step"*, but they are of the view that in the wider context of the scheme

*“it makes only a marginal difference to the harm caused”* and they maintain their objection.

644. The structural columns supporting the podium garden, visible in some views from the south (THVIA Second October 2024 View 58), have been carefully designed to ensure they do not appear overly overbearing and detract from the Church's prominence. Indeed, the interplay and framing from the columns in some views could provide an interesting new perspective of the Church, albeit in a way unrelated to heritage significance and setting.

645. In the public realm, the proposed Undershaft Square would introduce a tranquil garden inspired by the church's contemplative character. Features include planting beds evoking a forest floor and rainwater pools reflecting the surrounding cityscape. While this transformation enhances the currently uninviting area, it does not directly relate to the church's heritage significance.

646. Generally, the Church would continue to be appreciated in northward views from St Helen's Square and Undershaft Square. The proposed moss garden, (as redesigned following the July 2024 Deferral) would introduce calming green, low level features in these northward views of the church. The biophilic design of the proposed feature column by the west elevation, would complement the proposed green character of Undershaft Square, as now proposed, and would add interest when seen in conjunction with the church. Due to its soft, green character, it would appear separate from the Church, without competing with or detracting from it.

647. Historic England, in their letter dated 15th November 2024, expressed concerns that a large digital screen could potentially worsen the development's impact on the three nearby Grade I listed buildings, including St Helen's Church. However, officers disagree with this assessment. The screen would be almost entirely visually detached from St Helen's Church, while it would be perceived as a distinct contemporary feature, its location and scale would not be dominating and would be fully integrated with the proposed building's complex design. As such it would be a distinct modern feature associated with the character and ever changing functions of the city cluster, leaving the historic church unaffected, to be understood and appreciated within its established setting amidst modern developments.

648. The church currently experiences low levels of daylight and sunlight due to existing obstructions and the densely built-up nature of the area. Although the overall effect on daylight within the church, as a result of the proposals, is assessed as minor to moderate adverse (significant), given the already low daylight levels in the existing conditions, the change is unlikely to be noticeable. In terms of sunlight, four windows of the nave would experience some reduction (minor adverse and not significant) due to the proposed development, however,

the nave would still receive sunlight through other unaffected windows. Given the existing very low sunlight levels, the change is unlikely to be perceptible. It is considered that these changes would have no impact on the way the church is used and experienced and would not affect its heritage significance of the church. Daylight and sunlight impacts are further assessed in detail in the relevant section of this report.

649. Overall, the proposals would introduce some positive new elements to the setting of the church, but would also, in the increased width and proximity of the podium, create an assertive new presence immediately to the south of the church. It is considered that there would be some harm to the setting of the church and to its significance and this harm is considered to be at a low level of less than substantial.

### St Andrew Undershaft (Grade I)

#### *Significance*

650. The Church of St Andrew Undershaft is located at the intersection of Leadenhall Street and St Mary Axe, to the south-east of the site. A rare survival, dating to the 12th century, rebuilt in the 16th century, of squared rubble and stone incorporating an 15th century tower with a polygonal stair turret, which is partially rendered. Inside, there are several notable monuments and fittings.

651. Similarly to Church of St Helen, the church is of high historic interest as a rare medieval church that survived the Great Fire of London and the Second World War. Damage from an IRA bombing in 1992 resulted in the loss of its remaining 16th-century windows.

652. Architectural interest survives from the appreciation of its medieval architectural style and materials including the distinctive silhouette of the tower. It is a fine example of its kind and a particularly good, and now rare, example of a City church that predates the Great Fire.

#### *Setting*

653. St Andrew Undershaft is located at the southern end of St Mary Axe, just before it meets Leadenhall Street. Both streets are historic, and originally developed on all sides - Leadenhall and ancient route connecting Cornhill to Aldgate and St Mary Axe reflecting part of the City's medieval layout.

654. The setting of the Church was originally densely developed and has changed dramatically over the years, with the most drastic changes in the 20th century, and is now characterised in the main by modern, tall commercial developments which make a neutral contribution to its significance.

655. The small surviving churchyard to the north, including its walls and railings, contributes to the building's setting and significance. A group of small and medium sized 19th and 20th century buildings adjacent to the church on Undershaft and Leadenhall Street provide an appropriate townscape setting, with tall buildings of the City Cluster in close proximity to the north, south and west. These elements make a neutral contribution to the asset's significance.
656. Modern office buildings and tall towers of the City Cluster, such as the Leadenhall Building 30 St Mary Axe, 52 Lime Street, and 40 Leadenhall Street are some of the tall buildings in the immediate vicinity of the Church. The relationship of the asset and 30 St Mary Axe which is visible directly behind of the Church tower in views from Leadenhall Street has become an iconic and frequently photographed one, joined recently (in the cumulative scenario) by the form of 100 Leadenhall Street directly to the east of the church. Apart from the juxtaposition in terms of height, the contrast of the design and materiality of these buildings add further interest to this view, amplifying the historic character of the masonry church, albeit in a way unrelated to heritage significance, setting and an appreciation of it.
657. Historically, St Mary Axe and Leadenhall Street were densely developed, enclosing the church more than today. St Helen's Place, a mid-20th century creation, allows for more open views of the Church, particularly of its west elevation. Officers consider this modern space to be of no inherent interest and the Square to be a neutral element of setting, although the views of the church from there enable an appreciation of its architectural interest.

### *Impact*

658. The proposed development would change the setting of the Church of St Andrew Undershaft by replacing the existing 28-storey Aviva Tower with a 74-storey building. Changes to the public realm at St Helen's Square and along St Mary Axe are also proposed. Views 50-53, 55, 56, 62 and 64 of the THVIA Second Addendum October 2024 illustrate the proposed changes in relation to the Church of St Andrew Undershaft.
659. The proposed building would create an extended footprint to the east and south into St Helen's Square, thereby bringing the main building closer to the church. The southern projection has now however been reduced compared with the original 2023 scheme. The south elevation at ground level up to Level 03 has been set back by 10 meters while at Levels 04 and 05, it has been set back by 4.6 meters, leaving the southernmost pair of Cor-Ten trident structures freestanding. These adjustments retain a more visually open experience at pedestrian level around the church.

660. Historically, the Church of St Andrew Undershaft was surrounded by narrow streets and dense urban development, as shown in historic maps and photographs. Both sides of St Mary Axe were tightly built-up, with the church tower rising above the surrounding buildings. Over time, this area has evolved into the heart of the City Cluster, and the setting of the church has, since the construction of the existing building on the site, been characterised by tall buildings, such as 30 St Mary Axe, 22-24 Lime Street, the Leadenhall Building and more recently (in the cumulative) 100 Leadenhall. Within this context, a larger and taller building near the church aligns with the established character of the Cluster.

661. The GLA has assessed the development's impact on the church as causing less than substantial harm, ranking low to moderate within this scale. Historic England also identifies harm, noting that the scheme "*would fundamentally compromise the character of the public space bounded by St Mary Axe and Leadenhall Street.*" Following the footprint reduction, Historic England acknowledged the change but concluded in their letter dated 12th November 2024 that "*the slight reduction of the footprint of the building to the south (offset by its expansion to the west)*" would not meaningfully improve the previously identified impacts.

662. CC Land, in their objection, have also identified harm to St Andrews emphasising that the podium garden encroaches on the square's physical openness and the church's setting, disrupting its silhouette against the sky. They argue that the proposed scheme reduces the sense of openness and introduces an "alien character" that contributes to visual clutter.

663. More details and extracts of the consultation responses are included in the relevant section of this report and are attached in full and appended to this report.

664. Historic England notes that the best views of St Andrew's west end and tower are from St Helen's Square and along Leadenhall Street and St Mary Axe. While the 1960s establishment of St Helen's Square created more open views of the church, these are not reflective of the church's original medieval setting and are therefore not considered to be intrinsic to the church's setting, significance or an appreciation of it. Despite the proposed building's large footprint and elevated podium garden at Level 11, much of St Helen's Square and its views of the church would remain intact, particularly after the building's footprint reduction.

665. The redesign of the southern part of St Helen's Square would create a vibrant environment with a grove of trees, new seating, and grade-level access. This redesigned area would provide an inviting space for various activities and allow appreciation of the historic and contemporary architecture surrounding the site. St Andrew's would remain prominent and appreciable from this area.

666. The Level 11 public podium garden, approximately 42 meters above ground, scarcely affects views of the church. Historic England acknowledges this (that uninterrupted views of the church would remain below) but raises concerns about overshadowing and the unconventional design. CC Land similarly criticises the garden for introducing an “*alien character*”.

667. Officers disagree with these assessments, finding the podium to be an elegant, distinctive addition and of stylistic flourish typical of the Cluster’s architectural character. It would contribute to the Cluster’s uniqueness, characterised by its blend of historic and contemporary architecture. So disassociated would it be in position, design, materials and general expression from the church that it would read definingly as belonging to the modern Cluster and not harm the church’s setting or significance.

668. In terms of the public realm changes, Officers find Historic England’s general claim that the proposal “*would degrade the public realm, hem in the buildings and streets around it, reduce sightlines, and thus directly compromise an appreciation of the setting of exceptional heritage assets and the broad experience of the City around them*”, to be without foundation, finding almost the reverse to be true instead, particularly in relation to this church: the public realm would be enhanced, the surrounding buildings and streets newly framed rather than hemmed-in, sightlines would remain, and an appreciation of the church would be preserved.

669. Regarding the proposed digital screen on the south elevation, Historic England suggests it would ‘arguably’ worsen the impacts, drawing the eye, by design, and so contributing to further harm to the Grade I listed St Andrew, Undershaft in particular, by distracting from its prominence. USS also object to the proposed screen, they comment that due to its “*close proximity to sensitive heritage assets including the Grade I listed St Andrew’s Church and St Helen’s Place Conservation Area, is considered inappropriate. The screen’s size, scale and modern aesthetic are jarring within the historic context... .*”

670. Officers disagree, the digital screen is clearly a contemporary feature disassociated from the medieval church and instead integral to a complex new building and appropriately scaled and located to directly address a very modern square. The screen will be self-contained and understood as part of the character and functions of the city cluster, adding vibrancy without detracting from the church’s significance. The church would continue to hold its presence within the evolving City Cluster, clearly separate from the site, and the way the church is understood and appreciated would not be adversely affected.

671. The two, now freestanding, Cor-Ten tridents, located to the south of the proposed structure and the building’s larger footprint would clearly read as interesting parts of the new proposal and would not be inconsistent with the



existing townscape character here; the church is already framed on the west side of the Square by the large, expressed steelwork structure of 122 Leadenhall Street.

672. In terms of daylight, some of the west windows of the church would experience some changes, with the effect on daylight levels deemed to be minor to moderate adverse (significant). However, due to existing low levels of daylight currently experienced by the church, these changes are unlikely to be noticeable. The change in the sunlight would be negligible and not significant. There would therefore be no impact on heritage significance as a result of daylight and sunlight matters, which are further assessed in detail in the relevant section of this report.

673. Overall, in both baseline and cumulative scenarios, while the proposed development would introduce changes to the Church's setting, it would clearly preserve the setting and significance of the church and the ability to appreciate it. The proposal would be the latest addition to the now arguably iconic setting of modern high-rise buildings which frame the church, and its medieval charisma would remain undimmed.

#### Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II)

674. The wrought iron gates, with overthrow and finials, along with the railings at the entrance to the Church, date back to the 18th century and are listed at Grade II. Of intrinsic special interest, they have group value with the church.

675. The setting of the gates and railings is mainly defined by its relationship to the church which makes a very positive contribution to their significance.

676. While the proposals would introduce a change within the listed railings' wider surroundings, this is considered to preserve those aspects of setting which have been found to contribute to significance. Therefore, there would be no impact upon the setting or significance of the listed building or the ability to appreciate it.

#### Lloyds Building (Grade I and Grade II)

##### *Significance:*

677. The Lloyd's Building, designed by Richard Rogers Partnership (RRP) with engineers Ove Arup and Partners, opened in 1986. The stone façade, originally designed by Sir Edwin Cooper between 1925-1928 and listed at Grade II in 1977, is included in this assessment as it was integrated into the RRP building's design in the 1980s.

678. The Lloyd's building has historic interest as a highly inspirational late 20th century building by one of Britain's most significant modern architects for an internationally important organisation that successfully integrates the traditions and fabric of earlier Lloyd's buildings (including the Adam Room, originally from Bowood House and the 1925 Cooper façade).

679. The building has architectural interest as a prominent and high-quality example of high-tech architecture, with its design exemplifying architectural innovation, high quality materials and flexibility of plan throughout its impressive interior and exterior. The building's futuristic appearance and the clear architectural expression of different functional spaces contribute to a bold aesthetic.

680. Situated in the heart of the City, the Lloyd's Building forms a strikingly incongruous backdrop to many listed neighbouring buildings. It has notable group value with the nearby Grade II\* Leadenhall Market, an important Victorian commercial building to which Lloyd's nods with its glazed atrium. To its neighbouring buildings it presents a strikingly original aesthetic which has never been replicated in quite the same way within the Cluster. Its high-tech facades, shining metalwork panels and complex elevational design consistently draw the eye and make it one of the most standout buildings in the heart of the Cluster.

### *Setting*

681. Such is its architectural singularity that the significance of Lloyd's relies very little on its setting. Tall commercial buildings define its immediate context, including the existing building on the site, the Leadenhall Building, 8 Bishopsgate, and 22 Bishopsgate to the north, the Willis Building and 52 Lime Street to the east, and 1 Leadenhall to the west. Most of these buildings make a neutral contribution to the significance of the Lloyd's Building. However, the Leadenhall Building, also designed by the Richard Rogers Partnership, with similar architectural elements such as exposed circulation and services is considered to make a low contribution to the Lloyd's Building's significance.

682. The existing building on the application site makes a neutral contribution to the significance of the Lloyd's Building, being one of many towers that surround it. St Helen's Square is also considered to make a neutral contribution as an amorphous post-war public space of no inherent interest.

### *Impact*

683. The proposals would change the setting of the Lloyd's Building by replacing the existing 28 storey tower with a much taller tower, bringing a building line of more complex elevational design further south across St Helen's Square and establishing a new projecting public podium garden elevated above and

extending over the Square. THVIA December 2023 View 54 and THVIA Second Addendum October 2024 Views 52, 55, 56 and 61 are of relevance.

684. The GLA has identified very low, less than substantial harm to this asset. Historic England also identified harm to this asset as a result of the “*the general effect on the quality of space in the reduced plaza immediately opposite it and the shrinking of the area from which it can be seen, the cantilevered terrace and greatly expanded building would obscure views of the Lloyd’s building along St Mary Axe.*” Following the changes to the scheme in response to the deferral – including the reduction of the building’s footprint at lower levels and the introduction of a digital screen on the south elevation – Historic England responded that the proposal would still “*seriously degrade the scale and character of the public realm around the site, causing harm to the significance of the three Grade I listed buildings adjacent.* And that the reduction of the footprint would not meaningfully improve these impacts, while “*the introduction of a large digital screen would arguably worsen the impacts*”.
685. CC Land identified “*a clear and measurable degree of harm, albeit less than substantial*” to the Lloyd’s Building. More details and extracts of the consultation responses are included in the relevant section of this report and are attached in full and appended to this report.
686. Officers robustly disagree with the conclusion of harm to the setting of the listed building. Officers are of the view that the existing Square and building on the site are elements of setting which do not contribute to the significance of the Lloyd’s Building; as such, the principle of change in these areas is uncontentious. The listed building’s significance stems from its unique style, designed to be a bold and contrasting addition to its surroundings; its high-quality architectural composition exemplifies what is unique about the City Cluster. Such is its architectural singularity that Officers consider that it is more than capable of holding its own amongst the wide variety of architectural styles and built forms which characterise its setting.
687. For the same reasons, Officers consider that the proposed digital screen on the south elevation of the proposed structure would leave the significance of the Lloyd’s Building unaffected. Historic England reach a different professional conclusion and comment (in their 15th November 2024 letter) that it would arguably worsen the impacts of the development on the three Grade I listed buildings around the site, including the Lloyd’s Building. The digital screen in scale, location and its contained nature would be a modest addition with a neutral presence within the setting and one which would be compatible and seamlessly integrate with the robust, hyper modern and dynamic nature and activities of the city cluster.

688. The relationship between the Lloyd's Building and the neighbouring Leadenhall Building, both designed by the same firm, would remain unaffected, preserving an aspect of the Lloyd's Building's setting that contributes to its significance. Similarly, its relationship with Leadenhall Market to the south would be unaffected.

689. The visibility of the Lloyd's Building from St Mary Axe would be reduced due to the increased massing of the proposed development, but this would simply create a townscape 'moment' so characteristic of the City: the sudden revelation of the Lloyd's Building as the viewer proceeds southwards down St Mary Axe alongside the proposal. Furthermore, new views and perspectives of the Lloyd's Building would be provided by the proposed podium garden. Whilst some views of the listed building would be truncated, others would be amplified, and others still created anew.

690. The Lloyd's Building, a late 20th-century commercial structure, exists within a densely modern urban context characterised by tall commercial buildings. The proposed development, set back further than the Leadenhall Building, is unlikely to affect the light received by the Lloyd's Building. Key architectural features of the Lloyd's Building, such as the glazed lifts and central atrium, do not rely on specific daylight levels to be appreciated.

691. Dramatic contrasts between old and new are a characteristic trait of the Lloyd's Building's setting. The proposed development would be consistent with this character by adding a high-quality architecture to the existing group of tall, modern buildings, reinforcing the City Cluster's character, and in its different footprint creating townscape drama and interest that would not be harmful to the setting of the Lloyd's Building but, indeed, would create new ways to engage with it. The relationship and juxtaposition of the Lloyd's Building with both historic and modern buildings that contribute to its significance would remain unaffected. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

### St Paul's Cathedral (Grade I)

#### *Significance:*

692. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other

notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

### *Setting:*

693. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance.

a) those wider strategic plan-London riparian views from the Thames, it's embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.

b) The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the preeminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.

c) Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.

d) Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst

others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

### *Impact*

694. The Surveyor of the Fabric of St Paul's Cathedral have not objected to the application "*the scheme would be entirely hidden from view behind existing development... We welcome the understanding that this sensitivity appears to have been acknowledged by the proposed design as a form of embedded design mitigation.*"

695. The proposed development would lie approximately 1km to the east of the Cathedral, within the centre of the existing City Cluster of tall buildings.

696. The building has been strategically sited within the heart of the City Cluster, which has been a Plan-led approach to consolidating tall buildings and growth in a manner which would be the least impactful on strategic heritage assets, including St Paul's.

697. In designated LVMF Panoramas (Views 1-6 in the THVIA) the proposed development would be visible as the tallest building within the City Cluster, consolidating its form and marking the centre of the City's commercial District. The overall form, scale and sitting of the proposals would have no impact on the ability to recognise and appreciate St Paul's Cathedral in any of the designated LVMF Panoramas.

698. In terms of those strategic City-wide riparian views from the banks of the Thames and its bridges, they would be preserved with the Cathedral remaining as the pre-eminent landmark in the view and this represents an important element of significance, both as a symbol of the Diocese of London and as an internationally famous symbol of London itself with Wren's great classical dome dominating the townscape around. In medium and long-range views from the west along the River Thames, including from LVMF River Prospects, the proposed development would appear at the centre of the City Cluster, well separated from the St Paul's Cathedral. It would form the apex at the heart of the Cluster and would consolidate its cascading arced form. It would be embedded within the Cluster and as such the lower and middle stepped stages would be largely unappreciable due to intervening built development, resulting in the slender and elegant proportions of the upper stage forming the most visible element on the skyline. The proposed development would be seen to strengthen the existing composition of the City Cluster, with no change to its relationship to St. Paul's.

699. In views from Fleet Street (Views 28, A12, B7, B8 and B9 in the THVIA December 2023), on the processional route towards St Paul's, the proposed

development would only be minimally visible on the processional route towards St. Paul's, with only a sliver of its top visible to the side of the top of 22 Bishopsgate, and the remainder of the proposed development obscured by other buildings, including 22 Bishopsgate and 8 Bishopsgate. Therefore, there would be no impact to the Cathedral in terms of its prominence and the way it is being appreciated in the processional route.

700. From the immediate surroundings of the Cathedral, including from St. Paul's Cathedral Churchyard (View A13 in the THVIA December 2023) a small part of the upper stage of the upper part of the development would be visible in the distance, behind existing buildings, including 8 Bishopsgate, the Leadenhall Building and 22 Bishopsgate, and at a lower apparent height than the latter building.
701. From the Golden Gallery of St. Paul's (View 29, THVIA December 2023), a sliver of the upper stage of the proposed development would be visible, to the side of 22 Bishopsgate and at a lower apparent height than that building. The tip of the Level 11 podium garden would also be visible beyond 8 Bishopsgate. Only marginally visible, it would appear as part of the consolidated Cluster, behind or next to existing tall buildings. In views from the immediate vicinity of St. Paul's, and from the Golden Gallery, the limited visibility of the proposed development in the distance would be entirely consistent with the existing character of the views.
702. From the Level 11 public podium garden there would be a new elevated public view of the peristyle, dome and southwest tower of St Paul's Cathedral seen against the sky. In this new view the Cathedral would be visible in combination with other important Grade I listed Wren church spires, including St Peter-upon-Cornhill, St Michaels, St Mary-le-Bow (the second tallest Wren spire in London). The view of St Paul's would be channelled and framed by commercial buildings in the City Cluster, including 122 Leadenhall Street, 8 Bishopsgate, Lloyds Building and 1 Leadenhall Street, directing the viewers' focus towards these landmarks. The proposed development would therefore provide a unique new view of the Cathedral from the City Cluster, seen in combination with other important Wren churches and the dome of the Cathedral would be seen against open sky, enabling an appreciation of its skyline presence. The proposed development would further provide a new high-level view of the Cathedral from the Level 73 public viewing gallery. This would provide a very low magnitude of impact, resulting in a negligible/ minor beneficial effect on the ability to appreciate the landmark quality and skyline presence of the Cathedral as a Strategically Important landmark, and a slight enhancement in NPPF terms.
703. Due to its height, mass, and siting, the proposed development in baseline and cumulative scenarios would be almost concealed or only marginally visible, behind or next to existing tall buildings that form the main part of the Cluster. In all cases the proposal has been designed to be either occluded by the cathedral

dome, or where visible, seen to form part of the established cluster of tall buildings, and read a distant feature on the City's skyline. Therefore, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

### St Katherine Cree (Grade I)

#### *Significance:*

704. At the corner of Leadenhall Street and Creechurch Lane is the Guild Church of St Katharine Cree, established by 1631 with a tower of c. 1504, is of outstanding historic, architectural and archaeological interest. It predates the Great Fire and is a rare example of the early use of classical architectural motifs (internally) alongside the then more traditional perpendicular gothic (externally).

#### *Setting*

705. The church benefits from an enclosed churchyard to the north-east that contributes to its significance. Part of a street block, the setting of the church is complemented by buildings of broadly sympathetic scale. These neighbouring buildings include historic warehouses but also modern office buildings which form quieter, neutral components of the church's setting.

706. The City Cluster, including the Leadenhall Building, the Scalpel, 40 Leadenhall Street, 30 St Mary Axe, and 22 Bishopsgate, forms a significant part of the wider setting of the listed building and can be seen in views along Leadenhall Street. The upper part of the existing Aviva Tower is also visible in some of these views. These buildings do not contribute to the Church's significance. They define however, its wider setting characterised by modern, tall commercial buildings at the heart of the City Cluster.

#### *Impact:*

707. The GLA identified low level of less than substantial harm to this Church.

708. The proposed development would result in a closer relationship between the cluster and the church, as the proposed building would be located closer to the Church, and as seen in View 49 in the THVIA Second Addendum October 2024, to the east of Leadenhall Building and 22 Bishopsgate, already prominent in this view. Modern medium-scale buildings already form the backdrop of the Church's tower, and a buffer between the Church and the Cluster. The stepped massing of the proposed development would be visible, integrating its scale with its surroundings and stepping down towards Leadenhall Street. Its high architectural design quality, featuring materials such as natural zinc, light-coloured solid spandrel panels, brise soleil, and weathering steel, would ensure it fits within the



established, eclectic cluster of tall modern buildings that characterise the setting of the Church. The proposed development would remain distinct and in the background, contrasting with the robust masonry and colour of the Church and its immediate surroundings.

709. In the cumulative scenario, the cumulative scheme at 100 Leadenhall Street would be largely obscure the proposed development, in views from Leadenhall Street that include the Church. Only a small portion of the lower part of the tower and the podium garden would be visible, adding small elements of interest to the existing multi-layered backdrop of the Church.

710. The proposed development would not affect the Church's relationship with the historic streets of Creechurch Lane and Leadenhall Street, or with the churchyard. The Church is already viewed within a context of mid-rise and tall modern developments in both local and wider settings. The proposed development would align with this existing character. Consequently, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Gateway in churchyard of Church of St Katherine Cree (Grade II)

711. The contribution of setting to an appreciation of the significance of this listed building, is limited primarily to the church yard of St Katherine Cree. Due to the very enclosed character of the setting of this asset, the proposals are considered to preserve those aspects of setting which have been found to contribute to significance. Therefore, the proposed development would have a neutral impact upon the listed building's significance or the way this significance is appreciated.

#### Royal Exchange (Grade I):

##### *Significance:*

712. The Royal Exchange is one of the most recognisable buildings within the City, located prominently at Bank junction. Designed by Sir William Tite, the building possesses a richness of style which exemplified the wealth of Empire as well as the end of the Georgian Neoclassical revival period. It replaces three royal exchanges previously built on the site and is symbolic as symbolising the centre of commerce for the City of London.

713. It is of exceptional historic and architectural interest as "*the greatest of the City's 19th century exchanges*" and remains as the only survivor. Its exceptional architectural composition, prominent site location and historical association all suggest a public role. It is historically symbolic as the centre of the commercial life of the City and the financial role of the surrounding development.

### *Setting:*

714. The setting of the listed building comprises the grand cluster of Portland stone buildings facing Bank junction, including the Bank of England and No 1 Cornhill. The alignment of the group towards the junction contributes to a sense of arrival which compliments the richness of their architectural detail and contributes to an understanding of the former function in this financial district of the City. Views east from the junction take in, the tall buildings of the City Cluster seen in the backdrop. The contrasting architectural languages of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building's setting.

### *Impact:*

715. In the baseline scenario, only a small section of the upper part of the proposed development would be visible in views east from Bank Junction, which include the Royal Exchange. As shown in View 30 of the THVIA December 2023, the proposed building would appear behind 8 Bishopsgate and 22 Bishopsgate, to the right of the latter, and at a lower apparent height. The upper part of the proposed development would be seen as part of the established group of taller buildings with the Royal Exchange retaining its prominent position in views from Bank Junction. This intervisibility would not affect the value of the heritage asset and would further reinforce the positive juxtaposition between the significant assets and the commercial centre of the Cluster. Therefore, the proposals would be consistent with the existing tall building backdrop.

716. Officers consider that the proposals would not diminish the appreciation of the listed building's silhouette or decorative details and would be consistent with its dynamic, modern wider setting. It is considered that the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

### Church of St Botolph, Aldgate (Grade I)

#### *Significance*

717. The Church of St Botolph Aldgate has historic interest as it dates to 1741-4, to the designs of George Dance the Elder. Architectural interest derives from the appreciation of its architectural styles, materials including yellow and red brick with partly painted stone dressings and decorative features including sporting pediments, quoins and Venetian and Gibbsean windows. The church tower and spire rise prominently from the body into open clear sky and have a landmark quality. 665 The Church has group value with the Grade II listed wrought iron gates (probably dating from the early 19th century) with open work piers on Portland stone base, to the entrance of the churchyard.

## Setting

718. The setting of the church includes the churchyard, with its associated planting and trees, enclosed by the listed railings and gates. These elements make a very positive contribution to the significance of the church. A positive element within the Church's, only recently added in the early 21st century, is Aldgate Square. The whole ensemble of the Grade II\* Aldgate School, the Square and the Church form a striking and sympathetic townscape group of great character and interest. The setting is otherwise characterised by modern commercial buildings of medium scale in the City and Tower Hamlets, with tall buildings of the Cluster set some distance away to the west. Aviva Tower is visible to the west of the church, between 30 St Mary Axe and 122 Leadenhall Street. These modern elements of the setting make a neutral contribution to the significance of the church.

## Impact

719. The proposed tower would be seen in the backdrop of the church as part of the established cluster of tall buildings, and in some distance from the Church. The proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

## Guild Church of St Ethelburga the Virgin, Grade I

### *Significance*

720. The Guild Church of Ethelburga dates from the late C14 to early C15 with later alterations from the C20 by Sir Ninian Comper. It was built on the site of an older church and incorporates some of the material from this earlier structure. The church is built out of ragstone and brick with stone dressings and quoins to the tower. It has a four-bay nave with a southern aisle and a western tower.

721. The church derives historic interest as a remnant of the medieval city in this location, and one of only eight pre -Great Fire churches surviving in the City of London. The church derives further architectural interest owing to the survival of features dating from the 14th century, particularly on its principal exterior elevation which fronts Bishopsgate. It is also listed for its interesting interiors.

722. The church has high historic and archaeological interest as it predates the Fire of London. Constructed the late 14th or early 15th centuries, on the site of an older church, incorporating some of the materials. Later alterations include work between 1912 and 1914 by Sir Ninian Comper. Architectural interest derives from the appreciation of the style of the church and its materials including rag stone and brick with stone dressings. The various alterations and phases of construction contribute to its significance. The church features a four-bay nave

and a southern aisle and a western tower. There is a late 18th-century, two-stage rectangular bell-turret, each stage featuring a projecting dentil cornice, topped by an ogee roof with a weathervane dated 1671.

### *Setting*

723. The Guild Church has a strong relationship with Bishopsgate which forms a significant part of its immediate setting. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the heritage value of the Church. Its setting is comprised of Victorian and Edwardian townscape interspersed with significant tall buildings including Heron Tower, 99 Bishopsgate, Tower 42 and 100 Bishopsgate adjacent to the north.
724. The Church is modest in size and is now seen in a context of modern tall buildings. This relationship now forms a significant part of Guild Church's setting with the sublime contrast between what at once was Bishopsgate's tallest building to the high finance towers that now occupy this part of the City.
725. At street level the historic character of the church with its C14 features and distinctive C18 bell turret stands out prominently within the street scene. The architectural value of the church is best appreciated on approach from the north and south, where the short western tower rises above the ragstone wall. The proposed development site is located almost directly opposite the church the current building of which sits quietly within its setting reflecting the scale, proportion and construction materials of nos. 52-68 Bishopsgate opposite.
726. The setting of the church is defined by its location on the eastern side of Bishopsgate, a now busy thoroughfare with ancient routes. The surrounding historic network of streets, lanes and alleys either side of Bishopsgate also originates from Roman and medieval times, contributing to the church's significance.
727. The church is experienced in a context of tall modern buildings, along with classical-style, stone-clad Victorian, Edwardian, and Inter-War period buildings along Bishopsgate. The church's modest scale is contrasted greatly by the neighbouring tall buildings.
728. The immediate setting of the church is quite enclosed, with the 1920s nos. 52-68 Bishopsgate (Grade II), directly to the south, with five main and additional attic and roof storeys, and to the north, separating by an alley the imposing and dramatically contrasting 40-storey building at 100 Bishopsgate. In terms of the wider setting, the church is typically seen within a local context of tall buildings including 22 Bishopsgate and Tower 42 to the south, and the 41-story 30 St. Mary Axe (Gherkin) directly behind it in views from the east towards its main Bishopsgate frontage. The existing Aviva Tower on the application site is visible to

a limited extent in some southeast views towards the Church, forming a neutral part of the listed building's setting and not contributing to its significance.

### *Impact*

729. The proposed development would feature a taller building than the current one on the application site, located to the southeast of the listed building. This new structure would be more prominent in certain views compared to the existing St. Helen's Tower and would be visible alongside other tall buildings, such as 22 Bishopsgate and 30 St. Mary Axe.

730. The proposed development would intensify the existing character of the local setting rather than introduce a new aspect to it. It would be seen as part of the established cluster of tall buildings in the background of the church and align with the immediate and local setting of the listed building. Therefore, it would not affect any aspects of setting that contribute to the significance of the church. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

### Bevis Marks Synagogue, Heneage Lane, Grade I

#### *Significance:*

731. Located off Bevis Marks, reached through the gated archway in Nos. 10-16, is Bevis Marks Synagogue, built in 1701 to replace a smaller one in Creechurch Lane. As the oldest Synagogue in the UK, the building is of outstanding architectural and historic interest. It was the first purpose-built Synagogue in the City of London following the Readmission of the Jewish community in the C17. It is the oldest Synagogue in Britain still in use for continuous worship; a line of continuity unbroken since it was constructed. As such, it has profound and multifarious associations with generations of the Jewish community.

732. The Synagogue remains largely unaltered and has architectural interest as an undemonstrative brick building, rectangular in plan, with simple elevations of red brick and modest Portland stone dressings with classical stylings. Above these, a slate roof is set behind a plain parapet above cornice level. The interior features a gallery supported by Doric columns. The wainscot, benches, railings, finely carved reredos, and large brass chandeliers create a remarkably intact original layout, with some fittings predating the current building.

#### *Setting:*

733. The Synagogue is situated within a tight network of narrow medieval lanes and alleys typical of the City of London. A small courtyard wraps around the north and west sides of the Synagogue, accessible through an arch in 10-16 Bevis Marks.

The courtyard is surrounded by buildings of various dates but mostly consistent scale and, Valiant House excepted, framing the Synagogue with brickwork elevations with regular window openings. The Synagogue has particularly strong functional, aesthetic and historic relationships with the adjacent Rabbi's House (2 Heneage Lane) and the Vestry (4 Heneage Lane).

734. There is an intimate sense of enclosure, seclusion and quietness that comes with observing the Synagogue from the courtyard or Heneage Lane that contrasts strongly with the bustle of Bevis Marks and the surrounding modern City, despite the presence of tall buildings in the Cluster beyond this self-contained complex. This is recognised in the emerging City Plan 2040 in the proposal of an 'Immediate Setting' area around the Synagogue.

735. The Synagogue's wider setting comprises tall buildings such as 40 Leadenhall Street, 52-54 Lime Street to the south, 6 Bevis Marks to the west, One Creechurch Place to the east, and to a lesser extent 30 St Mary Axe and 110 Bishopsgate (Heron Tower) to the west and northwest, are visible and do not contribute to its significance. The existing building on the application site is not visible from the Synagogue or its immediate setting. The tall buildings in the wider setting of the Synagogue do not make any contribution to its significance.

### *Impact*

736. The ZVI indicates that there would be no visibility of the proposed development from the courtyard of the Synagogue, or Heneage Lane. However, there would be some visibility from the northern side of Bevis Marks, in which the eastern elevation of the Synagogue is seen to a small extent along the narrow Heneage Lane, and set back behind a modern office building.

737. The medieval street layout around the Synagogue and the buildings identified to make a positive contribution to its significance, would be unaffected by the proposed development. Where visible in views from Bevis Marks, the proposed development would appear in the background, fitting comfortably into established Cluster of tall buildings and in combination with the existing 30 St Mary Axe.

738. The proposed development would have only a tangential visual relationship with the listed building, being seen some distance away and set apart as the crowning addition to an established cluster of tall buildings. In this respect, the proposal would be consistent with the existing character of the listed building's wider setting in this direction. As such the proposal would preserve the setting and significance of the listed building or the ability to appreciate it.

### Former Port London Authority Building (PLAB), 10 Trinity Square (Grade II\*)

#### *Significance:*

739. The Former Port of London Authority Building (Grade II\*) was built 1912 – 22 by Sir Edwin Cooper. This monumental Portland stone landmark building is in the Beaux Arts classical style and features a richly embellished tower. Its significance lies in its architecture and historic Port of London civic function and to a lesser degree its setting. It is of a high level of architectural, historic and artistic significance.

*Setting:*

740. The setting of the listed building comprises open space to the foreground with Trinity Square Gardens and the Tower Hill War Memorial for Mercantile Marines. The adjacent buildings within its immediate setting are also constructed from Portland stone helping to form a small group of classical styled traditional buildings of a similar scale.

741. In the wider setting there is a broad range of buildings in terms of period, style, height and materiality. The building forms part of the setting of the Tower of London. The broad tower embellished with order of Corinthian pilasters, arched niche and colossal figure sculpture (Old Father Thames) is a clearly identifiable landmark feature in river prospect views. In longer north westerly views the building's back drop is dominated by the tall towers of the City Cluster.

*Impact*

742. Views 17.2, 17.3 and 24 in the THVIA December 2023, and Views 17.1, 19 and 26 in the THVIA Addendum May 2024 show the proposed development in views of the Former Port of London Authority, forming part of a backdrop of a well-established group of tall buildings within the City Cluster. The proposed development as the tallest building at the heart of the Cluster would be visible and in some views, including View 24 (THVIA December 2023) would appear directly to the background of the listed building, rising behind it.

743. Officers consider that while visible, in both baseline and cumulative scenarios, the proposals would not diminish an appreciation of the listed building's silhouette or decorative detail. The contemporary architecture and materiality of the proposed development would align it with the existing modern towers. This would ensure that the robust architectural form and contrasting materiality of the PLAB when compared to the Cluster buildings would result in the asset remaining a prominent element in these views. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

Holland House (1-4 Bury Street), Grade II\*

744. The building is of high historic interest as offices of 1914-16, built to designs by H.P. Berlage for a Dutch shipping company. The building consists of six storeys with additional set back roof storeys. High architectural and artistic interest derives from the appreciation of its Expressionist style, distinctive detailing and materials, making it a striking landmark and singular in its use of grey-green faience materials; it possesses a similar architectural singularity to the Lloyd's building nearby, and the modern Cluster buildings more widely. It has a very high quality of detailing and execution and is one of the architecturally standout buildings in the locality. It wraps around Renown House onto the southern part of Bury Street, continuing the same style and architecture, with a strong and imposing carved corner feature in polished black marble, with stylised prow of ship.

### *Setting*

745. Holland House is integrated into an urban block composed of similarly scaled post-war office buildings. It wraps around the existing neighbouring Renown House building, built just before it and which is a positive contributor; the grain and scale of the buildings along Bury Street to the north illustrate the historic scale of the street block and contribute positively also. Directly to the west, it faces 30 St. Mary Axe and its surrounding plaza, with the existing building on the site visible beyond, alongside the Leadenhall Building and 22 Bishopsgate. These buildings, along with the rest of the Cluster form established and prominent features of its local and wider setting that make a neutral contribution to its heritage significance.

### *Impact*

746. The proposed development would introduce a taller building than currently exists on the site to the west of the listed building. This would be more visible in some views from around the listed building but, in any case, it would be seen in conjunction with existing tall buildings including 30 St Mary Axe.

747. The proposed development would not affect any positive elements of the setting of Holland House and it would be consistent with existing tall development in the City Cluster, and the existing character of the asset's wider setting. Views between them would be limited, occluded partially by 30 St Mary Axe in between, and the proposals would be of the sort of architectural eclecticism that form the wider, Cluster setting of the listed building. While the proposals would introduce a change within the listed buildings wider surroundings, this is considered to preserve those aspects of setting which have been found to contribute to significance. As such, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.



### *Significance*

748. The building has historic interest as an inter-war office building (1922) in the City, designed by Sir Edwin Cooper. This stone-faced building of four storeys with two additional attic storeys illustrates an important phase of office development in the City, characterised by stone facades and Classical proportions.

749. Architectural and artistic interest derives from an appreciation of the Classical style and ornamentation of the building, including a Doric entablature at the ground floor and an enriched frieze and dentil cornice at the fourth floor.

### *Setting*

750. The setting of the listed building is defined by its prominent corner location, addressing both St Mary Axe and Bury Court. It includes office buildings of similar scale, adjacent to the east and north, and on the west side of St Mary Axe, of a later date that make a neutral contribution to the setting of the listed building.

751. Due to its location in the City Cluster, the setting of the listed building is mainly characterised by large-scale, tall modern commercial buildings that make a neutral contribution to the asset's significance. These include 30 St Mary Axe, directly to the south of the asset, but also the Aviva Tower (on the application site), and 22 Bishopsgate, to the south-east. Additional tall buildings including 70 St. Mary House and 100 Bishopsgate are located to the north and west, respectively.

### *Impact*

752. The proposed development would introduce a considerable change to the setting of the listed building. This would mainly affect views from the listed building to the south, as illustrated in View 61 in the THVIA Second Addendum October 2024.

753. Although of larger scale than the existing Aviva Tower, the proposed development would be consistent with the setting of the listed building that is characterised by tall modern development. The proposed development would be seen and appreciated as part of the group of tall buildings that form the City Cluster, rather than an isolated tall element.

754. In the cumulative scenario, the tall building at 100 Leadenhall Street would also be prominent within the asset's setting. However, similarly to the proposed development, it would be consistent with tall development in the vicinity of the listed building.

755. As such, in both baseline and cumulative scenarios, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Leadenhall Market, Grade II\*

756. A market complex built in 1881 by the City Corporation to the designs of Sir Horace Jones on the site of the Roman forum-basilica. The current market buildings have external walls that are constructed of red brick and Portland Stone. The interior comprises giant painted Corinthian columns in cast iron with an ornate roof structure and cobbled floors.

757. The heritage asset derives its historic interest as one of the oldest covered market sites in London and is a remnant of the early phase of commercial development within this part of the City. It has further historic interest owing to its association with Sir Horace Jones, who was architect and surveyor to the City of London. He was also responsible for the design of Billingsgate and Smithfield Markets. The market derives architectural interest owing to its decorative roof structure, interior detailing and exterior facades, which together establish an ornate and impressive principal entrance way on Gracechurch Street.

#### *Setting:*

758. The market is largely appreciated internally from within its covered arcades, with development at its perimeter having minimal impact on its character. To the west, south and east, the immediate setting of Leadenhall Market comprises a rich mix of architectural styles and eras, which reflect the various stages of development within this part of the City. These elements of the setting make a positive contribution to the significance of the listed building. As part of the wider backdrop to the market complex, the tall buildings of the City Cluster are visible in views looking north along Gracechurch Street, as illustrated in View A18 of the THVIA December 2023, which is approx. 115m south of the market. In this and views looking north from Lime Street, the Cluster forms a dynamic and arguably iconic backdrop to the listed building, albeit in a way unrelated to heritage significance and setting; this zone of setting to the north makes a neutral contribution to the significance of this asset.

#### *Impact*

759. The ZVI indicates that there would be some visibility of the proposed development from Gracechurch Street, parts of Lime Street Passage and Leadenhall Place. Given the large-scale intervening forms of the Leadenhall Building, 8 Bishopsgate and the Lloyd's Building, this visibility would be limited. The proposed development would appear as part of the existing Cluster of tall

buildings to the north and would reinforce the dynamic contrast between historic and modern so characteristic of the Cluster.

760. The proposed development would have some limited visibility within the setting of the listed building but would not change the way the asset's significance is appreciated which lies in its architectural detail and composition and relationship to the historic streets and grain to the west, south and east. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Lloyd's Registry, 71 Fenchurch Street (Grade II\*)

761. The Lloyd's Register building, completed in 1900 by architects T.E. Colcutt and B. Emmanuel, was developed alongside a masterplan for the street by property developer James Dixon. This three-story building with an attic has long elevations on Lloyd's Avenue and a shorter one on Fenchurch Street.

762. It has historic interest as a grand classical building to act as the headquarters of a leading independent shipping classification organisation. Architectural interest derives from the appreciation of its free classical style described by Pevsner as "arts and crafts baroque," featuring extensive sculptured and carved decoration. It reflects the late 19th and early 20th-century trend for grand classical stone-clad buildings in the City of London and features a 14-storey extension by Richard Rogers Partnership (2000) which is not included in the listing.

#### *Setting*

763. The coordinated development flanking both sides of Lloyds Avenue, overseen but not individually designed by Colcutt (now known as the Lloyd's Avenue Conservation Area), forms a positive element of the setting of the listed building and enhances its significance.

764. The City Cluster, positioned to the north and west of the listed building, forms part of its wider context and setting. Tall buildings including 20 Fenchurch Street, visible from along Fenchurch Street to the west, while 40 Leadenhall Street defines the views north along Lloyd's Avenue. The surrounding modern mid-rise and tall buildings do not directly contribute to the significance of the listed building but contribute to a visually interesting, contrasting modern context.

#### *Impact*

765. The ZVI indicates that there would be no visibility of the proposed development in front of this listed building on Fenchurch Street. However, there would be some limited visibility along Lloyd's Avenue, in the middle distance and beyond 40 Leadenhall Street which lies in closer proximity to the listed building.

766. The proposed development would not affect the relationship of the Lloyd's Registry with the historic buildings along Lloyd's Avenue or other positive elements of the setting of the listed building. Due to its distance from the site, intervening buildings and its location in the context of established tall buildings in the wider context of the asset, the proposals be read as part of the modern Cluster distant and disassociated from the listed building. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### Tower Bridge (grade I)

767. Tower Bridge was designed by the by the architect Sir Horace Jones, for the City of London Corporation in 1894 with engineering by Sir John Wolfe Barry. It represents a triumph of Victorian engineering as a low, hybrid suspension and bascule bridge with a steel frame, clothed in revivalist French gothic towers, turrets and pinnacles. The dramatic symmetrical composition acts as a 'portal' to central London from the River and has become an iconic and internationally recognised landmark of London.

768. The building possesses very high architectural/artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings and marriage of modern functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

### *Setting*

769. Elements of setting which make a substantial/significant contribution to the significance and appreciation of the heritage asset are set out in relative order of contribution below:

770. The broad riparian views from the River Thames, its embankments and Bridges, including from London Bridge, Southwark Bridge, the Queen's Walk, the North Bank and Butler's Wharf. From here its commanding, strategic siting, architecture and silhouette stands sentinel, guarding the entrance to central London from the sea and as a City (and London) Landmark.

771. That strategic siting and historic intrinsic connection with the operational River Thames is accentuated when appreciated in a 360 degree panoramic context with those other defining landmarks and features of the historic Pool, including City Hall, the Tower of London, the Monument, St Paul's Cathedral, Old

Billingsgate and the London Custom House. In addition to those the remains of the quays, wharfs and warehouses of the historic Pool contribute to a wider familial shared setting. These collectively make a substantial contribution to significance and an appreciation of it.

772. The local and wider townscape views/approaches, many of which are coincidental and fortuitous, perhaps the most important from in and around the Liberties of the Tower of London, from main vista at 'More London' on the South Bank and others which are more fortuitous, even incidental, townscape moments/glimpses where its inspiring architectural form makes an unexpected announcement. This includes broad panoramas such as from Greenwich Park (where it is seen alongside St Paul's), where the strategic role of the Pool of London is announced by its towering and dramatic architectural form and silhouette. These make a significant contribution to significance and an appreciation of it.

### Impact

773. In the baseline scenario, the proposal would appear off to the right as the totemic centrepiece of the Cluster, a consolidating presence pulling together the existing towers into a more coherent form. It would be separated visually from Tower Bridge in the view by the existing forms of 22 Bishopsgate, the Cheesegrater, the Scalpel, 8 Bishopsgate and 50 Fenchurch Street. In the cumulative the effect would be the same, but with the balancing silhouettes of 100 Leadenhall and 55 Gracechurch further consolidating and defining the overall shape of the Cluster and the proposal's role as its centrepiece.

774. In both scenarios, the proposal would not change the existing composition of the view, nor the visual focus in the view; it would read, like the rest of the Cluster to the north of the bridge, as disassociated from the iconic listed building. It would preserve those elements of setting identified above and thus the significance of the listed building and an appreciation of it.

### 46 Bishopsgate (Grade II)

#### *Significance:*

775. 46 Bishopsgate has historic interest as a well-preserved example of a mid 18th century house that was re-fronted in the 19th century. It has a modern shopfront at ground floor and illustrates the early 20th century phenomenon of retail conversion of the ground floors of residential buildings.

776. It is of four-storeys with a recessed garret that is constructed of yellow London Stock Brick and a slate roof. The building has architectural and artistic interest that derives from the appreciation of its Neo-Classical architectural style,

articulated by the symmetrically placed sash windows, stucco detailing, restrained façade and flat roof. The surviving 18th century original interiors also add to this interest.

### *Setting*

777. The setting of the listed building is defined by its location on the eastern side of Bishopsgate, a busy thoroughfare with ancient origins. The historic setting of the listed building has been largely eroded, but some historic buildings are still present, including two neighbouring buildings, nos. 52-68 and the adjacent no. 48 Bishopsgate. The neighbouring Guild Church of St Ethelburga survives as a small remnant of the late 14th century. These elements of the setting make a positive contribution to the significance of the asset.

778. The Victorian and Edwardian periods saw significant redevelopment along Bishopsgate with stone-clad, classical-style buildings. These broadly contemporaneous structures contribute to the significance of the 19th-century No. 48 Bishopsgate.

779. The immediate setting of the buildings includes modern mid-scale office buildings opposite and further along the Bishopsgate, many of which have been constructed in a contemporary Portland stone, referencing the historic materiality of the area. In the wider vicinity, the contrast in contemporary development becomes greater with the presence of a number of tall buildings which form part of the City Cluster, including 22 and 100 Bishopsgate, which appear against the backdrop of the building's principal elevation. Glimpses of the existing Aviva Tower on the site can be obtained from the west side of Bishopsgate. These tall modern buildings are a neutral aspect of the listed building's setting and do not contribute to its significance.

### *Impact*

780. The proposed development would introduce a taller building on the site, southeast of the listed building. This new structure would be more prominent in some views than the current St. Helen's Tower, however, it would be seen alongside existing tall buildings including 22 Bishopsgate, The Leadenhall Building and 30 St. Mary Axe.

781. The proposed development would not affect any positive elements of the setting of the listed building, such as the relationship with the other historic structures along Bishopsgate or the way the listed building is experienced from Bishopsgate. The proposed development would introduce a more prominent structure to the setting of this asset, that would however appear in the context of other tall buildings already prominently visible in the background and in some

cases directly behind the listed building. As such, it would be consistent with the character of its wider surroundings.

782. In the cumulative scenario, 55 Bishopsgate would further intensify the tall building development in the setting of the asset by adding a prominent feature to the west of this listed building which has its principal elevation to Bishopsgate.

783. In both scenarios, the proposals would be consistent with the dynamic modern character of the listed building's wider setting. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

#### 48 Bishopsgate (Grade II)

##### *Significance*

784. 48 Bishopsgate dates to the late 19th century and is a four-storey building, constructed of Portland Stone with richly designed architraves and pedimented windows and doorways. The windows also feature Juliet balconies, constructed of intricate, carefully crafted cast ironwork. The ground floor has a large round headed principal doorway entrance with intricate stonework detailing. The ground floor also features a large square headed opening, with a plate glass window.

785. The building derives historic interest as a well-preserved example of a late 19th century building in the Second Empire Style. The building derives further architectural interest for the flamboyancy of its design with ornate stonework that illustrates the quality of craftsmanship at the time.

##### *Setting:*

786. The setting of the listed building is defined by its location on the eastern side of Bishopsgate, a busy thoroughfare with ancient origins. The historic setting of the listed building has been largely eroded, but some historic buildings are still present, including two neighbouring buildings, nos. 52-68 and the adjacent no. 46 Bishopsgate. The neighbouring Guild Church of St Ethelburga survives as a small remnant of the late 14th century. These elements of the setting make a positive contribution to the significance of the asset.

787. The Victorian and Edwardian periods saw significant redevelopment along Bishopsgate with stone-clad, classical-style buildings. These broadly contemporaneous structures contribute to the significance of the 19th-century No. 46 Bishopsgate.

788. The immediate setting of the buildings includes modern mid-scale office buildings opposite and further along the Bishopsgate, many of which have been constructed in a contemporary Portland stone, referencing the historic materiality

of the area. In the wider vicinity, the contrast in contemporary development becomes greater with the presence of a number of tall buildings which form part of the Eastern Cluster, including 22 and 100 Bishopsgate, which appear against the backdrop of the building's principal elevation. Glimpses of the existing Aviva Tower on the site can be obtained from the west side of Bishopsgate. These tall modern buildings are a neutral aspect of the listed building's setting and do not contribute to its significance.

### *Impact*

789. The proposed development would introduce a taller building on the site, southeast of the listed building. This new structure would be more prominent in some views than the current St. Helen's Tower, however, it would be seen alongside existing tall buildings including 22 Bishopsgate, The Leadenhall Building and 30 St. Mary Axe.

790. The proposed development would not affect any positive elements of the setting of the listed building, such as the relationship with the other historic structures along Bishopsgate or the way the listed building is experienced from Bishopsgate. The proposed development would introduce a more prominent structure to the setting of this asset, that would however appear in the context of other tall buildings already prominently visible in the background and in some cases directly behind the listed building. As such, it would be consistent with the character of its wider surroundings.

791. In the cumulative scenario, 55 Bishopsgate would further intensify the tall building development in the setting of the asset by adding a prominent feature to the west of this listed building which has its principal elevation to Bishopsgate.

792. In both scenarios, the proposals would be consistent with the dynamic modern character of the listed building's wider setting. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### Hasilwood House 52-68 Bishopsgate (Grade II)

#### *Significance:*

793. 52-68 Bishopsgate was built in 1928 to the designs of Mewes and Davis. It comprises a five-storey building with attic and roof storey which is 14 bays wide. It is constructed of Portland Stone in a North American Beaux Arts architectural style.

794. The building has historic interest as an 1920s commercial development that illustrates the wide range of classical style stone commercial buildings constructed in the City of London in the inter-war period.



795. The building possesses a high architectural and artistic interest owing to the survival of its grand, extensive principal façade, cupola and entranceway which is a high-quality example of Beaux Art commercial architecture. This is articulated by symmetrically placed sash windows, the use of Doric columns, restrained façade, and detailing. The entrance to St Helen's Place penetrates the building in its central four bays and features the arms of Leathersellers Company on an entablature carried on fluted Doric columns and striking and prominent cupola which is equally experienced from within St Helen's Place and from Bishopsgate.

### *Setting*

796. This listed building faces both Bishopsgate and St Helen's Place, historic routes that form the main elements of its setting. Nos. 52-68 was constructed as an entrance to St Helen's Place from Bishopsgate, and thus the layout of both contributes to the building's significance.

797. The historic setting of the listed building has been largely eroded, apart from the neighbouring Guild Church of St Ethelburga which survives as a small remnant of the late 14th century and the two neighbouring buildings to the south-west (Nos. 46 and 48 Bishopsgate, Grade II) which survive and illustrate the 18th and 19th century development within the area. These elements of the setting make a positive contribution to the significance of the asset.

798. The immediate setting of the buildings includes modern mid-scale office buildings opposite and further along the Bishopsgate Road, many of which have been constructed in a contemporary Portland stone, referencing the historic materiality of the area. In the wider vicinity, the contrast in contemporary development becomes greater with the presence of a number of tall buildings which form part of the Eastern Cluster. 56-68 Bishopsgate is already experienced in the context of the tall towers of 22 and 100 Bishopsgate, which appear against the backdrop of the building's principal elevation. The existing Aviva Tower on the site is partially visible in some views around the listed building. These tall modern buildings are a neutral aspect of the listed building's setting and do not contribute to its significance.

799. The gateway and its architectural interest is particularly appreciated within the tranquil setting of St Helen's Place a unique enclave and commercial context where there is an unblemished backdrop to the roofscape and cupola with Tower 42 on the periphery. This clear sky setting enables an appreciation of architectural and artistic values.

### *Impact:*

800. The proposed development would introduce a taller building on the site, southeast of the listed building. This new structure would be more prominent in some views than the current St. Helen's Tower, however, it would be seen alongside existing tall buildings including 22 Bishopsgate, The Leadenhall Building and 30 St. Mary Axe.

801. The proposed development would not affect any positive elements of the setting of the listed building, such as the relationship with the other historic structures along Bishopsgate or the way the listed building is experienced from Helen's Place and Bishopsgate. The proposed development would introduce a more prominent structure to the setting of this asset, that would however appear in the context of other tall buildings already prominently visible in the background and in some cases directly behind the listed building. As such, it would be consistent with the character of its wider surroundings.

802. In the cumulative scenario, the consented tall building at 55 Bishopsgate would further intensify the tall building development by adding a prominent feature immediately to the west of this listed building which has its principal elevation to Bishopsgate.

803. In both scenarios, the proposals would be consistent with the dynamic modern character of the listed building's established setting. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### Park House and Garden House (Grade II)

#### *Significance*

804. Park House and Garden House has historic and architectural interest as an imposing early 20th century building in the Classical style with a symmetrical composition, designed by Gordon and Gunton. It has group value with the other buildings around Finsbury Circus.

#### *Setting*

805. All buildings, structures and landscaping associated with the planned arrangement of Finsbury Circus make a positive contribution to the setting of this asset.

806. There is a mix of historic and modern development in the vicinity of this asset, with historic buildings, including the listed buildings around the Globe Public House to the west making a positive contribution to the significance of this asset. Modern development of bigger scale including Moor House and 21 Moorfields is present to the west of the site. Development further east and south-east, in the

wider setting of the asset, includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. These modern elements of its setting, including the application site to the east of the asset do not contribute to its significance.

### *Impact*

807. The proposed development would be visible in views that include the listed building from Finsbury Circus looking east, including View 36 in the THVIA Addendum May 2024 and View A17 in the THVIA December 2023, and in some cases the proposed development would rise behind it. In such views, the development would be seen next to 22 Bishopsgate and in the context of other tall buildings, including 110 Bishopsgate and Tower 42. As such it would be consistent with the character of the views to the east of the asset.

808. Although the proposed development would intensify the existing backdrop to some extent, it would appear as part of the coherent and distinctive City Cluster, clearly separate from the historic development of Finsbury Circus. The positive elements of the setting of Park House and Garden House, including the Finsbury Circus arrangement would remain unaffected.

809. In the cumulative scenario, 55 Bishopsgate would almost entirely obscure the proposed development. Similarly to the proposed development, it would be consistent with tall development in the vicinity of the listed building.

810. In both scenarios, the proposals would be consistent with the dynamic modern character of the listed building's wider setting. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### Finsbury House (Grade II)

#### *Significance*

811. Finsbury House dates from 1877, designed by E C Robins in an enriched Classical style. It has historic interest as it marks the initial phase of transformation of Finsbury Circus, shifting from a Georgian residential neighbourhood to a hub of commercial offices in the late 19th century. Architectural interest derives from its ornate Classical style and imposing stone façade. It forms a cohesive ensemble and has group value with the other buildings at Finsbury Circus.

#### *Setting*

812. Finsbury House is located in the south-eastern quadrant of Finsbury Circus, in the corner of Blomfield Street and Finsbury Circus, and adjacent to London Wall Buildings, to the north.

813. The setting of this asset is informed by its location at Finsbury Circus, with all buildings, structures and landscaping associated with the planned arrangement making a positive contribution to its setting. Development in its immediate setting is of relatively similar scale. However, development further east and south-east, in its wider setting, includes tall buildings within the City Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. These modern elements of its setting, including the application site, to the east of the asset do not contribute to its significance.

### Impact

814. The proposed development would be visible in views that include the listed building from Finsbury Circus looking east, including View 36 (THVIA Addendum 2023) and A17 (THVIA Addendum May 2024), and in some cases the proposed development would rise behind it. In such views, the development would be seen next to 22 Bishopsgate and Tower 42 and in some cases would be screened by the former building. In all views, it would be seen in the context of other tall buildings of the City Cluster. As such it would be consistent with the character of the views to the east of the asset. Although the proposed development would intensify the existing backdrop to some extent, it would appear as part of the coherent and distinctive City Cluster, clearly separate from the historic development of Finsbury Circus.

815. In the cumulative scenario, 55 Bishopsgate would almost entirely obscure the proposed development. Similarly to the proposed development, it would be consistent with tall development in the vicinity of the listed building.

816. In both scenarios, the proposals would be consistent with the dynamic modern character of the listed building's wider setting. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### London Wall Buildings (Grade II)

#### *Significance*

817. Office block, constructed in 1901 and designed by Gordon and Gunton, features a striking stone exterior, and mansard roofs with slate cladding on the end pavilions. 766 Located in the southeast quadrant of Finsbury Circus, this grand Edwardian building holds historic as a representative example of office development in the area surrounding Finsbury Circus while architectural interest

derives from the appreciation of its Baroque style and materials and its prominent location in an impressive formal planned development in the City.

818. London Wall Buildings has group value with the other buildings that form part of the Finsbury Circus arrangement as well as with Carpenters' Hall to the south.

### *Setting*

819. The setting of this asset is informed by its location at Finsbury Circus, with all buildings, structures and landscaping associated with the planned arrangement making a positive contribution to its setting. The Carpenters' Hall to the south also makes a positive contribution to the setting of this asset, as they are of a similar age and style. Modern development is present in its immediate context, generally of similar scale. To the east and south-east, the wider setting of the asset includes tall buildings within the Eastern Cluster, including 110 Bishopsgate, 99 Bishopsgate and 22 Bishopsgate. Dashwood House, directly north of the application site is also visible in some views of the listed building. These modern elements of its setting, including the application site to the east of the asset do not contribute to its significance.

### *Impact*

820. The proposed development would be visible in views that include the listed building from Finsbury Circus looking east, including View A17. In such views, the development would be seen next to 22 Bishopsgate and Tower 42 and in some cases would be screened by the former building. In all views, it would be seen in the context of other tall buildings of the City Cluster. As such it would be consistent with the character of the views to the east of the asset. Although the proposed development would intensify the existing backdrop to some extent, it would appear as part of the coherent and distinctive City Cluster, clearly separate from the historic development of Finsbury Circus.

821. In the cumulative scenario, 55 Bishopsgate would almost entirely obscure the proposed development. Similarly to the proposed development, it would be consistent with tall development in the vicinity of the listed building.

822. In both scenarios, the proposals would be consistent with the dynamic modern character of the listed building's wider setting. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### Liverpool Street Station (Grade II)

#### *Significance:*

823. Liverpool Street Station is one of the great Victorian symbols of the Railway Age and the principal gateway to the City from the East, accruing high historic interest. One of the last London termini to be built, its significance is also derived from its architectural interest and sophisticated engineering. The western trainshed was undertaken by Edward Wilson in 1873-1875 before subsequent expansion by W.N. Ashbee in 1894 with another trainshed and a series of Flemish-style frontages. Thus, becoming the largest London terminus of the period, Wilson utilised gothic detailing to the brick work which together with expansive structural ironwork created a cathedral-like nave and transept. A later 1985-1992 extension has been recognised in its own right for a considered conservation lead scheme which continued the detailing and form of the original structure. The later extension is illustrative of contemporary conservation movement with its own architectural historic interest. Considerable commemorative value is also retained, through a number of monuments including the Great Eastern Railway First World War Memorial, the London Society of East Anglians First World War Memorial. Additionally, the station is association with the arrival of the Kindertransport evacuees into London, bringing 10, 000 unaccompanied children into London, commemorated with a memorial just to the south in Hope Square.

*Setting:*

824. Setting makes a positive contribution to the significance of the building, despite recent and late twentieth century development to the east and north screening the full extent of the train sheds from view from the majority of the surroundings. The principal positive contributors to setting are the zones of historic buildings to the south, east and south-east; views from here, especially of the station entrance from Bishopsgate are seen together with the Great Eastern Hotel (Grade II\*) make a particularly strong contribution, revealing the historic functional relationship between the two buildings. Similarly Hope Square to the south-west corner provides a small open space with a civic quality which showcases the southern elevation and Metropolitan Arcade.

825. Further to the south, to the north and to the west the listed building is characterised by a dynamic setting of modern buildings, including the City Cluster, which make a neutral contribution to setting.

*Impact*

826. The proposed development would be visible in some views from the station (View B23 THVIA December 2023) or views of the station, including from Exchange Square (View 41 THVIA December 2023).

827. The upper part of the proposed development would be visible from Exchange Square (View 41 THVIA December 2023) with the historic train shed roof profile

in the foreground as a striking composition. The development would form part of the already established tall building setting which is a prominent feature and typifies the juxtaposition of historic building and City Cluster whilst remaining entirely distinct of one another. The proposal would be seen as the focal point of the Cluster, sitting comfortably between 110 Bishopsgate and 22 Bishopsgate.

828. The elegant upper part of the proposed building defined by a light vertical tapering would appear as a slender, elegant addition to the existing built forms, reinforcing the interesting character of the skyline. The distinctive but subtle termination, crown, of the proposed building would provide an appropriate apex to the existing Cluster.

829. In the cumulative scenario in views from Exchange Square, 55 Bishopsgate would appear as the taller building in the Cluster, located in front of 22 Bishopsgate, adding another high quality tall layer to the established group.

830. In views from the station, the upper part of the proposed development would be visible from certain locations, including from Liverpool Street (View B23). From the front of the station on Bishopsgate, due to the development's position to the southwest, it would not impact the relationship between the station and the Great Eastern Hotel. The proposed development would be only partially visible, blending into the established City Cluster to the southwest.

831. Although not currently part of the cumulative scenario, an application (23/00453/FULEIA) for a new development associated with Liverpool Station has been submitted, the outline of which is visible in View 41 of the THVIA December 2023.

832. In both scenarios, the proposals would be consistent with the dynamic modern character of the listed building's wider setting. The proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Museum of the Home (formerly The Geffrye Museum, 136 Kingsland Road – Grade I)

833. The Museum of the Home, formerly known as the Geffrye Museum, is situated in the early 18th-century almshouses of the Ironmongers' Company in the London Borough of Hackney. The almshouses were acquired by the London County Council in 1910 and opened as a museum of the furniture trade in 1914, following internal alterations.

834. The building has historic interest as an early 18th-century almshouses, converted into a museum in the early 20th century. Architectural interest derives from an appreciation of its Georgian architecture and symmetry. Specifically, its long, U-shaped range with two storeys and a basement. Prominence is added to

the main east range with a chapel at its centre. The chapel is defined by stone quoins and features a pediment with a clock, above which there is a bell-cupola. Constructed of stock brick with red brick dressings, it has original tiled roofs and a wooden modillion cornice. Symmetrically positioned sash windows, mostly replaced, have glazing bars in moulded flush frames.

### Setting

835. The setting of the building has evolved over the years. In the 1700s, the surrounding area was predominantly rural, however, as London expanded during the 1800s, the area transformed into a hub for the city's furniture and clothing trades and farmland was replaced by terraced housing, factories, and workshops. The 20th century saw the area becoming one of the most densely populated parts of London. 785 Today, the listed building is surrounded by urban development of modest scale. Its wider setting includes tall buildings, including the City Cluster. As it is visible in View 31 (THVIA December 2023), there are partially obscured views of towers within the City Cluster in the distance (to the south-west), including 22 Bishopsgate and Tower 42, along the alignment of Kingsland Road. Existing trees in the Shoreditch Gardens obscure such views towards the Cluster, with views mostly obscured in the summer months. The tall buildings in the Cluster appear in the far distance, clearly separate from the buildings immediate environs and make a neutral contribution to its significance.
836. Shoreditch Gardens, enclosed by the museum's U-shaped range make a very positive contribution to the significance of the listed building. Similarly, the Grade II listed gateway and railings, partly dating from the 18th century, that border Shoreditch Gardens, to the west, also make a very positive contribution to the significance of the listed building.

### *Impact*

837. The upper part of the proposed development would be visible in some views from Shoreditch Gardens, towards the City Cluster. The upper part of the proposed development would appear in the context of existing tall buildings, to the left of 22 Bishopsgate and at a similar apparent height.
838. To the limited extent it would be visible, behind existing trees in winter, it would appear as a distant object, distinct from the museum and gardens in the foreground, and consistent with the existing character of views towards the City. During summer months the proposed development would even more obscured in such views.
839. The development at 55 Bishopsgate would appear next to the proposed development (to the right of views towards the City), at a lower apparent height, with other cumulative schemes of even lower apparent height further to the right. These would be heavily screened by trees and difficult to discern, but to the



extent they are visible, they would consolidate the composition of the City Cluster along with the proposed development.

840. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Nos. 19 - 21 Billiter Street (Grade II)

##### *Significance*

841. Nos 19-21 Billiter Street hold historic and architectural interest as a Classical inspired early Victorian office building constructed of Portland stone. Dating back to 1865, it exemplifies the grand mid-Victorian style typical of that era's development in the City. Its long, nine-bay façade with rusticated pilaster at ground floor level, give its prominence in the streetscene, despite its modest height of four storeys. Emphasis is given on the first floor which is adorned with columns of polished pink granite and carved spandrels above the round-arched windows. This building is currently the subject of extensive alterations as part of the construction of the 40 Leadenhall Street development.

##### *Setting*

842. Aside from the surviving medieval street layout of Billiter Street, the setting of listed building is now utterly defined by its dramatic integration into the 40 Leadenhall Street development, a new office tower which frames it to the north, east and south; to the west its setting is defined by tall buildings, including post-war and modern office buildings which do not contribute to its significance. These include the 15-storey building at 120 Fenchurch Street, to the south-west and the 42-storeys development at 52-54 Lime Street, to the north-west. This close setting of the listed building.

##### *Impact*

843. The immediate and wider setting of this listed building includes large-scale modern buildings in all directions. The ZVI indicates that part of the proposed development would be visible along Billiter Street looking north, capturing an oblique view of the building's main frontage, contributing to the high-quality contemporary architecture of the area.

844. The proposed development would be partially visible in the context of existing tall buildings, in the middle distance, beyond closer large-scale modern buildings like 52-54 Lime Street. As such it would be consistent the existing character of such views and the local and wider setting of the listed building.

845. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### 2-16 Creechurch Lane (Grade II)

#### *Significance*

846. Nos. 2-16 Creechurch Lane is tea warehouse building of 1887. The building is five storeys high, of brick, iron and stone and gives a typical flavour of the locality. It incorporates many surviving warehouse features such as external cranes and loading bays which contribute to its special historic and architectural interest and also its townscape value. The complex forms a group with the warehouse buildings immediately to the east and on Mitre Street.

#### *Setting*

847. The immediate setting of this listed warehouse building is defined by the relatively intact historic urban blocks of dense, tight grain, mid-rise historic buildings, which retain richly detailed masonry elevations, of a traditional hierarchy. A high degree of significance is drawn from this setting of the group, as it enables the appreciation of the historic development of this area of the City. However, the wider setting of the building is defined by contemporary glass-faced commercial buildings of considerable scale. These include 30 St Mary Axe, to the west, 22 Bishopsgate as well as Aviva Tower, as it is visible on View 47 (THVIA December 2023). These are experienced in the middle distance, rising above buildings of modest scale, to the west of the Creechurch Lane. These tall buildings, including the existing building on the application site make a neutral contribution to the appreciation of this asset's significance.

#### *Impact:*

848. The proposed development would be visible in views from Mitre Street that include 2-16 Creechurch Lane. The proposed development would intensify existing tall building development of the Cluster, as the proposed building would appear as part of a layer of tall development in the middle distance, distinct and separate from intervening medium scale development between the asset and the City Cluster. As seen in View 47 (THVIA December 2023), the proposed development would appear to the south of 30 St Mary Axe and in front of 22 Bishopsgate, already prominent in this view. The stepped massing of the proposed development would be partially visible, integrating its scale with its surroundings and stepping down towards Leadenhall Street. Its high architectural design quality, featuring materials such as natural zinc, light-coloured solid spandrel panels, brise soleil, and weathering steel, would ensure it fits within the established, eclectic cluster of tall modern buildings that characterise the setting of the listed building.

849. In the cumulative scenario, the cumulative scheme at 100 Leadenhall Street would be obscure part of the proposed development, in views from Mitre Street that include nos. 2-16 Creechurch Lane. The cumulative scheme would appear closer to the listed building, and only the northern part of the proposed development would be visible as a slender element, adding interest to the existing multi-layered backdrop of the listed building.

850. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### 13 Bishopsgate (Grade I)

#### *Significance:*

851. The Westminster Bank, 13 Bishopsgate, was built in 1865 by J Gibson. The building was constructed as the new head of office by the direction of the National Provincial Bank of England. The Bank is constructed in Portland stone in a Neo-Classical style with arched windows and Corinthian columns.

852. The building derives historic interest as a mid-19th century purpose-built headquarters of a national bank. Commercial development of this period in this area of the City was defined by the design and use of buildings for banking and associated commercial activities. It also derives historic interest for its association with a prominent 19th century architect, John Gibson, who worked with Sir Charles Barry on the Houses of Parliament. The bank also draws architectural interest from its principal elevations that present a rich Neo-Classical façade with figures in high relief to the Bishopsgate Road.

#### *Setting:*

853. The immediate setting of Westminster Bank is the junction of Threadneedle Street and Bishopsgate. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the historic heritage value of the Bank. The development which surrounds the heritage asset is mixed with Victorian, Edwardian and inter-war buildings as well as modern tall buildings that show the historic evolution of this area of the City.

854. Directly opposite the listed building and within its rear backdrop can be seen a number of tall buildings of the Eastern Cluster. This includes 22 Bishopsgate directly opposite, which stands at 62 storeys (294.5m AOD in height) and Tower 42 and 99 Bishopsgate. The existing building on the application site is not visible from this listed building due to the density of the intervening built environment, particularly 22 Bishopsgate and 8 Bishopsgate. Overall, it is considered that the

setting makes a neutral contribution to the understanding of the listed building's significance. Impact

855. The ZVI shows that the proposed development would not be visible from close range of the listed building on Bishopsgate, except for a narrow sliver seen through the gap between 22 Bishopsgate and 8 Bishopsgate. Views further north and south on Bishopsgate that may include the listed building at no. 13 would include partial views of the proposed development to the east of 22 Bishopsgate.

856. When visible, the proposed development would align with the existing character of the eastern setting of the listed building, which already include taller structures at closer distances than the site. The direct short-range views along Bishopsgate, where the listed building is mainly appreciated would not be negative affected.

857. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Church of St Botolph Without Bishopsgate – Grade II\*

##### *Significance:*

858. Built between 1725 and 1729, this church was initially designed by James Gould and later modified under the supervision of George Dance. Notably, it diverges from the typical layout of other City churches, with the tower located at the east end, and the chancel situated beneath it. The tower rises in three stages, embellished with pilasters, a clock, and crowned with four urns encircling a circular lantern within a balustrade.

859. The church has historic interest as an early Georgian church with 19th century alterations that illustrates the development of the area at the time. Architectural and artistic interest derives from the appreciation of its Neoclassical style, featuring an unusually placed tower at the east end. The interior of the church also contributes to its significance. The church is part of four medieval churches dedicated to Saint Botolph, each situated by one of the city's gates. Today, only three of these churches remain, including this church, St Botolph's Aldgate, and St Botolph's Aldersgate. Their collective significance is enhanced by their proximity and association with essential medieval defence features (gates) within the City.

860. The church of St Botolph (Grade II\*), two drinking fountains, three overthrows and lanterns, the Bishopsgate Parish Memorial (Grade II) and St Botolph's church hall (all Grade II), all have group value and form a distinct group of buildings and structures.

##### *Setting*

861. The setting of the church is defined by its location along Bishopsgate, just north of the remains of the medieval London Wall and one of the City gates. The setting of the Church encompasses its churchyard, to the east of the church. While the setting of the church has undergone substantial changes over the years, the enduring presence of a churchyard, regardless of its various forms, forms a positive element of the setting of the Church which consistently enhances the church's significance. The Church Hall and listed structures within the churchyard also make a positive contribution to it. The church's setting extends to include numerous large-scale developments that surround it, varying in size, age, and appearance. While the distinctive elliptical tower-like structure at The Crosspoint (34-37 Liverpool Street) immediately to the north, does not contribute to the significance of the church, the remaining 19th century facades of the buildings to the north of the Church make some positive contribution to its significance.

862. The wider setting is defined by the tall buildings of the City Cluster particularly Heron Tower and 1 Bishopsgate Plaza, 100 Bishopsgate and 99 Bishopsgate which do not contribute to the significance of the church, but which create an established, contrasting modern setting.

### *Impact*

863. There would be limited intervisibility of the church and the proposed building, as illustrated in the THVIA December 2023 View B24. There would be some limited visibility from Bishopsgate in front of church and in aligned views from the churchyard looking east but this visual experienced would be within the context of existing tall buildings including 100 and 110 Bishopsgate. The tall modern character of the wider setting to the east of the listed building would not be altered.

864. In baseline and cumulative scenarios, there would be a consolidation of the established modern tall building setting of the building without diminishing the ability to appreciate the heritage significance of the listed building.

865. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### 10 Brushfield Street (Grade II) & 14 Brushfield Street (Grade II)

#### *Significance:*

866. The listed buildings at 10 and 14 Brushfield Street, both have historic and architectural interest as late 18th century townhouses with stock brick symmetrical facades and timber shopfronts and sash windows at the upper floors.

### *Setting:*

867. The development which surrounds the listed buildings is mixed in terms of age, style and scale. Both buildings form part of a terrace (nos. 8 to 14) on the southern side of Brushfield Street, with buildings of similar style and appearance. The unlisted buildings of this terrace at nos. 8 and 12 make a very positive contribution to the setting of these listed buildings.

868. Modern development in the immediate setting of the assets include the 11-storey building at 250 Bishopsgate, to the north of Brushfield Street. This development does not contribute to the significance of the assets.

869. The wider setting of the listed buildings include tall buildings in the City Cluster, partly visible in views of the assets to the south-west. These buildings do not contribute to the significance of the assets. There is currently no intervisibility between the existing building on the application site (Aviva Tower) and the listed buildings on Brushfield Street.

### *Impact*

870. The upper part of the proposed development would be partially visible in some views of the assets, when looking towards the Cluster. When visible, the proposed development would align with the existing character of these views, which already include taller structures. The immediate, short-range views along Brushfield Streets, where the listed buildings are mainly appreciated would not be negatively affected, by the proposed development. The relationship of the assets with the elements of their setting that contribute positively to their significance would be retained.

871. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### 139-144 Leadenhall Street (Grade II)

### *Significance*

872. The listed building at nos. 139-144 Leadenhall Street was built in 1929 to designs by Lutyens, Whinney and Hall. It is five-storeys, constructed of Portland stone and in classical style. The ground floor is highlighted with an arcade while there are two open, arched, and pedimented end pavilions prominently displayed in front of a significantly recessed, two-storey attic. This attic section is distinguished by a central pediment and ornate, open-end towers adorned with Corinthian pilasters and distinctive, shaped roofs crowned with gilded spheres.

873. The building has architectural and historic interest as an inter-war building in the City of London in classical style, and also of interest for its association with Lutyens. The building has group value with Nos. 147-148 (also Grade II listed), to the west, which dates from the same period.

### *Setting*

874. The setting of the asset has changed considerably over the years and now predominantly characterised by tall buildings and its location in the City Cluster. Tall structures in the vicinity of the asset include the Leadenhall Building, directly to the east, 8 Bishopsgate, 1 Leadenhall Street, and the Willis Building. The current building on the application site, also a tall building is partially visible in angled views along Leadenhall Street. Neither the tall buildings in the Cluster nor the tall building on the application site contribute to the significance of the asset.

875. The listed building at 147-148 Leadenhall Street, which similarly to nos. 139-144 Leadenhall Street, dates from the interwar period, positively contributes to the significance of the listed building. The preserved 1920s frontage of the Lloyd's Building to the south also makes some positive contribution to its significance.

876. The Grade I listed Lloyd's Building and other mid-rise office buildings are also part of the asset's setting. These do not contribute to the significance of the asset.

### *Impact*

877. The proposed development would be located to the north-east of the Leadenhall Building, and as indicated by the ZTV, there would be some visibility of the proposed development along Leadenhall Street, in views that would include the listed building. Only a small part of the proposed development would be visible in such views, which would mainly include the podium garden element, as shown in View 54 of the THVIA December 2023.

878. When visible, the proposed development would be seen in the context of other tall buildings, including the Leadenhall Building and associated canopy, which is located between the asset and the application site. The proposed development would appear as a distinct feature among other tall buildings, and would not affect any elements of setting that make a positive contribution to the significance of the listed building, including its relationship with other interwar structures in the vicinity.

879. The proposed development, in both baseline and cumulative scenarios would be consistent with existing modern development in the setting of the listed building.

880. In both baseline and cumulative scenarios, the proposals would preserve the setting and significance of the listed building and the ability to appreciate it.

### 147-148 Leadenhall Street (Grade II)

#### *Significance*

881. The building dates to 1927, designed by American architect J.W. O'Connor as a four-story bank and office building for Grace & Co., a New York family owned banking firm, using Portland stone. The ground floor features two entrances with a pediment above the central entrance. The middle bay is further highlighted with a central fanlight.

882. The building has historic and architectural interest as a rare example from the interwar period in the City, featuring large, opulent spaces. The building has group value with Nos. 139-144 close by which dates from the same period.

#### *Setting*

883. The setting of the asset has changed considerably over the years and now predominantly characterised by tall buildings and its location in the City Cluster. Tall structures in the vicinity of the asset include the Leadenhall Building, directly to the east, 8 Bishopsgate, 1 Leadenhall Street, and the Willis Building. The current building on the application site, also a tall building is partially visible in angled views along Leadenhall Street. Neither the tall buildings in the Cluster nor the tall building on the application site contribute to the significance of the asset.

884. The listed building at 139-144 Leadenhall Street, which similarly to nos. 139-144 Leadenhall Street, dates from the interwar period, positively contributes to the significance of the listed building. The preserved 1920s frontage of the Lloyd's Building to the south also makes some positive contribution to its significance.

885. The Grade I listed Lloyd's Building and other mid-rise office buildings are also part of the asset's setting. These do not contribute to the significance of the asset.

#### *Impact*

886. The proposed development would be located to the north-east of the Leadenhall Building, and as indicated by the ZTV, there would be some visibility of the proposed development along Leadenhall Street, in views that would include the listed building. Only a small part of the proposed development would be visible in such views, which would mainly include the podium garden element, as shown also in View 54 of the THVIA December 2023.



887. When visible, the proposed development would be seen in the context of other tall buildings, including the Leadenhall Building and associated canopy, between the asset and the application site. The proposed development would appear as a distinct feature among other tall buildings, and would not affect any elements of setting that make a positive contribution to the significance of the listed building, including its relationship with other interwar structures in the vicinity.

888. The proposed development, in both baseline and cumulative scenarios would be consistent with existing modern development in the setting of the listed building and would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Whitehall Court (Grade II\*) Westminster

889. The GLA identify a low degree of less than substantial harm to the designated heritage asset. The GLA consider there would be harm to setting as the development would appear in the backdrop of the listed buildings as a singular form referencing THVIA Addendum May 2024 Views 7, 8 and December 2023 8N. This is a departure from the 2016 permission when the GLA raised no concerns. There is no objection from Westminster City Council. THVIA View 7 is LVMF 26A.1 and this is addressed in the Strategic Views section of the report.

#### *Significance:*

890. A mansion block of flats, built in 1884 by Thomas Archer and A. Green. The north end of the block, historically occupied by the National Liberal Club by Alfred Waterhouse and completed in 1887. The block is constructed of Portland Stone, in a '*vast elaborated pile with Exuberant French Renaissance, Chateau de la Loire inspired details*' and an example of a late 19th century purpose-built block of luxury apartments, for the upper classes. Its architectural value is predominantly derived in its exterior facades, the principal of which fronts Whitehall Court Road and the picturesque roofline is best appreciated and understood from St. James's Park or in riparian views. It derives further historic interest in its associations with a number of prominent historic residents including William Gladstone, George Bernard Shaw and Lord Kitchener. During World War One the building was used by MI6.

#### *Setting*

891. The surrounding context comprises a number of highly graded listed buildings. The buildings form an ensemble of tiered roof forms with Horse Guards and the War Office best appreciated from the Blue Bridge of St James's Park and uniquely capture London's character as a city that combines historic architecture with historic landscapes. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the

apartment block and connections with former prominent residents. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. These positively contribute to an understanding of the building's historical placement. The building is also located within close proximity to the St James Park to the west and the River Thames and Victoria Embankment to the east. These natural elements of setting provide opportunities to appreciate the architectural significance particularly the entirety of the roofscape in an open aspect. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall.

### *Impact*

892. Consistent with the 2016 the proposals would appear to the right of and be slightly occluded by 22 Bishopsgate and behind the apex of the much lower 1 Leadenhall. The development would be an addition to this grouping of city buildings and in the view positioned above the largely concealed and uppermost part of the Ministry of Defence hallmark green copper roof. Whilst within the setting of the development is set well to the right of White Hall Court's sky etched silhouette and the ensemble grouping with Horse Guards and Old War Office which is experienced views from St James's Park Blue Bridge.

893. 1 Undershaft is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The height and scale of the development and colourfully distinctive but subtle crown would not compete with or erode the visual clarity and silhouette of the series of roofscapes which form the setting and contribute to the architectural significance and appreciation of Whitehall Court. Whitehall Court and its contribution to the ensemble of unique government buildings would be preserved. This view is equally appreciated in nighttime views (THVIA December 2023 View 8N) 1 Undershaft would be a gently illuminated addition in the distant background and the eye would be drawn to the brightness of Whitehall Court and the wider ensemble and the London Eye would remain dominant as the key colourful nighttime feature in the right.

894. In cumulative scenarios 55 Bishopsgate would appear to the left of 22 Bishopsgate and 100 Leadenhall to the right both stepping down in scale from 1 Undershaft. Together these would form part of a background layer of development consolidating the City Cluster, in combination with existing tall buildings such as 22 Bishopsgate, One Blackfriars, South Bank Tower and the London Eye all of which are distinct of and dissociated from Whitehall Court.

895. In both baseline daytime and nighttime and cumulative scenarios, there would be no impact upon the setting or significance of the listed building or the ability to appreciate it.

### Horse Guards (Grade I) Westminster

896. The GLA identify a low degree of less than substantial harm to the designated heritage asset. The GLA consider there would be harm to setting as the development would appear in the backdrop of the listed buildings as a singular form referencing THVIA Addendum May 2024 Views 7, 8 and THVIA December 2023 8N. This is a departure from the 2016 permission when the GLA raised no concerns. There is no objection from Westminster City Council. View 7 is LVMF 26A.1 and this is addressed in the Strategic View section of the report.

### *Significance:*

897. The building was constructed in c.1754-48 as army headquarters to the designs of William Kent and built by John Vardy and William Robinson. It is constructed of Portland Stone, in the Palladian architectural style. It replaced an earlier building, as barracks and stables for the Household Cavalry. It was, between the early to mid-18th century, the main military headquarters for the British Empire. It originally formed the entrance to the Place of Whitehall and later St James's Palace. The significance of the building is derived in its existence as an exceptional example of a mid-18th century purpose-built army headquarters in the Palladian architectural style. Its principal significance is drawn from its important contribution to historic and current Royal and State ceremonies and the Horse Guard Parade Ground. Architectural values derive from its exterior elevations and roof form including cupola lantern and octagonal clock tower which can be viewed by the Horse Guards Parade. In particular, the unique and complex roof form of the building in the foreground including the clock tower together with that of the War Office and Whitehall Court roofscapes can be best appreciated from its pastoral settings when viewed from the bridge over the lake within St James's Park. Horse Guards occupies a central and prominent position within Whitehall itself both as an individual building but also as part of an ensemble of high value historic buildings on the processional route to Parliament.

### *Setting*

898. Positioned prominently on Whitehall the surrounding context comprises a number of highly valued listed buildings and spaces. In this experience Horse Guards is backdropped by War Office/Ministry of Defence and Whitehall Court and collectively these form an elaborate cascade of unique spires and pinnacles which uniquely capture London's character as a city that combines historic architecture with historic landscapes. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting

bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall including Horse Guards.

### *Impact*

899. As with the Whitehall Court the impact would be consistent with the 2016 the proposals would appear to the right of and be slightly occluded by 22 Bishopsgate and behind the apex of the much lower 1 Leadenhall. The development would be an addition to this grouping of city buildings and in the view positioned above the largely concealed and uppermost part of the Ministry of Defence hallmark green copper roof. Whilst within the setting the development is set well to the right of Horse Guards and the ensemble grouping with Whitehall Court and Old War Office as experienced in views from St James's Park Blue Bridge.

900. 1 Undershaft is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The height and scale of the development and colourfully distinctive but subtle crown would not compete with the ensemble of roofscape which form the setting and contribute to the architectural significance and appreciation of Horse Guards. Horse Guards and its contribution to the ensemble of unique government buildings would be preserved. This view is equally appreciated in nighttime views (THVIA December 2023 View 8N) 1 Undershaft would be a gently illuminated addition in the distant background and the eye would be drawn to the brightness of Old War Office and Horse Guards clock and the wider ensemble and the London Eye would remain dominant as the key colourful nighttime feature on the right.

901. In cumulative scenarios 55 Bishopsgate would appear to the left of 22 Bishopsgate and 100 Leadenhall to the right both stepping down in scale from 1 Undershaft. Together these would form part of a background layer of development consolidating the City cluster, in combination with existing tall buildings such as 22 Bishopsgate, One Blackfriars, South Bank Tower and the London Eye all of which are distinct of and dissociated from Horse Guards.

902. In both baseline daytime and nighttime and cumulative scenarios, there would be no impact upon the setting or significance of the listed building or the ability to appreciate it.

### War Office (Grade II\*) Westminster:

903. The GLA identify a low degree of less than substantial harm to the designated heritage asset. The GLA consider there would be harm to setting as the development would appear in the backdrop of the listed buildings as a singular form referencing THVIA Addendum May 2024 Views 7, 8 and 8N. This is a

departure from the 2016 permission when the GLA raised no concerns. There is no objection from Westminster City Council. View 7 is LVMF 26A.1 and this is addressed elsewhere in detail elsewhere in the report.

### *Significance*

904. A Government office completed 1907 and designed by William Young which possess considerable architectural and historic values. Its significance derives from its monumental English Baroque references, distinguished by the bowed corner pavilions surmounted by Baroque cupolas which disguise the irregular plan of the deep island site; the cupolas an essential part of the Whitehall roofscape, in particular when viewed from St. James's Park. Historic significance is derived from its associations with Britain's former imperialism as the main base for British Military operations. Former occupiers include Kitchener, Churchill, Lloyd George and Profumo. The building has been converted into a high residential use.

### *Setting:*

905. Positioned between Whitehall Court and Horse Guards the surrounding context comprises a number of highly valued listed buildings and spaces. These form an ensemble along Whitehall with Whitehall Court, Horse Guards, Banqueting House and other Government Offices. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the building and its former functions. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. These positively contribute to an understanding of the building's historical placement. The building is also located within close proximity to the Grade I RPG of St James to the east. This naturalistic setting provides opportunities to appreciate the architectural significance particularly the entirety of the roofscape in an open aspect including the defining cupolas. In this experienced positioned between Whitehall Court and Horse Guards collectively this unique grouping forms an elaborate cascade of unique spires and pinnacles. This pastoral setting, from St James's Park over the lake within the Royal Park articulates a dramatic series of projecting bays and pavilions in Portland stone, forming the foreground of a group of classical buildings around Whitehall.

### *Impact:*

906. As with the Whitehall Court and Horse Guards the impact would be consistent with the 2016 the proposals and the development would appear to the right of and be slightly occluded by 22 Bishopsgate and behind the apex of the much lower 1 Leadenhall. The development would be an addition to this grouping of

city buildings and in the view positioned above the largely concealed and uppermost part of the Ministry of Defence hallmark green copper roof. Whilst within the setting of the War Office the development is set well to the right of the War Office and the ensemble grouping with Whitehall Court and Horse Guards in views from St James's Park.

907. 1 Undershaft is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The height and scale of the development and colourfully distinctive but subtle crown would not compete with the ensemble of roofscape which form the setting and contribute to the architectural significance and appreciation of Horse Guards. The War Office and its contribution to the ensemble of unique government buildings would be preserved. This view is equally appreciated in nighttime views (THVIA December 2023 View 8N) 1 Undershaft would be a gently illuminated addition in the distant background and the eye would be drawn to the brightness of War Office and Horse Guards clock tower and the wider ensemble and the London Eye would remain dominant as the key colourful nighttime feature on the right.

908. In cumulative scenarios 55 Bishopsgate would appear to the left of 22 Bishopsgate and 100 Leadenhall to the right both stepping down in scale from 1 Undershaft. Together these would form part of a background layer of development consolidating the City cluster, in combination with existing tall buildings such as 22 Bishopsgate, One Blackfriars, South Bank Tower and the London Eye all of which are distinct of and dissociated from the War Office.

909. In both baseline daytime and nighttime and cumulative scenarios, there would be no impact upon the setting or significance of the listed building or the ability to appreciate it.

#### Ministry of Defence (Grade I) Westminster

910. The GLA identify a low degree of less than substantial harm to the designated heritage asset. The GLA consider there would be harm to setting as the development would appear in the backdrop of the listed buildings as a singular form referencing THVIA Addendum May 2024 Views 7, 8 and 8N. This is a departure from the 2016 permission when the GLA raised no concerns. There is no objection from Westminster City Council. View 7 is LVMF 26A.1 and this is addressed elsewhere in detail elsewhere in the report.

#### *Significance:*

911. The Ministry of Defence was designed in 1913 by Vincent Harris, but only built after World War II, completed in 1959. It was built on part of the former site of the Palace of Whitehall. It also comprises a 16th century vaulted undercroft as well

as 18th century historic rooms, originating from the buildings formerly on the site. The building is constructed of Portland Stone in a Stripped Edwardian Baroque style, also comprising some Neo-Classical features. The Ministry of Defence possesses historic and architectural interest as a well-preserved example of an early 20th century institutional building, purpose built as the headquarters of Britain's Ministry of Defence. It derives additional historic and architectural interest for incorporating 16th century vaulted undercroft and 18th century historic rooms reconstructed into the interior.

*Setting:*

912. The building draws significance from its Whitehall location the surrounding context comprises a number of highly valued listed buildings and spaces. The proximity to Westminster Abbey, the Houses of Parliament and interposing government buildings reinforce the high status of the building and its former functions. Much of the surrounding development comprises buildings dating to a similar era, which are also constructed of Portland Stone and of a similar architectural style. The landscape setting to the east and west and river frontage as well as the glimpse of the copper roof from St James's Park emphasise the status and important function of the Headquarters. These elements positively contribute to an understanding of the building's historical placement.

*Impact:*

913. The proposed new building would appear to the right of and slight behind 22 Bishopsgate and the apex of 1 Leadenhall is within the foreground. Whilst within the setting of the historic roofline of the Whitehall Buildings ensemble (Whitehall Court, War Office and Horse Guards) and immediately behind the distinct copper roof of the Edwardian Ministry of Defence Roof in the iconic views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes. It is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. No 22 Bishopsgate and 1 Leadenhall already appears above the glimpsed roofline of Ministry of Defence and the presence of the tall building has the effect of bringing a greater sense of awareness of the wider context. 1 Undershaft with its subtle colouration to the crown would be legible and teased out from 22 Bishopsgate. The development provides a landmark function for the City and would create a coherent cluster of tall buildings which are distinct and dissociated from the foreground context.

914. This view is equally appreciated in nighttime views (THVIA December 2023 8N) 1 Undershaft would be a gently illuminated addition in the distant background and the eye would be drawn to the brightness of Old War Office and Horse Guards clock and the wider ensemble and the London Eye would remain dominant as the key colourful nighttime feature on the right.

915. In cumulative scenarios 55 Bishopsgate would appear to the left of 22 Bishopsgate and 100 Leadenhall to the right both stepping down in scale from 1 Undershaft. Together these would form part of a background layer of development consolidating the City cluster, in combination with existing tall buildings such as 22 Bishopsgate, One Blackfriars, South Bank Tower and the London Eye all of which are distinct of and dissociated from the Ministry of Defence.

916. In both baseline and cumulative scenarios, there would be no impact upon the setting or significance of the listed building or the ability to appreciate it.

#### St James Park (RPG Grade I)

917. Historic England object to the impact of the development on the designated heritage asset and identify a degree of harm by virtue of the development's size and dominance by increasing the prominence of the Cluster and eroding its significance derived from the relationship between water, mature planting and historic Whitehall buildings in key views from the bridge over the lake (LVMF view 26A.1). A similar objection was raised in relation to the 2016 scheme. In addition, the proposed crown treatment including colouration is considered to be distracting. The GLA consider there would be harm to setting as the development would appear in the backdrop of the listed buildings as a singular form referencing THVIA Addendum May 2024 Views 7, 8 and THVIA December 2023 View 8N. The GLA did not raise any objections to the 2016 approved scheme. There are no objections from the Westminster City Council. The impact on LVMF view 26A.1 and the historic park composition (THVIA May 2024 View 7) is addressed in detail in the Strategic Views section of the report.

#### *Significance:*

918. The heritage value of the Royal Park is of high significance, and it is at the historic heart of the nation. Its origins as a Royal hunting ground on the edge of London, and subsequently a Royal Park are still recognisable in its verdant and pastoral character. The inner park survives today substantially to the picturesque manner of John Nash, with its naturalistic lake and islands, informal plantations and shrubberies. The Park is culturally significant in terms of its location, neighbours, and national ceremonial routes. They are both heavily used by visitors from all over the world due to their proximity to Buckingham Palace, Whitehall, Downing Street and Trafalgar Square. The Park continually hosts significant State, Ceremonial and National events. Historic architecture and landscape complement each other to form a highly significant place that uniquely capture London's character as a city.

#### *Setting:*



919. The setting of the Royal Park has undergone substantial change throughout the years. However, the ability to appreciate the significance of the Park is not diminished by the ongoing contextual development of London. The setting is varied bound by major roads The Mall to the north, Birdcage Walk to the south and numerous and the historic rooflines of 18th and 19th century buildings to the east principally Horse Guards, War Office/Ministry of Defence and Whitehall Court create a unique urban contribution to the significance of the landscape.

*Impact:*

920. The proposed new building would appear to the north of the LVMF 26A.1 viewpoint (THVIA Addendum May 2024 View 8) behind the historic roofline of the Whitehall Buildings ensemble (Whitehall Court, War Office and Horse Guards) and Ministry of Defence to the right of 22 Bishopsgate in iconic views from St James's Park that uniquely capture London's character as a city that combines historic architecture with historic landscapes. The proposed development would be visible to the right of 22 Bishopsgate, at a slightly greater apparent height than that existing building. The top of its upper stage would be the most visible part of the proposed development, appearing as a distinct and elegant volume and adding positively to the distant skyline variety within this view with a distinctive 'crown'. Together with 22 Bishopsgate, the proposed development would create a new focus for the city cluster commercial core in the distance and as a grouping would appear as part of a background layer of development, distinct and separate from St. James's Park and surrounding buildings in the foreground and middle ground.

921. The development is strategically sited, as part of a distinct consolidating City Cluster skyline form, set aside from, and subservient to, the pre-eminent Whitehall composition. The principal sky-etched silhouette of Whitehall Court and the ensemble of roof forms which contribute to an understanding of significance of the Royal Park would be, preserved. The height and scale of the development would be similar to other towers which are visible and the colouration of the crown in the distance would be subtle and enable the viewer to tease out the individuality of 1 Undershaft from 22 Bishopsgate. The development would not be a detracting feature within the setting nor distract from the picturesque groups within the composition which contribute to understanding and appreciation of significance of St James's Park.

922. This view and St James's Park is equally appreciated in nighttime views (THVIA December 2023 View 8N) 1 Undershaft would be a gently illuminated addition in the distant background and the eye would be drawn to the brightness of the War Office and Horse Guards clock and the wider ensemble and the London Eye would remain dominant as the key colourful nighttime feature on the right.

923. In cumulative scenarios 55 Bishopsgate would appear to the left of 22 Bishopsgate and 100 Leadenhall to the right both stepping down in scale from 1 Undershaft. Together these would form part of a background layer of development consolidating the City cluster, in combination with existing tall buildings such as 22 Bishopsgate, One Blackfriars, South Bank Tower and the London Eye all of which are distinct of and dissociated from the parkland setting, water and foreground historic buildings.

924. In both baseline and cumulative scenarios, there would be no impact upon the setting or significance of St James Park (RPG) or the ability to appreciate it.

### St Helen's Place Conservation Area

#### *Significance:*

925. St. Helen's Place Conservation Area is a small, tightly defined area on the east side of Bishopsgate, in close proximity to the Bank Conservation Area and the heart of the City. It is the sole survivor of an intricate pattern of spaces and alleys which once connected Bishopsgate and St Mary Axe. The heritage value of St Helen's Place CA is derived from its historic character, articulated by its tight-knit urban grain, medieval layout of streets and alleyways, and inclusion of two nationally important pre 1666 churches. St Helen's Church in particular remains as one of the most important pieces of medieval fabric surviving in the City. Its 13th century origins are still evident, as well as the physical manifestation of the building's organic history. There is considerable archaeological potential for the extensive precinct of the Priory of St Helen which for centuries influenced the form of the area.

926. The area continues to have deeply rooted associations with the Leathersellers Company whose architectural patronage from the reformation onwards exerted a massive influence on the area and continues to shape its development. Associations with Canadian exploration through the Hudson's Bay company and St Ethelburga's church. The development along St Helens Place is Edwardian, and a formally planned enclosure which is unusual in the City. It provides a quiet and delightful contrast to the surrounding City Cluster and activity of Bishopsgate. There is an important group of three buildings with narrow plot widths (nos. 46, 48 and 50) that are the only survivors of the finely-grained appearance of Bishopsgate before the combination and redevelopment of building plots from the 20th century onwards. They give an indication of how Bishopsgate would have looked in the 19th century and with the larger buildings elsewhere illustrate the development of the street. Accordingly, they are significant components of the conservation area. They offer important contrasts to the ongoing planning and development of tall buildings along Bishopsgate as part of the Eastern City Cluster. Hasilwood House provides an arched public entrance and enclosure to St Helens Place a discreet enclave of a type that is unusual in the City.

## Setting

927. The Conservation Area has, uniquely in a nationwide context, a dramatic setting among the tall buildings of the City Cluster. The Conservation Area's current setting contributes very little to an appreciation of its heritage value. The application site is located to the south of the Conservation Area and already includes a tall building that does not contribute to the significance of the Conservation Area. The published Character Summary for St Helen's Place CA does not note specific views, but the views into and within St Helen's Place are clearly of importance; here, again, the backdrop of the tall buildings of the Cluster makes for a dramatic juxtaposition with the Edwardian CA buildings in the foreground. Views up and down Bishopsgate and looking east at St Helen's Church share this quality; nowhere in the conservation area are the presence of tall buildings not felt to some degree and this is intrinsic to its setting.

### *Impact:*

928. A tiny sliver of the northern edge of the site falls within the St Helen's Place Conservation Area. The proposed works in this area would focus on the footpath to the north of the Undershaft carriageway, and would just include the realignment and resurfacing of the footpath in accordance with the City of London Technical Palette of Materials. These works would be addressed in detail through the Section 278 agreement for improvements to the surrounding streets of the development, and in any case they would not affect the character or appearance of the Conservation Area, and they would preserve its significance.

929. The remainder of the works, including the construction of the new tall building, would fall outside of the boundary of the Conservation Area and are assessed below.

930. The GLA have identified low to middle less than substantial harm to the significance of St Helen's Conservation Area and the listed buildings within it. HE also identified some concurrent harm to the Conservation Area as a result of harm caused to St Helen's Church which is an important part of the Conservation Area.

931. The Conservation Area lies within the Eastern City Cluster policy area for tall buildings. The dramatic setting among the tall buildings of the City Cluster is identified as a key characteristic which contributes to the special interest.

932. The proposed development would replace an existing tall building on the application site just to the south of the Conservation Area and in close proximity to St Helen's Church. The proposed development would be visible from much of the Conservation Area, including St. Helen's Place and the area around the

Church of St Helens and Bishopsgate, as illustrated in THVIA December 2023 View 46 and THVIA Second Addendum October 2024 Views 59 from within the Conservation Area, and THVIA Second Addendum October 2024 Views 57, 58, 60, 61, 62 and 63 adjacent to it.

933. The proposed development would introduce a larger and wider element to the south of the Conservation Area which would be prominent in views from within the quiet reflective area in St Helen's Place and this is where the change in setting would be the most impactful. Moving around the Conservation Area, outside of St Helen's Place itself, the proposed tower would add to the existing contrast established by the presence of modern skyscrapers and the historic environment which is of demonstrable smaller scale. Thus, it would be consistent with the existing setting of the Conservation Area and the experience of the commercial centre and juxtapositions of old and new. The contemporary nature of the building's form and materials would reinforce the deliberate juxtaposition between the natural stone and ornate facades of the historic buildings in the Conservation Area.

934. Public realm improvements to the south of the Conservation Area would include the resurfacing of Undershaft, the removal of detracting elements, such as the servicing ramp and railings and rationalisation of the existing HVM and street furniture. These are considered to be beneficial changes as they currently detract from the significance of the Conservation Area. In addition, the redesign of Undershaft Square as a tranquil space, characterised by low key greening, inviting moments of contemplation against the backdrop of a dynamically changing skyline, designed to pay homage to St Helen's Church, is also considered to be a positive change and an improvement to the existing situation and the currently uninviting area to the west of the Aviva Tower.

935. Officers disagree with USS comments that the proposed digital screen would be jarring with the historic context around the site and that it would be inappropriate for the setting of St Helen's Place Conservation Area. The screen would be a distinct, modern element, part of a contemporary building, which aligns with the setting of the conservation area. It would face a very modern square, contributing to a vibrant street scene without undermining the conservation area's well-defined historic character and appearance.

936. The scale, form, and appearance of the proposed development would generally align with the existing character of the Conservation Area's setting. However, due to the increased width of the podium, as well as its new increased proximity to the Church (as illustrated in View 59 of the THVIA Second Addendum October 2024), the proposed development would detract to some extent from the primacy of the Church in some views, from the churchyard and St Helen's Place, to the west. The proposed colour palette of the podium and the podium garden's soffit to a lighter, speckled glaze, to brighten the podium levels, enhance the contrast and

depth behind the weathering steel tridents while providing a less detracting and 'lighter' background in views of the Church. That has mitigated to some extent the impact of the proposed development in views of the church.

937. Taking into consideration all elements of the proposal, Officers consider that it would cause a slight level of less than substantial harm, due to the impact on the setting of the church to the south.

#### Bank Conservation Area:

##### *Significance:*

938. The area comprises the commercial heart of the City of London around Bank Junction.

939. The majority of the Conservation Area interior comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. The contrast of medieval street plan, 18th and 19th century buildings and modern office developments is the quintessential character of the City of London.

940. High historic interest stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic connection of financial power with its high historic associative interest. This is expressed through the sense of dramatic arrival at bank junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction. The Bank Conservation Area combines architectural, historic and social heritage value.

##### *Setting:*

941. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate and Gracechurch Street. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east providing a strong contrast between old and new.

942. Bank Conservation Area is also bordered by Finsbury Circus Conservation Area to the north, Guildhall Conservation Area to the West and Leadenhall Market Conservation Area to the east which all form an important part of its setting.

943. The Thames and London Bridge also contribute to its setting providing significant views of buildings within the conservation area including those of the Wren churches.

944. The character of Bank junction as a historical centre is presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive.

### *Impact*

945. There would generally be limited visibility of the proposed development from the Bank Conservation Area, largely confined to Gracechurch Street/ Bishopsgate, which bounds the Conservation Area to the east, and the eastwest routes of Cornhill, Threadneedle Street (towards its western end), Queen Victoria Street, and Bank Junction where these streets meet. Views 30, A16, A18 (THVIA December 2023), are located within the Conservation Area.

946. In these views, only the upper part of the tower would be visible mostly screened or in the context of existing tall buildings in the City Cluster, including 8 and 22 Bishopsgate and the Leadenhall Building. Where visible, it would fit with the City Cluster's character, which is distinct and contrasting from the Conservation Area in the foreground.

947. The scale, form, and appearance of the proposed development would align with the existing character of the Conservation Area's local and wider setting. In both baseline and cumulative scenarios, the proposed development would be only partially visible in the context of the established City Cluster. As such, the proposals would not harm the setting, significance, character or appearance of the Conservation Area.

### Leadenhall Market Conservation Area

#### *Significance:*

948. The Leadenhall Market Conservation Area encompasses a relatively small area, dominated by Leadenhall Market and its associated buildings. The street layout of the Conservation Area is a result of the various phases of development that the conservation has undergone. This has resulted in a combination of irregularly aligned medieval streets and narrow alleyways, overlaid with the Market complex creating a layout unique to this part of the City.

949. The heritage value of the conservation area is derived from the dominance of the Victorian buildings of Leadenhall Market which are an outstanding example of a Victorian market and offer a remarkably cohesive and immersive experience.

This is enhanced by the contemporary vibrant mix of uses and activity, which strongly compliment the predominant financial and insurance activities in the area.

950. The conservation area derives further historic interest owing to its highly significant archaeological remains relating to the 1st century Basilica Forum and medieval Leaden Hall. As well as the preservation of the medieval street plan, comprising 19th century market buildings which offers an intricately layered plan form with retained historic thoroughfares throughout.

#### Setting:

951. The immediate setting of the CA comprises a rich mix of architectural styles and eras, which reflect the various stages of development that this part of the City has undergone. Tall buildings of the City Cluster are visible in views looking north along Gracechurch Street (A18 in the THVIA December 2023). They introduce a considerable new height element within the immediate setting of the market. Due to the enclosed and inward looking nature of Leadenhall Market and its associated buildings, its immediate setting, bar its historical location within the former commercial hub of the City contribute little to the appreciation of its heritage value.

952. The development site and existing building are visually separated from the Conservation Area by intervening development and do not make any contribution to its significance.

#### *Impact:*

953. The ZVI indicates that there would be small areas of visibility of the proposed development within the Conservation Area, mainly along parts of Gracechurch Street and Lime Street, and to a lesser extent from some areas on smaller streets such as Lime Street Passage and Ship Tavern Passage. When visible only the upper part of the proposed development would be seen, in the distance, and beyond existing tall buildings in closer proximity to the Conservation Area.

954. The distance of the site from the Conservation Area; the intervening buildings, including tall buildings; the limited visibility of the proposed development, and when visible, its perception as a part of an existing Cluster of tall buildings; as well as the inward looking and enclosed nature of the Conservation Area have as a result that the proposed development within the Conservation Area's wider setting would not harm the setting, significance, character or appearance of the Conservation Area.

#### Creechurch Conservation Area

### *Significance:*

955. The historic and architectural interest of the area derives from a varied townscape and history with strong and visible connections to the Roman and medieval City.
956. Anchored in three diverse and architecturally significance places of worship Bevis Marks Synagogue, St Katherine Cree, and St Botolph Aldgate, the area is closely associated with the Holy Trinity Priory, still evident in the modern street pattern, including historic open spaces of different scales and functions.
957. At the heart of the Conservation Area, is a characterful group of late 19th and early 20th-century warehouses on Creechurch Lane and Mitre Street which are fine examples of a now rare building type in the City.
958. The historic interest of the area is strengthened due to its enduring associations with the Jewish community since their resettlement in the 17th century, highlighted by Bevis Marks and the sites of the First and Great Synagogues.
959. The area juxtaposes contrasting architectural scales against the backdrop of the City Cluster's tall buildings.

### *Setting*

960. The immediate setting of the CA comprises a variety of scales and styles of buildings with modern development being prevalent. Tall buildings of the City Cluster including 30 St Mary Axe and the Aviva Tower at the application site, form part of the immediate and wider setting of the Conservation Area, to the west. In general, this juxtaposition of contrasting architectural scales of the Conservation Area against the backdrop of the City Cluster's tall buildings, defines the setting and contributes to the significance of the Conservation Area. However, the existing Aviva Tower building itself is not considered to make any contribution to the significance of the conservation area.

### *Impact:*

961. The proposed development would be located to the west of the Conservation Area and in close proximity to it. It would introduce a building of additional height and scale, as seen in View 47 of the THVIA December 2023 and Views 48 and 49 of the THVIA Second Addendum October 2024. In all views, only part of the development would be visible, within a group of an established tall buildings. The scale, form, and appearance of the proposed development would align with the existing character of the Conservation Area's local and wider setting.



962. In the cumulative scenario the proposed development would be partially screened by 100 Leadenhall, particularly in views from Leadenhall Street (View 49, THVIA Second Addendum October 2024).

963. In both scenarios, the proposed development would be consistent with the striking backdrop of modern tall buildings in the City Cluster. It would remain distinct and separate from the Conservation Area, aligning with the existing character of its setting. As such, the proposals would not harm the setting, significance, character or appearance of the Conservation Area.

### Bishopsgate Conservation Area

964. The GLA identified a very low level of less than substantial harm to the Bishopsgate Conservation Area and listed buildings within it, including Liverpool Street Station.

### *Significance*

965. The conservation area has historic interest and architectural interest that derives from its staggered, more piecemeal redevelopment that occurred in the 19th and 20th centuries. This is in contrast to other areas of the City, which saw dramatic and transformative commercial development. This, combined with the Conservation Area's variety of uses (industrial, residential, commercial and transport) has led to a diverse character. The historic street layout and orientation of alleyways and squares is still visible, despite few houses remaining from this period. A significant townscape feature within the Conservation Area is Liverpool Street Station.

### *Setting*

966. The immediate setting of the Conservation Area is much changed with the recent expansion of the Eastern Cluster and large complexes such as the Broadgate Estate. The southerly setting of the Conservation Area is dominated by tall modern buildings at the northern edge of the City's Eastern Cluster including Dashwood House, 99 Bishopsgate and Heron Tower. These contemporary developments form attractive buildings within the Conservation Area's setting that are considered to make a neutral contribution to its significance.

967. The site lies approximately 200m south of the Conservation Area, beyond 100 Bishopsgate and in the same general direction as the existing 62-storey tower at 22 Bishopsgate and the 41-storey 30 St. Mary Axe. The existing Aviva Tower on site makes no contribution to the significance of the Conservation Area.

### *Impact:*

968. The Bishopsgate Conservation Area is located at the heart of the Square Mile's commercial district. The area is well contained with a collection of historic Victorian and Edwardian buildings which sit beyond the original City Walls and is read as separate to the tall buildings on its boundaries.

969. The ZVI indicates that there would be only some limited visibility of the proposed development from the Conservation Area, including areas on Liverpool Street, from the churchyard of St. Botolph's Church, Devonshire Square and part of Bishopsgate, as illustrated in Views 41, 42, 43, B23 and B24.

970. The scale, form, and appearance of the proposed development would align with the existing character of the Conservation Area's wider setting to the south and east, which includes the tall buildings at 22 Bishopsgate, 110 Bishopsgate, and 30 St. Mary Axe. Visibility from much of Bishopsgate would be minimal due to the intervening tall buildings to the north of the application site, with only the top of the proposed development visible, blending coherently with the Cluster. Where visible, it would form part of the existing City Cluster in the background while remaining distinct from the Conservation Area in the foreground. It would be seen as a high-quality, slender addition to the skyline.

971. In both baseline and cumulative scenarios, the scale and appearance of the building would reflect the established townscape forming part of the City Cluster which forms a significant part of the Conservation Area's setting.

972. Officers consider that the proposed development within the conservation areas wider setting would not harm the setting, significance, character or appearance of the Conservation Area.

#### Finsbury Circus Conservation Area and Finsbury Circus Registered Historic Park and Garden (II)

973. The GLA identified low level of less than substantial harm to the significance of the Finsbury Circus Conservation Area and the listed buildings within it.

#### *Significance:*

974. The Conservation Area is a small area comprising the Registered Park and Garden (RPG) of Finsbury Circus and its surrounding development. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as City Surveyor, William Montague, although its design dated from 1775-1800. The significance of the CA is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful

perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus. It features large 19th and 20th century commercial buildings with extensive ornamental detail and a generally uniform roofline. Buildings are of particular historic and architectural interest as impressive 19th and 20th century commercial buildings with extensive detailing, modelling, uniform height and varied rooflines.

*Setting:*

975. The conservation area and the RPG is bound by London Wall to the south, Moorgate to the west, Blomfield Street to the east and South Place and Eldon Street to the north. To the south the Conservation Area shares a boundary with the Bank Conservation Area and to the south, and New Broad Street to the east. The residential towers of the Barbican are visible to the west of the Conservation Area, with other, contemporary, taller buildings visible within its immediate setting. Owing to the imposing buildings contained within such a tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited. Due to the considerable distance and extent of interposing development, there is no functional nor visual relationship with the Conservation Area, the RPG and the site.

*Impact:*

976. The upper levels of the proposed development would infill part of an existing skyline gap when appreciated in some views moving through the Conservation Area looking south, by introducing a new building to the left (north) of 22 Bishopsgate, as shown in Views 36 (THVIA Addendum May 2024) and A17 (THVIA December 2023). Where visible, the appearance of the building would be in keeping with the established commercial centre of the City Cluster and would not challenge the appreciation of the formally planned landscape of Finsbury Circus and its significance as a Conservation Area.

977. In the cumulative scenario, most of the development would be obscured by 55 Bishopsgate. In both baseline and cumulative scenarios, the proposed development would add to the varied cluster of tall buildings which are clearly distinct from this historic space and would be consistent with Finsbury Circus wider setting. As such, the proposals would not harm the setting, significance, character or appearance of the Conservation Area.

Bunhill Fields and Finsbury Square Conservation Area including Bunhill Fields Burial Ground Registered Park and Garden, Grade I

978. The GLA has identified a very low, less than substantial harm to the significance of the Bunhill Fields and Finsbury Square Conservation Area including Bunhill Fields Registered Park and Garden.

## Significance

979. Bunhill Fields and Finsbury Square Conservation Area is located in the southeast corner of the London Borough of Islington, immediately north of the Moorgate entrance to the City of London. The Conservation Area comprises a small area which is centred around the burial ground of Bunhill Fields which is also designated as a Registered Park and Garden (RPG).
980. Bunhill Fields was a nondenominational burial ground on the outskirts of the City of London, which was used between 1665 and 1854. As London's population grew, the requirement of cemeteries increased. With the ceasing of burials in Bunhill Fields, London's authorities embarked on the construction of seven major new cemeteries on what was then the periphery of the city. Bunhill Fields subsequently got smaller due to development pressure as Victorian development encroached on the land. A larger number of these buildings survive of traditional construction which are interspersed with more modern post war development.
981. Finsbury Square was developed in 1777 on the site of Finsbury Fields of which none of the original terraces remain. The Square has been developed to include large-scale buildings which include modern development such as 30 Finsbury Square and the University of Liverpool's London campus.
982. The heritage value of the CA is derived from how the area lies within the open spaces throughout the Conservation Area, including the RPG and how they are enclosed. There is further historic interest and associations through the Wesley Chapel and tomb of John Wesley and other positively contributing buildings of different periods.

## Setting:

983. Beyond the boundaries are various other Conservation Areas including St. Luke's (LB Islington), South Shoreditch (LB Hackney), and Sun Street (LB Hackney). Each conservation area has a character distinctive to itself with variations on building style and scale.
984. Views of the City and the clusters of towers are prominent within the skyline of different vistas throughout the area. Views into the Barbican are also experienced where the buildings terminate views at the end of roads. The urban setting is varied, with contemporary, tall buildings of mixed use predominating in views out of the Conservation Area.
985. The development site, due to the separation distance and the extent of interposing development does not share a visual or functional relationship with the Conservation Area or the RPG.

## *Impact*

986. The proposed development will be partially visible from some parts within the Conservation Area and RPG looking southeast towards the commercial centre of the City Cluster. View 33 (THVIA December 2023) shows the limited visual impact from Bunhill Fields itself and there will be certain points where the visibility of the building is more pronounced, as shown in Views 34 and 35 (THVIA December 2023) from the Honourable Artillery Company and Finsbury Square respectively. Where the proposed development would be more visible it would be understood as part of the established cluster of tall buildings and would be in keeping with the existing character of the setting of the Conservation Area and the RPG.

987. Furthermore, in the cumulative context, the proposed would be partly obscured by 55 Bishopsgate, as the City Cluster being further consolidated by new tall buildings. This would also be consistent with tall development in the wider setting of the Conservation Area and RPG.

988. Officers consider that the proposed development would not harm the setting, significance, character or appearance of the Conservation Area or the RPG.

## Non-Designated Heritage Assets

989. A scoping of the wider setting has been made to ascertain whether, in Officers' view, the proposed development has the potential to affect the significance of any building/structure which is of itself of sufficient heritage significance to warrant consideration as a non-designated heritage asset. The following assets were identified as a result of that scoping exercise.

### 113-116 Leadenhall Street

#### *Significance and setting:*

990. 113-116 Leadenhall Street is an attractive stone bank dating to 1891 with refined detailing. As the only surviving Victorian building on Leadenhall Street, the building is a valuable element of the townscape and particularly reinforces and contributes to the setting of St Andrew's Church, as two of the smaller, and most historic buildings in this location. The setting of the building is much altered, with the exception of the Church of St Andrews to the north. The surroundings are now principally defined by contemporary glass-faced commercial buildings of considerable scale to the north, west and south. Recently consented development at 100, 106 & 107 Leadenhall Street, adjoining on its eastern party wall, would maintain the stone-faced street elevations which are reflective of the historic Victorian evolution of the street, however this will further the prevailing contemporary architectural character in the immediate surroundings. Due to the

significant level of change within the local area which is of a radically different architectural character, and sale, the building's sensitivity to change within the immediate surroundings is low, and the contribution of the setting to the significance of the building is limited to its historical position along Leadenhall, a key street, within the heart of the City's financial district, which has retained a traditional rhythm, hierarchy and solidity, alluding to its historic origins.

#### **Impact**

991. As described above, like the setting of St Andrews Church, there would be an appreciable change in the setting of 113-116 Leadenhall Street and the composition of the townscape in this location by virtue of the proposals, which would introduce new built form above the roofscape of the building. However, the height of the Level 11 podium garden, and the distance between, would maintain the sense of spaciousness and sky around the tops of these buildings, and not undermine the contribution it makes to the corner of Leadenhall Street and St Mary Axe which it positively defines.

#### **33-34 Bury Street**

992. 33-34 Bury Street is a corner office building of 1912, built for Messrs Burge, grain dealers. The building is a characterful survival of a small-scale early 20th-century office building, once a common type in the City, and. It has good quality carved stone detailing and makes an effective contrast with the Listed Holland House adjacent.

993. The proposed development would not harm the setting or significance of the non-designated heritage asset

#### ***Setting:***

994. To the west of the site the setting of the building is principally defined by contemporary glass-faced commercial buildings of considerable scale. 30 St Mary Axe, and the spacious public realm at its base, sits immediately opposite, thereby creating a highly juxtaposed street scape between contemporary and historic forms of development. To the east the setting is characterised by a more dense, tight grain, mid-rise historic buildings, within a historic block which retains richly detailed masonry elevations. As a corner building, it is important in leading the eye further east to Cree House – another NDHA, which reinforces the group value of these assets, which mutually contribute to their respective settings.

#### ***Impact:***

995. The impact of the proposed development on this building is considered to be limited, given its location on the eastern boundary of the eastern cluster which is defined by a backdrop of contemporary tall buildings, of which the existing

building at 1 Undershaft forms an established part. Furthermore, the building is best appreciated looking east along the southern axis of Bury Street, where the proposal at one Undershaft would not be seen.

996. The proposed development would not harm the setting or significance of the non-designated heritage asset.

Group to the east of Creechurch Lane:

997. 18-20 Creechurch Lane (Cree House), 24 Creechurch Lane (Fibi House), 12-14 Mitre Street (Mitre House), 27-31 Mitre Street, are 19th -century former 4 – 5 storey warehouse buildings with convincing high-quality brick facades and are considered to be non-designated heritage assets for the positive contribution they make to the townscape. The buildings form a strong group and are a valuable section of the surviving historic townscape at the eastern edge of the City cluster which contributes to their significance.

*Setting:*

998. The immediate setting of this group of historic buildings is defined by the relatively intact historic urban blocks of dense, tight grain, mid-rise historic buildings, which retain richly detailed masonry elevations, of a traditional hierarchy. A high degree of significance is drawn from the from this setting of the group, as it enables the appreciation of the historic development of this area of the City. However, to the west and east of these buildings, the setting is defined by defined by contemporary glass-faced commercial buildings of considerable scale, which are experienced rising above the groups rooflines in all views looking both east and west, which plays a neutral role in the ability to appreciate their combined significance.

*Impact:*

999. The impact of the proposed development on these buildings is considered to be limited, given their location and setting, to the east of the cluster, which has come to be defined by a backdrop of contemporary tall buildings. Equally, the tight grain historic street pattern which they sit within, and which defines their immediate setting and how they are experienced within the local townscape, limits the views of these buildings to very close range, which is best experienced in views looking east - away from the cluster. Given the established relationship between these historic buildings, and the tall buildings of the City cluster and it is not considered that the impacts of the scheme would be harmful to their significance.

1000. The proposed development would not harm the setting or significance of the non-designated heritage asset.

## Liverpool Street Arcade

### *Significance:*

1001. Remains of the original Metropolitan Line Station, including the (much altered) post-electrification Edwardian Metropolitan Arcade, executed in a well-detailed French pavilion classical manner, drawing much significance from setting, namely at the heart of a major Victorian railway ensemble at Liverpool Street with a strong group value with Liverpool Street Station (Grade II) (including 50 Liverpool Street, Hope Square and the 'Neo-Victorian' towers) and the former GEH (Grade II\*). It is considered to be of a high level of local significance for its architectural and historic value and considered a non-designated heritage asset.

### *Setting:*

1002. The arcade draws much significance from setting, namely at the heart of a major Victorian railway ensemble at Liverpool Street with a strong group value with Liverpool Street Station (Grade II) (including 50 Liverpool Street, Hope Square and the 'Neo-Victorian' towers) and the former GEH (Grade II\*).

### *Impact:*

1003. There would be some intervisibility with the Arcade, View B23 of the December 2023 THVIA is of relevance. The NDHA is part of a low scale late 19th historic townscape. This is articulated by varied and interesting roof profile and architectural features of note including the stucco treatment and round arched/circular windows. The upper elements of the proposed development would appear behind the existing tall building context. Full views of the proposals would remain obscured by interposing development, including 100 Bishopsgate. The proposal would integrate into the existing tall building cluster and add a new layer to the skyline next to the existing tall buildings within the frame. In baseline and cumulative scenarios, the proposal would be distinct from the more historic low scale townscape, and consistent with the background of existing tall buildings to the south-east of this asset.

1004. The proposed development would not harm the setting or significance of the non-designated heritage asset.

## 30 St Mary Axe

### *Significance:*

1005. Despite its relatively recent completion (2003), The Gherkin is regarded as a non-designated Heritage Asset due to its striking architectural contribution and



impact on the skyline. Since completion, the building has caught the public imagination and arguably developed an architectural iconic status, frequently used to symbolize the City of London and London as a whole, both to the UK and globally (for example, publicizing the London Olympics). The building has won numerous architectural awards including the Stirling Prize in 2004. As one of the earlier towers in an area subsequently earmarked for a cluster of towers, the Gherkin has been subsumed in the emerging cluster. As such its distinctive appearance on the skyline of London has diminished, particularly from the west. Despite this, its striking profile and appearance means it retains a high architectural significance worthy of being identified as a non-designated heritage asset.

#### *Setting:*

1006. The Gherkin draws a moderate degree of significance from setting, namely through its position on the eastern edge of the cluster which it has come to define, both in local and longer-range strategic views of the City.

#### *Impact:*

1007. The impact of the proposed development on the significance of the Gherkin is considered to be negligible. In views from the east along Mitre Street, and Creechurch Lane, the proposal would introduce an additional tall built form behind the 30 St Mary Axe, however, in the context of the city Cluster of contemporary tall buildings, this change is consistent with the existing character of the surroundings not considered harmful. The unique silhouette of the building and its iconic curved top and edges would remain applicable/recognisable from the vast majority of vantage points tested around the site. With the exception of a single fleeting/momentary highly localised View 55 (THVIA Second Addendum October 2024) on approach from the south-west, the proposal would not occlude any views of the Gherkin. The proposed development would therefore not undermine its prominence and contribution to the City's distinctive skyline, which contributes to its significance. It is considered this change would not result in any harm to the significance of the heritage asset.

1008. The proposed development would not harm the setting or significance of the non-designated heritage asset.

#### Other Heritage Assets

1009. The setting of a heritage asset is defined in the NPPF as "*The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.*" Given the dense central London

location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise was conducted so as to identify heritage assets the setting of which may be affected. Section 13 of the THVIA December 2023 explains which heritage assets were scoped in and out of the assessment. The designated heritage assets considered included but not exclusively so:

- Custom House, (Grade I)
- Old Billingsgate, (Grade I)
- Bank of England (Grade I)
- Church of St Margaret (Grade I)
- Tower and Remains of Church of All Hallows Staining (Grade I)
- Church of St Mary Woolnoth (Grade I)
- Church of All Hallows (Grade I)
- Church of St Peter Cornhill (Grade I)
- Church of St Michael (Grade I)
- Church of St Edmund (Grade I)
- Tower and remains of Church of All Hallows Staining (Grade I)
- Mansion House (Grade I)
- Drapers Hall (Grade II \*)
- Carpenters Hall (Grade II\*)
- Lutyens House (Grade II\*)
- Sir John Cass School (Grade II\*)
- Merchant Taylor's Hall (Grade II\*)13-17 Old Broad Street (Grade II)
- 18 Old Broad Street (Grade II)
- Wentworth Street CA
- Wormwood Street buildings
- 23, 24 and 25, Great Winchester Street (Grade II)
- The Dutch Church (Grade II\*)
- 123 Old Broad Street (Grade II)
- 26 Throgmorton Street (Grade II)
- 13-17, and 18, Old Broad Street (Grade II)
- Royal Bank of Scotland (Grade II)
- 32, 34, 41, and 43-47, Threadneedle Street (Grade II)
- 1 Old Broad Street (Grade II)
- 7 Lothbury (Grade I)
- Hyde Park (RPG)
- Adelaide House (Grade II)

1010. GLA identified harm to a number of heritage assets. In the table of indirect impacts they provided, they assigned:

- very low level of less than substantial harm to the Bishopsgate Conservation Area and the listed buildings within it, including Liverpool Street Station, listed Grade II;

- low level of less than substantial harm to the Finsbury Circus Conservation Area and the listed buildings within it; and
- low to middle level of less than substantial harm to St Helen's Place Conservation Area and the listed buildings within it.

1011. Officers have assessed the impact on these conservation areas. Officers have also scrutinised all of the listed buildings in these conservation areas using the THVIA and digital model. The report has only assessed in detail those listed buildings where there is meaningful intervisibility between the asset and the proposal – and consequently the potential for an impact. The listed buildings in these conservation areas that have scoped in and assessed in the Heritage Section above, include: all of the listed buildings in the St Helen's Place Conservation Area; within the Bishopsgate Conservation Area - Liverpool Street Station (Grade II), St Botolph's without Bishopsgate (Grade II\*), 10 Brushfield Street (Grade II) and 14 Brushfield Street (Grade II); and within Finsbury Circus Conservation Area - Park House and Garden House (Grade II), Finsbury House (Grade II) and London Wall Buildings (Grade II). For clarity, the following listed buildings were scoped out of this assessment include:

- Within the Bishopsgate Conservation Area: Bishopsgate Institute (and 6 Brushfield Street), Grade II\*; Great Eastern Hotel, Grade II\*; 164 Bishopsgate (former Fire Brigade Station), Grade II; Two drinking fountains, three overthrows and lanterns at Bishopsgate Churchyard Grade II; St Botolph's Church Hall, Grade II; Wall to the rear of 14-18 Devonshire Row, Grade II; 12-23 Devonshire Square, Grade II; Police Call Box outside Liverpool Street Station, Grade II; Great Eastern Railway war memorial & London Society of East Anglians War Memorial, both Grade II; 5-7 New Street, Grade II; Gateway to no. 21 New Street, Grade II; Port of London Authority Warehouses to Middlesex Street, Cutler Street and New Street, Grade II; Shield House, 16 New Street, Grade II; 76-80 Old Broad Street, Grade II; and 1 Stone House Court, Grade II.
- Within the Finsbury Circus Conservation Area: 1-6 Finsbury Circus (Britannic House/Lutyens House), Grade II\*; Drinking fountain and shelter, north side of gardens, Grade II; Salisbury House, Grade II; 76-92 Moorgate, Grade II; and 94-100 Moorgate, Grade II.

1012. The settings and the contribution they make to the significance of the heritage assets which were scoped out of consideration, would not be affected by the proposals due to the relative distance of the proposal, intervening topography and/or existing fabric blocking the view of the of the proposed development in the backdrop, allowing for the roofscape silhouette of the listed buildings to be unaffected by the proposals.

1013. The assets assessed in detail in this report are those affected by the proposed development. Other assets have been scoped out of consideration for the

reasons given in the THVIA (Officers agree with that scoping exercise). Your officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the THVIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development. Officers are confident that the analysis that has been undertaken is sufficient to identify the heritage assets which may be affected, to understand their significance, and to assess impact on that significance.

### Conclusion on Heritage

1014. The proposal would result in low to slight levels of less than substantial harm to the Church of St Helen's Bishopsgate (Grade I) and St Helen's Conservation Area. As such, the proposal would fail to preserve the significance/special interest or setting of these designated heritage assets and would conflict in this respect with Local Plan policies CS12 (1 and 2), DM12.1 (1), emerging City Plan 2040 S11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. These conflicts with Development Plan policy are addressed at the end of the report when considering whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

1015. The proposals otherwise preserve the settings and significance of all other relevant designated heritage assets and comply with Local Plan CS14, CS 12 (3-5), CS13 and DM12.1 (2-5), DM 12.2, and emerging City Plan 2040 S11 (1,3-5), S13, HE1.

### Overall conclusion on Strategic Views and Heritage

1016. The scheme is design-led and has accounted for strategic and local heritage considerations, having been designed to accentuate the unique characteristics, spirit and sense of place of the City of London.

1017. The proposal would not harm the attributes or components of the Outstanding Universal Value, Significance, authenticity and integrity of the Tower of London World Heritage Site, and would accord with the relevant parts of Local Plan Policy CS12, CS13 (3), emerging City Plan 2040 Policy S11, HE1, HE3, London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

1018. The proposals comply with London Plan Policy HC4, Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD. In LVMF pan-London panoramas and some local views from the London Boroughs of Southwark and Lambeth, Officers conclude

the development would consolidate, and in several instances, enhance the visual appearance of the City Cluster on the skyline.

1019. The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging roof terraces which are also important to the character of the City of London.
1020. The proposal would result in low to slight levels of less than substantial harm to the Church of St Helen's Bishopsgate (Grade I) and St Helen's Conservation Area. As such, the proposal would fail to preserve the significance/special interest or setting of these designated heritage assets and would conflict in this respect with Local Plan policies CS12 (1 and 2), DM12.1 (1), emerging City Plan 2040 S11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies.
1021. The proposals comply with Local Plan CS14, CS12 (3-5), CS13 and DM12.1 (2-5), DM12.2, DM 12.5, emerging City Plan 2040 S11 (1,3-5) S13, HE1 and London Plan Policies HC1 (A, B, D and E), HC2, HC3 and HC4.
1022. The proposal would preserve the special interest/significance and setting of the listed buildings at the Tower of London (WHS, SM and LBs), St Peter ad Vincula (Grade I) St Paul's Cathedral (Grade I), Tower Bridge (Grade I), Royal Exchange (Grade I), St Andrew Undershaft (Grade I), Lloyd's Building (Grade I), St Katherine Cree (Grade I), Church of St Botolph, Aldgate (Grade I) , Guild Church of St Ethelburga the Virgin (Grade I), Bevis Marks Synagogue (Grade I), The Monument (SM and Grade I), 13 Bishopsgate (Grade I), Museum of the Home (Grade I), Former Port of London Authority (Grade II\*), Holland House (Grade II\*), Leadenhall Market (Grade II\*), Lloyd's Registry (Grade II\*), Bishopsgate Institute (Grade II\*), Church of St Botolph Without Bishopsgate (Grade II\*), Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II), Gateway in yard of Church of St Katherine Cree (Grade II), Liverpool Street Station (Grade II), 46 Bishopsgate (Grade II), 48 Bishopsgate (Grade II), Hasilwood House (Grade II), Park House and Garden House (Grade II), Finsbury House (Grade II), London Wall Buildings (Grade II), 139- 144 Leadenhall Street (Grade II), 147-148 Leadenhall Street (Grade II), 38 St Mary Axe (The Baltic Exchange, Grade II), 20 and 21 Billiter Street (Grade II), 2-16 Creechurch Lane (Grade II), 10 Brushfield Street (Grade II) and 14 Brushfield Street (Grade II), Whitehall Court (Grade II\*), Horse Guards (Grade I), War Office (Grade II\*) and Ministry of Defence (Grade I) would be unharmed.
1023. The proposals would preserve the significance and setting of Finsbury Circus Registered Historic Park and Garden (Grade II) and St James Park Registered

Historic Park and Garden (Grade I) and Bunhill Fields Burial Ground Registered Park and Garden (Grade I).

1024. The proposal would preserve the significance, character and appearance and setting of the conservation areas including Leadenhall Conservation Area, Bank Conservation Area, Creechurch Conservation Area, Bishopsgate Conservation Area, Finsbury Circus Conservation Area, Bunhill Fields and Finsbury Square Conservation Area, Tower of London Conservation Area.

1025. The proposal would preserve the significance of non-designated heritage assets: 113-116 Leadenhall Street; 33-34 Bury Street; 18-20 Creechurch Lane (Cree House), 24 Creechurch Lane (Fibi House), 12-14 Mitre Street (Mitre House), 27-31 Mitre Street; Liverpool Street Arcade; and 30 St Mary Axe.

1026. The Cluster is a place of architectural exuberance and idiosyncrasy, exemplified by the Lloyd's Building. In this vein the proposal, due to its striking architecture and public realm improvements, which are considered to be entirely appropriate for the heart of the Cluster, would be a contextual scheme and make a very positive contribution to the local character and distinctiveness, according to paragraph 203 of the NPPF.

1027. The benefits and harms will be considered as part of the paragraph 208 NPPF balancing exercise and in the final planning balance at the end of this report.

### **Archaeology**

1028. Section 16 of the NPPF and Policy HC21 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 200 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.

1029. The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago, and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan states 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.

1030. Compared to the original 2023 scheme, in the 2023 revised scheme there would be a 2m increase in the depths of the basements across the loading bay and plant rooms from 5.7m above Ordnance Datum (aOD) to 3.7m aod. The increased depth would also result in slight variation in the piling strategy below the lowered part of the basement area as well as the need for additional secant walls along the western boundary of the basements. The application is

accompanied by an archaeological desk-based assessment which is contained within the Environmental Statement (Chapter 14) and Chapter 14 of the Environmental Statement Addendum provides an update to the originally submitted Environmental Statement.

1031. The desk-based assessment has indicated potential for surviving Roman features and also, specifically in the north-east of the site, remains relating to the former medieval churchyard and Close of St Helen's which previously appears to have extended within the site. A good potential for medieval burials is therefore also present. During excavations for the current basement, Roman buildings and pavements, medieval buildings, and alleyways, and post medieval buildings and courtyard areas were found.

1032. The desk-based assessment has indicated that although extensive basements are present across the site, there are two areas in the north-east and in the west that are outside the current basement that would be incorporated into the new basements. These new areas of excavation will have a high impact on archaeological remains. All archaeological remains within the existing basement will have been removed already, given the extensive depths of the basements. AECOM have confirmed that there are no new services of landscaping proposals that will affect land that has not already been affected by the current basements.

1033. For the avoidance of doubt, Historic England Greater London Archaeological Advisory Service were consulted on both the original 2023 scheme and the revised 2023 scheme; and that it was highlighted that latest revisions to the scheme did not affect the previous advice provided. Historic England have advised that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. Although the NPPF envisages evaluation being undertaken prior to demolition, in this case considering the nature of the development, the archaeological interest and/or practical constraints are such that Historic England consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. In addition, a condition requiring a detailed design and method statement for foundations and piling configuration is also attached.

1034. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

## **Public Access and Inclusivity**

### **Accessible and Inclusive Design**

1035. Accessible and inclusive design is covered by NPPF paragraphs 96 and 135, London Plan policy D5, Local Plan policy DM10.8 and emerging City Plan 2040 policy HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming safe and easy to use without disabling barriers, undue effort, separation, or special treatment.
1036. London Plan policy D5 3.5.3 sets out how development should be informed by an inclusive design statement and detail engagement with relevant user groups. An inclusive design statement has been provided. The initially submitted 2023 proposals were subject to review by the City of London Access Group (CoLAG) on 12<sup>th</sup> January 2024 and the revised 2023 proposals were reviewed on 26<sup>th</sup> November 2024.
1037. The Site is well-served by public transport, noting that public transport is not accessible to all people. The scope of the S278 works includes street furniture which would provide on-street resting points within the extent of the S278 works. It should also be noted that there are no loading/unloading restrictions along St Mary Axe and drop off and pick ups can be undertaken when safe to do so.
1038. Some building users cannot access public transport and suitable drop-off points are recommended in best practice guidance BS 8300. No specific drop off points are identified with informal drop-off anticipated along Undershaft and St Mary Axe. This matter will be explored through the S278 agreement and by condition through the Access Management Plan condition.
1039. London Plan policy T6.5 states that all developments should be car-free except for at least one on or off-street disabled persons parking bay. Two accessible parking bays are proposed within the development. As part of the revised 2023 scheme, these spaces would be located adjacent to waste compaction facilities. Further details will be secured in the Access Management Plan to ensure that space is kept clean and comfortable for use as well as the management of these spaces. The Travel Plan secured by the S106 agreement, would also secure details to ensure clear access to these spaces, including swept path analysis as well as passive Electric Vehicle Charging points (also secured by condition), and demarcation of bays.
1040. Standards for inclusive cycling are set out in Chapter 8 of the London Cycling Design Standards. 5% of long and short term spaces should accommodate larger and adapted cycles with associated end of trip facilities. The cycle parking entrance is on the northern elevation of the building on Undershaft. Full details of the cycle parking and facilities layouts would be secured by condition to ensure that all spaces are accessible for relevant users.
1041. The existing stepped public realm is a significant barrier to access for people who require step-free routes into, and around the building. The revised 2023



scheme will create the new Undershaft Square to the west of the proposed building, and a revised St Helen's Square. As with the 2023 scheme, the revised 2023 scheme would remove the barrier created by the stepped public realm in St Helen's Square. Gentle slopes across the site will allow step-free access and are more inclusive to a greater range of people. The revised landscape proposals will offer shelter, connections with nature, more options for shade and a variety of landscape features. The public realm at grade and the Level 11 Podium Garden should include seating options for a range of people including recesses in seating for wheelchair users, or for buggies to be placed alongside the seating and for assistance animals. There should be options for seating at a range of heights. Seating should allow for wheelchair users to transfer, for back rest and arm rests for support when rising, as well as single and group seating, all of these details will be secured by condition as to ensure an accessible public realm and level 11 podium garden for a range of people.

1042. There would be a narrowing of the route to the southwest corner, where there could be congestion around one of the piers. Pedestrian comfort Levels of B+ should be maintained across principal access routes and desire lines, allowing people in wheelchairs, with buggies or on crutches to pass. Details of all surfaces including contrast and tactile paving will be secured by condition.

1043. Details of glare analysis for the dichroic cladding and oculus would be secured by condition to ensure that these elements are not perceived as barriers particularly by people with visual impairments.

1044. Guidance on neurodiversity and the built environment refers to the effect of materials on people with information and/or sensory processing differences, including colour and texture. To limit potential sensory overload, details of the cladding material, colour, and screens and displays, including glare analysis, siting, hours of operation and maximum volumes would be secured by condition, and this should be informed by engagement with relevant user groups and identification of low stimulus routes during hours of operation, to minimise potential barriers to people with sensory and/or information processing differences.

1045. London Plan policy D5 requires entrances to be easily identifiable and to allow independent access. The revised 2023 scheme introduces a new route to access the public uses within the building, which includes a new public lobby area at level 1. The public lobby would be accessed from steps and lifts at the southwestern corner of the proposed building. Access is either by three flights of stairs or two lifts. The stair comprises of 30 steps with two intermediate landings. People who require step-free routes into the building will reach the public lobby via the lifts and a connecting passage overlooking Undershaft Square. The passage runs parallel to the stair and diverts to meet the top landing of the stairs.

People who do not require step free access will have a choice of entry- either by the stairs into the public lobby, or the lifts.

1046. The step-free entrance from St Helen's Square is set next to the principal stair access, providing a single public entry point into the building. Each lift will have maximum capacity of 17 people. The public lifts would be prominent and would be identified by red cladding and lighting, together with vertical signage identifying the public entrance. There would be further red cladding to the canopy soffit. Visualisations indicate further use of red on internal ceilings and in conjunction with glazing, final details of materials would be secured by condition. A seat is proposed set into the alcove adjacent to the lift which may be used for rest, while waiting.

1047. Lift capacity, priority of use and queuing will need careful management, particularly at peak times of arrival/exit from the building. Management protocols will need to have regard for disabled people who have non-visible conditions, differences and impairments. Details of how lift access and queues will be managed will be secured within the Access Management Plan condition.

1048. The office entrances would be located to the east of site on St Mary Axe. Full details of type of door proposed would be secured by condition to ensure that the access arrangement would not separate people. An inclusive entrance strategy would also be secured by condition which would include details of doors, opening mechanisms, surface contrast and any control points.

1049. Vertical access for the principal lift core would be by a mix of double deck and single deck lifts to provide direct level access to each floor. London Plan policy D5 states that as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift to be used to evacuate people who require level access from the building. Lift cars to the publicly accessible areas should be capable of accommodating people using larger motorised vehicles and Class C mobility scooters, the full details of the lift and stair access would be secured by condition. Details of the horizontal movement within the building would also be secured by condition, including details of providing sufficient space for wheelchair users to pass, rest points, colour contrast of 30 LRV and clear wayfinding throughout the building.

### Public Access

1050. As set out above access to the public uses of the building is gained from the shared public lobby at level 1. The public lobby is accessed via a wide staircase or via two public lifts for those who are not able to use the stairs. The staircase and lifts are next to each other to create a single public entry point into the building. These access points that take visitors to the shared public lobby, have been designed to be prominent and legible from the surrounding street and public

realm. As is set out in Design and Heritage section of this report, the use of Yorkstone paving would seamlessly lead from the public realm to the entrance staircase and the lifts would be framed by red architraves, linking with the red frames of the viewing gallery at the top of the building, highlighting and framing the public parts of the building. An occupancy indicator would also be provided in this area.

1051. A carefully considered lifting strategy is proposed that seeks to ensure that there is enough capacity to accommodate demand and to move people efficiently to avoid queuing. The two lifts from grade which would serve level 1 have a capacity of 17 and the average journey time from grade to level 1 would be 25 seconds; the lift that does not stop at level 2 would have an average five-minute handling capacity of 53 people. One of the lifts at grade also serves the restaurant at level 2, with the average journey time being 32 seconds.
1052. Once in the public lobby at level 1, visitors can either make their way to the cultural and food and beverage uses and Level 11 Podium Garden at levels 2, 3 and 11 or to the education space and viewing gallery at levels 72 and 73. The lobby has been designed to accommodate queuing for security (security is addressed in a later section of this report) which removes this from street level. There are 4x 17 person lifts to transport visitors to levels 2, 3 and 11, the average journey time to level 11 would be 42 seconds; these lifts would have estimated average 5-minute handling capacity of 87 people across the four lifts.
1053. Public access to the education space and the viewing gallery would incorporate pre-booking and organised groups of school children and their teachers. Security checks (discussed in a later section of this report) would be required prior to entering the lifts. 2x person lifts which can move a typical class of 30 and two (or more) teachers would transport visitors to the top of the building. The average journey time would be 79 seconds with an estimate average five-minute handling capacity of 58 people.
1054. The proposals offer a unique opportunity for inclusive and affordable learning. At Levels 72 and 73 the spaces would host bespoke and immersive cutting edge learning experiences, delivered from the highest classroom in the country connecting children and young people with London through a two-level education and viewing destination. The central leaning hub would be an inclusive space aimed at a broad audience with learning rooms, breakout spaces for students to engage in the City's history and jumping off point to other nearby heritage and cultural sites. Learning programmes are yet to be finalised but are expected to include London Museum led workshops, research and school classes: curriculum specific learning and field trips with a specialised learning programme; and there would be out of school hours educational learning to include evening skills training and community workshops. The affordability, opening hours and outreach to schools and colleges in underprivileged and deprived areas would be critical to

ensure that this is genuinely deliverable and adds value and to ensure this is locked in, the final details would be controlled via a S106 obligation.

1055. At levels 2, 3 and 11 the cultural spaces could provide an opportunity for educational and creative workshops and community and youth engagement programmes as is set out in the Land Use section of this report. The final operation of these spaces could provide opportunities to co-curate with voluntary, community and social enterprises and again the scope for partnerships and affordability would be secured through a S106 obligation.

1056. The overall scheme would align with the City Belonging Project. This seeks to build a more inclusive and connected Square Mile which strives to support and improve the links between diversity networks to ensure institutions and events are more open to our communities. This would be achieved by the considerable uplift in office space hosting a diverse work force of tenants including SMEs and affordable workspaces. Networking, connections and socialisation would be supported by the range of outdoor terrace spaces private and public and cultural activities hosted within the building and wider public realm.

#### Public toilets and changing places

1057. Policy DM22.2 of the Local Plan and Policy HL6 of the emerging City Plan 2040 and policy S6 of the London Plan require the provision of an inclusive range of publicly accessible toilets and facilities within major developments that have high level of public access and pedestrian footfall. A range of single sex, 'universal' toilet facilities, Changing Places toilet, wheelchair accessible and ambulant accessible toilets and separate baby changing facilities would be provided across the development.

1058. Changing Place toilets are facilities for people with multiple or complex impairments who may require the assistance of up to two assistants. They are a requirement of Building Regulations for places of assembly, recreation or entertainment with more than 350 people. These are provided in addition to wheelchair accessible toilets, single sex and 'universal' facilities, and baby change facilities. There are few Changing Places facilities currently available in the City. The revised 2023 scheme proposes that a Changing Places toilet to be provided at ground floor level, alongside the publicly accessible wheelchair accessible toilet, accessed from Undershaft Square. These facilities would be available for use during the hours of building operation. These facilities would be free to use and available for use for the lifetime of the building and this would be secured within the S106 agreement. Further to this, full details of fit-out of the Changing Places facilities would be secured as part of the Inclusive Toilet Strategy condition. An accessible toilet is proposed to the rear of the office reception and before the controlled security line. This is consistent with guidance in the Building Regulations.

1059. All details of all Changing Places, wheelchair accessible, ambulant accessible and larger toilets, single sex toilets, baby changing facilities and assistance animal spend areas would be secured via the Inclusive Toilet Strategy Condition. The strategy will include but not limited to drawings at a scale of no less than 1:20 of Changing Places toilet facilities with fit-out, wheelchair accessible and ambulant toilet facilities and appropriate wayfinding and signage should be included. The management of the Changing Places and wheelchair accessible facilities would be secured within the Access Management Plan condition, in addition to details of spend areas for assistance animals.

## **Highways and Transportation**

### **Surrounding Highway Network and Site Accessibility**

1060. There is an established network of footways in the area immediately surrounding the site, with footways provided along each of the adjacent roads.

1061. To the south, the site is bounded by Leadenhall Street, which operates two-way traffic traversing east to west and connects to Cornhill and Aldgate High Street respectively. Pedestrian footways are provided on both sides of the carriageway.

1062. The east of the site is bound by St Mary Axe, a one-way street for northbound traffic only, which connects to Leadenhall Street in the south and Bevis Marks in the north. There are footways present on both sides of the carriageway along this street. St May Axe also features two pedestrian-only routes to Bury Street in the east, which travel through the public realm surrounding 30 St May Axe, (The Gherkin).

1063. The north and part of the west of the site is bound by Undershaft, (which lies within the site boundary). Undershaft is a cul-de-sac that provides vehicle access to the loading bay for the developments at 22 Bishopsgate, the 8 Bishopsgate servicing area, and the Leadenhall Building servicing lifts at 122 Leadenhall Street.

1064. Undershaft features footways on both sides of the carriageway. A pedestrian route provides access from Undershaft to Great St Helens in the west, travelling via Crosby Square.

1065. There are numerous signalised pedestrian crossings located in proximity to the site, which provide safe crossing locations. This includes a signalised crossing on the A10 Bisphosphate, (to the northwest of the site) and approximately 30m north of the Great St Helen's priority junction. Further signalised pedestrian crossings are located at the Leadenhall Street/St Mary Axe junction, (to the southeast of the site), and at the Leadenhall Street /

Gracechurch Street junction (to the southwest of the site).

1066. The surrounding road network enables pedestrians to travel directly to and from the site and permeate through the City to public transport nodes and other destinations. The site is within proximity of Bank, Aldgate, Liverpool Street, Monument, Aldgate East, and Fenchurch Street stations.

1067. These stations provide access to various services on the Underground, DLR and National Rail networks.

1068. The site is therefore considered well located (PTAL of 6B) to enable and encourage sustainable trip making in accordance with policy T1 of the London Plan which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

### Trip Generation

1069. TfL have a set of strategic transport models which have been developed to assess future changes in London, which will affect any form of transport mode such as: car, underground, overground trains and buses.

1070. All developments, which propose to generate a significant number of new units and jobs in the future, are required to use TfL's strategic modelling tools to assess their impact.

1071. A strategic modelling (MoTiON) was prepared by the applicant's consultant to determine the impact of this development on the transport network. The methodology for trip distribution coming for 1 Undershaft and output conclusions of the model have been accepted by TFL. With its prominent location within St Mary Axe and Leadenhall. The pedestrian assessment methodology and key routes were accepted as part of the TFL modelling exercise.

1072. It is acknowledged that Bishopsgate is also a main desire line (and highlighted by TFL); however, due to the upcoming developments in the area, we recognize that St Mary Axe is forecasted to be one of the main routes.

1073. To date, it has been established that the change in vehicle demand generated by the development is not significant. The modelling process (Modular-MoTiON) has focused on the strategic impact on public transport and appropriate contributions will be agreed with TFL.

1074. To predict the trip generation and the impact of the new development on

the transport network. Person trips have been calculated using a first principles methodology based on employee densities and Net Internal Area (NIA). Below is the extract from the transport assessment provided by the applicant.

**Table 5-14 Total Proposed Multi Modal Trip Generation**

Trips	AM (0800-0900)			PM (1700-1800)		
	Arr.	Dep.	Total	Arr.	Dep.	Total
Crossrail	629	27	656	54	604	658
Underground, metro, light rail, or tram	1,418	61	1,478	123	1,360	1,483
Train	2,658	114	2,772	230	2,551	2,780
Bus, minibus, or coach	367	16	382	32	352	384
Taxi	31	1	32	3	29	32
Motorcycle, scooter or moped	0	0	0	0	0	0
Driving a car or van	0	0	0	0	0	0
Passenger in a car or van	0	0	0	0	0	0
Bicycle	343	15	358	30	329	359
On foot	275	12	287	24	264	288
<b>Total*</b>	<b>5,721</b>	<b>245</b>	<b>5,966</b>	<b>495</b>	<b>5,489</b>	<b>5,984</b>

### Trip Generation - Servicing and Delivering

1075. The service yard for the proposed development is located on basement level B2. Access to this area is done through the two vehicle lifts, located in the north-eastern corner of this site. The lifts are set back from the public highway to ensure that vehicles arriving have a place to wait off the highway to prevent congestion and minimise conflicts with cyclists/pedestrians and other vehicles.

1076. The swept path analysis were included and show that vehicles used for servicing and deliveries are able to manoeuvre IN and OUT in the forward gear.

1077. The basement level 2, includes six servicing/delivering bays, four of which can accommodate the 10m rigid HGV's, and the other two are appropriate for 8m LGV's.

1078. A 'Dockmaster' will be employed to manage the servicing area. Using the vehicle management system, they will ensure that lifts operate efficiently, with no queuing onto the highway, as well as ensuring vehicles use the correct loading bays. Following arrival to the servicing area, the 'Dockmaster' will

review the booking/delivery note, with the vehicle then allocated to a loading bay where goods will be unloaded.

1079. Vehicles accessing the basement servicing yard will be controlled with security bollards, with all deliveries pre-booked via a delivery booking system.

1080. The consolidation strategy which was prepared for the 2019 consented scheme calculated a reduction in the number of deliveries/servicing trips by 50%. Therefore, a maximum of 193 daily servicing movements were forecast for the consented scheme.

1081. The consented 2019 scheme proposed that no deliveries would be undertaken during the peak network times, as follows:

- AM peak period (07:00-09:00);
- Lunchtime peak period (12:00-14:00); and
- PM peak period (16:00-18:00).

1082. For the proposed scheme, the same principles were applied. The applicant appointed a logistic consultant to review the trip requirements for servicing, deliveries, waste, and the lift capacity required to facilitate this development.

1083. The applicant's delivering/servicing trip rate was derived based on the developments across London, with trip rate ranging from 0.8 to 1.2 deliveries per 1000m<sup>2</sup> per day. If the higher rate is used this proposal requires 120 deliveries per day to facilitate the office use. With 60% consolidation, number of deliveries/servicing trips drops to 48 trips per day.

1084. When considering that other uses in this mixed use development have requirements for delivery/servicing, additional trips will need to be included. The figures in the TA suggest that there are some deliveries/servicing trips that cannot be consolidated, such as food & beverage, laundry, mail and legal documents. This requires an additional 120 trips associated with deliveries per day. Additionally, to allow for Facilities Management (FM) and waste collection this number increases by 10. To account for retail uses, an additional 30 deliveries/servicing per day are required.

1085. Therefore, based on the paragraph above, the proposed daily trips to facilitate the delivery, servicing, refuse and recycling for this mixed-use development are: 48 (office) + 120 unconsolidated + 10 (waste and FM) + 30 (retail)= 208 (total)

1086. Although the modal split of such trips was not shown in the TA, to comply with CoL adopted and emerging policies, a high percentage of the overall



proposed trips will have to use sustainable modes of transport.

1087. The City however, applies a methodology based on the assumption that 0.22 deliveries are required per 100sqm for Class E (office use), whereas for retail, the rate is calculated at 1.35 per 100sqm and it is used to compare the predicted figures given in the TA, to correlate with other developments recently approved in the City.

1088. When the City methodology mentioned above is applied, a proposal with 158,508 sqm (GEA) of office space is estimated to generate 349 trips per day, whereas for 1,473 sqm (GEA) retail/commercial use, 20 trips are associated with deliveries/servicing in a day, thus making a total 369 of trips per day.

1089. If 60 % of consolidation is applied to the 369 daily trips generated by the office use of this proposed development, it requires 140 trips per day for delivery and servicing purposes. For each delivery, two trips are required (IN/OUT movements); therefore the expected number of deliveries for office use is 70 within a 24-hour period.

1090. When the proposed retail use is factored in, when consolidation is applied, the anticipated number of daily trips is 150 for the two main land uses of this development. Therefore, using this methodology, it can be concluded that a total of 75 deliveries per day are required to facilitate the largest land uses within this development.

1091. When considering that other remaining parts of this development need to be serviced and do produce waste, there are no figures on the TRICS database to predict the trips required, for these parts of the development.

1092. The table below shows: modal split, 2 way trips required (office and retail), with and without consolidation, and daily deliveries required for office and retail

<b>Mode</b>	<b>% Mod al split (offic e)</b>	<b>No cons olidat ion</b>	<b>With 50% cons olidat ion</b>	<b>Wit h 60 % co ns oli dat ion</b>	<b>% Mod al split (ret ail)</b>	<b>No cons olidat ion</b>	<b>With 60% cons olida tion</b>	<b>Total develop ment*an d adjusted for 2 way Trips</b>	<b>Deliverie s for office and retail (daily)</b>
Motorcycl e/scooter	4	14	7	6	0	0	0	6	3

Car	34	119	<b>60</b>	<b>48</b>	25	5	<b>2</b>	50	25
LGV	53	185	<b>92</b>	<b>74</b>	25	5	<b>2</b>	76	38
Rigid 3 or 4 axle (HGV)	9	31	<b>15</b>	<b>12</b>	50	10	<b>6</b>	18	9
<b>Total</b>	100	349	<b>174</b>	<b>140</b>	100	20	<b>10</b>	<b>150</b>	<b>75</b>

\* adjusted to even numbers to represent the 2 way trips that are required to make 1 delivery

1093. The consented 2019 scheme was approved with a maximum of 228 daily movements consolidated and restricted the deliveries/servicing trips during the peak hours: AM peak period, (07:00-09:00), Lunchtime peak period, (12:00-14:00), and PM peak period, (16:00-18:00).

1094. When comparing the trip generation of the consented scheme 2019 against this part of the proposal, there is no increase in trips required for facilitating deliveries, servicing and waste collections.

1095. Having considered all of the above, further details on the Delivery/Service should be submitted as part of the Delivery and Service Management Plan and secured as part of the Section 106 Agreement. As a minimum the total number of vehicles will be capped to ensure that the total number of trips does not exceed what has been previously consented in 2019. The submission should include agreeing on modal split, setting targets to reduce the vehicular trips required to facilitate this development, keeping records of all trips, as well as restricting timings allowed for vehicle trips.

1096. The proposed development seeks to provide two vehicle lifts, accessed via St Mary Axe, with capacity of 10 vehicles per hour per lift. It is estimated that 11 vehicles per hour are required to use the lifts therefore with two lifts included in this proposal there is sufficient capacity.

1097. Taking into consideration that deliveries will be operated via a booking system and consolidated (aiming for optimum consolidation, as experienced in previous projects), in the event of malfunction, maintenance can be quickly organized whilst the second lift can operate as "in/out", whilst the other is being repaired.

1098. In addition to the above, Undershaft will no longer be used as a service route by the proposed development therefore alleviating the existing number of service trips from this road. The new arrangements for access are

welcomed.

1099. The formation of the new access and associated works will be implemented as part of the Section 278 Agreement. The detail of the proposed arrangements and any road safety concerns (highlighted within the Road Safety Audit Stage 1) will be addressed as the design progresses and form part of the design process.

1100. For the proposal to be compliant with the strategic Policy S9: Transport and Servicing, including Policy VT2 of the emerging City Plan 2040, the timing of deliveries/servicing must be outside peak hours, the development is to promote such activities on foot or bicycle and recommend for the Delivery and Servicing Management Plan to be secured via s106, submitted to and approved by the LPA.

#### Pedestrian Comfort Levels (Pedestrian Footway Assessment)

1101. The Transport for London (TfL) Guidance states that Pedestrian Comfort Levels (PCL) classify the level of comfort, based on the level of crowding a pedestrian experiences on the street.

1102. Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute. It is noted that results simply reflect the level of crowding on pedestrian links and do not account for more holistic factors (such as those included within the Healthy Streets Design Check) which influence the on-street experience (i.e. crossing environment, safety, desire lines etc.)

1103. Pedestrian Comfort Levels are graded A+ (Comfortable) to E (Uncomfortable) and a target of B+ is commonplace across the City. TfL's guidance suggests PCL's levels for different area types. For office and retail areas, scores of up to C+ are considered acceptable.

1104. A PCL assessment has been undertaken on key footways and crossings within the local area, based on thresholds set by TfL's 'Pedestrian Comfort Guidance for London' document.

1105. A pedestrian movement forecast and Pedestrian Comfort Level (PCL) assessment was carried out for two scenarios: Scenario 1 Future baseline 2030 and Scenario 2 Future baseline 2030 + Proposed Development, including the cumulative impact of the future baseline as well as the changes in the spatial layout as result of the proposal and the proposed trips generated.

1106. The forecast and PCL assessment were carried out for the three peaks: AM, Lunchtime and PM peak. The results were also compared to the existing conditions around the site.
1107. In the proposed scenario, all tested locations within the site boundary and adjacent highways are within PCL B+ which is the target set by the City.
1108. Similarly to the existing and future baseline conditions, locations 1, 5, 23, 26, 28, 29 and 31 all on St Mary Axe, are below the target of PCL B+ during all peak periods, and therefore having a negative impact on pedestrian comfort levels. In addition to these, locations 22, 25 and 30 are below the target of PCL B+ during AM and PM peak and location 27 only during the AM peak.
1109. Following the deferral at July's Planning Sub-Committee, the applicant made minor changes to the proposal. Addressing the matter to increase the footprint of the southern public space, led to changes of the proposal, and as a consequence re-evaluation of the pedestrian movements. The supporting document titled 'Pedestrian movement- second addendum' was submitted, focusing on the design impact evaluation and PCL assessments, due to the relocation of the public entrance and other necessary changes as a result.
1110. The findings are detailed in the addendum, and summarised as follows: relocation of the public entrance to southwest does not have an impact on the pedestrian movement forecast. The only affected section is location 10, which is the location where the new stairs are positioned with the Leadenhall building, where the effective width is reduced from 9.62m to 6.93m. Nevertheless, PCL levels at this location are still scored A during the AM, PM and lunchtime peaks. Therefore, proposed changes are considered acceptable in this matter.
1111. To mitigate the impact of the development on pedestrian comfort levels and reduce road safety risks, the carriageway in St Mary Axe is proposed to be re-built and re-designed to prioritise pedestrians. Pedestrian routes will be clearly demarcated and designated to mitigate road safety risks. Other features and enhancements might be considered at the time of the feasibility study and also part of the Section 278 works, to further improve the area and eventually deliver the City Cluster Vision and these works are therefore welcome. The highways proposals are to be delivered as part of the Section 278 works for highways. The design will be subject to road safety audits and feasibility. The details of the scope of the works are set out within the S278 section of this report.
1112. The results of the pedestrian comfort study demonstrate that the net uplift in walking trips expected can be, from a pedestrian comfort perspective,

satisfactorily accommodated via the proposed pedestrian network and highways interventions.

1113. The pedestrian experience would be improved because of the proposed changes to the highways (fully funded by the applicant) and to be implemented as part of the Section 278 works. The proposals are in accordance with Policy AT1: 'Pedestrian Movement, Permeability and Wayfinding' of the emerging City Plan 2040 and Policy 16.2 of the Local Plan 2015.

1114. The submitted document 'Pedestrian movement- second addendum does not cover the proposed Section 278 improvement works. This is acceptable, because changes on the public highways are subject to several stages before the scheme is approved and implemented by the CoL Highway Authority.

### Cycle Parking

1115. Policy T5 Cycling states that development proposals should facilitate and remove barriers to cycling, creating a healthy environment where people choose to cycle. This can be achieved by supporting the delivery of a London-wide network of cycle routes, including new routes and improved infrastructure

1116. This proposal includes highway improvement works to be delivered as part of the Section 278 works. These improvements will enable substantial changes to the public highway, enhancing the environment for cyclists. This will be achieved by securing the provision of appropriate levels of cycle parking that meet minimum standards, are fit for purpose, secure, and well-located.

1117. Following the deferral, changes to the cycle parking provision were made to comply with the London Plan standards. The table below shows the long and short cycle parking numbers.

<b>London Plan Requirement</b>		<b>Proposed</b>	
Long Stay	Short Stay	Long Stay	Short Stay
2,264	178	2,264	178

1118. To ensure full compliance with current policies, details of the cycling facilities will be secured through a planning condition.

1119. Long-stay cycle parking will be provided within the basement levels B1 and B2, with cyclists being able to access the basement from ground level via lifts/ramp.
1120. Short-stay cycle parking is provided within basement level B1, with 20 spaces located at ground level within the public realm. Short-stay cycle parking for all uses would be provided via a combination of Sheffield stands within the public realm, and cycle store within the building. The proposed visitor cycle parking is in line with the London Plan standards.
1121. The new development will offer changing and showering facilities (located at B1) for use by all staff and building occupants, this will be of particular use to those travelling by cycle and other active travel modes. The proposed development will provide a minimum of 1 shower per 12 long-stay cycle parking spaces, equating to 192 showers of which 5 are accessible to all. The London plan recommends shower facilities (at least one per ten long-stay spaces). However, due to the size of the proposed development it is unlikely that all of showers will be in use at all times therefore a degree of flexibility is applied, and the proposed provision is considered acceptable in principle. Nevertheless, the possibility of increasing the numbers will be explored and discussed further, secured by condition.
1122. The proposed development will provide 504 locker spaces (3-tier lockers) in the shower rooms. The changing facilities will ensure that cyclists have access to a private space where they can change before and after working and separate from their workspace facilities. The London Plan recommendation for lockers is at least two per three long-stay spaces. This proposal falls short in terms of recommendation, however due to the magnitude of the proposed development and various transport modes available in the vicinity, it is not expected that all lockers will be in use and occupied at the same time. The provision is considered acceptable in principle. Nevertheless, the possibility of increasing the numbers will be explored and discussed further, secured by condition.
1123. Cycle repair stations will be provided within parking areas to allow cyclists to service their bikes. This station will provide essential tools to allow for repairs to be undertaken much more efficiently and with ease for a wider range of users.
1124. The areas of cycle parking and analysis of lifts will be subject to further details regarding management as part of a condition.
1125. The proposed development will also look to provide a cycle workshop allowing access to maintenance or repair services.

1126. In addition, provision of the electric cycle charging points are included to allow owners to quickly and safely charge their bikes.

### Refuse Management/Waste Strategy

1127. Estimated waste arisings have been quantified based on daily waste generation metrics provided by the City. The waste strategy has been produced in accordance with the National and Local Waste Policies.

1128. For the proposed development each of the commercial tenants will be required to provide suitable waste storage areas within their tenanted area which allows the waste that they generate to be segregated at source into refuse and mixed recyclables.

1129. In addition to the containers for refuse and recyclables, producers of large quantities of glass and food waste will be required to provide additional separate containers for these waste streams.

1130. At regular intervals the tenants' staff or their FM contractor will transport their segregated wastes from their tenanted areas to the main waste storage area via back of house service corridors and using the goods lifts provided within the service core. The goods lift will be provided in the same location on every occupied level.. The details of vehicle collection and specification are to be submitted for further consideration via condition.

1131. On the second addendum, minor revisions to the basement structure were made to allow for deeper root planting for improved public realm which also enabled the refuse/recycling collection vehicles to enter the building and make collections at the basement. The refuse/recycling pick up collections are to be done during the scheduled slots. Nevertheless, further details are required and secured by a condition.

### Car Parking

#### On-site

1132. The proposals would be 'car free' except for three Blue Badge bays. This approach to car parking is supported based on encouraging sustainable travel choices and improving access for those with mobility needs and would be in accordance with Policy VT3: 'Vehicle Parking' of the emerging City Plan 2040.

1133. Two blue badge parking spaces will be provided within basement B2. Occupiers will inform the management company should they require the use

of a blue badge space. The management company will monitor the demand for blue badge car parking spaces through a record of those tenants that are Blue Badge holders. Blue Badge spaces will be identifiable through the introduction of appropriate signage. Any parking outside of designated bays, or without a valid permit / blue badge, will be enforced robustly by an on-site management team.

### Off-site

1134. Car-free development can in some cases lead to parking displacement on the surrounding highway network. However, the whole of the City of London is covered by a controlled parking zone, (CPZ) active Monday to Friday from 0700-1900 and Saturdays from 0700-1100. During these times motorists must pay to park in pay and display bays and must not park on single or double yellow lines. When different times apply, signage displays the controlled parking hours for specific locations.

1135. The existing car-parking area located within the Undershaft are proposed to be removed and replaced by disabled parking and cycle parking. Parking displacement is not expected due to the existing parking restrictions in the vicinity. Office workers and visitors are expected to travel via sustainable modes of transport.

1136. There are existing parking restrictions on Undershaft and St Mary Axe and it is acknowledged by the City, that a robust enforcement will be required in the area to prevent illegal parking and obstruction of the highway.

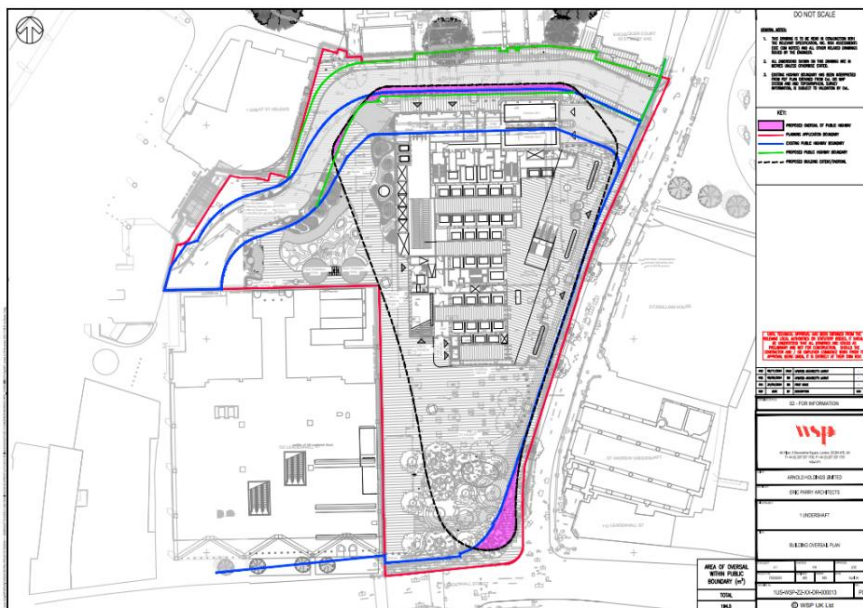
### Oversailing

1137. Structures that oversail the public highway permanently, must be licensed by the local authority, typically in accordance with Section 177 of the Highways Act 1980. Additional temporary licensing requirements in relation to cranes, scaffolding and other requirements during the construction stage, will be addressed by the appointed contractor.

1138. The proposed development would oversail the street-level public realm in a number of locations. The proposed area of public highways oversail is 194.5 m<sup>2</sup>

1139. The drawing below, with reference:1US-WSP-ZZ-XX-DR-000013 rev03 is showing the oversail,





1140. Should planning permission be granted an Approval In Principle (AIP) would be required. The AIP is a construction compliance certificate for all highway structures, such as bridges. This will be required to be set as a condition and on this basis the proposed oversailing is considered acceptable in principle.

### Highway Boundary/Stopping Up and Adoption

1141. As the highway authority the City of London has the power to stop up areas designated as highway land by making orders known as a 'stopping up' order. The term 'stopping up' means that once such an order is made, the highway land ceases to be a highway, road, or footpath i.e. the highway rights are extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway if it is satisfied that it is necessary to do so in order to enable development to be carried out. That process would be carried out under separate procedures to considerations of the applications currently before you.

1142. Areas of privately owned land can alternatively be 'offered up' for adoption as public highway, for instance for the creation of a new 'estate road' to be adopted and maintained by the local authority.

1143. As a result of the proposals, a section of the existing Undershaft will need to be stopped up, reconstructed and eventually adopted with areas of permissive path to be dedicated as public highway. The area to be stopped up is 633 m<sup>2</sup>, whereas the area to be adopted as the public highway is 787

m<sup>2</sup>.

1144. The new road is expected to be designed and reconstructed per the CoL highway standards and adopted by the highway authority. The area shown in green, highlights the proposed section of the Undershaft to be adopted as the public highway.

1145. The draft stopping up / public highway offering plan, was produced by the applicant and is shown below, which illustrates the proposed changes. The plan is preliminary and will be subject to further refinement in consultation with the City's Highways Authority, following any planning approval. The process to formalise stopping up orders can only be made at the appropriate point. In principle, the plan with reference 1US-WSP-ZZ-XX-DR-000012-P05 is considered acceptable.



### Section S278/38 - Highways Works

1146. The proposed development will attract a substantial number of pedestrians within the area. It is acknowledged that meaningful changes are ongoing in the area due to the construction of tall buildings and therefore, an increase in pedestrian flows is expected. This will require mitigation works to assure that pedestrian comfort levels and pedestrian flows are not compromised further.

1147. The highways works necessary to mitigate the impact of the development

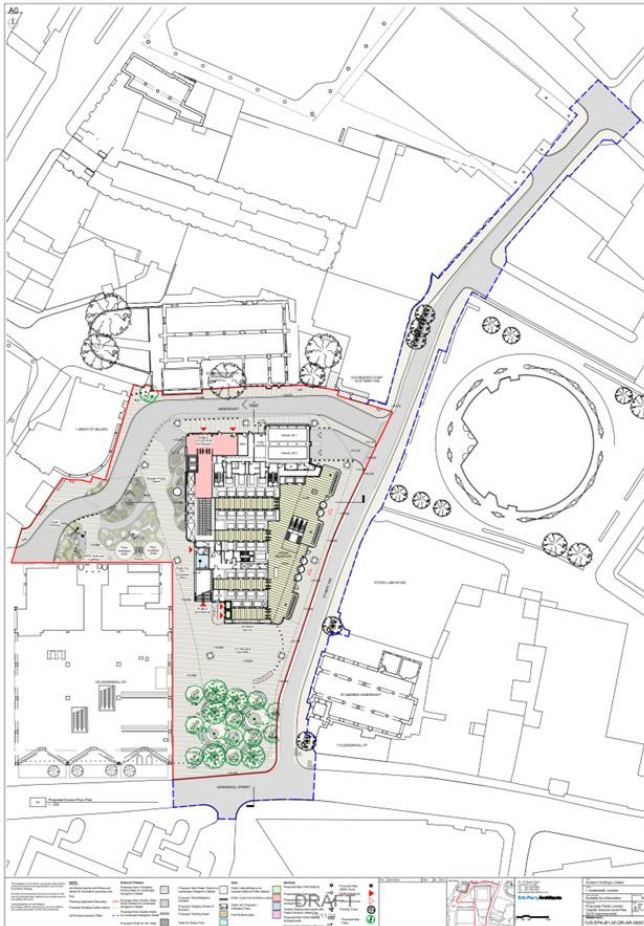
on the transport network, will be carried out as part of a Section 278 Agreement of the Highways Act 1980 in addition to a contribution to TFL towards the improvement works within the A10 corridor scheme

1148. The works will assist in mitigating the additional footfall within the area and to deliver the Cluster Vision for the City along with the aims of the current Transport Strategy to increase pedestrian priority streets and, to provide public spaces, delivering high quality public realm and public highway.

1149. As part of the Section 278 scope of works, a pedestrian priority scheme will be considered to provide significant public realm improvements. In addition to the highways works, access restrictions in St Mary Axe will be explored and if necessary, traffic orders will be reviewed and or introduced. The current location of the motorcycle parking will have to be reviewed however, as part of the construction works, the bays will have to be suspended. During this period, potential alternative locations will be explored through the construction logistics plan, which would be secured by condition.

1150. The proposed works are (and not limited to) to be carried out in St Mary Axe (from Leadenhall to Camomile Street/Bevis Marks), Undershaft and part of Leadenhall. The highways works will deliver a pedestrian priority scheme by raising the carriageway in St Mary Axe (and not limited to), improved footways, drainage, lighting, parking arrangements/traffic orders and pedestrian routes, throughout the adjacent highways and, in high quality material.

1151. The road alignment of the new Undershaft and accesses will be addressed within the detailed design of the S278 works to ensure there are no overruns onto the footway areas. There are currently loading/unloading restrictions within the Undershaft, and these will be maintained as part of the highways scheme (subject to public consultation). Road safety audits will be undertaken as part of the detailed design to ensure the safety of the proposals.



1152. The overview of the s278 scope of works is shown on the drawing, and the delivery is subject to feasibility study and detailed design.

Consideration has been given to whether the large screen display would pose a risk of glare and distraction to drivers, as highlighted by TFL. The proposed screen is located far from the road where it is most visible, specifically on Leadenhall Street. The luminance of the screen is likely to be obstructed by the proposed greenery and will comply with guidelines limiting the luminance of illuminated advertisements. Notwithstanding, the brightness of the illuminated screen will be controlled to avoid causing glare or distraction to drivers and pedestrians. Due to the pedestrian priority scheme proposed for St Mary Axe and the reduction in traffic in the vicinity, the likelihood of accidents caused by glare-induced distraction is minimal.

#### Construction Logistics Plan

1153. The proposal would involve a significant amount of demolition and construction works. This will generate a large number of construction vehicle movements during the overall construction period. The proposed works could therefore have a significant impact on the operation of the public highway in the local area if not managed effectively. The primary concern is public safety, but it also needs to be ensured that construction traffic does not unreasonably create (or add to existing) traffic congestion, or impact on the road safety or

amenity of other highway users.

1154. As part of the enabling works to for construction, the motorcycle parking bay will be relocated. This relocation will be discussed at this stage, and potential locations will be identified.
1155. The CLP was submitted and considered acceptable as an outline document. Nevertheless, a detailed CLP to be secured through a Condition. The document to comply with measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines. The detailed CLP to show how construction vehicles will be managed during the demolition and construction phase, and in line with the principles of three Rs, that is, Reduce, Re-time and Re-mode.
1156. This provides information to describe the proposed works and how, at this preliminary stage, they could be undertaken. It also provides information to describe how the impacts associated with the construction period would be mitigated and to highlight concerns of local stakeholders at an early stage to ensure that these are accounted for within the detailed Construction Logistics Plan; this requirement should be secured by condition and would be prepared once a Principal Contractor has been appointed. This document will need to be in line with Transport for London's Construction Logistics Plan Guidance and said document would be subject to City of London approval before demolition and construction are able to commence.
1157. The emerging City Plan 2040, Transport Policy VT1, The impacts of development on transport, section 5, states that Construction Logistics Plans (CLP) are required for all major developments, or refurbishments and for any developments that would have a significant impact on the transport network during construction.
1158. The proposal is also likely to lead to a variety of amenity issues for local people that would need to be carefully managed (e.g. noise, vibration, air quality). An outline Construction Logistic Plan (CLP) has been submitted in support of the planning application.
1159. This provides information to describe the proposed works and how, at this preliminary stage, they could be undertaken. It also provides information to describe how the impacts associated with the construction period would be mitigated and to highlight concerns of local stakeholders at an early stage to ensure that these are accounted for within the detailed Construction Logistics Plan; this requirement should be secured by condition and would be prepared once a Principal Contractor has been appointed. This document will need to be in line with Transport for London's Construction Logistics Plan Guidance and said document would be subject to City of London approval before

demolition and construction are able to commence.

1160. If planning permission is granted, a CLP should be secured separately via condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the City of London Local Plan 2015. This would provide a mechanism to manage / mitigate the impacts which the proposed development would have on the local area. The detailed CLP would need to be approved by the City of London prior to works commencing on site should planning permission be granted.

### Transportation Conclusion

1161. The proposals are considered acceptable in transport terms subject to the conditions and s106/s278, as set out below

1162. Should planning permission be granted the following conditions, along with the proposed S278/38 works, would need to be secured:

- A planning condition requiring the provision of 2,264 long stay cycle parking spaces, 178 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.
- A planning condition to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The condition shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be followed.
- A planning condition to secure a detailed Deconstruction and Construction Logistics Plan (DCLP). The condition shall state that the detailed DCLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the DCLP has been approved by the planning authority.
- A planning condition to secure a Workplace Travel Plan (TP) for the development. The condition shall state that the TP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The condition shall require the applicant to undertake a TRICs after survey and to provide TfL and CoL with a copy of the results as part of the travel plan review and monitoring process. Technical Approval of all necessary structural elements and associated matters linked to proposed land designation amendments.

1163. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing

and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction. It accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2. It also accords with the emerging City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

### **Environmental Impacts of the Proposals on Surrounding Area**

1164. Local Plan policy DM10.1 requires the design of development, and materials used to ensure that unacceptable wind impacts at street level and in the public realm are avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Emerging City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

### **Wind Microclimate**

1165. Following the deferral on the 2<sup>nd</sup> July 2024, the wind tunnel testing has been redone to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been updated in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

1166. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being five Comfort Categories defining conditions suitable for frequent sitting, occasional sitting, standing, walking and uncomfortable.

1167. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.

1168. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use a result of development. If wind conditions become windier but remain in a category suitable for the intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.



1169. Assessments have been carried out for both the windiest and the summer season.

1170. The wind tunnel testing and CFD results broadly give the same assessment results. However, variance can occur as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

1171. The wind microclimate across the site was tested for the following configurations:

- Scenario 1: Baseline (all of the existing site and existing building within an approximate 500m radius of the site, in addition to 17/00447/FULEIA 6-8 Bishopsgate and 150 Leadenhall Street; 18/00740/FULEIA Leadenhall Court, 1 Leadenhall Street; 13/01004/FULEIA Site bounded by 19-21 & 22 Billiter Street, 49 Leadenhall Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings; 21/00726/FULEIA 1-14 Liverpool Street and 11-12 Blomfield Street; 18/01065/FULEIA 1 & 2 Broadgate; 15/01067/FULL 15-16 Minories & 62 Aldgate High Street; 19/01051/FULMAJ 41 Tower Hill; 14/00178/FULEIA Bank Station Upgrade, site bounded by King William Street, Canon Street, Abchurch Lane & Nicholas Lane; 19/01307/FULEIA Site bounded by Fenchurch Street, Mark Lane, Dunster Cort and Mincing Lane; 22/00882/FULMAJ Friary Court, 65 Crutched Friars; and 23/01254/FULMAJ 5-10 Great Tower Street).
- Scenario 2: Future baseline (all of the existing site and existing buildings within an approximate 500m radius of the site in addition to those listed in Scenario 1 and 22/00790/FULEIA 100, 106 & 107 Leadenhall Street; 17/00330/FULMAJ Bevis Marks House; 21/00922/FULEIA 115-123 Houndsditch; 20/00816/FULEIA 70 Gracechurch Street; 20/00671/FULEIA 55 Gracechurch Street; 23/00469/FULEIA 55 Old Broad Street; 23/0365/FULMAJ 30-33 Minories and Writers House; 22/01155/FULEIA 85 Gracechurch Street; 23/00453/FULEIA Liverpool Street Station; 22/00981/FULEIA 55 Bishopsgate; 16/00406/FULMAJ 15 Minories, 57-60 & 62 Aldgate Highstreet and 1 Little Somerset Street; 21/00826/FULMAJ Boundary House, 7-17 Jewry Street; 19/01345/FULMAJ 1-5 London Wall Buildings; and 24/00743/FULEIA Allianz House, 60 Gracechurch Street).
- Scenario 3: Proposed development and existing surrounds (the existing surrounds are those listed in Scenario 1)
- Scenario 4: Proposed development and cumulative surrounds (the cumulative surrounds are those listed in Scenario 2)

1172. Wind mitigation proposals were developed for Scenarios 3 and 4.

1173. It is highlighted that the Scenarios set out above have been updated since the Planning Committee on the 2<sup>nd</sup> July 2024. This is due schemes moving



from Cumulative to the Baseline scenarios, new applications being added to the Cumulative list and planning permissions expiring resulting in schemes no longer needing to be included as set out in the submitted ES Addendum.

1174. A planning application at 99 Bishopsgate (24/00836/FULEIA) was validated on 09 September 2024, which was after the wind tunnel testing had been completed and therefore is not included in the wind tunnel testing. The Environmental Statement sets out that the cumulative effects associated with 99 Bishopsgate have been assessed qualitatively based upon the professional opinion and experience, as well as information obtained from the wind microclimate environmental statement chapter and technical appendices submitted on the planning application at 99 Bishopsgate. The submitted Environmental Statement for 1 Undershaft sets out that from a comparison of the results outlined in the documents from 99 Bishopsgate, a deterioration of wind conditions is observed when the proposed 99 Bishopsgate scheme is introduced. However, these are localised in the area within/around 99 Bishopsgate. The proposed 1 Undershaft scheme – which is featured as cumulative scheme for the wind microclimate assessment of 99 Bishopsgate – has very little impact on the wind conditions around 99 Bishopsgate. Similarly, the introduction of 99 Bishopsgate is not expected to have significant impact on the wind conditions within the site of the Proposed Development.

1175. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features.

1176. The City of London Lawson Criteria defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.

1177. There are four criteria for determining the sensitivity of a receptor:

- High: seating areas, entrances and terraces
- Moderate: thoroughfares
- Low: high pedestrian traffic thoroughfares
- Negligible: roads and areas of no pedestrian access

1178. There are also four criteria for determining the magnitude of change/impact to a receptor:

- Large: Safety exceedance

- Medium: two categories above the criteria
- Small: one category above the criteria
- Negligible: within suitable criteria

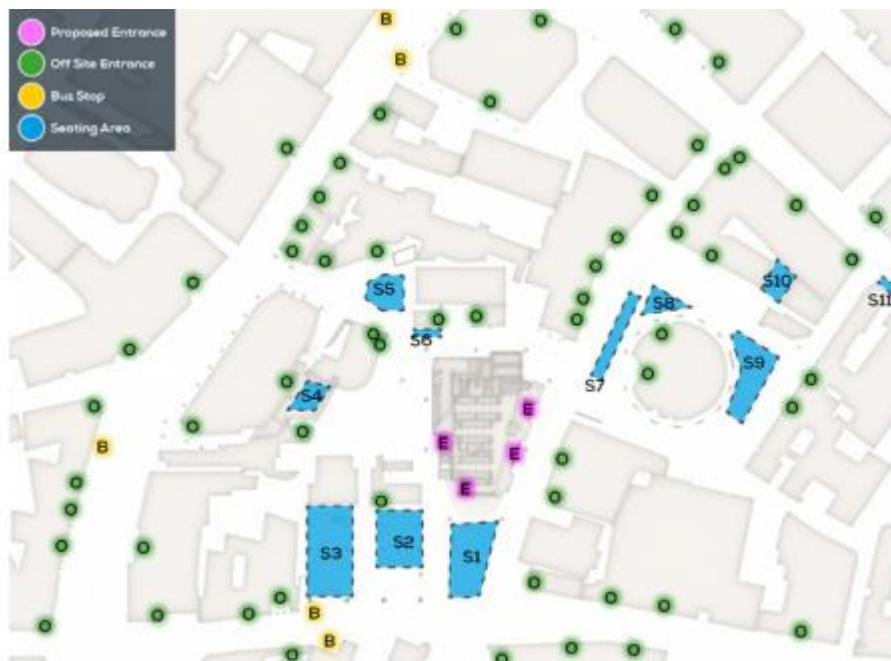
1179. The City of London Lawson Comfort Criteria are as follows:

- Frequent sitting
- Occasional sitting
- Standing
- Walking
- Uncomfortable

1180. It is highlighted and for the avoidance of doubt, the assessment set out below is on the revised 2023 scheme and that both the wind tunnel testing and CFD analysis have been updated and re-tested. It is also highlighted, that due to localised changes to the positioning and numbering of the receptors in the wind tunnel testing due to the design amendments, a direct receptor-receptor comparison cannot be made to the receptors for the 2023 scheme.

1181. The wind tunnel testing and CFD analysis was not re-done for the private terraces on levels 30 and 48 and the balconies, this is as they are not affected as result of the design changes and the results from the earlier assessments are still valid and considered below.

1182. The diagram below shows the receptors tested in the CFD Analysis. The diagrams showing the receptors for the Wind Tunnel Testing are shown in Scenario section below.



### Scenario 1: Baseline

1183. Scenario '1', the baseline condition demonstrates that the application site and its surroundings are inherently windy, this is evidenced by both the CFD analysis and Wind Tunnel Testing results, which show exceedances in both the safety and comfort criteria.

#### *Safety Criteria*

1184. The CFD analysis evidenced four instances of strong winds that exceed the safety criteria at the following locations:

- To the southeast of 100 Bishopsgate
- In Great St Helens Street
- In the passage to the south of 22 Bishopsgate
- On the southern side of Leadenhall Street

1185. The Wind Tunnel Testing evidenced safety exceedances at the following locations:

- The pedestrian crossing/cycle path near 48 Bishopsgate
- Along Great St Helens (at the northern end of 22 Bishopsgate)
- The northeast corner of Leadenhall Street
- Along Leadenhall Street between 6-8 Bishopsgate and Leadenhall Court
- The southwest corner of 6-8 Bishopsgate
- Within the east to west 'Art Walk' through the building passage at the base of 22 Bishopsgate.

1186. The safety exceedances set out above are consistent with those identified for the originally submitted 2023 scheme.

#### *Comfort Criteria*

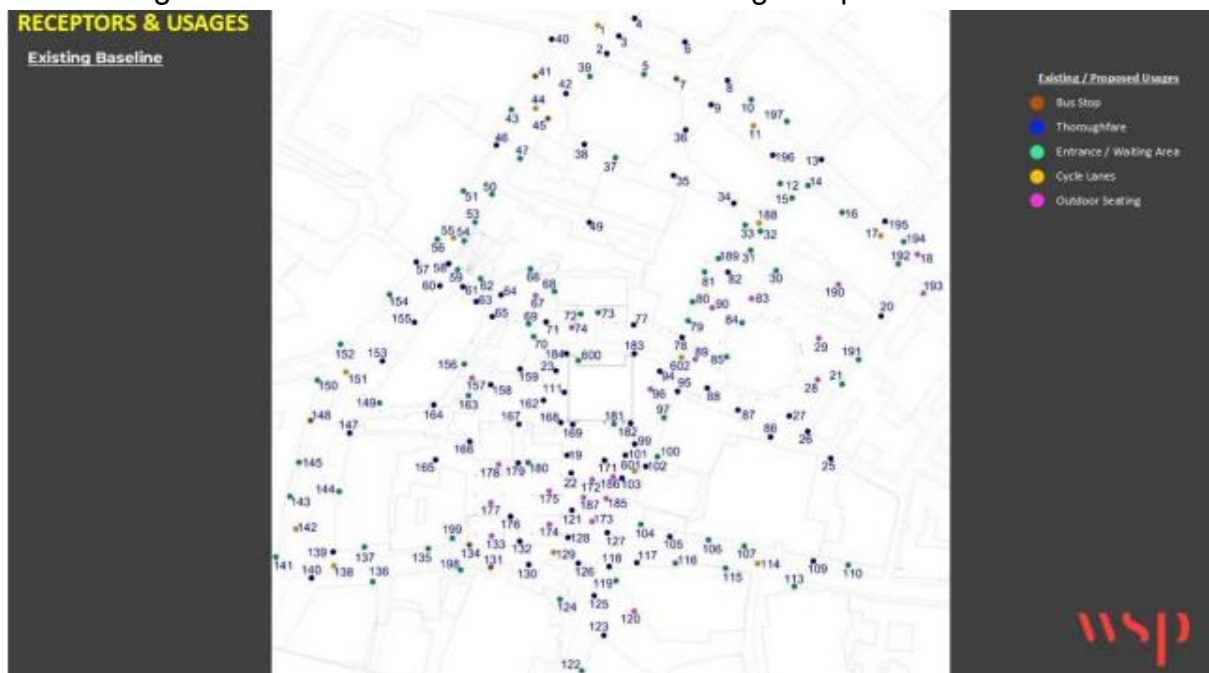
1187. In terms of suitability for the intended activities, the CFD analysis evidences the areas which are windier than for their intended use, at the following locations:

- Instances of some localised regions of uncomfortable conditions, in the same locations identified as safety exceedances.
- Seating to the south of the existing building is suitable for a mix of occasional sitting and standing in the summer; this ranges between being suitable and one category windier than the target condition. In the winter this area is suitable for standing with instances of occasional sitting; this ranges between being suitable and one category windier than the target condition.
- Seating at the southeast of the Leadenhall Building (outside of the application site) is suitable for a mix of occasional sitting and standing in the summer; this ranges between being suitable and one category windier than the target condition. In the winter this area is suitable for a mix of occasional sitting and

standing; this ranges between being suitable and one category windier than the target condition.

- The seating by 22 Bishopsgate (outside of the site) is suitable for standing in the summer; this is one category windier than the target condition. In the winter this area is suitable for standing and walking; this ranges between one and two categories windier than the target condition.
- The seating by the west of St Helens Church (outside of the site) is suitable for occasional sitting in the summer; this meets the target condition. In the winter, this area is suitable for a mix of occasional sitting and standing; this ranges between being suitable and one category windier than the target condition.
- The benches to the west of 30 St Mary Axe (outside of the site) are suitable for occasional sitting in the summer; this is suitable for the target condition. In the winter this area is a mix of standing and occasional sitting; this ranges between being suitable and one category windier than the target condition.
- The seating to the northwest of 30 St Mary Axe (outside of the site) is suitable for standing in both the summer and winter; this is one category windier than the target condition.
- The seating at the east end of 30 St Mary Axe (outside of the site) is suitable for a mix of occasional sitting and standing in the summer; this ranges between being suitable and one category windier than the target condition. In the winter, this area is suitable for standing; this is one category windier than the target condition.

1188. The diagram below shows the Wind Tunnel Testing receptors for Scenario 1.



1189. In terms of suitability for the intended activities, the Wind Tunnel Testing evidences that the following areas are windier than is appropriate for their intended use:

*Throughfares/crossing points/ cycle paths:*

- Receptors 60, 61 and 64 along Great St Helens (at the northern end of 22 Bishopsgate), in the summer, receptor 61 is uncomfortable and receptors 60 and 64 are suitable for walking; this ranges between being suitable and one category windier than the target condition. In the winter, all three receptors are uncomfortable; this is one category windier than the target condition.
- Receptor 164 within the east to west 'Art Walk' through the building passage at the base of 22 Bishopsgate, in the summer this is suitable for walking; this meets the target. In the winter, this area is uncomfortable, this is one category windier than the target condition.

*Entrances/ Waiting Areas/ Bus Stops:*

- Receptor 62 along Great St Helens (at the northern end of 22 Bishopsgate) is suitable for walking in the summer; this is one category windier than the target. In the winter this area is uncomfortable; this is two categories windier than the target condition.
- Receptor 136 at the northeast corner One Leadenhall is suitable for walking in the summer; this is one category windier than the target condition. In the winter, this area is uncomfortable, this is two categories windier than the target condition.

*Outdoor seating areas*

- Receptor 18 at the intersection of Bevis Marks and Bury Street is suitable for occasional sitting in the summer; this meets the target. In the winter, this area is suitable for standing in the winter; this is one category windier than the target condition.
- Receptors 28, 29, 83, 89 and 90 at the base of 30 St Mary Axe, in the summer the suitability ranges between standing (29 and 89) and occasional sitting (28, 83 and 90); this ranges between being suitable and one category windier than the target condition. In the winter the suitability ranges between walking (29) and standing (28, 83, 89 and 90); this ranges between one and two categories windier than the target condition.
- Receptors 67 and 74 to the west and south of St Helens Church are suitable for occasional sitting in the summer; this is suitable for the target condition. In the winter, these receptors are suitable for standing; this is one category windier than the target condition.
- Receptor 96 which is to the east of the existing Aviva Tower is suitable for standing in both the summer and winter; this is one category windier than the target condition.
- Receptor 120 along the southwest façade at the base of 52-54 Lime Street is suitable for occasional sitting in the summer; this meets the target condition. In

the winter, this area is suitable for standing; this is one category windier than the target condition.

- Receptors 133 and 174 at the base of 122 Leadenhall Street are suitable for occasional sitting in the summer; this is suitable for the target condition. In the winter, this area is suitable for standing; this is one category windier than the target condition.
- Receptor 157 in the courtyard to the east of 22 Bishopsgate (Crosby Square) is suitable for standing in the summer and winter; this is one category windier than the target condition.
- Receptor 162 to the west of the existing Aviva Tower is suitable for standing in the summer and winter; this is one category windier than the target condition.
- Receptors 172, 173, 185, 186 and 187 within St Helens Square to the south of the existing building are suitable for standing (172, 173, 185 and 186) and occasional sitting (187) in the summer; this ranges between being suitable and one category windier than the target condition. In the winter, all of the receptors are suitable for standing; this is one category windier than the target condition.

1190. In terms of conditions within and immediately around the application site, the wind tunnel tests show that in winter the majority of areas are suitable for standing and occasional sitting with some isolated areas of walking. In the summer the majority of areas, including St Helens Square are suitable for occasional sitting and standing.

### Scenario 2: Future Baseline

1191. In Scenario '2', the Future Baseline, like the baseline condition, demonstrates that the site and its surroundings are inherently windy, this is evidenced by both the CFD analysis and the Wind Tunnel Testing results, which show exceedances in both the safety criteria and comfort criteria.

### *Safety Criteria*

1192. The CFD analysis evidenced four instances of strong winds that exceed safety criteria at the same locations as in Scenario 1: Baseline. The instances of the strong winds to the southeast of 100 Bishopsgate are less severe than in the baseline scenario. Whilst in Great St Helens, the passage to the south of 22 Bishopsgate and on the southern side of Leadenhall Street, the instances of strong winds are more severe than in Scenario 1: Baseline.

1193. In addition to the safety exceedance in Scenario 1: Baseline, the Wind Tunnel Testing identified an additional exceedance at the following locations:

- Thoroughfares at the interaction of Bishopsgate and Camomile Street (both on the footways and the road junction).

1194. It is highlighted that for the original 2023 scheme, the 2<sup>nd</sup> July 2024 committee report identified a second additional exceedance at an entrance along Bishopsgate; this exceedance is now marked as safe, this is due to changes in composition of the surrounding context.

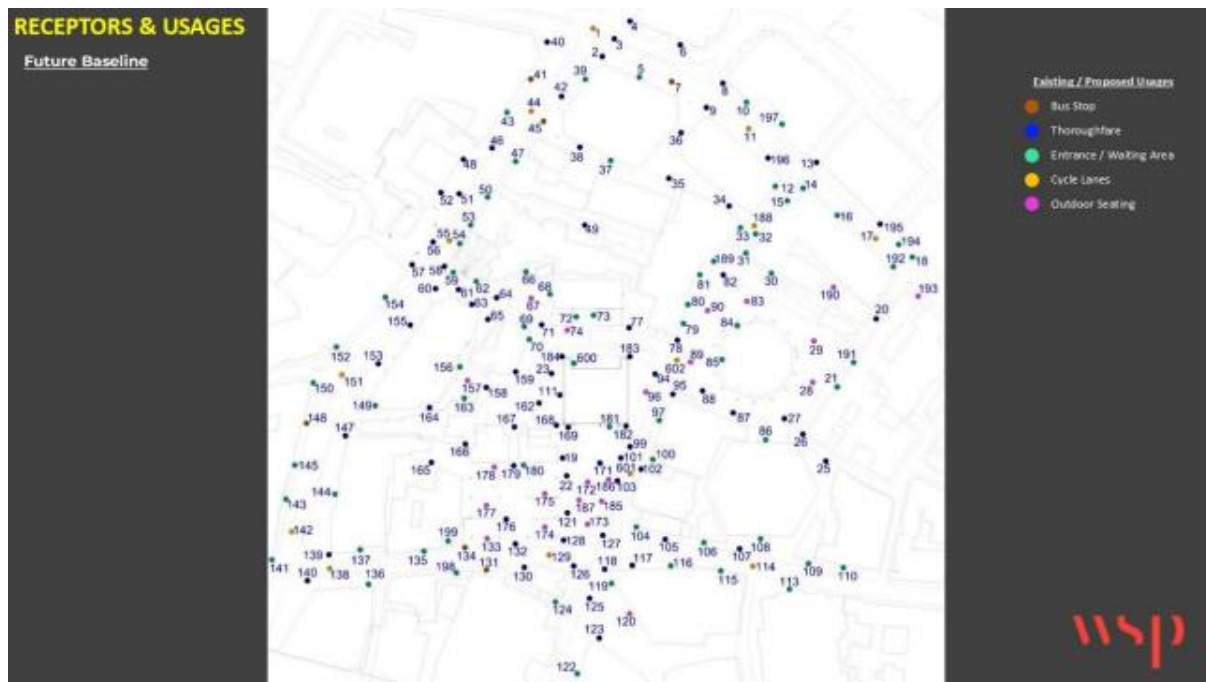
### *Comfort criteria*

1195. In terms of suitability for the intended uses, the CFD analysis evidenced that the following locations are windier than in the baseline scenario:

- Entrances in the stretch from Nos. 42 to 64 Bishopsgate are adjacent to a region which is suitable for walking, this is one category windier than the target condition and was suitable for the target condition in the baseline scenario.
- The seating to west of St Helens Church Bishopsgate is suitable for a mix of occasional sitting and standing in the summer; this ranges between being suitable and one category windier than the target condition. This is one category windier than Scenario 1: Baseline. In the winter, the majority of the area is suitable for standing with instances of occasional sitting; this ranges between being suitable and one category windier. In the winter, the categories are the same as in Scenario 1: Baseline but the area is slightly windier, as more is suitable for standing compared to Scenario 1: Baseline.
- The benches to the south of St Helens Church Bishopsgate are suitable for occasional sitting in the summer; this meets the target condition and is consistent with Scenario 1: Baseline. In the winter, the majority of the area is suitable for occasional sitting and some instances of standing; this ranges between being suitable and one category windier. In the winter, the categories are the same as in Scenario 1: Baseline but the area is slightly windier, as more is suitable for standing compared to Scenario 1: Baseline.

1196. For avoidance of doubt, the CFD analysis evidenced all other locations are either consistent with Scenario 1: Baseline or calmer than Scenario 1: Baseline.

1197. The diagram below shows the Wind Tunnel Testing receptors for Scenario 2.



1198. In terms of suitability for the intended activities, the Wind Tunnel Testing evidenced that the following locations are windier than in Scenario 1: Baseline:

*Thoroughfares/ crossing points/ cycle paths*

- Receptors 1,3 and 4 at the intersection of Bishopsgate and Camomile Street is suitable for walking in the summer; this meets the target condition. In the winter this area is uncomfortable; this is one category windier than the target condition.
- Receptor 55 at the pedestrian crossing/cycle path near 48 Bishopsgate is suitable for walking in the summer; this meets the target condition. In the winter, this area is uncomfortable; this is one category windier than the target condition.
- Receptor 138 along Leadenhall Street between 6-8 Bishopsgate and One Leadenhall is suitable for walking in the summer; this meets the target condition. In the winter this area is uncomfortable; this is one category windier than the target condition.
- Receptor 139 at the southwest corner of 6-8 Bishopsgate is suitable for walking in the summer; this meets the target condition. In the winter, this area is uncomfortable; this is one category windier than the target condition.

*Entrances/ waiting areas/ bus stops:*

- Receptor 45 at the southwest corner of 100 Bishopsgate is suitable for standing in the summer; this meets the target condition. In the winter, this area would be suitable for walking; this is one category windier than the target condition.



- Receptors 50, 53 and 54 along Bishopsgate /A10 is suitable for a mix of walking (53 and 54) and standing (50) in the summer; this ranges between meeting the target condition and one category windier than the target condition. In the winter, all of the receptors are suitable for walking; this is one category windier than the target condition.
- Receptors 59 and 62 along Great St Helens (at the northern end of 22 Bishopsgate) ranges between being uncomfortable (62) and suitable for standing (59); this ranges between meeting the target and being two categories windier than the target. In the winter, this area uncomfortable (62) and suitable for walking (59); this ranges between being one and two categories windier than the target condition.

#### *Outdoor seating areas*

- Receptors 29 and 89 at the base of 30 St Mary Axe are suitable for standing in both the summer and winter; this is one category windier than the target condition.
- Receptors 67 and 74 to west and south of St Helens Church Bishopsgate are suitable for a mix of occasional sitting (74) and standing (67) in the summer; this ranges between being suitable and one category windier than the target condition. In the winter, these areas are suitable for standing, which is one category windier than the target condition.
- Receptors 133 and 174 at the base of 122 Leadenhall Street are suitable for a mix of standing (133) and occasional sitting (174) in the summer; this ranges between being suitable and one category windier than the target. In the winter these areas are suitable for standing, this is one category windier than the target condition.
- Receptor 157 in the Courtyard to the east of 22 Bishopsgate (Crosby Square) is suitable for standing in the summer; this is one category windier than the target. In the winter, this area is suitable for walking; this is two categories windier than the target condition.
- Receptors 172, 173, 185, 186 and 187 to the east of 122 Leadenhall Street are suitable for mix of standing (172, 173 and 185) and occasional sitting (186 and 187); this ranges between being suitable and one category windier than the target condition. In the winter, this area is suitable for standing; this is one category windier than the target condition.

1199. For the avoidance of doubt, the Wind Tunnel Testing evidenced all other locations to be predominately consistent or calmer than Scenario 1: Baseline.

1200. In the future baseline scenario, there is an increased level of inherent windiness around the Bishopsgate and Camomile Street intersection (both the footways and road junction) compared to Scenario 1: Baseline.

### Demolition and Construction effects

1201. A quantitative assessment of the impacts during demolition and construction has not been undertaken this is because the wind effect at pedestrian level is associated with the size and shape of the massing of buildings and during demolition and construction this is constantly changing. As works progress, the wind conditions would transition from the baseline scenario to those of the final completed development. There would be a variety of effects during the demolition and construction given the nature of the works, and all effects would be temporary. Demolition and construction activities are less sensitive to wind conditions (given their protection from site hoardings, and site access being restricted to site workers).

### Scenario 3: Proposed development and existing surrounds

#### *Safety criteria*

1202. In Scenario 3, the proposed development in the existing surrounds, there are no additional safety exceedances in the surrounds of the site beyond those identified by the CFD Analysis and Wind Tunnel Testing in Scenario 1: Existing Baseline. The inherent safety breaches to the northwest, west and southwest persist.

1203. The CFD Analysis identified localised instances of strong winds on the Proposed Level 11 Podium Garden (to the south of the core and at the northern perimeter) and amenity terraces at levels 30 and 48. The CFD Analysis also identified highly localised exceedances at the southeast corner of the southern facing balconies, these exceedances would impact approximately 30cm across the southeast corner, as such the raised wind speeds would not cover a sufficient area to generate the level of wind force to cause harm to a balcony user.

1204. The Wind Tunnel Testing identified four exceedances within the proposed development on the Level 11 Podium Garden, these are situated to the north (receptors 211 and 212) and south (receptors 206 and 220) of the Level 11 Podium Garden.

#### *Comfort Criteria*

1205. In terms of on-site suitability for the intended uses on the Level 11 Podium Garden, the CFD analysis for the winter evidenced that majority of the podium garden would be suitable for standing, with instances of walking and occasional sitting. In the summer, the instances of areas being suitable for walking and standing would be reduced with an increase in the areas suitable for occasional sitting. The Wind Tunnel Testing evidenced that in the winter that there would be

two instances of receptors being rated as uncomfortable to the north and south (receptors 206 and 212). In the winter, the majority of the receptors are suitable for standing and instances of walking and one instance of occasional sitting. In the summer, there would one instance of a receptor being rated as uncomfortable (receptor 212), with most receptors being suitable for standing or occasional sitting and some instances of walking.

1206. The CFD analysis identifies that the proposed Amenity Terrace on Level 30 would be suitable for a mix of occasional sitting and standing in the summer; and in the winter would predominately be suitable for standing with some instances of walking and very minor instances of sitting. The Wind Tunnel Testing demonstrates that the Amenity Terrace on Level 30 would be suitable for standing in both the winter and summer but would not meet the requirements for more sedentary activities such as short or long periods of sitting.

1207. The CFD analysis identifies that the proposed Amenity Terrace on Level 48 would be suitable for a mix of occasional sitting and standing in the summer; it is noted that the majority of the terrace would be suitable for standing. In the winter it would predominately be suitable for standing, with some instances of walking. The Wind Tunnel Testing demonstrates that the Amenity Terrace on Level 48 would be suitable for standing in both the winter and summer but do not meet the requirements for more sedentary activities.

1208. Both the CFD analysis and Wind Tunnel Testing evidence that the proposed balconies would meet the comfort criteria for the intended use.

1209. The CFD analysis shows that in the winter the majority of the seating areas in St Helens Square to the south of the proposed building would be suitable for occasional sitting with instances of standing; this ranges between meeting the target condition to being one category windier than the target condition. In the summer, the majority of the area would be suitable for occasional sitting, with minor instances of frequent sitting and standing, the instances of standing are reduced compared to the winter; this ranges between meeting the target condition to one category windier than the target condition. The Wind Tunnel Testing demonstrates that this area would be suitable for standing in the winter, which is one category windier than the target condition. In the summer, this area would be suitable for a mix of standing and occasional sitting, this ranges between meeting the target and being one category windier than the target condition. In both the winter and summer, this Scenario would see a reduction in the instances of standing and an increase in areas suitable for occasional sitting compared to Scenario 1: Existing Baseline.

1210. Undershaft Square to the west of the proposed building, would largely be a transient area with the exception of areas of permeant seating which would be situated around receptors 158 and 184. In the winter, the receptors would both be

suitable for standing; receptor 158 would be suitable for occasional sitting for 92% of the time (compared to the target of 95%) and receptor 184 would be suitable for occasional sitting for 92% of the time (compared to the target of 95%). In the summer, these receptors would both be suitable for occasional sitting.

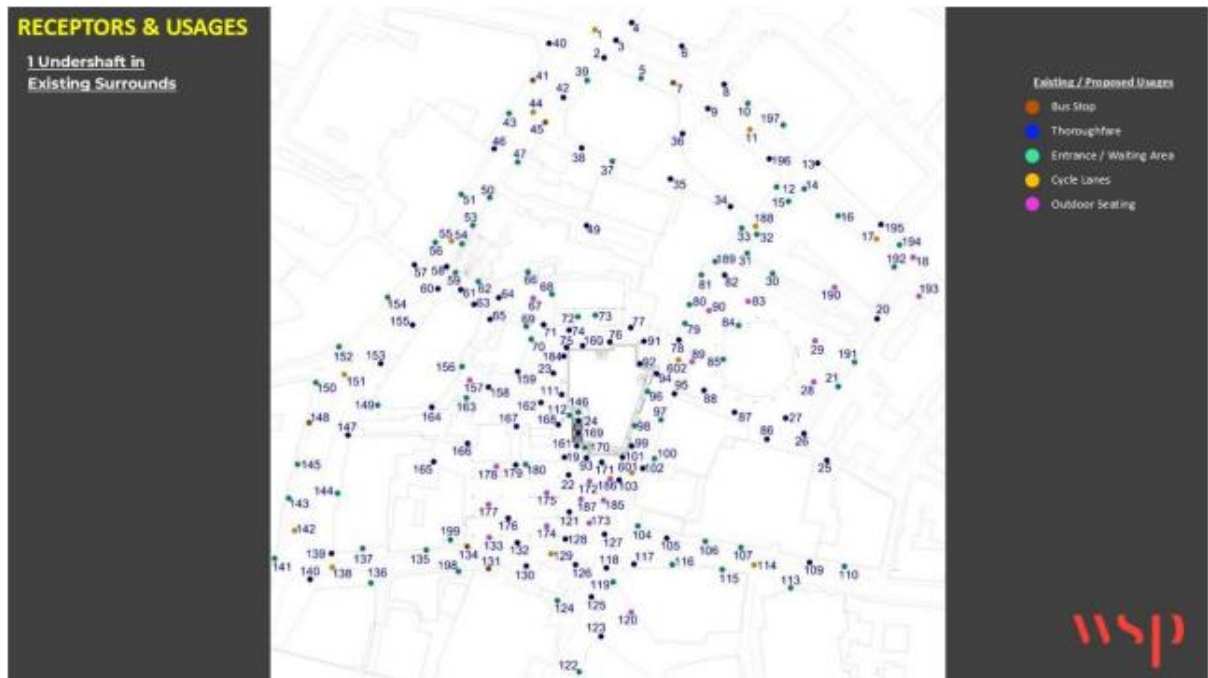
1211. The CFD Analysis demonstrated that the seating to the southwest of the Leadenhall Building and the seating by 22 Bishopsgate would be calmer or consistent with the conditions in Scenario 1: Baseline in the winter and/or the summer.

1212. The CFD Analysis demonstrated that the following off-site locations would experience windier conditions compared to in Scenario 1: Baseline:

- The benches to the west of 30 St Mary Axe would be suitable for a mix of standing (majority) and occasional sitting (minor instances), this area would be windier than in Scenario 1: Baseline; the exceedance would be 12.5% compared to 11%, which would be a 1.5% increase of the season. In the summer, this area would be suitable for a mix of occasional sitting and standing; the extent of the standing has increased compared to Scenario 1: Baseline. The exceedance of threshold would impact part of the site for 2% of the summer, as this would be up to 6.5% of the season compared to 4.5% in Scenario 1: Baseline. Due to the extent of the percentage change of the exceedance beyond the Baseline in both the winter and summer, this is not considered to be of a sufficient magnitude that would require mitigation.
- The seating to the east of 30 St Mary Axe in the winter would be suitable for mix of standing and occasional sitting and this would be consistent with Scenario 1: Baseline. In the summer, this area would be suitable for a mix of occasional sitting and standing; the extent of standing has increased compared to Scenario 1: Baseline. The exceedance of the threshold for occasional sitting would be 6.3% compared to 4.6%, which would be an increase of 1.7% of the season. Due to the extent of the percentage change of the exceedance beyond the Baseline in the summer, this is not considered to be of a sufficient magnitude that would require mitigation.
- The seating in Bury Court in the winter would be suitable for a mix of frequent and occasional sitting and standing, compared to Scenario 1: Baseline the instances of standing has increased by 1.5%. Due to the extent of the percentage change compared to the Baseline, this is not considered to be of a sufficient magnitude that would require mitigation. In the summer, this area would be suitable for a mix of frequent and occasional sitting, and this is consistent with Scenario 1.

1213. For the avoidance of doubt, the other conditions and exceedances identified by the CFD Analysis for Scenario 1: that would not change in this scenario would persist.

1214. The diagram below shows the Wind Tunnel Testing receptors for Scenario 3.



1215. The Wind Tunnel Testing demonstrated that the following Thoroughfare/ crossing point/ cycle paths receptor would either be calmer or windier than in Scenario 1: Baseline in the winter and/or summer but would still be suitable for the intended use; the receptors are: 1; 23; 57; 61; 64; 65; 78; 94; 95; 101; 103; 105; 114; 117; 121; 129; 153; 164; and 178. The Wind Tunnel Testing demonstrated that the following receptors for entrances/ waiting areas/ bus stop would be calmer or windier than in Scenario 1: Baseline in the winter and/or summer but would still be suitable for the intended use; the receptors are: 14; 21; 56; 66; 70; 97; 100; 119; 122; and 191. The Wind Tunnel Testing demonstrated that the following outdoor seating receptors would either be calmer or windier than in Scenario 1: Baseline in the winter and/or summer but would still be suitable for the intended use; the receptors are: 66 and 178.

1216. Receptors 172, 173, 185, 186 and 187 are all within the red line boundary and are situated within St Helen's Square and are in an area that should be suitable for at least occasional sitting. In the winter, all of these receptors would be suitable for standing, which whilst consistent with Scenario 1: Baseline, would be one category windier than for the intended use. In the summer, receptors 185 and 186, would be suitable for occasional sitting and would be suitable for the intended use, however, receptors 172, 173 and 187 would remain being suitable for standing like in Scenario 1: Baseline and would be one category windier than for the intended use.

1217. For the avoidance of doubt, the other conditions and exceedances identified by the Wind Tunnel Testing in Scenario 1: Baseline, that would not change in this scenario would still persist.

1218. Overall, the introduction of the proposed development does not introduce any new safety exceedances nor are any of the existing safety breaches worsened. The inherent breaches to the northwest, west and southwest persist. This is considered a long-term, negligible effect and is not significant. Most of the inherent exceedances of the pedestrian comfort persist within the surrounding area and these are considered a long term, moderate adverse (off-site) to moderate beneficial effect and is not significant.

#### Scenario 4: Proposed development and cumulative surrounds

##### *Safety Criteria*

1219. In Scenario 4, the proposed development in the cumulative surrounds (Future Baseline), there are no additional safety exceedances in the surrounds of the site identified by the CFD analysis and Wind Tunnel Testing in Scenario 2: Future Baseline. The CFD analysis demonstrates that the safety exceedance in Great St Helens Street is reduced marginally compared to in Scenario 2: Future Baseline.

1220. The CFD analysis did not identify any instances of strong winds on the Level 11 Podium Garden. The Wind Tunnel Testing identified one safety exceedance on the Level 11 Podium Garden to the south (receptor 206); the number of safety exceedances has reduced by three compared to Scenario 3: Proposed development in the existing surrounds.

1221. The CFD analysis identified localised instances of strong winds on the Amenity Terraces at Levels 30 and 48 and in the southeast corner of the south facing balconies. These conditions would be consistent with Scenario 3: Proposed development in the existing surrounds. It is noted that the highly localised exceedance on the southeast corner of the southern balconies in Scenario 3 does not persist in this Scenario. The Wind Tunnel Testing did not identify any safety exceedances on the Amenity Terraces and balconies.

##### *Comfort Criteria*

1222. In terms of the suitability of the intended uses on the Level 11 Podium Garden, the CFD analysis for the winter evidenced that the majority of the podium garden being suitable for standing, with instances of occasional and frequent sitting and walking; compared to Scenario 3 there would be less instances of standing and walking. In the summer, the majority of the podium would be suitable for occasional sitting with instances of standing and frequent sitting; compared to Scenario 3 there would be less instances of standing and no instances of

walking. Overall, the CFD analysis evidenced that the Level 11 Podium Garden would have calmer conditions in Scenario 4 compared to Scenario 3. The Wind Tunnel Testing evidenced that in the winter there would be one instance of a receptor being rated as uncomfortable to the south (receptor 206); compared to Scenario 3 there is an improvement as only one receptor would be rated as uncomfortable. In the winter, the majority of the receptors would be suitable for standing with instances of walking and occasional sitting; compared to Scenario 3 there would be less instances of walking and more instances of occasional sitting. In the summer, there would be no instances of receptors being rated as uncomfortable and the majority of receptors would be suitable for standing and occasional sitting with minor instances of walking and frequent sitting; compared to Scenario 3, there would be no instances of receptors being uncomfortable and there would be an increase in the number of receptors being suitable for occasional sitting and a reduction in the number of the receptors being suitable for walking.

1223. The CFD analysis demonstrated that the suitability of the proposed Amenity Terraces and balconies is consistent with those in Scenario 3: Proposed development in the existing surrounds. The Wind Tunnel Testing demonstrated that the Amenity Terraces at Level 30 and 48 are suitable for walking or standing in both the winter and summer but do not meet the requirements for more sedentary uses such as short or long-term sitting. Receptor 403 which is located in the northeast corner the Level 48 Amenity Terrace is rated as uncomfortable for all uses in the winter.

1224. In respect of St Helens Square to the south of the proposed building, the CFD analysis evidenced that in the winter the majority of this area would be suitable for occasional sitting with instances suitable being suitable for standing and frequent sitting; this ranges between being suitable for the intended use and one category windier than the intended use. In the summer, the majority of this area would be suitable for occasional sitting, with minor instances of frequent sitting and standing; this ranges between being suitable for the intended use and one category windier than the intended use. The Wind Tunnel Testing demonstrates that the in the winter this area would be suitable predominately standing with instances of occasional sitting; this ranges from being one category windier than the target condition to being suitable for the intended use. In the summer, this area would predominately be suitable occasional sitting with instances of standing; this ranges between being suitable for the intended use and one category windier than target condition.

1225. Undershaft Square to the west of the proposed building would largely be a transient area with the exception of areas of permanent seating which would be situated around receptors 158 and 184. In the winter, these receptors would be both be suitable for standing; receptor 158 would be suitable for occasional sitting for 90% of the time (compared to the target of 95%) and receptor 184 would be

suitable for occasional sitting for 90% of the time (compared to the target of 95%). In the summer, receptor 184 would be suitable for occasional sitting and receptor 158 would be suitable for standing; receptor 158 would be suitable for occasional sitting for 94% of the time (compared to the target of 95%).

1226. The CFD Analysis demonstrated that the seating to the southwest of the Leadenhall Building the seating by 22 Bishopsgate would be calmer or consistent with the conditions in Scenario 1: Baseline in the winter and/or the summer.

1227. The CFD Analysis demonstrated that the following off-site locations would experience windier conditions compared to in Scenario 2: Future Baseline:

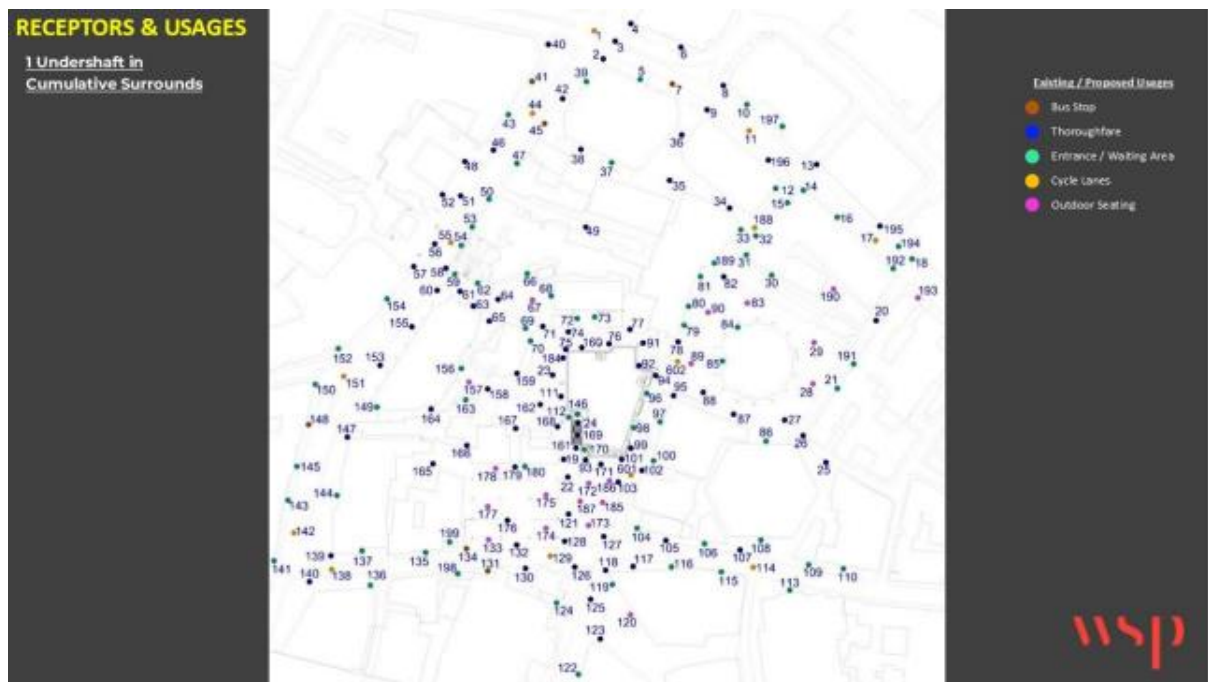
- The seating (S6) by St Helen's Bishopsgate Church would be suitable for standing in winter, this would be one category windier than in Scenario 2: Future Baseline and would be one category windier than the target condition. The exceedance of the 4m/s sitting threshold would rise from 3% (Scenario 2) to 8% in this scenario. In the summer, this area would be suitable for occasional sitting, and this is consistent with Scenario 2: Future Baseline. No seating is proposed in this location in the proposed development, so would not need to be suitable for seating. The applicant has confirmed that the existing benches would be relocated to an area that is suitable for sitting and this would be secured by condition.
- The benches to the west of 30 St Mary Axe would be suitable for a mix of occasional sitting (majority), with instances of standing in the winter, this ranges between being suitable for the intended use and being one category windier; compared to Scenario 2: Future Baseline, part of this area would be windier. The exceedance would increase from 4% in Scenario 2 to 6% in this scenario. In the summer, this area would be suitable for occasional sitting, and this is consistent with Scenario 2: Future Baseline. Given the extent of the exceedance in winter, combined with the area being suitable for sitting in the summer, this is acceptable.
- The seating to the northwest of 30 St Mary Axe would be suitable for a mix of standing and occasional sitting in both the winter and summer, which ranges between being suitable for the intended use and one category windier; whilst the categories are the same as in Scenario 2: Future Baseline, this area would be windier as there would be an increase in the area that is suitable for standing. In winter the exceedance would have a peak of 8% over the season and in the summer the exceedance would have a peak of 6% over the season; given the extent of the exceedance combined with size of the region that would be impacted, this is considered to be acceptable.
- The seating to the east of 30 St Mary Axe would be suitable for standing in the winter, this is one category windier than the target condition; Scenario 2: Future baseline included an instance of being suitable for occasional sitting and this would not be retained in this scenario; the extent of the exceedance would increase from 4% to 6% from Scenario 2 to this scenario. In the



summer, this area would be suitable for occasional sitting and standing which ranges between being suitable for the intended use and one category windier; compared to Scenario 2: Future Baseline, the extent of the area suitable for occasional sitting would be reduced. Given the extent of the exceedances this is considered to be acceptable.

1228. For the avoidance of doubt, the other conditions and exceedances identified by the CFD Analysis in Scenario 2, that would not change in this scenario would still persist.

1229. The diagram below shows the Wind Tunnel Testing receptors for Scenario 4.



1230. The Wind Tunnel Testing demonstrated that the following Thoroughfare/ crossing point/ cycle paths receptor would either be calmer or windier than in Scenario 2: Future Baseline in the winter and/or summer but would still be suitable for the intended use; the receptors are: 23; 42; 49; 55; 64; 65; 77; 99; 101; 103; 105; 107; 117; 123; 127; 128; 129; 153; 155; 176 and 601. The Wind Tunnel Testing demonstrated that the following receptors for entrances/ waiting areas/ bus stop would be calmer or windier than in Scenario 2: Future Baseline in the winter and/or summer but would still be suitable for the intended use; the receptors are: 12; 31; 33; 37; 50; 62; 97; 113; 119; 180; and 198. The Wind Tunnel Testing demonstrated that the following outdoor seating receptors would either be calmer or windier than in Scenario 2: Future Baseline in the winter and/or summer but would still be suitable for the intended use; the receptors are: 133; 175; and 177.

1231. Receptors 172, 173, 185, 186 and 187 are within the redline boundary and situated within St Helen's Square and are in an area that should be suitable for at least occasional sitting. In the winter, all these receptors would be suitable for standing, which whilst consistent with Scenario 2: Future Baseline, would be one category windier than for the intended use. In the summer, receptor 185, 186 and 187 would be suitable for occasional sitting and would be suitable for the intended use; for receptor 185 this would be one category calmer compared to Scenario 2: Future Baseline. Receptors 172 and 173 would remain being suitable for standing like in Scenario 2: Future Baseline and would be one category windier than for the intended use.

1232. Overall, the introduction of the proposed development does not introduce any new safety exceedances nor are any existing safety breaches worsened. The inherent breaches to northwest, west and southwest persist within the surrounding area and these are considered a long term, moderate adverse (off-site) to moderate beneficial effect and is not significant.

### Landscaping and Mitigation

1233. Mitigation has been embedded in the design on the Level 30 and 48 Amenity Terraces. On level 30 this includes:

- Full height panels with 50% perforation at the northeastern and northwestern corners of the amenity terrace, which would separate the main accessible terrace area from the inaccessible 'U'-shaped landscaped areas around the building perimeter.

1234. On level 48 this includes:

- The extension of the louvered canopy (total 11m depth of projection from the south façade), which would have a 50% perforation.
- Full height panels with 50% perforation at the northeastern and northwestern corners of the amenity terrace, which would separate the main accessible terrace area from the inaccessible 'U'-shaped landscaped areas around the building perimeter.

1235. The embedded mitigation was included in the Wind Tunnel Testing in Scenario 3: Proposed development in existing surrounds and Scenario 4: Proposed development in cumulative surrounds.

1236. Following the testing of Scenario 3 and Scenario 4, the wind mitigation process was conducted sequentially, this was so that the safety exceedances could be addressed specifically without the before the introduction of the soft landscaping element. The following mitigation measures are proposed:

### *Level 11 Podium Garden*

- 12x units of 1.5m (W) x 3m (H) screens with 50% perforation
- 10x units of 1.5m (W) x 1.5m (H) screens with 50% perforation
- Perforated gates at each end of the through-building passage
- 2x units of 1.5m (W) x 1.5m (L) x 3m (H) L-shaped free-standing screens with 50% perforation
- A soft landscaping scheme

### *Street Level*

- 1.2m high backrests (50% perforation) on the curved benches in St Helen's Square
- A soft landscaping scheme

1237. For the avoidance of doubt, all of the proposed mitigation is within the redline boundary and none is proposed off-site.

### *Scenario 3: Proposed development and existing surrounds with the addition of landscaping and mitigation*

1238. This scenario includes Scenario 3 which is the proposed development in the existing surrounds with the addition of the mitigation measures and landscaping set out in section above.

### *Safety Criteria*

1239. The inherent exceedances to northwest, west and southwest of the proposed development persist and these are considered a long-term, negligible effect and is not significant.

1240. The introduction of the mitigation measures and landscaping would result in receptors 211, 212 and 220 being marked as safe, this means that there would be no safety exceedances on the Level 11 Podium Garden.

### *Comfort Criteria*

1241. On the Level 11 Podium Garden, the introduction of the proposed mitigation and soft landscaping scheme would result in all of the receptors being suitable at least standing in the winter. In the summer, the majority of the receptors would be suitable for occasional sitting, with remaining receptors being suitable for standing. This would be suitable for the intended use and would be a long-term, negligible effect and is not significant.

1242. Both the level 30 and 48 Amenity Terraces would remain generally suitable for walking and standing in the winter and walking, standing and occasional sitting in the summer.

1243. The Wind Tunnel Testing shows that St Helen's Square would be suitable for standing and occasional sitting in the winter. Receptors 172 and 173 which are in the areas of the proposed seating to the south of the building would be suitable for standing in the winter and not occasional sitting; receptor 172 would be suitable for occasional sitting for 92.5% of the year (compared to the 95% target) and receptor 173 would be suitable for occasional sitting for 91.5% of the year (compared to the 95% target). In the summer, both of these receptors would be suitable for occasional sitting. Given the extent of the exceedance combined with the seating being suitable for occasional sitting in the summer, this is considered to be acceptable.

1244. In addition to the permanent seating, ad-hoc seating in association with the public screen would be situated to the south of receptors 172 and 186, intermingling with the fixed seating positions. In the winter, receptor 172 would be suitable for standing and not occasional sitting; receptor 172 would be suitable for occasional sitting for 92.5% of the year (compared to the 95% target). In the winter, receptor 186 would be suitable for occasional sitting so would be suitable for the ad-hoc seating. In the summer, both receptors 172 and 186 would be suitable for occasional sitting. Given the extent of the exceedance in the winter, combined with the area being suitable in the summer and that the details and management of the ad-hoc seating would be secured in the Public Realm and Public Screen Management Plan secured by the S106, this is considered to be acceptable.

1245. Undershaft Square to the west of the proposed building would largely be a transient area with the exception of area of permanent seating which would be situated around receptors 158 and 184. In the winter, these receptors would be suitable for standing; receptors 158 would be suitable for occasional sitting for 92% of the time (compared to the target of 95%) and receptor 184 would be suitable for occasional sitting for 93% of the timer (compared to the target of 95%). In the summer, these receptors would both be suitable for occasional sitting. Given the extent of the exceedances, combined with the seating being suitable for occasional sitting in the summer, this is considered acceptable.

1246. Overall, for all other receptors (off-site), the effects range between moderate adverse to moderate beneficial and are considered not significant.

Scenario 4: Proposed development and cumulative surrounds with the addition of landscaping and mitigation

1247. This scenario is Scenario 4 which is the proposed development in the cumulative surrounds with the addition of mitigation measures and landscaping set out in the section above.

### *Safety Criteria*

1248. The inherent exceedances to the northwest, west and southwest of the proposed development persist and these are considered a long-term, negligible effect and is not significant.

1249. The introduction of the mitigation measures and landscaping would result in receptor 206 being marked as safe, this means there would be no safety exceedances on the Level 11 Podium Garden.

### *Comfort Criteria*

1250. On the Level 11 Podium Garden, the introduction of the proposed mitigation and soft landscaping scheme would result in the receptors primarily being suitable for occasional sitting and instances of standing and frequent sitting in the winter. In the summer, the majority of receptors would be suitable for occasional sitting with instances of standing and frequent sitting; compared to the winter, the instances of standing have reduced and the instances of being suitable for frequent sitting have increased. This would be suitable for the intended use and would be a long-term, negligible effect and is not significant.

1251. Both the Level 30 and 48 Amenity Terraces would remain generally suitable for walking/standing in the winter and walking/standing occasional sitting in the summer.

1252. The Wind Tunnel Testing shows that St Helen's Square would be suitable for standing and occasional sitting in the winter. Receptors 172 and 173 which are in the areas of the proposed seating to the south of the building would be suitable for standing in the winter and not occasional sitting; receptor 172 would be suitable for occasional sitting for 93.8% of the year (compared to the 95% target) and receptor 173 would be suitable for occasional sitting for 92% of the year (compared to the 95% target). In the summer, both of these receptors would be suitable for occasional sitting. Given the extent of the exceedance, combined with the seating being suitable of occasional sitting in the summer, this is considered to be acceptable.

1253. In addition to the permanent seating, ad-hoc seating in association with the public screen would be situated to the south of receptors 172 and 186, intermingling with fixed seating positions. In the winter, receptor 172 would be suitable for standing and not occasional sitting; receptor 172 would be suitable for occasional sitting for 93.8% of the year (compared to the 95% target). In the

winter, receptor 186 would be suitable for occasional sitting so would be suitable for the ad-hoc seating. In the summer, both receptors 172 and 186 would be suitable for occasional sitting. Given the extent of the exceedance in the winter, combined with the area being suitable in the summer and that the details and management of the ad-hoc seating would be secured in the Public Realm and Public Screen Management Plan secured by the S106, this is considered acceptable.

1254. The public realm to the west of the proposed building would largely be a transient area with the exception of areas of permanent sitting, which would be situated around receptors 158 and 184. In the winter, these receptors would both be suitable for standing; receptor 158 would be suitable for occasional sitting for 90% of the year (compared to the target of 95%) and receptor 184 would be suitable for occasional sitting for (compared to the target of 95%). In the summer, both of these receptors would be suitable for occasional sitting. Given the extent of the exceedance, combined with the seating being suitable of occasional sitting in the summer, this is considered to be acceptable.

### Microclimate Conclusion

1255. In terms of safety, the introduction of the proposed development within the baseline or future baseline scenario does not result in any additional safety exceedances nor worsen any exceedances in the surrounds of the site.

1256. With the introduction of the proposed mitigation measures and landscaping there are no safety exceedances within the proposed development.

1257. In terms of suitability for the proposed uses, the proposed balconies are suitable for their intended uses without mitigation measures; and the introduction of the proposed landscaping and mitigation measures would result in the Level 11 Podium Garden and public realm at grade being suitable for its intended use, with seating areas being suitable for occasional sitting in at least the summer. There are instances of the proposed seating locations not being suitable for at least occasional sitting in the winter, however, given the extent of the exceedances and the quantum of seating that would meet the required comfort criteria, this is considered acceptable. Even with embedded mitigation on the Levels 30 and 48 amenity terraces, they would not be suitable for all intended uses, however, given that these are private terraces and access can be restricted when conditions are unfavourable, this is acceptable.

1258. In terms of impact on the off-site receptors in terms of comfort suitability, the effect would range between moderate adverse to moderate beneficial and are considered not significant.

1259. Overall, the Wind Microclimate impact of the proposed development with the proposed mitigation measures and landscaping is acceptable. The proposed development has taken measures to mitigate any significant wind effects and does not worsen any existing safety exceedances in the surrounding area.

1260. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessment carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the Environmental Statement.

1261. It is considered that the microclimate in and around the site, with regard to wind condition, would be acceptable and in accordance with London Plan Policy S8, Local Plan Policy DM10.1 and emerging City Plan 2040 policies S8 and DE2 and the guidance contained within the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

#### Daylight, Sunlight, Overshadowing

##### *Policy and Assessment Context*

1262. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.

1263. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

1264. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice in that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the emerging City Plan 2040 relates to the City's residential environment and states that when considering impact on the amenity of existing residents, the Corporation will consider the cumulative effect of development proposals on the amenity of existing residents.

1265. The BRE guidelines 'Site layout planning for daylight and sunlight – A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where the occupants have a reasonable expectation of natural light (full details on the tests is set out in appendix C to this report):

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

1266. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

#### *Interpreting the Results of the Tests*

1267. In undertaking assessments, a judgement can be made as to the level of impact on daylight and sunlight levels to affected windows and rooms. Where there is proportionally a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-29.9% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. In the ES a significance criteria is also assigned to each property, for this consideration is given to the proportion of rooms/windows affected, percentage alterations, absolute changes, existing levels, retained levels and any other relevant factors such as orientation, balconies, overhangs or design features. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

#### *Updated Daylight and Sunlight Assessment*

1268. In conjunction with the originally submitted 2023 scheme a full assessment of the impact of the development on daylight and sunlight was undertaken in accordance with the BRE Guidelines and having regard to policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the emerging City Plan 2040.

1269. An updated daylight and sunlight assessment has been undertaken in the light of the revisions to the 2023 scheme and to establish whether the updated cumulative position would have any impact on the results.



1270. The updated assessment shows that there are some minor variations (ranging from 0.1 to 0.8 VSC) to the numerical results for a very small number of windows/rooms when comparing the 2023 scheme with the revised 2023 scheme. These minor changes would not alter the daylight/sunlight conclusions reached in the assessment of the 2023 scheme.

1271. In respect of daylight, the updates show there would be no changes in the magnitude and scale of VSC and NSL impacts to those identified in conjunction with the original 2023 scheme. The revised 2023 scheme would not alter the potential daylight effects that were presented in conjunction with the original 2023 scheme. The daylight effects on nearby receptors would remain unchanged ranging from negligible (not significant) to moderate adverse (significant).

1272. In respect of sunlight the updates show that there would be no changes in the magnitude and scale of Annual Probably Sunlight Hours (APSH) and Winter Probable Sunlight Hours (WPSH) when compared to the 2023 scheme. The revised 2023 scheme would not alter the potential sunlight effects that were presented in conjunction with the original 2023 scheme. The sunlight effects on nearby receptors would remain unchanged and range from negligible (not significant) to moderate adverse (not significant).

1273. The cumulative scenario has been reviewed and updated and there are no additional cumulative schemes which have been approved or have been submitted for planning which would likely to result in any additional or cumulative effects than those identified previously under the assessment of the 2023 scheme.

1274. Qualitative consideration has been given to 99 Bishopsgate. (As is set out in the planning history section of this report, proposals for 99 Bishopsgate were submitted at a point when the revised application documents for this Undershaft scheme was in its final stages.)

1275. The 99 Bishopsgate application documentation includes a cumulative daylight, sunlight and overshadowing scenario which includes the 2019 1 Undershaft consented development.

1276. The daylight, sunlight and overshadowing assessment for 99 Bishopsgate has been analysed alongside the daylight, sunlight and overshadowing results for the revised Undershaft scheme.

1277. The majority of sensitive receptors are not affected (i.e. see no impact or negligible effects) by both 99 Bishopsgate and the proposed development so no cumulative effects would occur. This is due to their distance and/or window orientation, such that they do not face towards both sites. Notwithstanding, 33

Great St Helens, 48 Bishopsgate and 1 – 24 Wormwood Street have been assessed in further detail.

1278. In respect of 33 Great St Helens and 48 Bishopsgate which are assessed for both the 99 Bishopsgate and proposed development daylight and sunlight analyses, negligible to minor alterations occur to daylight as a result of 99 Bishopsgate. The cumulative changes are considered insignificant effects because it would be unlikely that the changes with 99 Bishopsgate coming forward would be perceptible.

1279. As is set out in subsequent sections of this report the revised 2023 scheme would have a minor to moderate adverse effect and negligible to minor adverse effect to daylight at these properties respectively. The north westerly elevations of these properties look towards 99 Bishopsgate, whereas the south easterly elevations look towards the Proposed Development. Therefore, 99 Bishopsgate and the Proposed Development do not affect the same windows. The ES notes that from a review of the 33 Great St Helens and 48 Bishopsgate floor plans, these windows are on different elevations and do not serve the same rooms. Furthermore, the transgressions in question are very small, due to the built-up nature of the surroundings and are unlikely to be perceptible. Therefore, significant cumulative daylight and sunlight impacts are not considered to occur.

1280. In relation to, 1-24 Wormwood Street, the ES notes that the Proposed Development would minimally affect daylight to this property. It is however, unlikely that the changes would be noticeable. If built out, the submitted 99 Bishopsgate scheme, would shield 1-24 Wormwood Street from the Proposed Development and therefore no cumulative impacts would occur from both schemes.

1281. With regard to overshadowing of amenity spaces, the terrace at 99 Bishopsgate was previously given consideration in the cumulative scenario as part of the assessment of the original 2023 Undershaft scheme.

1282. With the submitted 99 Bishopsgate scheme built out, the overshadowing impact on the 99 Bishopsgate terrace would no longer apply as it would be demolished. In the 99 Bishopsgate plans, all outdoor terraces would be located to the north and would not be affected by the Proposed Development.

#### *Assessment of the Impact of the Proposed Development (the revised 2023 scheme) on Daylight and Sunlight to sensitive receptors*

1283. The daylight and sunlight impacts of the of the revised 2023 scheme are set out in the following sections of the report, with the overall conclusions remaining the same as those presented in conjunction with the original 2023 scheme.

1284. The residential buildings that have been considered are:

- 2&10-16 Creechurch Lane

- 18-20 Creechurch Lane
- 27-31 Mitre Street
- 18-20 Creechurch Lane – Flat 34
- 4-8 Creechurch Lane
- 33 Great St Helen's
- 26 Wormwood Street
- 25 Wormwood Street
- 1-24 Wormwood Street
- 2 Heneage Lane
- 50 Bishopsgate

1285. One hotel and one apart hotel have been assessed and these are:

- 36 Great St Helens
- 48 Bishopsgate

1286. The places of worship as sensitive receptors to be considered are:

- St Helen's Church Bishopsgate
- Bevis Marks Synagogue
- St Katherine Cree Church
- 78 Bishopsgate (St Ethelburga's Centre)
- St Andrew Undershaft Church

1287. When referring to the degree of impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Impact Statement when describing the degree or extent of adverse impacts. Officers agree with the judgements reached in the environmental statement and daylight/sunlight review when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in the BRE Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the Environmental Statement in forming a judgement on whether the proposed development provides for sufficient daylight and sunlight to surrounding housing and sensitive receptors and is appropriate for its context (Part D of London Plan Policy D6), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan Policy DM10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (emerging City Plan Policy DE7).

1288. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and

hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the site have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same daylight/sunlight test requirements as residential properties. The dense urban environment of the city in and around the Cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in this respect.

### Daylight

1289. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL) tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met (full details on the daylight tests are set out in appendix c to this report).

1290. The BRE criteria states that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experience a 20% or more reduction). In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

1291. Both the London Plan 2021 and emerging City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

1292. The following scenarios have been assessed:

- Existing Baseline
- Proposed Development
- Cumulative Development

### *Results Overview*

### *Existing Baseline*

1293. A total of 18 buildings have been considered as sensitive receptors (see list above) and assessed in the baseline condition in relation to daylight and sunlight. Within these 18 buildings, a total of 668 windows serving 180 rooms have been assessed. In the existing baseline condition, of the 668 windows assessed for VSC, none would meet the BRE's target of 27% VSC. Of the 180 rooms assessed for NSL 37 (20.6%) would receive 80% NSL.

### *Proposed Scenario*

1294. Of the buildings assessed in the proposed scenario, the following buildings were assessed as experiencing a negligible (not significant) effect within the BRE guidelines as both the VSC and NSL criteria is met:

- 27-31 Mitre Street
- 18-20 Creechurch Lane Flat 34
- Bevis Marks Synagogue
- 4-8 Creechurch Lane
- St Katharine Creechurch Lane
- 26 Wormwood Street
- 25 Wormwood Street
- 2 Heneage Lane

### *Cumulative Scenario*

1295. In the cumulative scenario the following buildings were assessed as experiencing a negligible (not significant) effect within the BRE guidelines as both the VSC and NSL criteria is met:

- 18-20 Creechurch Lane Flat 34
- St Katherine Creechurch
- 26 Wormwood Street
- 25 Wormwood Street

### *Assessment of Affected Properties*

1296. The assessment below focuses on those buildings with windows/rooms that see a reduction in VSC and/or NSL in both the proposed development and cumulative development scenarios.

#### St Helen's Bishopsgate Church

1297. This is a place of worship located to the north of the site. The nave and the church office have been assessed for daylight. A total of 58 windows serving 13 rooms were assessed for daylight within this building.

### *Proposed development*

1298. For VSC, 41 of the 58 (70.7%) windows assessed would meet the BRE criteria and so are considered to experience a Negligible effect. Of the 17 affected windows, one would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect and 16 would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1299. For NSL, four of the 13 (30.8%) rooms assessed would meet the BRE criteria and so are considered to experience a Negligible effect. Of the nine affected rooms, one would experience an alteration in NSL between 20-29.9% which is considered a minor adverse effect, four would experience an alteration in NSL between 30-39.9% which is considered a Moderate Adverse effect and four would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1300. Due to the existing low VSC values to the windows, the resulting percentage change has a disproportionate impact on the results, as the absolute changes in VSC equate to less than 3.6% VSC, which is unlikely to be a noticeable alteration. In respect of the NSL, all affected rooms sit within the auxiliary building and are assumed to be of an office use. Due to the number of windows serving the nave, the NSL results for the Nave would be BRE compliant.

1301. Overall, percentage changes beyond BRE's criteria occur in respect of the VSC results to windows in both the nave and offices within the auxiliary building. However, these are disproportionate percentage reductions due to the low baseline values (which can be attributed to the densely built-up nature of the surrounding area). The absolute reductions are unlikely to be perceptible. The nave would be BRE compliant for NSL given the number of windows that serve this area

1302. Notwithstanding the above, there is a high level of compliance for VSC, with most windows having a negligible impact. Therefore, the overall effect of the proposed scheme on daylight to St Helen's Bishopsgate is Minor to Moderate Adverse (significant) effect.

### *Cumulative scenario*

1303. For VSC, seven of the 58 (12.1%) windows assessed would meet the BRE criteria and so are considered to experience a Negligible effect. Of the 51 affected windows, seven would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect, 11 would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect and

33 would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1304. For NSL, three of the 13 (23.1%) rooms assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the 10 affected rooms, three would experience an alteration in NSL of between 30-39.9% which is considered a Moderate Adverse effect and seven would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1305. All impacted windows have low existing values of daylight experienced due to the densely built-up nature of the surrounding area, therefore resulting in a disproportionate percentage change. In most instances, the alterations are not considered to result in a noticeable change and the Cumulative Effect is Moderate to Major Adverse (significant) effect, compared to a Minor to Moderate Adverse (significant) effect of the proposed scheme alone. The additional impacts are a result of the cumulative schemes coming forward.

#### 2 and 10 – 16 Creechurch Lane

1306. This is a four storey residential building. At its closest point it is 150 m to the southeast of the application site. A total of 88 windows serving 16 rooms were assessed.

#### *Proposed development*

1307. For VSC, 84 of the 88 (95.5%) windows assessed would meet the BRE criteria and so are considered to experience a Negligible effect. Of the four affected, all four would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect.

1308. For NSL, eight of the 16 (50%) rooms assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the eight affected rooms, two would experience an alteration in NSL of between 20-29.9% which is considered a Minor Adverse effect, three would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect, and three would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1309. Due to the existing low VSC values, the resulting percentage change is disproportionate, as the absolute changes in VSC equate to less than 1.6%, which is unlikely to be a noticeable change.

1310. In respect of NSL, the eight rooms rely on sky visibility above the site due to the built-up nature of the surrounding area. It is understood that these rooms are

bedrooms, BRE guidelines suggests that bedrooms are less sensitive compared to living rooms and dining rooms.

1311. Overall, the effect on daylight to this property is considered Negligible to Minor Adverse (not significant) effect given the low absolute percentage change and given that some of the impacted rooms are bedrooms.

#### *Cumulative scenario*

1312. For VSC, 53 of 88 (60.2%) windows assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the 35 affected windows, 15 would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect, 14 would experience an alteration between 30-39.9% which is considered a Moderate Adverse effect and six would experience an alteration in excess of 40% which is considered a Major Adverse effect.

1313. For NSL, eight of the 16 (50%) rooms would meet the BRE criteria so are considered to experience a Negligible effect. Of the eight affected rooms, one would experience an alteration in NSL between 30-39.9% which is a Moderate Adverse effect and seven would experience an alteration in excess of 40% which is considered a Major Adverse effect. It is highlighted that these are the same rooms that are as impacted in the proposed scenario.

1314. The effected windows serve bedrooms, which the BRE guidelines notes as being less important. Overall, the additional impacts occur due to the impacts of the surrounding cumulative schemes coming forward. The Cumulative Effect would be Minor to Moderate Adverse (significant effect), compared to the Negligible to Minor Adverse (not significant) effect of the proposed scheme alone.

#### 18 – 20 Creechurch Lane

##### *Proposed development*

1315. This is a four storey residential building located approximately 160 m east of the application site. The building wraps around the corner of Creechurch Lane which results in the corner windows looking directly towards the proposed development. The windows on the west and north elevation would have an oblique view of the proposed development. A total of 34 windows serving 15 rooms have been assessed.

1316. For VSC, all 34 (100%) windows assessed would meet the BRE criteria so are considered to experience a Negligible effect.



1317. For NSL, 13 of 15 (86.7%) of rooms assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the two affected rooms, both would experience an alteration in NSL between 20-29.9% which is a Minor Adverse effect.

1318. In respect of NSL, it is understood that the two impacted rooms are bedrooms, which the BRE guidelines considers to be less sensitive compared to living rooms and dining rooms.

1319. Overall, the effect of the proposal on daylight to this property would be Negligible to Minor Adverse (not significant) effect.

#### *Cumulative scenario*

1320. For VSC, 13 of 34 (38.2%) windows assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the 21 affected windows, three would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect, 10 would experience an alteration between 30-39.9% which is a Moderate Adverse effect and 8 would experience an alteration in excess of 40% which is a Major Adverse effect.

1321. Ten of the effected windows would serve bedrooms where daylight generally may be considered less important as noted in the BRE Guidelines. The remaining 11 affected windows for VSC serve either kitchens or living rooms. All of the windows serving living rooms affected for VSC would comply with the NSL criteria. The three kitchens affected for NSL are less than 13 square metres in size and alteration to NSL may be difficult to avoid. The remaining five rooms affected for NSL are bedrooms where daylight may be considered less important as noted in the BRE Guidelines.

1322. For NSL, seven of the 15 (46.7%) rooms assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the eight affected rooms, two would experience an alteration of NSL between 20-29.9% which is a Minor Adverse effect and six would experience an alteration in excess of 40% which is a Major Adverse effect.

1323. Five of the effected rooms would be bedrooms which the BRE guidance states are less important. Three of the effected rooms are kitchens, all of which are less than 13m<sup>2</sup> in size; one of these kitchens would only marginally exceed the BRE criteria (1.3% exceedance).

1324. The additional impacts occur due to the impacts are a result of the surrounding cumulative schemes coming forward. The cumulative impact is considered to be Minor to Moderate Adverse (significant), when compared to Negligible to Minor Adverse (not significant) impact of the proposed scheme alone.

### 33 Great St Helen's

#### *Proposed development*

1325. This is a residential building to the north of the site. A total of 19 windows serving seven rooms have been assessed.

1326. For VSC, five of the 19 (26.3%) windows assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the 14 effected windows, one would experience an alteration of VSC between 20-29.9% which is a Minor Adverse effect and 13 would experience an alteration in excess of 40% which is a Major Adverse effect.

1327. For NSL, all seven of the rooms would fail to meet the BRE criteria. One would experience a reduction in NSL between 30-39.9% which is a Moderate Adverse effect and six would experience an alteration in excess of 40% which is a Major Adverse effect.

1328. The effected windows have existing low VSC values (ranging from 8.8% to 1.9%), as a result the percentage changes are disproportionate. The absolute changes in VSC range from 0.8% to 2.6% which are unlikely to be a perceptible change.

1329. In respect of NSL, the seven effected rooms rely on sky visibility above the site due to the built-up nature of the surrounding area. It is understood that three of the effected rooms are bedrooms and the BRE guidelines suggests that bedrooms are less sensitive compared to living rooms and dining rooms.

1330. Overall, given the disproportionate percentage changes due to the low existing values and given that three of rooms seeing NSL impacts are bedrooms, the effect is considered to be Minor to Moderate adverse (significant) effect.

#### *Cumulative scenario*

1331. For VSC, five of the 19 (26.3%) windows assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the 14 effected windows, one would experience an alteration of VSC between 30-39.9% which is a Moderate Adverse effect and 13 would experience an alteration in excess of 40% which is a Major Adverse effect.

1332. For NSL, all seven rooms would fail to meet the BRE criteria. One would experience a reduction of NSL between 30-39.9% which is a Moderate Adverse effect and six would experience an alteration in excess of 40% which is a Major Adverse effect.

1333. Overall, the impact of the cumulative scenario on daylight levels to 33 Great St Helen's would be as per the proposed scenario; Minor to Moderate Adverse (significant) effect.

1334. Representations have been received on behalf of this property raising concerns that the proposed and cumulative development scenarios would result in the property experiencing a detrimental impact upon its function, operation and amenity due to loss of daylight and sunlight. Officers highlight the cumulative scenario would have no material additional impacts beyond the proposed scenario. Whilst the concerns are acknowledged, regard has to be given to the surrounding context and the consented application. The existing surrounding built-up context contributes to the existing low baseline values; the existing low baseline values result in disproportionate percentage changes, whilst the result shows that 13 windows and seven rooms (of which three are bedrooms and less important), experience an alteration greater than 40%, in absolute terms the absolute changes would be circa 2% (for VSC), and alterations of this extent are unlikely to be perceptible. Also, when compared to the consented scheme, the impacts on this property are commensurate in absolute terms. As such, considering the context of the site, the existing baseline value, absolute changes and the consented development, the proposal is not considered to result in alterations in daylight and sunlight that would have unacceptable impacts on the function, operation and amenity of this property.

#### 1 – 24 Wormwood Street

1335. This is a residential building located approximately 200 m to the north of the site. A total of 100 windows serving 34 rooms were assessed.

#### *Proposed Development*

1336. For VSC, 94 of the 100 (94%) windows assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the six affected windows, all would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect.

1337. For NSL, eight of the 34 (23.5%) rooms assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the 26 affected rooms, seven would experience an alteration in NSL between 20-29.9% which is a Minor Adverse effect, 10 would experience an alteration between 30-39.9% which is a Moderate Adverse effect and nine would experience an alteration in excess of 40% which is a Major Adverse effect.

1338. Due to the existing low VSC values (ranging from 9.6% - 4.4%), the resulting percentage change is disproportionate. The absolute changes in VSC equate to 1.6% or less, which is unlikely to be a perceptible change.

1339. In respect of NSL, these rooms are single aspect and rely on sky visibility from one window, which looks towards the site. Due to the built-up nature of the surrounding context, the sky view within most of these rooms is somewhat limited, as shown by the existing baseline values (the majority are below 50% NSL), this results in a disproportionate percentage alteration. The two rooms (R2/F04 and R6/F04) which receive greater levels of NSL in the existing baseline condition (73% and 60% respectively), whilst they are already below the BRE's recommended levels, would retain 49% and 40% NSL. These values are in line with existing values observed elsewhere in the building and can be attributed to the single aspect nature of the rooms and the built-up surrounding context.

1340. Overall, the results are disproportionate percentage reductions to the low baseline values which can be attributed to the densely built-up nature of the surrounding area. Therefore, the effect is considered to be Negligible to Minor Adverse (not significant) effect.

#### *Cumulative scenario*

1341. For VSC, 94 of the 100 (94%) windows assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the six affected rooms, all six rooms would experience an alteration in VSC between 20-20.9% which is a Minor Adverse effect.

1342. For NSL, seven of the 34 (20.6%) rooms assessed would meet the BRE criteria so are considered to experience a Negligible effect. Of the 27 affected rooms, seven would experience an alteration in NSL between 20-29.9% which is a Minor Adverse effect, 11 would experience an alteration between 30-39.9% which is a Moderate Adverse effect and nine would experience an alteration greater than 40% which is a Major Adverse effect.

1343. Overall, the daylight levels in the cumulative scenario would be similar to those in the proposed scenario, only one additional room would be impacted beyond the proposed development. The effect is considered to remain Negligible to Minor Adverse (not significant) effect.

#### *St Andrew Undershaft*

1344. This is a religious building located to the southeast of the application site. The place of worship (nave) and auxiliary building have been assessed. The north facing windows serving the nave are already obstructed and receive low levels of daylight (VSC and NSL) in the baseline condition. The west facing windows have an oblique view of the proposed development. A total of 86 windows serving four rooms were assessed.

### *Proposed development*

1345. For VSC, 66 of the 86 (76.7%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the 20 affected windows, five would experience an alteration in VSC of between 20-29.9% which is a Minor Adverse effect, one would experience an alteration between 30-39.9% which is a Moderate Adverse effect and 14 would experience an alteration in excess of 40% which is a Major Adverse effect.

1346. For NSL, all four rooms assessed would meet the BRE criteria so would have a negligible effect.

1347. Due to the existing low VSC values, the resulting percentage changes are disproportionate. The absolute VSC changes equate to a maximum of 2.5% VSC, which is unlikely to be a perceptible change. Also, each room is served by multiple windows. When an average of the windows is taken, the Nave would experience 20.7% reductions which would be 0.7% above the 20% threshold in the BRE Guidance.

1348. Overall, the VSC results are disproportionate percentage reductions due to the low baseline values which can be attributed to the densely built-up nature of the surrounding area. It is acknowledged that all rooms comply with the NSL test and all windows that have VSC impacts are not the only windows serving the room. When the average is taken for the rooms, two would see no reduction and the Nave would experience a reduction marginally above the BRE threshold. Therefore, the effect is considered to be Minor to Moderate Adverse (significant) effect.

### *Cumulative scenario*

1349. For VSC, 38 of the 86 (44.2%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the 48 affected windows effected, three would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect, 17 would experience an alteration between 30-39.9% which is a Moderate Adverse effect and 28 would experience an alteration in excess of 40%.

1350. For NSL, all four rooms assessed would meet the BRE criteria so would have a negligible effect.

1351. Overall, the impacted windows experience low existing daylight values due to the built-up nature of the surrounding area. Additional impacts would occur to the VSC results in the cumulative development when compared to the proposed scheme alone. Whilst these alterations may not be perceptible, due to the greater magnitude of impact the effect is considered to be Moderate to Major

Adverse (significant) compared to a Minor to Moderate Adverse (significant) effect of the proposed scheme alone.

#### 50 Bishopsgate

1352. This is a residential building situated approximately 70m to northwest of the application site. A total of seven windows serving four rooms were assessed.

#### *Proposed development*

1353. For VSC, all seven windows fail to meet the BRE criteria. One window would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect and six would experience an alteration in excess of 40% which is a Major Adverse effect.

1354. For NSL, all four rooms would fail to meet the BRE criteria. All four rooms would experience an alteration in NSL in excess of 40% which is a Major Adverse effect.

1355. Due to the existing low VSC values (ranging from 0.6% to 3%), the resulting percentage change is disproportionate. The absolute changes in VSC equates to 1.8% or less which is unlikely to be perceptible alteration.

1356. In respect of NSL, all four of the affected rooms have limited sky visibility (below 15% NSL) in the existing baseline. The difference to daylight within these rooms is unlikely to be noticeable as the percentage reductions are disproportionate. The absolute losses are 0.7sqm, 1.0sqm and 0.4sqm for the bedrooms and 0.3sqm for the studio.

1357. Overall, the effect on daylight levels within this property are considered to be Minor to Moderate Adverse (significant) effect. However, due to the existing levels of daylight, the percentage reduction is disproportionate, and the absolute losses as set out above, should be taken into consideration. The impact is to three bedrooms which the BRE guidance states are less important and one studio-apartment. In this context it is not considered that the proposal would result in an unacceptable impact.

#### *Cumulative scenario*

1358. For VSC, all seven windows fail to meet the BRE criteria. One window would experience an alteration in VSC in between 20-29.9% which is a Minor Adverse effect and six would experience an alteration in excess of 40% which is a Major Adverse effect.

1359. For NSL, all four rooms fail to meet the BRE criteria. All four rooms would experience an alteration in NSL in excess of 40% which is a Major Adverse effect.

1360. Overall, the levels of daylight in the cumulative scenario would be virtually unchanged from those in the proposed scenario for this building. The impact would still be on the three bedrooms and one studio apartment. The effect is considered to remain Minor to Moderate Adverse (significant).

### 78 Bishopsgate (St Ethelburga's Centre)

1361. This is a religious building situated approximately 105m from the application site. A total of 24 windows serving four rooms were assessed.

#### *Proposed development*

1362. For VSC, 22 of the 24 (91.7%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, one would experience an alteration of VSC of 32.4% which is a Moderate Adverse effect, and one would experience an alteration of 42.9% which is a Major Adverse effect.

1363. For NSL, all four rooms assessed would meet the BRE criteria so would have a Negligible effect.

1364. In respect of the two windows that would not meet the BRE criteria for VSC, the existing baseline values are low. Therefore the resulting percentage change is disproportionate. The absolute change equates to 1.1% or less which is unlikely to be a perceptible change, and the room would be compliant if a VSC average is taken for all windows serving the room.

1365. Overall, percentage changes beyond the BRE criteria occur in two windows and there would be NSL compliance. The alterations to the windows are not considered to result in a perceptible change, as the percentage alterations are disproportionate due to the existing low values. Furthermore, it is noted that the rooms would be VSC compliant if taken as an average of all the windows in the room. Therefore, the effect is considered to be a Negligible (not significant).

#### *Cumulative*

1366. For VSC, 17 of the 24 (70.8%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, three would experience an alteration of VSC between 20-29.9% which is a Minor Adverse effect, three would experience an alteration between 30-39.9% which is a Moderate Adverse effect, and one would experience an alteration in excess of 40% which is a Major Adverse effect. The five additional windows effected in the cumulative scenario compared to the proposed scenario, have low baseline values which can result disproportionate percentage changes.

1367. For NSL, all four rooms assessed would meet the BRE criteria so would have a Negligible effect.

1368. Compared to the proposed development scenario, there would be five additional windows that would be affected beyond the BRE criteria. There is no change in respect of NSL compared to the proposed development scenario. Overall, given the NSL compliance, and considering the additional alterations in VSC, which may not be perceptible in some instances, the effect on daylight in this property is considered to be Negligible to Minor Adverse (not significant) effect, compared to Negligible (not significant) effect of the proposed scheme alone.

### 36 Great St Helen's

1369. This building is a hotel situated approximately 60m from the application site. It would have a transient occupancy and is therefore less sensitive when compared to permanent residential accommodation. A total of 29 windows serving 13 rooms have been assessed.

#### *Proposed development*

1370. For VSC, eight of the 29 (27.6%) windows assessed would meet the BRE criteria so would have a negligible effect. Of the affected windows, four would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect, five would experience an alteration between 30-39.9% which is a Moderate Adverse effect and 12 would experience an alteration in excess of 40% which is a Major Adverse effect.

1371. For NSL, 11 of the 13 (84.6%) rooms assessed would meet the BRE criteria so would have a negligible effect. Of the affected rooms, both rooms would experience an alteration in NSL in excess of 40% which is a Major Adverse effect.

1372. In respect of the VSC results, due to the existing low VSC values (ranging from 0% to 2.3%), the resulting percentage changes are disproportionate. The absolute change equates to 1.5% VSC or less which is unlikely to result in a noticeable difference.

1373. In respect of NSL, both of the two affected rooms are hotel rooms and would experience an alteration greater than 40%, however, both of these rooms have very low baseline values (7% and 3.7%). Due to the very low baseline values, the alteration is unlikely to be noticeable, as the absolute losses would be 0.5sqm and 0.2sqm respectively.



1374. Overall, due to the existing low levels of daylight experienced, the absolute alterations are unlikely to be noticeable, combined with the hotel use, the effect is considered to be Minor Adverse (not significant) effect.

### *Cumulative Scenario*

1375. For VSC, eight of the 29 (27.6%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, four would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect, five would experience an alteration between 30-39.9% which is a Moderate Adverse effect and 12 would experience an alteration in excess of 40% which is a Major Adverse effect.

1376. For NSL, 11 of the 13 (84.6%) rooms assessed would meet the BRE criteria so would have a Negligible effect. Of the affected rooms, both rooms would experience an alteration in NSL in excess of 40% which is a major adverse effect.

1377. As set out above, all of the effected windows serve hotel rooms, which the BRE guidance states are less important given that the population is transient when compared to residential units.

1378. Overall, whilst there would be some alterations in the results due to the impacts of surrounding cumulative schemes (all of the impacts are to hotel bedrooms), these may not be perceptible in some instances due to the low existing baseline values, notwithstanding the cumulative effect is considered to be a Minor to Moderate Adverse (significant) effect compared to Minor Adverse (not significant) effect of the proposed scheme alone.

### 48 Bishopsgate

1379. This building is in use as an apart-hotel situated approximately 66m from the application site. The Environmental Statement sets out that floor plans show that the building comprises of four bedrooms on the first, second, third and fifth storeys and a living room, kitchen and dining room (LKD) is located on the fourth storey. A total of 11 windows serving five rooms were assessed.

### *Proposed development*

1380. For VSC, six of the 11 (54.5%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, four would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect, and one would experience an alteration between 30-39.9% which is a Moderate Adverse effect.

1381. For NSL, all five rooms would meet the BRE criteria so would have a Negligible effect.

1382. Due to the existing low VSC values (ranging from 13.4% to 2.4%), the resulting percentage changes are disproportionate. The highest absolute change equates to less than 3.3%, which is unlikely to be a noticeable difference. It is noted that the LKD that would be impacted would remain compliant with the BRE guidelines on a room average VSC basis.

1383. Overall, only bedrooms would see VSC alterations, this is due to low baseline values. In respect of the LKD, as this is served by multiple additional unaffected windows, the absolute alterations are unlikely to be noticeable. Also all of the rooms would be NSL compliant. The effect of daylight in this property is considered to be Minor Adverse (not significant) effect.

#### *Cumulative scenario*

1384. For VSC, one of the 11 (9.1%) windows assessed would meet the BRE criteria so would have Negligible effect. Of the affected windows, four would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect, one would experience an alteration between 30-39.9% which is a Moderate Adverse effect and five would experience an alteration in excess of 40% which is a Major Adverse effect.

1385. Of the 10 effected windows, six would serve bedrooms which the BRE guidance states is less important. The four remaining windows all serve a single LKD.

1386. For NSL, three of the five (60%) rooms assessed would meet the BRE criteria so would have a Negligible effect. Of the affected rooms, one would experience an alteration in NSL between 30-39.9% which is a Moderate Adverse effect, and one would experience an alteration more than 40% which is a Major Adverse effect.

1387. Overall, whilst there would be some alterations, due to the impacts of the surrounding cumulative schemes, there would be instances where the changes would not be perceptible due to low existing baseline values, the cumulative effect is considered to be Minor to Moderate Adverse (significant), compared to a Minor Adverse (not significant) effect of the proposed development alone.

1388. Representations have been received on behalf of this property raising concerns that the proposed and cumulative development scenarios would result in the property experiencing a detrimental impact upon its function, operation and amenity due to the loss of daylight and sunlight. As this building is an apart-hotel, the population of this building is more transient compared to standard residential

accommodation. In the proposed scenario, for VSC, the absolute reductions to the weighted rooms average equates to circa 2% which is unlikely to be a perceptible alteration; the existing low baseline levels result in disproportionate percentage changes. Officers do acknowledge that the impact in the cumulative scenario is greater compared to the proposed scenario. The additional losses in the cumulative scenario occur due to other developments rather than the proposed development, this is partially a function of the low existing baseline values. In the cumulative scenario, the LKD on the fourth floor would experience an absolute reduction of 4.1% VSC to the room as whole (this has been weighted as the room is served by multiple windows) and for the bedroom (which the BRE Guidance states are less important) on the fifth floor, this would experience an absolute alteration of 5.4% to the room as a whole. Also, when compared to the consented scheme, the impacts on this property are commensurate in absolute terms. As such, considering the context of the site, that the population of the building is more transient, the consented scheme, and cumulative scenarios are not considered to result in alterations in daylight and sunlight that would have unacceptable impacts on the function, operation and amenity of this property.

#### Cumulative Daylight Impact

1389. The assessment below focuses on the buildings with windows/rooms that see a reduction in the VSC and/or NSL as result on the cumulative development only. For the avoidance of doubt, these buildings comply with the BRE criteria in the proposed development scenario.

#### 27-31 Mitre Street

1390. This is a residential building situated approximately 155m to the east of the application site. A total of 32 windows serving 20 rooms were assessed.

#### *Cumulative scenario*

1391. For VSC, 29 of the 32 (90.6%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, two would experience an alteration in VSC between 30-39.9% which is a Moderate Adverse effect and one would experience an alteration in excess of 40% which is a Major Adverse effect. It is understood that two of the affected windows serve living/dining rooms which would see absolute losses of 3% and 3.5% and one window serves a bedroom which would see an absolute loss of 3.7%. However, each of these three rooms are served by additional windows where they would meet the BRE criteria on a weighted rooms average basis.

1392. One of the effected windows serves a bedroom which the BRE guidance states are less important. The two other effected windows serve living/dining

rooms, in both instances, they are one of three windows that serve the rooms, and the rooms would meet the NSL criteria.

1393. For NSL, all 20 rooms assessed would meet the BRE criteria so would have a Negligible effect.

1394. The absolute alterations are minimal, and therefore the cumulative effect is considered to be Minor Adverse (not significant) effect, compared to Negligible (not significant) effects of the proposed scheme alone.

#### Bevis Marks Synagogue

1395. This is a place of worship situated approximately 150m from the application site. A total of 23 windows serving two rooms were assessed.

#### *Cumulative scenario*

1396. For VSC, 14 of the 23 (60.9%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, four would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect, two would experience an alteration between 30-39.9% which is a Moderate Adverse effect and three would experience an alteration in excess of 40% which is a Major Adverse effect. The absolute losses to the affected windows ranged between 0.1% to 2.3% VSC.

1397. All of the effected windows would be one of multiple windows serving the two rooms. Of the four windows that would see an alteration between 20-29.9%, two would have an existing baseline value of 3.9% or less and two would have an existing baseline value of 7.2% or less. Of the two windows that would experience an alteration between 30-39.9% they have an existing baseline value of 5% or less. Of the three rooms experiencing an alteration greater than 40% they have an existing baseline value of 5.3% or less.

1398. For NSL, all of the rooms assessed would meet the BRE criteria so would have a Negligible effect.

1399. The absolute alterations are minimal and all rooms comply for NSL, and the cumulative effect is considered to be Minor Adverse (not significant) effect, compared to Negligible (not significant) effect of the proposed scheme alone.

#### *4-8 Creechurch Lane*

1400. This is a residential property situated approximately 175m to the east of the application site. A total of 59 windows serving 21 rooms were assessed.

#### *Cumulative scenario*

1401. For VSC, 49 of the 59 (83.1%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, nine would experience and alteration in VSC between 20-29.9% which is a Minor Adverse effect, and one would experience an alteration between 30-39.9% which is a Moderate adverse effect.

1402. Of the 10 affected windows, four of these serve two bedrooms, two windows serve a living room, and four windows serve a studio apartment. One bedroom would see both windows in one bedroom with absolute losses of 2.8% and the other bedroom would see absolute losses of 1.1% and 1.3%. The two windows serving a living room would see absolute losses of 2.5% and 2.7%, however, this room has two additional windows, as such the living rooms would meet the BRE criteria on a weighted room average. The four windows in the studio apartment would see absolute losses between 3.1% to 3.4%; however, the studio apartment would meet the BRE criteria on a weighted room average.

1403. For NSL, all of the rooms assessed would meet the BRE criteria so would have a Negligible effect.

1404. The absolute alterations are considered minimal and therefore the cumulative effect is considered to be Minor Adverse (not significant), compared to Negligible (not significant) in the proposed scheme alone.

### 2 Heneage Lane

1405. This is a residential building situated approximately 150m from the application site. A total of six windows serving five rooms were assessed.

#### *Cumulative scenario*

1406. For VSC, five of the six (83.35%) would meet the BRE criteria so would have a Negligible effect. The one affected window would experience an alteration in VSC between 20-29.9% which is a Minor Adverse effect.

1407. For NSL, all of the five rooms would meet the BRE criteria so would have a Negligible effect.

1408. Overall, one window would experience an alteration in VSC and all rooms comply with the NSL criteria, so the effect on daylight within this property is Negligible to Minor Adverse (not significant) effect, compared to Negligible (not significant) effect of the proposed scheme alone.

#### *Sunlight to neighbouring buildings*

1409. Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

1410. To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

1411. The submitted Environmental Statement also includes an assessment of Winter Probable Sunlight to give a detailed analysis of winter conditions.

1412. The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

1413. The following scenarios were assessed for sunlight:

- Existing baseline
- Proposed development
- Cumulative scenario

#### *Existing Baseline*

1414. In the existing baseline 369 of the total windows assessed for APSH and WPSH, 361 (97.1%) would meet the BRE criteria or would experience little to no impact (less than 20% alteration).

1415. Of the buildings assessed (for information all the sensitive receptors that were tested for daylight were tested for sunlight with the exception of 2&10-16 Creechurch Lane, 18-20 Creechurch Lane and 2 Henage Lane as they do not have a window serving a habitable room facing within 90 degrees of due south) in the proposed scenario the following buildings were assessed as experiencing a

negligible (not significant) effect and are therefore compliant with the BRE guidelines:

- 27 – 31 Mitre Street
- 18-20 Creechurch Lane – Flat 34
- Bevis Marks Synagogue
- 4-8 Creechurch Lane
- St Katherine Cree Church
- 26 Wormwood Street
- 25 Wormwood Street
- 1-24 Wormwood Street
- St Andrew Undershaft Church
- 50 Bishopsgate
- 78 Bishopsgate (St Ethelburga's Centre)
- 36 Great St Helen's

1416. In the cumulative scenario the following buildings were assessed as having no difference to the magnitude of impact to the sensitive receptors, when compared to the Proposed Development scenario. Therefore, the effect to the following receptors remains unchanged from the Proposed Development scenario:

- St Helen's Bishopsgate Church
- 27-31 Mitre Street
- 18-20 Creechurch Lane- Flat 34
- Bevis Marks Synagogue
- 4-8 Creechurch Lane
- 33 Great St Helen's
- St Katherine Cree Church
- 26 Wormwood Street
- 25 Wormwood Street
- St Andrew Undershaft Church
- 50 Bishopsgate
- 78 Bishopsgate (St Ethelburga's Centre)
- 36 Great St Helen's
- 48 Bishopsgate

1417. The assessment below focuses on those buildings with windows that would see a reduction in APSH and/or WPSH in the proposed development scenario.

*Proposed Development*

### St Helen's Bishopsgate Church

1418. For APSH, 33 of the 37 (89.2%) windows assessed would meet the BRE criteria so would have a Negligible effect. Of the affected windows, all four would experience an alteration in APSH in excess of 40% which is a Major Adverse effect.

1419. For the four windows affected in the APSH, these windows serve the nave and look towards the proposed development. The Environmental Statement sets out that whilst sunlight is reduced to windows individually, the room as a whole would still receive sunlight from other windows. Taking into account the room average, an absolute alteration of 5% APSH would occur, changing from 22% APSH to 17% APSH, which equates to an absolute reduction of 22.7% which is considered Minor Adverse.

1420. For WPSH, 35 of the 37 (94.6%) windows assessed would meet the BRE criteria so would have a Negligible effect. The two affected windows in the WPSH have very low baseline values (1% WPSH) and so the absolute reduction would not be perceptible, with no alteration occurring to the room average.

1421. Overall, whilst there are four windows that experience APSH alterations, the nave would continue to receive sunlight through unaffected windows. When considering the room, an absolute alteration of 5% APSH would occur, and BRE notes that reductions of 4% or less APSH would not be noticeable. Two windows would be affected in the winter and these windows have very low baseline values, which means that the change is unlikely to be perceptible. The effect on sunlight in this property is considered to be Minor Adverse (not significant).

### 33 Great St Helen's

1422. A total of 19 windows were assessed in this building, of which 16 (84.2%) would meet the BRE criteria for both APSH and WPSH, so would have a Negligible effect. The remaining three windows would experience losses in excess of 40% which is a Major Adverse effect.

1423. One of these three windows serves a living room and the other two rooms are of an unknown use. The existing baseline values at each of these windows are generally relatively low, receiving 6%, 10% and 9% APSH respectively and 1-2% WPSH at all three windows. This relatively low baseline values are typical within a built-up urban environment like the City of London.

1424. For APSH, the BRE Guidelines suggests that alterations of up to 4% absolute APSH are not noticeable, and the alterations to the four affected windows would be 5-6% APSH. The alteration annually may therefore be minimally noticeable.



1425. For WPSH, given the low baseline values of 1-2% WPSH, the percentage alterations are disproportionate to what the occupants would be likely to experience.

1426. Overall, APSH and WPSH reductions occur to three windows, whilst these reductions occur, the retained values would be similar to the current baseline seen at comparable windows. Whilst the majority of windows would be unaffected, however, the alterations may be minimally perceptible at the three windows that are affected to the greatest extent. The effect on sunlight in this property is considered to be Minor Adverse (not significant).

1427. Representations have been received on behalf of this property raising concerns that the proposed and cumulative development scenarios would result in the property experiencing a detrimental impact upon its function, operation and amenity due to loss of daylight and sunlight. The impact of the development on daylight is set out in the daylight section of this report. In respect of sunlight for the reasons set out above (low baseline values and minimal percentage changes), the impact is considered to be Minor Adverse (not significant).

#### 48 Bishopsgate

1428. A total of six windows were assessed within the building, of which five (83.3%) would meet the BRE criteria for both APSH and WPSH so would have a Negligible effect.

1429. For APSH, five of the six (83.3%) windows assessed would meet the BRE criteria so would have a Negligible effect. The remaining window would see a loss in excess of 40% which is a Major Adverse effect. The window affected for APSH serves a bedroom, the BRE guidelines states that bedrooms are considered less important. Due to having additional windows, this room would remain well sunlit. Based on a weighted room average taking into account the two further windows serving this bedroom, 23% APSH would be retained, which is marginally below the BRE recommendation of 25%.

1430. For WPSH, all of the windows would meet the BRE criteria so would have a Negligible effect.

1431. Overall, there is a high level of compliance, with the one remaining window remaining well sunlit, the effect on sunlight levels is considered to be Negligible (not significant).

1432. Representations have been received on behalf of this property raising concerns that the proposed and cumulative development scenarios would result in the property experiencing a detrimental impact upon its function, operation and

amenity due to loss of daylight and sunlight. This objection is addressed above in the Daylight impacts section in respect of daylight. For the reasons set out above the impact of the proposed development on sunlight would be Negligible (not significant). Only one bedroom window would be effected in sunlight terms and the BRE guidance notes that sunlight to bedrooms is of less importance.

### *Cumulative Scenario*

1433. The assessment below focuses on those buildings with windows that would see a reduction in APSH and or WPSH in the cumulative scenario only.

#### 1-24 Wormwood Street

1434. For the avoidance of doubt, the proposed development alone does not result in any reduction to the APSH and or WPSH at 1-24 Wormwood Street. In the cumulative scenario however, two windows would see alterations to WPSH greater than 40% which are considered a Major Adverse effect.

1435. Both of the rooms that these impacted windows serve would remain compliant with BRE recommendations overall based on a weighted average. In the cumulative scenario, the changes to APSH are unchanged from the proposed development. Overall, because there are only isolated changes to winter sunlight (WPSH) as a result of the cumulative schemes coming forward, and no change to annual sunlight (APSH) the cumulative effect on sunlight is considered to be Negligible (not significant) effect.

#### Sunlight to nearby amenity spaces

1436. In relation to overshadowing, all areas of public open space, such as parks, squares, neighbouring communal areas and private gardens, are considered highly sensitive. A total of 27 outdoors spaces have been considered as nearby sensitive receptors and have been tested for Sunlight Hours on the Ground (full details of the Sunlight Hours on Ground test are set out in appendix C to this report), these 27 spaces are:

- 99 Bishopsgate podium terrace (the existing outdoor amenity for office occupants only)
- St Botolph Gardens (public religious outdoor amenity)
- Jubilee Gardens (public outdoor amenity just off the junction with Houndsditch and Outwich Street)
- Devonshire Square 1 (public outdoor amenity off Devonshire Square and Devonshire Row )
- Devonshire Square 2 (public outdoor amenity on the north east side of Devonshire Square)
- Cutler's Gardens Estates (public outdoor amenity on the north east side of Devonshire Square)
- Royal Fusiliers 1 (public outdoor amenity north east side of Cutler Street)
- Royal Fusiliers 2 (public outdoor amenity west side of Harrow Street)

- Devonshire Square 3 (public outdoor amenity)
- Royal Exchange 1 (public outdoor amenity to the west of Royal Exchange, off Bank Junction)
- Royal Exchange 2 (public outdoor amenity to the west of Royal Exchange, off Bank Junction)
- Royal Exchange 3 (public outdoor amenity to the east of Royal Exchange)
- City of London Club (public outdoor amenity to the rear of the building)
- St Helen Churchyard 1 (public outdoor amenity)
- St Helen Churchyard 2 (public outdoor amenity)
- St Andrews Church (religious outdoor amenity)
- 30 St Mary Axe (public outdoor amenity around the building)
- 11-12 Bury Street (public outdoor amenity)
- Bevis Marks Synagogue (religious outdoor amenity)
- 19 Bevis Marks (public outdoor amenity)
- Creechurch Courtyard (public religious outdoor amenity)
- 1 Creechurch (public outdoor amenity)
- Mitre Square Gardens (public outdoor amenity)
- Aldgate School 1 (outdoor amenity to the south west of the school)
- Aldgate School 2 (public amenity to the south east of the school)
- Aldgate Memorial (public outdoor amenity)
- Aldgate Square (public outdoor amenity)

1437. For each amenity space three scenarios were tested:

- Existing baseline
- Proposed development
- Cumulative scenario

### *Baseline*

1438. The above amenity areas have been assessed against the BRE sun on ground criteria. In the baseline condition, only 11 of the amenity areas comply with the BRE criteria of receiving at least two hours of sunlight on March 21st for at least 50% of their total area.

### *Proposed*

1439. In the Proposed Development scenario, two amenity spaces would see alterations in terms of the percentage of total area which sees at least two hours of direct sunlight on March 21st, when compared to the baseline condition. These are:

- Devonshire Square 1
- 99 Bishopsgate podium terrace

### *Devonshire Square 1*

1440. In the existing scenario, 67% of Devonshire Square 1 receives at least two hours of direct sunlight on March 21st. Devonshire Square would see a 3% reduction in the amount of area receiving at least two hours of sunlight. This is a negligible (not significant) effect and the area would still remain BRE compliant as a result of the proposed development.

#### 99 Bishopsgate Podium Terrace

1441. In the existing scenario, 15% of the podium terrace receives at least two hours of direct sunlight on March 21st, and as such, as it currently exists does not comply with the BRE guidance. In the Proposed Development scenario, 2% of the podium terrace would receive at least two hours of direct sunlight on March 21st, this represents an alteration of 87% compared to the existing, which would technically be a Major Adverse (significant) effect. However, this area has a low baseline as only 15% of the podium terrace receives at least two hours of direct sunlight (so is not compliant with the BRE guidance in the existing situation), the sun exposure images show that southern portion of the terrace receives a maximum of three hours of sun on March 21st so the absolute reduction equates to 1-2 hours loss of sunlight, due to this, the effect is considered to be Moderate Adverse (significant) effect. It is noted that this is a private terrace for the occupiers of this office building and as such is less important.

#### *Cumulative*

1442. In the Cumulative Development scenario, 21 amenity spaces would see an alteration in terms of the percentage of total area which sees at least two hours of direct sunlight of March 21st of less than 20%. As the reduction is less than 20%, in accordance with the BRE Guidance this would result in a Negligible (not significant) effect.

1443. As such, in the cumulative scenario, six amenity spaces would see alterations in terms of the percentage of total area which sees at least two hours of direct sunlight on March 21st beyond a negligible effect, when compared to the baseline condition. These are:

- 99 Bishopsgate podium terrace (the existing terrace has been assessed, notwithstanding should the proposals for the 99 Bishopsgate site be implemented this terrace would be removed as set out above in the Updated Daylight and Sunlight Assessment section of this report)
- Devonshire Square 1
- Devonshire Square 2
- Culter's Gardens Estates
- Royal Fusiliers 1
- 30 St Mary Axe

### 99 Bishopsgate Podium Terrace

1444. In the Cumulative Development scenario, there would be a 100% alteration in term of the percentage of the total area which sees at least two hours of direct sunlight as 0% would receive at least two hours of direct sunlight. As in the proposed development scenario, the effect remains a Major Adverse (significant) effect and the additional impact is as a result of the surrounding cumulative schemes coming forward. It is noted that this is a private terrace for the occupiers of this office building and as such is less important.

### Devonshire Square 1

1445. In the Cumulative Development scenario, there would be a 36% alteration in terms of the percentage of the total area which sees at least two hours of direct sunlight on March 21st as 43% would receive at two hours of direct sunlight compared to 67% in the existing baseline. This is a Moderate Adverse (significant) effect. It is highlighted that the Cumulative Development scenario is 7% below the target value of 50% receiving at least two hours sunlight on March 21st.

1446. The cumulative effect is Moderate Adverse (significant) compared to Negligible (not significant) effect of the proposed scheme alone.

### Devonshire Square 2

1447. In the Cumulative Development scenario, there would be a 100% alteration in terms of the percentage of the total area which would see at least two hours of direct sunlight as 0% of the amenity space would receive at least two hours of direct sunlight. This is a Major Adverse (significant) effect. The impact is as a result of cumulative schemes coming forward.

1448. The cumulative effect is Major Adverse (significant) effect compared to Negligible (not significant) of the proposed scheme alone.

### Cutler's Gardens Estates

1449. In the Cumulative Development scenario, there would be a 100% alteration in terms of the percentage of the total area which would see at least two hours of direct sunlight as 0% of the amenity space would receive at least two hours of direct sunlight. This is a Major Adverse (significant) effect as a result of cumulative schemes coming forward.

1450. The cumulative effect is Major Adverse (significant) effect compared to Negligible (not significant) of the proposed scheme alone.

### Royal Fusiliers 1

1451. In the Cumulative Development scenario, there would be a 63% alteration in terms of the percentage of the total area which would see at least two hours of direct sunlight as 12% would receive at least two hours of direct sunlight compared to 32% in the existing baseline. This is a Major Adverse (significant) effect.

1452. The cumulative effect is Major Adverse (significant) effect compared to Negligible (not significant) effect of the proposed scheme alone.

### 30 St Mary Axe

1453. In the Cumulative Development scenario, there would be a 25% alteration in terms of the percentage of the total area which would see at least two hours as 3% would receive at least two hours of direct sunlight compared to 4% in the existing baseline. This is a Minor Adverse (not significant) effect.

1454. The cumulative effect is Minor Adverse (not significant) compared to Negligible (not significant) effect of the proposed scheme alone.

1455. Representations have been received on behalf of this property stating that no there is no apparent detailed explanation of the assessed outputs in terms of the overshadowing of 30 St Mary Axe. Officers highlight that paragraph 12.232 of the relevant chapter of the Environmental Statement sets out that in the proposed scenario that there would be a negligible impact in terms of overshadowing. In respect of the cumulative development scenario, the results that are presented in paragraphs above are discussed in paragraph 12.379 of the relevant chapter of the Environmental Statement and on page 32 of Appendix 14-2 further images are shown showing the sun exposure for this area.

### *Sunlight to amenity areas within the application site*

1456. Sunlight levels to external amenity areas within the site have also been tested for the existing, proposed and cumulative scenarios. The Sun Hours on Ground (SHOG) test has been carried out and sun exposure diagrams have been included within the ES. Some of the objections have raised concern over the impact that the proposal would have on light available to St Helen's Square.

### *Baseline*

1457. The Sun Hours on Ground (SHOG) test shows that the existing public realm around the building, including St Helen's Square, Undershaft and the area to the west of the existing building, does not comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight on the 21st March.

Less than 1% of the public realm currently receives at least two hours of direct sunlight and this is located to the north-east of the existing building.

1458. The sun exposure on the ground assessment demonstrate that on the 21st March and 21st September the majority of the site receives total sunlight hours of between 0 to 0.5 hours. There are instances to the northeast and east of the building that receive between 1 and 2 hours of total sunlight hours.

1459. On the 21st April and 21st August areas to the west and north of the existing building largely receives total sunlight hours between 0 to 0.5 hours, with very minor instances of parts receiving 1 hour. The north-east corner receives between circa 1.5 to 3.5 hours. The majority of St Helen's Square to the south of the existing building receives around 1.5 to 2.5 hours.

1460. On the 21st May and 21st July, the areas to the west and north of the existing building largely receives total sunlight hours between 0 to 0.5 hours with some very minor instances of parts receiving 1 hour. The northeast corner receives total sunlight hours between circa 2.5 to 4 hours. St Helen's Square to the south of the existing building receives between 1.5 to 4.5 hours.

1461. On the 21st June, the areas to the west and north of the existing building largely receives total sunlight hours between 0 to 0.5 hours, with some very minor instances of parts receiving 1 hour and 3 hours. The northeast corner receives between circa 2.5 to 4 hours. The majority of St Helen's Square to the south of the existing building receives between 3 to 6+ hours.

1462. As set out above, the existing public realm including St Helen's Square does not comply with the BRE criteria of receiving at least two hours of sunlight for 50% of its area on the 21st March. The sun exposure results also demonstrate on the 21st March that the public realm around the existing building including the St Helen's Square to the south of the existing building receives between 0 to 0.5 hours. This can be attributed to the densely built-up nature of the area.

### *Proposed*

1463. In the proposed scenario, the SHOG assessment shows that that the public realm around the proposed building would not comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight on the 21st March, as none of the public realm would receive at least two hours of direct sunlight. This would not be a considerable change from the existing situation, where less than 1% of the public realm complies with the BRE criteria.

1464. On the proposed podium level, the SHOG assessment results show that 35% of the public realm at podium level would comply with the BRE criteria of receiving at least two hours of direct sunlight on the 21st March. It is highlighted,

that a greater area of the public realm at podium level receives more direct sunlight compared to existing public realm at grade (less than 1%).

1465. The SHOG assessment has also been undertaken for the private amenity terraces at level 30 and 48, with 88% and 77% receiving at least to two hours of direct sunlight respectively on the 21st March.

1466. Sun exposure on ground assessments have also been undertaken for each amenity area including St Helen's Square:

*21 March and 21 September*

1467. These demonstrate that on the 21st March and 21st September the majority of the public realm around the proposed building, including St Helen's Square would receive between 0 to 0.5 total sunlight hours. There are instances to the northeast of the proposed building that would receive between 1 and 2 hours of total sunlight hours.

1468. At podium level on the 21st March and 21st September, the total sunlight hours would range between circa 0 to 3 hours. The instances of the 2.5 to 3 hours are located to the south and northeast of the podium.

1469. On the levels 30 and 48 private amenity terraces on the 21st March and 21st September, the total sunlight hours would range between 0 to 6+ hours.

*21 April and 21 August*

1470. On the 21st April and 21st August, the sun exposure on ground assessments demonstrate that areas to the north and north-west receive total sunlight hours between 0 to 0.5 hours. The north-east corner would receive between circa 1.5 and 3.5 hours. South of the proposed building (St Helen's Square) would receive between circa 0 to 2 hours. Like in the existing situation, the northeast of the building would receive the highest total sunlight hours between circa 1.5 to 3.5 hours.

1471. At podium level on the 21st April and 21st August, the areas to the north and west would receive the lowest total sunlight hours between 0 and 0.5 hours. The northeast corner of the podium would receive total sunlight hours between 3 to 4.5 hours and the southern end of the podium would receive between 0 to 6+ hours.

1472. For the levels 30 and 48 private amenity terraces on the 21st April and 21st September the total sunlight hours would range between 0 to 6+ hours.



## *21 May and 21 July*

1473. On the 21st May and 21st July, the sun exposure on ground assessment demonstrate that the areas to the north and west would receive total sunlight hours between 0 to 0.5 hours; this is similar to the existing situation. The northeast would receive between 1.5 to 3 hours. The public realm to the south of the proposed building would receive between 0 to 3.5 hours.

1474. At podium level on the 21st May and 21st July, the north and west would receive between 0 to 0.5 total sunlight hours. The northeast and east would receive between 0.5 to 4.5 hours and the southern end of the podium would receive between 0 to 6+ hours.

1475. For the private amenity terraces on levels 30 and 48, these would receive total sunlight hours between 1.5 to 6+ hours on the 21st May and 21st July.

## *21 June*

1476. On the 21st June, the sun exposure on ground assessment demonstrates that to the west and the north of the proposed building would receive between 0 to 0.5 total sunlight hours. To the northeast and east of the proposed building would receive between 1.5 to 3.5 hours and to the south of the proposed building would receive between 0 to 5 total sunlight hours.

1477. At podium level on the 21st June, the public realm to the north and west would receive between 0 to 1 total sunlight hours. The public realm to the northeast and east would receive between 0.5 to 4.5 hours and the southern end of the podium would receive between 0 to 6+ total sunlight hours.

1478. For the private amenity terraces on levels 30 and 48, these would predominately receive total sunlight hours between 3 hours to 6+ hours on the 21st June.

1479. It is noted that whilst the proposed podium would oversail part of the application site, the proposed oculus in the southern end of the podium would allow high-angle sunlight to filter to the ground floor. This is why the results do not show the area under the podium receiving no sunlight.

1480. Overall, the proposed scenario, like the existing situation, would not comply with the BRE criteria on the 21st March, as 50% of the amenity space would not receive direct sunlight for at least two hours. Whilst 0% of the public realm at grade would not receive at least two hours of direct sunlight, 35% of the publicly accessible space on the proposed podium would receive at least two hours of

direct sunlight on the 21st March; compared to less than 1% in the existing situation at grade. When sun exposure is considered, the southern end of the podium garden would experience 2.5 to 3 hours, compared to 0 to 0.5 hours of the existing St Helen's Square. Taking into account both the public realm at grade and the publicly accessible space on the podium level, there would be an improvement beyond the existing situation in terms of how much of the public realm would receive at least two hours of direct sunlight on the 21st March.

1481. The proposed private amenity terraces on levels 30 and 48 would comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight.

### *Cumulative*

1482. In the cumulative scenario, similarly to the proposed scenario, the SHOG shows that the public realm around the proposed building would not comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight on the 21st March, as none of the public realm would receive at least two hours of direct sunlight on the 21st March. This is not a considerable change from the existing situation, as existing, less than 1% of the public realm complies with the BRE criteria.

1483. On the proposed podium level, the SHOG results show that 19% of the public realm would comply with the BRE criteria of receiving at least two hours of direct sunlight on the 21st March. As like in the proposed scenario, in the cumulative scenario, a greater area of the public realm at podium level receives more direct sunlight compared to the existing public realm at grade (less than 1%).

1484. The SHOG assessment has also been undertaken for the private amenity terraces on levels 30 and 48, with 88% and 75% receiving at least two hours of direct sunlight respectively on the 21st March.

1485. Sun exposure on ground assessments have also been undertaken. These demonstrate that on the 21st March and 21st September, the majority of the public realm around the proposed building would receive between 0 to 0.5 hours of total sunlight hours.

1486. At podium level on the 21st March and 21st September the total sunlight hours would range between 0 to 3 hours. The instances of 2 to 3 hours are located to the southern end of the podium with some minor instances of around 1.5 hours in the northeast corner.

1487. On the private amenity terraces at levels 30 and 48 on the 21st March and 21st September, the total sunlight hours would range between 0 to 6+ hours.

1488. On the 21st April and 21st August, the sun exposure on ground assessments demonstrate that areas to the north, west and east would receive between 0 to 0.5 hours. Areas to the north-east and south would received around 0 to 1.5 hours.
1489. At podium level on the 21st April and 21st August, the north and west would receive the lowest total sunlight hours between 0 to 0.5 hours. The northeast corner of the podium would receive between 1.5 to 2.5 hours and the southern end of the podium would receive between 0 to 5 hours.
1490. On the private amenity terraces at levels 30 and 48 on the 21st April and 21st August, the total sunlight hours would range between 1 to 6+ hours.
1491. On the 21st May and 21st July, the sun exposure on ground assessment demonstrates that the areas to the north and west would receive total sunlight hours between 0 to 0.5 hours; this is similar to the existing and proposed situation. The northeast would receive between 0 to 2.5 hours. The public realm to the south of the proposed building would receive between 0 to 2.5 hours.
1492. At podium level on the 21st May and 21st July, the north and west would receive between 0 to 0.5 hours. The northeast and east would receive between 0.5 to 2.5 hours and the southern end of the podium would receive between 0 to 6+ hours.
1493. On the private amenity spaces at levels 30 and 48 on the 21st May and 21st July, the total sunlight hours would mainly range between 3 to 6+ hours.
1494. On the 21st June, the sun exposure on the ground assessment demonstrates that to the west and north of the proposed building would receive between 0 to 0.5 hours; this is similar to the existing and proposed situation. To the northeast and east of the proposed building would receive between receive between 0 to 3.5 hours.
1495. At podium level on the 21st June, the public realm to the north and west would receive between 0 to 1 total sunlight hours. To public realm to the northeast and east would receive between would receive between 0 to 2.5 hours and the southern end of the podium would receive between 0 and 6+ total sunlight hours.
1496. For the private amenity terraces on levels 30 and 48, these would receive total sunlight hours mainly between 3 to 6+ plus hours on the 21st June.
1497. It is noted that whilst the proposed podium would over sail part of the application site, the proposed oculus in the southern end of the podium would allow high-angle sunlight to filter to the ground floor. This is why the results do not show the area under the podium receiving no sunlight.

1498. Overall, the cumulative scenario, like the existing situation, would not comply with the BRE criteria on the 21st March, as 50% of the amenity space would not receive direct sunlight for at least two hours. Whilst 0% of the public realm at grade would receive at least two hours of direct sunlight, 19% of the publicly accessible space on the proposed podium level would receive at least two hours of direct sunlight on the 21st March; compared to less than 1% in the existing situation. When sun exposure is considered, the southern end of the proposed podium garden would experience 2 to 3 hours, compared to 0 to 0.5 hours of the existing St Helen's Square. Taking into the account both the public realm at grade and the publicly accessible space on the podium level, there would be an improvement beyond the existing situation in terms of how much of the public realm would receive at least two hours of direct sunlight on the 21st March.

1499. The proposed private amenity terraces on levels 30 and 48 would comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight.

1500. An objection has been received from CC Land raising concern in respect of St Helen's Square receiving a reduction in the direct sunlight received during summertime. Officers highlight that the 21st March is the key date within the BRE Guidance and as existing St Helen's Square does not meet the BRE Guidance and that whilst the proposed development would not be compliant with the BRE guidance on the 21st March, when both the public realm at grade and podium garden are considered, a greater percentage of these spaces would receive at least two hours of direct sunlight compared to the existing.

### Conclusion on Daylight and Sunlight Impact

1501. In summary the above considerations demonstrate that in respect of daylight out of the 18 properties considered in the proposed scenario:

- Nine would experience negligible (not significant) effects, three would experience negligible to minor adverse (not significant) effects, two would experience minor adverse (not significant) effects, one would experience minor to moderate adverse (not significant) effects and three would experience minor to moderate adverse (significant) effects.

1502. In respect of daylight for the 18 properties considered in the cumulative scenario:

- Four would experience negligible (not significant) effects, three would experience negligible to minor adverse (not significant) effects, three would experience minor adverse (not significant) effects, seven would experience minor to moderate adverse (significant) effects and one would experience moderate to major adverse effects.

1503. In respect of sunlight 13 of the 15 properties would experience negligible (not significant) effects in both the proposed and cumulative scenarios. Two properties would experience minor adverse, not significant effects.

1504. In the proposed scenario, five of the residential properties considered would experience an effect greater than negligible. Of these five, three (2&10-16 Creechurch Lane; 18-20 Creechurch Lane and 1-24 Wormwood Street) would experience a Negligible to Minor Adverse (not significant) effect and two (33 Great St Helen's and 50 Bishopsgate) would experience a Minor to Moderate Adverse (significant) effect on daylight. In respect of sunlight, one of the residential properties (33 Great St Helen's) would experience a Minor Adverse (not significant) effect. Whilst officers do acknowledge that the properties listed above would experience impacts greater than the BRE Guidance, due to the existing low baseline values and the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations in most instances are not likely to be noticeable and as such the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels in accordance with policy DM10.7 of the Local Plan 2015, and the daylight and sunlight for these properties is considered to be appropriate for their context in accordance with policy D6(d) of the London Plan 2021 and policy DE7 of the emerging City Plan 2040, and these properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

1505. In addition, in the proposed scenario, two religious buildings (St Helen's Bishopsgate Church and St Andrews's Undershaft Church) and two hotels/apart-hotels (36 Great St Helen's and 48 Bishopsgate) would experience an effect greater than negligible. In respect of daylight, the two hotels/apart-hotels would experience Minor Adverse (not significant effect) and the two churches would experience Minor to Moderate Adverse (significant) effect. In respect of sunlight, one of the churches (St Helen's Bishopsgate) would experience a Minor Adverse (not significant) effect. Whilst officers do acknowledge that these sensitive receptors would experience impacts greater than the BRE Guidance, due to the existing baseline values and due to the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations are not likely to be noticeable and as such the daylight and sunlight to these sensitive receptors is considered to be appropriate for the context and provide these buildings with acceptable levels of daylight and sunlight in accordance with policy DE7 of the emerging City Plan 2040.

1506. In the proposed scenario, one amenity space (99 Bishopsgate podium terrace) would experience a Moderate Adverse (significant) effect. In absolute terms, this amenity space would experience a 1–2-hour loss of sunlight and as such this is considered acceptable for the context in accordance with policy DM10.7 of the

Local Plan 2015 and is not considered to compromise the comfort and enjoyment of this space in accordance with London Plan policy D9C(3)(a).

1507. In the cumulative scenario, eight of the residential properties considered would experience an effect greater than negligible. Of these eight, two (2 Heneage Lane and 1-24 Wormwood Street) would experience a Negligible to Minor Adverse (not significant) effect, two (27-31 Mitre Street and 4-8 Creechurch Lane) would experience a Minor Adverse (significant) effect; and four (50 Bishopsgate; 2&10-16 Creechurch Lane; 18-20 Creechurch Lane; and 33 Great St Helen's) would experience a Minor to Moderate (significant) effect. 1-24 Wormwood Street is the only property that experiences sunlight impacts greater than the proposed scenario. Whilst officers do acknowledge that the properties listed above would experience impacts greater than the BRE Guidance, due to the existing low baseline values due to the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations in most instances are not likely to be noticeable and as such the daylight and sunlight to these properties is not considered to be reduced to unacceptable levels in accordance with policy DM10.7 of the Local Plan 2015, and the daylight and sunlight for these properties is considered to be appropriate for their context in accordance with policy D6(d) of the London Plan 2021 and policy DE7 of the emerging City Plan 2040, and these properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

1508. In addition, in the cumulative scenario, four religious buildings (St Helen's Bishopsgate Church, St Andrew's Undershaft Church, 78 Bishopsgate (St Ethelburgas Centre); and Bevis Marks Synagogue) and two hotel/apart-hotels (36 Great St Helen's and 48 Bishopsgate) would experience an effect greater than negligible. Of these sensitive receptors, one (78 Bishopsgate (St Ethelburgas Centre)) would experience Negligible to Minor Adverse (not significant) effect, one would experience (Bevis Marks Synagogue) a Minor Adverse (not significant) effect, two (48 Bishopsgate and 36 Great St Helen's) would experience a Minor to Moderate Adverse (significant) effect, and two (St Helen's Bishopsgate Church and St Andrews Undershaft Church) would experience an Moderate to Major Adverse (significant) effect. Whilst officers do acknowledge that these sensitive receptors would experience impacts greater than the BRE Guidance, due to the existing baseline values and the dense urban context, the percentage alterations are disproportionate compared to the absolute alterations. The absolute alterations are not likely to be noticeable and as such the daylight and sunlight to these sensitive receptors is considered to be appropriate for the context and provide these buildings with acceptable levels of daylight and sunlight in accordance with policy DE7 of the emerging City Plan 2040.

1509. In the cumulative scenario, six amenity spaces would experience an effect greater than negligible. One (30 St Mary Axe) would experience a Minor Adverse (not significant) effect, one (Devonshire Square 1) would experience a Moderate Adverse (significant) effect and four (99 Bishopsgate amenity terrace (existing terrace, should the proposed 99 Bishopsgate scheme be implemented this terrace would be removed); Devonshire Square 2; Cutlers Gardens Estates; and Royal Fusiliers 1) would experience a Major Adverse (significant) effect. For the reasons set out in the assessment above, the impacts on 30 St Mary Axe and 99 Bishopsgate are considered acceptable for the context in accordance with policy DM10.7 of the Local Plan 2015 and is not considered to compromise the comfort and enjoyment of this space in accordance with London Plan policy D9C (3) (a). For Devonshire Square 2, Cutler's Gardens Estate and Royal Fusiliers the losses to these spaces could impact the comfort and enjoyment of these spaces as required by policy and this is considered in the planning balance section of this report.

1510. For open spaces within the site, overall, whilst both the proposed and cumulative scenarios would not comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight on the 21st March, there would be an improvement beyond the existing situation. This is because when both the public realm and the publicly accessible space on the podium level are considered, in the proposed and cumulative scenarios, 35% and 19% respectively of the podium level would receive at least two hours of direct sunlight, compared to less than 1% of the public realm at grade in the existing situation. Much like in the existing situation this is a result of densely built-up surrounding context. The combination of both the public realm at grade and the podium level are considered to provide useable public space, with the spaces being designed to respond to the conditions, for example, seating being proposed in the locations which experience greater levels of direct sunlight and the oculus within the podium allowing sunlight to filter to the ground floor. The levels of sunlight are considered to be appropriate for the dense urban context and will be acceptable for the use and therefore the development is considered to comply with policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.

### *Transient Overshadowing*

1511. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the different times of the day and year when shadow would be cast over a surrounding area.

1512. In relation to overshadowing, all areas of public open space, such as parks, squares, neighbouring communal areas and private gardens, are considered

highly sensitive. A total of 27 outdoors spaces have been considered as sensitive receptors, these 27 spaces are:

- 99 Bishopsgate podium terrace (public outdoor amenity)
- St Botolph Gardens (public religious outdoor amenity)
- Jubilee Gardens (public outdoor amenity)
- Devonshire Square 1 (public outdoor amenity)
- Devonshire Square 2 (public outdoor amenity)
- Cutler's Gardens Estates (public outdoor amenity)
- Royal Fusiliers 1 (public outdoor amenity)
- Royal Fusiliers 2 (public outdoor amenity)
- Devonshire Square 3 (public outdoor amenity)
- Royal Exchange 1 (public outdoor amenity)
- Royal Exchange 2 (public outdoor amenity)
- Royal Exchange 3 (public outdoor amenity)
- City of London Club (public outdoor amenity)
- St Helen Churchyard 1 (public outdoor amenity)
- St Helen Churchyard 2 (public outdoor amenity)
- St Andrews Church (religious outdoor amenity)
- 30 St Mary Axe (public outdoor amenity)
- 11-12 Bury Street (public outdoor amenity)
- Bevis Marks Synagogue (religious outdoor amenity)
- 19 Bevis Marks (public outdoor amenity)
- Creechurch Courtyard (public religious outdoor amenity)
- 1 Creechurch (public outdoor amenity)
- Mitre Square Gardens (public outdoor amenity)
- Aldgate School 1 (public outdoor amenity)
- Aldgate School 2 (public outdoor amenity)
- Aldgate Memorial (public outdoor amenity)
- Aldgate Square (public outdoor amenity)

1513. The proposed development and cumulative scenarios have been assessed and the results are set out below. The results have been updated for the revised proposal and they demonstrate that there would be no changes in the magnitude and scale of overshadowing impacts to receptors identified previously under the original 2023 scheme.

#### *Proposed Development*

##### *21st March*

1514. On this day, shadows are cast from the proposed development from 08:00 in a westerly direction and would move in a clockwise direction throughout the morning. At this time, shadow passes over St Helens Churchyard 1 and St Helens Churchyard 2, which are already partially in shade from the existing building. The shadow would clear these areas completely by 10:00. At this time,



the proposed development would cast a shadow over 99 Bishopsgate podium terrace, which is partially in shadow from the proposed development until 12:00. Between 14:00 and 15:00, the proposed development would pass shadow over Devonshire Square 1.

1515. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

#### *21st June*

1516. On this day, shadows are cast from the proposed development from 06:00 in a south-westerly direction. At 10:00 the shadow passes over St Helen Churchyard 1 and reaches St Helen Churchyard 2 by 11:00 at which time both are shaded from the proposed development. The shadow clears from St Helen Churchyard 1 by 13:00 and St Helen Churchyard 2 by 14:00.

1517. At 12:00, the proposed development shadow is cast over 99 Bishopsgate podium terrace for a short period.

#### *21st December*

1518. On this day, shadows are cast from the proposed development from 09:00 in a northerly direction. Due to the presence of existing buildings, most of the surroundings area is already cast in shade.

1519. At 10:00, 99 Bishopsgate podium terrace is shaded by the proposed development, which would clear by 12:00.

1520. The proposed development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

#### *Cumulative Development:*

#### *21st March*

1521. On this day, shadows are cast from the proposed development from 08:00 in a westerly direction. The shadow moves in a clockwise direction throughout the morning. At this time, shadow passes over St Helen Churchyard 1 and St Helen Churchyard 2, which are already partially in shade from existing buildings. The shadow moves quickly across these areas, with cumulative development shading the area at 09:00 and clearly completely by 10:00. At this time, the proposed development shadow is cast over 99 Bishopsgate podium terrace until 12:00. The cumulative developments would begin to shade area Devonshire Square 2, Cutler's Gardens Estates and Royal Fusiliers 1 from 10:00 which remain partially in shade from the cumulative developments until 14:00.

1522. The cumulative developments would also cast a slither of a shadow onto 30 St Mary Axe, which moves across the area and growing in scale until clearing at

16:00. Devonshire Square 3 would see a strip of shadow from the cumulative developments at 13:00 and between 14:00 and 15:00. The proposed development shadow would pass over Devonshire Square 1. At 15:00, the cumulative developments shadows pass over 11-12 Bury Street, Bevis Marks Synagogue and 19 Bevis Marks for a brief period.

1523. The cumulative development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

#### *21st June*

1524. On this day, shadows are cast from the proposed development from 06:00 in a south-westerly direction.

1525. At 10:00, the shadow passes over St Helen Churchyard 1 and reaches St Helen Churchyard 2 by 11:00 at which time both are shaded from the proposed development and cumulative developments. The shadow clears from St Helen Churchyard 1 by 13:00 and from St Helen Churchyard 2 by 14:00. At 12:00 the proposed development shadow is cast over 99 Bishopsgate podium terrace.

1526. The cumulative developments shade 30 St Mary Axe from 12:00 to 15:00 and the proposed development casts a small strip of shadow over 30 St Mary Axe between 14:00 and 15:00, which is mostly already in shade at this time.

1527. Between 14:00 and 16:00, cumulative developments pass over Devonshire Square 2, Cutler's Gardens Estates, Royal Fusiliers 1, 11-12 Bury Street, Bevis Marks Synagogue and 19 Bevis Marks.

1528. The cumulative development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

#### *21st December*

1529. On this day, shadows are cast from the proposed development from 09:00 in a northerly direction. Due to the presence of existing building, most the surrounding area is already cast in shade.

1530. At 10:00 99 Bishopsgate podium terrace is partially shaded by the proposed development, which clears before 12:00. The cumulative developments shade 11-12 Bury Street for a short period at 14:00.

1531. The cumulative development would not result in any additional shadow to the remaining sensitive amenity areas on this day.

1532. In conclusions, the results show that there would be no materially harmful overshadowing effects caused by the development to any public amenity areas

and therefore the proposal complies with policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the emerging City Plan 2040.

### Solar Glare

1533. Glare is the discomfort or impairment of vision caused by excessive or large contrast in luminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare: distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).

1534. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.

1535. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.

1536. It is highlighted and for the avoidance of doubt, the assessment set out below is on the updated solar glare assessment that was undertaken on the revised 2023 scheme.

1537. 69 road locations and two railway locations have been identified in the Environmental Statement as sensitive to solar glare approximately within 1KM of the site. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions, pedestrian crossings and railways lines at these locations.

1538. The assessment concludes that the development would have no effect or a Negligible (not significant) solar effect at 58 locations.

1539. At the remaining 13 locations, solar reflections are visible with 10° and 20° or between 10° and 5° of the driver's line of site for a short period of time. These results are largely unchanged from previous assessment, except for at viewpoint S7, travelling north along Lime Street, the reflections at the bottom of the proposed development would appear slightly differently. However, they occur beyond 15° of a road user's line of site for a short period of time; the overall effect is unchanged from the previous assessment. The Environmental Statement concludes that at these 13 locations, the solar glare effect would be Minor

Adverse (Not Significant). This is because some levels of reflections are virtually unavoidable where glaze or reflective materiality is proposed. It is highlighted that the top part of the building is of a similar height, footprint and orientation to the consented scheme, as such the reflection is unlikely to be substantially different from the consented development.

1540. Overall, the potential impact from solar glare from the proposed development are considered at its worse to be minor adverse but the effects are not significant.

1541. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of mitigation measures (if considered necessary). The proposed development would comply with Policy D9 of the London Plan, Local Plan policy DM10.1 and emerging City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

### Light Spill

1542. Local Plan policy DM15.7 and emerging City Plan policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.

1543. The potential light spillage impacts arising from the Proposed Development has been assessed on the following residential and religious buildings in the immediate vicinity of the site:

- 46-50 Bishopsgate
- 33 Great St Helen's
- St Helen's Bishopsgate Church
- St Andrew Undershaft Church

1544. The assessment shows that the 46-48- Bishopsgate, 33 Great St Helen's and St Helen's Bishopsgate Church receptors would see no additional artificial light (0 lux) reaching their windows as a result of the revised 2023 scheme and therefore experience a Negligible (Not Significant) effect. For the avoidance of doubt, these results are unchanged from the 2023 scheme.

1545. During the consultation that took place on the 2023 scheme, representations were received on behalf of 33 Great St Helen's and 48 Bishopsgate stating that they cannot see a site-specific assessment in relation to these properties in respect of potential light pollution. The impacts of this were discussed at paragraph 12.247 of the relevant chapter of the Environmental Statement, with the relevant technical appendices provided in Appendix 14-5. This objection was

re-provided on the revised 2023 scheme, it is highlighted that the impact on these properties is discussed in paragraph 12.16 of the Environmental Statement Addendum (October 2024), with the technical appendices provided at Appendix at 12.5. Officers reiterate, that like the 2023 scheme, in the revised 2023 scheme, that 33 Great St Helen's and 48 Bishopsgate would not be affected beyond the recommended thresholds and therefore experience a Negligible effect.

1546. At St Andrew Undershaft Church, pre-curfew (before 11pm) there would be no increase in lux level. Post curfew, there is potential for spillage levels of 0.5 to 3 lux to reach the windows of St Andrew Undershaft Church. Whilst this would be higher than the 2023 scheme, the increase would still be within the 5-lux threshold set within the ILP guidance; therefore, the additional lux levels are considered a Negligible (Not Significant) effect. The increase in is due the introduction of the screen, but as above it is reiterated that the increased is within the 5-lux threshold set within the ILP guidance.

1547. A condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaries, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

1548. Subject to conditions the development would comply with Local Plan policy DM15.7 and emerging City Plan policy DE8 and has been designed to avoid light spill.

### Third Party Review

1549. For information, Delva Patman Redler (DPR) were commissioned to undertake an independent review of daylight, sunlight, overshadowing and solar glare and the light pollution assessments in terms of their scope, method of assessment, criteria used, and conclusions reached for both the original 2023 development and the revised 2023 scheme. The findings of both reviews are set out below and have been taken into consideration in the above daylight, sunlight, overshadowing and solar glare assessments.

### *Review Findings in conjunction with the original 2023 scheme*

1550. The review concluded the scope of the assessment undertaken was appropriate.

1551. In respect of the assessment methodology and assessment the review concluded the DPR were generally satisfied with the assessment methodology and that is in accordance with guidelines. Further information was requested in

respect of the 3D modelling and sources of information and once this was received DPR had no further comments to make. DPR also highlighted that when room layouts have been assumed, less weight should be applied as they may be less accurate.

1552. In respect of significance criteria adopted within the Environmental Statement, DPR highlighted that there are no published numerical criteria for transient overshadowing and significance therefore relies on professional judgement. It was also highlighted that there are no published numerical criteria for solar glare and the significance that was adopted in the Environmental Statement is considered reasonable.

1553. In regard to the daylight and sunlight to neighbouring properties, DPR generally agreed with the effects ascribed within the Environmental Statement with the qualifications below:

*St Helen's Church Bishopsgate*

1554. Confirmation was required as to whether some figures in relation to VSC and NSL were typographical errors. The applicant team agreed with the corrections that DPR made and DPR confirmed no further comments to make.

1555. Regarding APSH, DPR said they could not concur with the room-based conclusion as the technical data was based on the window only. The applicant team provided the requested data and DPR confirmed no further comments to make.

1556. 2 & 10 – 16 Creechurch Lane, 33 Great St Helen's and 50 Bishopsgate, queries were made in respect of the absolute percentage changes stated in the ES. The applicant clarified the required information.

*78 Bishopsgate (St Ethelburga's Centre)*

1557. In respect of VSC, DPR said they could not concur with the room-based conclusion as the technical data was window only. The applicant team provided the requested data and DPR confirmed no further comments to make.

*36 Great St Helen's*

1558. This property does experience some moderate and major adverse effects in VSC terms and although the majority of the rooms would meet the BRE criteria for NSL, it is the professional view of DPR that a Minor Adverse (not significant) effect is more appropriate. The applicant team confirmed that they agree with the Minor Adverse (not significant) effect as there was a typographical error in the summary table.

*48 Bishopsgate*

1559. In respect of VSC and APSH, DPR said they could not concur with instances of the room-based conclusions as the technical data was window only. The

applicant team provided the requested date and DPR confirmed no further comments to make.

1560. DPR considered that the effects for all 27 amenity spaces are correctly stated.

1561. In respect of Solar Glare, DPR considered that a number of viewpoints should be attributed a minor effect rather than the stated negligible. The applicant team responded stating that the Environmental Statement sets out that a degree of professional judgement has been used to determine the effect at the locations. Factors that could influence the nature, scale and resultant significance (sunlight availability probability; area of façade off which reflections are visible; period of time when reflections are visible; angle at which reflections form line of sight; views of the development being obscured by trees; the time of day at which the solar reflection will occur), are applied in combination with the scales set out in the Solar Glare Criteria Table and therefore maintain the overall negligible effect is applicable. DPR confirmed on receipt of this justification they had no further comments to make.

1562. DPR considered that the significance effects in respect of light pollution are correctly stated.

1563. In respect of the comparison with the consented scheme, DPR set out that given the surrounding context has altered quite substantially from what existed in 2016 for the extant consent does not necessarily allow for a true reflection of the actual magnitude of impact. GIA have undertaken a supplementary assessment in the context of the current baseline situation, this demonstrates that generally any effects compared to that resulting from the extant consent are comparable with any alterations in VSC being no more than 2% absolute and in APSH terms. It is therefore anticipated that there would generally be no material alteration in neighbouring daylight and sunlight over and above the extant consent.

1564. In respect of the Cumulative Effects, DPR states that the Environmental Statement has provided a detailed commentary of the daylight and sunlight effects to each group, including the number of windows or rooms affected in that group and the magnitude of the effect. 10 of the 18 receptors considered experience significance effects other than negligible when compared against the proposed scheme in isolation. Naturally, with the introduction of the other consented developments, this has worsened the significance effects to these receptors. In addition, an additional four receptors experience a significance effect other than negligible. DPR asked the applicant team to confirm that the reference to eight additional receptors instead of four was a typographical error; the applicant team confirmed it was.

1565. DPR commented on the four additional receptors which as a consequence of the cumulative development scenario would experience a significance effect greater than negligible.

### *27-31 Mitre Street*

1566. Three of the 32 windows considered now experience VSC alterations over 30%. The NSL to the 20 rooms considered remains fully compliant, and on this

basis, a minor adverse effect has been ascribed compared to negligible when considered against the proposed development itself which is agreeable.

### *Bevis Marks Synagogue*

1567. 14 of the 23 windows considered now experience VSC alterations over 30%. The NSL to the 20 rooms considered remain fully compliant and, on this basis, a minor adverse effect has been ascribed compared to negligible when considered against the proposed development itself which is agreeable.

### *1568. 2 Heneage Lane*

1569. One of the six windows considered now experience VSC alterations beyond the level suggested as being negligible. The NSL to the five rooms considered remains fully compliant, and on this basis, a minor adverse effect has been ascribed compared to negligible when considered against the proposed development itself is agreeable.

1570. In terms of the sunlight in the cumulative scenario, 14 of the 15 receptors would experience no greater magnitude of impact and therefore the significance of the effects to these receptors does not alter. Only two windows at 1-24 Wormwood Street would see alteration in the WPSH greater than 40% as a result of the cumulative scenario. It is however agreed that the cumulative significance of this receptor can be considered negligible.

1571. In the cumulative scenario, DPR confirmed they are in agreement with the significance attributed to the five additional amenity spaces experiencing a significance effect other than negligible subject to a qualification in regard to 99 Bishopsgate Podium Terrace. Paragraph 12.373 of the report indicates that the alteration of 87% in the cumulative scenario is the same resulting from the scheme in isolation. However, on reviewing the technical appendices, this area does worsen from 87% to 100% of the area not seeing two hours sun on ground.

1572. Overall, DPR concluded that the assessment is comprehensive and has been undertaken in accordance with published guidelines and appropriate assessments have been used. The overall conclusions of the review are as follows:

- 10 of the 18 properties considered would experience between a negligible to moderate adverse effect as result of the proposed development with no more than minor adverse effects in sunlight terms.
- The comparison against the extant consent demonstrates that generally any effects compared to that resulting from the extant consent are comparable with any alterations in VSC being no more than 2% absolute and in APSH terms. It is therefore anticipated that there would generally be no material alteration in neighbouring daylight and sunlight over and above the extant scheme.
- The cumulative assessment demonstrates that an additional four properties (14 of 18) would experience an effect greater than negligible in daylight terms.
- There would be a moderate adverse effect to one of the 27 amenity spaces considered.



- Solar glare effects would be negligible or minor adverse.
- Light pollution effects would be negligible.

#### *Review Findings in Conjunction with the 2023 revised scheme*

1573. DPR concluded that the methodology adopted for the revised 2023 scheme is in accordance with the guidelines outlined in the December 2023 ES chapter and is therefore acceptable.

1574. From review of the technical information, any additional effects as a result of the revised scheme over and above what the ES concluded in conjunction with the original scheme, would be imperceptible and therefore DPR agree that the daylight and sunlight effects on nearby receptors would remain unaltered from what was previously concluded. The daylight effects would remain and range from negligible (not significant) to moderate adverse (significant) with sunlight effects ranging from negligible (not significant) to minor adverse (not significant).

1575. DPR agree that as a result of the revisions there would be no changes to the magnitude and scale of overshadowing impacts to the amenity spaces considered as part of the original 2023 scheme and the effects would range from negligible (not significant) to moderate adverse (significant).

1576. DPR agree that in the updated solar glare assessment there are no changes to the effects attributed to the test points and these range from negligible up to minor adverse when compared to the original 2023 scheme.

1577. For light pollution, DPR agree that there would be no changes as a result of the revised scheme to the test points when compared to the original 2023 scheme and the effects would be negligible.

1578. In the cumulative scenario there would be no change from the results set out in conjunction with the original 2023 scheme and the effects would continue to range from negligible (not significant) to major adverse (significant). Cumulative overshadowing effects on nearby amenity spaces also remain unchanged from the original 2023 scheme and would range from negligible (not significant) to major adverse (significant).

1579. The qualitative conclusions in respect of 99 Bishopsgate are generally acceptable.

1580. Overall, the addendum is comprehensive and has been undertaken in accordance with the published guidelines. Appropriate assessment criteria have been used.

#### Thermal Comfort Assessment

1581. London Plan Policy D8 and D9 and Policies S8, S12 and S21 of the emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

1582. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

1583. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort are set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description	Colour
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange
Transient	<25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).	Red

### Updated Thermal Comfort Assessment

1584. In conjunction with the 2023 scheme a full assessment of the impact of the development on thermal comfort was undertaken in accordance with the City of London Thermal Comfort Guidelines and having regard to policies D8 and D9 of the London Plan and policies S8, S12 and S21 of the emerging City Plan 2040.

1585. An updated thermal comfort assessment has been undertaken in light of the revisions to the 2023 scheme.

1586. The updated thermal comfort assessments shows that there would be some minor variations (improvements and worsenings) compared to the 2023 scheme. Notwithstanding, these minor changes do not alter the overall conclusions reached in the assessment of the 2023 scheme.

1587. The thermal comfort assessment of the revised 2023 scheme is set out in the following sections of this report, with the overall conclusions remaining the same as those presented in conjunction with the original 2023 scheme.

1588. Three configurations have been assessed, including the existing site with the existing surrounding buildings, the proposed development with the existing surrounding buildings and the proposed development with the cumulative surroundings.

#### Existing site with existing surrounding buildings

1589. In the existing baseline scenario, in the seasons of spring, summer and autumn, the UTCI values stay within the acceptable range at least 70% of the time in all locations. During the winter, due to lower air temperatures and reduced solar radiation combined with higher wind speeds, this results in a greater number of hours falling outside the acceptable range, in the winter the percentage of hours in the acceptable range within and around the site ranges between 32% to 98% The lowest values are along the A10, around the Fenchurch Building and to the immediate east of the site along 30 St Mary Axe.

1590. When looking at comfort, the majority of areas around the site are in 'Short-term Seasonal' or 'Short-term' categories. The existing seating to the south of the existing building and that near 30 St Mary Axe are not rated as being suitable for their intended use. All other areas are generally suitable for their intended use.

#### Proposed development with the existing surrounding buildings

1591. In the proposed development with the existing surrounding buildings scenario, there would be alterations to the UTCI values in the spring, summer and autumn, but the UTCI values would stay within the acceptable range at least 70% of the time. Like in the existing baseline scenario, in this scenario, winter is the least comfortable season, with the percentage of hours in the acceptable range within and around the site ranging between 33% to 99%. The lowest values are along the A10 and around the Fenchurch building. In this scenario, there are improvements on the areas of St Helen's Square along St Mary Axe and to the

immediate west of 30 St Mary Axe; these areas would experience an increase in the number of acceptable hours due to the updated wind mitigation measures in St Helens Square leading to reduced wind speeds in the local vicinity. The reduction in wind speeds would result in an improvement in thermal comfort during spring and winter.

1592. In respect of St Helen's Square (to the south of the proposed building) and Undershaft Square (to the west of the proposed building), there would be a high level of acceptable hours in summer, spring and autumn (ranging between 90% and 100%). In the winter, these areas would have lower acceptable hours (ranging between 66% to 90%).

1593. In respect of the Level 11 Podium Garden, there is a high level of acceptable hours in the spring, summer and autumn (ranging between 82% to 100%). In winter, the areas to the northeast, southeast and along the western side have lower acceptable hours (ranging between 66% to 100%).

1594. When looking at comfort for St Helen's Square to the south of the proposed building, this would be rated as short-term (only suitable for short duration/infrequent sedentary use) and seasonal (meeting the required seasonal category). Whilst all this area does not achieve the seasonal or better that is required for outdoor spaces, the comfort conditions of St Helen's Square would be improved compared to the existing conditions, as in the existing situation the areas would be suitable for short-term seasonal and short-term use and in the existing scenario there are no instances of being rated as seasonal. Conditions for St Helens Square improve again in the proposed development with cumulative buildings scenario, and this is discussed below.

1595. When looking at comfort for Undershaft Square to the west of the proposed building, this would be largely be rated as seasonal (meeting the required seasonal category) with some instances of short-term (only suitable for short duration/infrequent sedentary use). Undershaft Square is a transient space with some areas proposed for seating. The proposed thermal comfort of this area is acceptable.

1596. When looking at comfort for the Level 11 Podium Garden, most of this would meet the required seasonal category and there would be instances of all season (meeting the required seasonal category) and short-term which is only suitable for short duration/ infrequent sedentary use. The proposed use on the Level 11 Podium Garden have responded to the comfort conditions as seating is largely focused in areas that meet the seasonal category.

1597. In terms of comfort, outdoor spaces should achieve seasonal or better, this would be achieved by most of the balconies. However, both proposed amenity terraces on Levels 30 and 48 would not be rated as comfortable for outdoor

seating. Given that these terraces are private, and access can be managed and restricted when conditions are unfavourable, this is considered acceptable.

*Proposed development with the cumulative buildings*

1598. In the proposed development with the cumulative surrounding buildings scenario, there would be alterations (both improvements and worsening) to the UTCI values in the spring, summer and autumn but the UTCI values would stay within the acceptable range at least 70% of the in all locations. Like in the baseline and proposed development in existing surrounds scenarios, winter is the worse season, with the percentage of hours in the acceptable range within and around the site between 33% to 99%. The lowest values are on the corner of the A10 and Leadenhall Street. In this scenario, there are improvements in the area directly to the south of the development.

1599. In respect of St Helen's Square (to the south of the proposed building) and Undershaft Square (to the west of the proposed building), there would be a high level of acceptable hours in summer, spring and autumn (ranging between 90% and 100%). In the winter, these areas would have lower acceptable hours (ranging between 75% and 95%).

1600. In respect of the Level 11 Podium Garden, there is a high level of acceptable hours in the spring, summer and autumn (ranging between 86% to 100%). As like in the proposed development with the existing building scenario, the winter has the lowest percentage of hours in the acceptable range, but the conditions are improved compared to the proposed development with the existing buildings scenario (ranging between 72% to 100%).

1601. In terms of comfort, areas within the vicinity are generally suitable for the intended use. Compared to the proposed development with the existing buildings scenario, there would be improvements in the southern and western public realm spaces within the site as the areas being rated as 'Short-term' would be reduced. There would also be improvements so that the seating to the west of 30 St Mary Axe would be suitable for its intended use.

1602. When looking at comfort for St Helen's Square to the south of the proposed building, this would largely be rated as seasonal (meeting the required seasonal category), with some instances of short-term (only suitable for short duration/ infrequent sedentary use). The conditions are improved compared to the proposed development with existing surrounding buildings scenario as the instances of being rated as seasonal increase and there would be a marked reduction in the areas being rated as short-term. The proposed thermal comfort of this area is acceptable.

1603. When looking at comfort for Undershaft Square to the west of the proposed building, this area would largely be rated as seasonal (meeting the required seasonal category) with some instances of short-term (only suitable for short duration/ infrequent sedentary use); there would be an increase of the area rated as short-term compared to the proposed development with existing buildings scenario. Undershaft Square is a transient space with areas proposed for seating. The proposed thermal comfort of this area is acceptable.

1604. When looking at comfort for the Level 11 Podium Garden, this would primarily meet the required seasonal category. There would be instances of all-season (meets the required category) and very minor instances of being rated as short-term. This is suitable for the intended use.

1605. In terms of comfort, outdoor spaces should achieve seasonal or better, the proposed balconies would achieve this and are therefore acceptable for their intended use. However, both of the proposed amenity terraces at Levels 30 and 48 would be rated as short-term or short-term seasonal, which mean they are suitable for short duration and infrequent sedentary activities. Given that the amenity terrace at Levels 30 and 48 are private and access can be managed and restricted when conditions are unfavourable, this is considered to be acceptable.

### Thermal Comfort Conclusion

1606. It is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan Policy D8, Policy D9 and emerging City Plan 2040 policies S8 and S12, and the guidance contained in the Thermal Comfort Guideline for Development in the City of London.

### Air Quality

1607. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the emerging City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof of the height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy S11 of the London Plan.

1608. The Environmental Statement at Chapter 8 and appendices 8.1 to 8.3 of the original submission Chapter 8 of ES Addendum October 2024 include an assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development. A

Technical Memo provides responses to clarifications requested by the Air Quality Officer.

1609. During demolition and construction dust emissions would increase and would require mitigation measures contained with Construction and Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.
1610. The proposed development would be car free save for disabled car parking bays, and heating would be through air source heat pumps which is welcomed. The development meets both the transport and building emissions benchmarks for the Air Quality Assessment, and there are mitigation measures set out within the Air Quality Positive Assessment.
1611. Following the submission, and subsequent review of the revised 2023 scheme, the generator flues previously located on the 9<sup>th</sup> floor would be located on the 10<sup>th</sup> floor, below the public terrace on the 11<sup>th</sup> floor. It has been confirmed that the generators would only be tested when there is no access to the terrace.
1612. The City's Air Quality Officer has no objections following some clarifications. Conditions are recommended in relation to generator alternatives that have been considered and details of the generator, heights of combustion flues, and Non-Road Mobile Machinery
1613. Subject to the imposition of conditions, the proposed development would have a minimal impact on air quality. The scheme meets the air quality neutral and positive benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan policy CS15, policy DE1 of the emerging City Plan 2040, and policy SI1 of the London Plan which all seek to improve air quality.

#### Noise and Vibration

1614. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
1615. Chapter 9 of the Environmental Statement Addendum (October 2024) and Chapter 9 of the Environmental Statement and Appendices 9.1 to 9.4 assess the impact from noise and vibration associated with the proposed development, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in traffic which could be attributed to the proposed development. The Environmental

Statement has also included a comparison with the 2019 consented scheme (16/00075/FULEIA).

1616. The Environmental Statement identifies the following receptors that would be sensitive to noise and vibration from the proposal (the sensitive receptors):

- Non-residential- Office: 30 St Mary Axe (The Gherkin), 140 to 144 Leadenhall Street, Leadenhall Building, Fitzwilliam House and 1 Great St Helen's
- Non-residential – Office/Retail: 35 St Mary Axe and 22 Bishopsgate
- Non-residential – Place of Worship: St Helen's Bishopsgate Church and St Andrew Undershaft Church
- Non-residential – Hotel – Great St Helen's Hotel
- Residential: 48/50 Bishopsgate

1617. In most City redevelopment schemes the main noise and vibration issues occur during demolition and construction phases. In respect of noise, the assessment identifies significant impacts on three sensitive receptors, as the noise assessment criteria are exceeded at the following non-residential receptors:

- Leadenhall Building during the substructure/excavation phase.
- St Helen's Bishopsgate Church during deconstruction, substructure/excavation, superstructure/ envelope and fit out phases.
- St Andrew Undershaft Church during the deconstruction, substructure/excavation, and superstructure/envelope phases.

1618. All other receptors assessed are considered to have not significant effects.

1619. In respect of vibration, the assessment identifies that during piling the potential vibration levels are significant at the following sensitive receptors:

- Leadenhall Building
- Fitzwilliam House
- St Helen's Bishopsgate Church
- 35 St Mary Axe
- 1 Great St Helen's
- St Andrew Undershaft Church

1620. All other receptors assessed are considered to have not significant temporary vibration effects. It is noted that the sensitive receptors 30 St Mary Axe, Great St Helen's Hotel and 22 Bishopsgate, whilst the effects are concluded to be not significant, they may be noticeable and intrusive mitigation measures will need to be put into place to ensure that vibration is minimised.

1621. In respect of traffic noise and during the deconstruction and construction phases, the Environmental Statement concludes that the road traffic associated with the development would result in a worst-case increase in road traffic noise of



1.9dB on Undershaft, 1.2dB on St Mary Axe and 1.3dB on Leadenhall; this increase in noise is equivalent to minor adverse effect and is not significant. The Environmental Statement concludes that there would be a negligible increase in traffic noise on Houndsditch, St Boltoph Street, Camomile Street and Aldgate High Street. Chapter 9 of the Environmental Statement Addendum (October 2024) identified that due to revisions in the cumulative schemes, it is predicted that there would be an additional 96 vehicles on Link A (London Wall) and 6 additional vehicles on Link E (Aldgate High Street); this increase is predicted to equal to less than 0.1db increase and is classified as a negligible change.

1622. Noise and vibration mitigation during deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Construction and Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.

1623. The Environmental Statement concludes that operational traffic noise associated with the proposed development are negligible and not significant for all sensitive receptors except for St Helen's Undershaft Church. The proposed realignment of Undershaft and infrastructure would result in an increased of noise at worse between 1 and 3 dB, this is equivalent to minor adverse effect and is not significant. It is highlighted that compared to the extant 2019 planning permission; road traffic noise associated with the proposed development would reduce due to the re-location of the servicing bay which means that servicing vehicles associated with the development would not be using the newly relocated Undershaft like they would in the extant planning permission.

1624. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below the background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.

1625. A series of conditions are proposed to be attached in respect of the hours of use of the office amenity terraces and publicly accessible Level 11 Podium Garden, the use of amplified music on the amenity terraces and publicly accessible Level 11 Podium Garden. Further details will be secured through the management plan (secured through the S106 agreement) that will include hours of use, dispersal of patrons, management of smoking etc.

1626. The revised 2023 scheme introduces a screen on the southern elevation of the building. Conditions are proposed in relation to the hours of use of the screen and

where noise from the screen should be audible from. In addition, the S106 agreement would secure a Public Realm and Public Viewing Screen Strategy (including Management Plan), which would include details of the management and operation of the screen. Subject to the conditions and S106 obligations, the noise from the proposed screen is not considered to have an unacceptable impact on the amenity or operation of nearby sensitive receptors. Whilst no comments were received in respect of this during the consultation undertaken by the City, during the consultation undertaken by the applicant team, concern was raised that noise from proposed screen could have the potential to impact on the operations of neighbouring properties, officers consider the proposed conditions and S106 obligations would not result in the screen having an unacceptable impact.

1627. The submission considers the impacts of development on the noise environment. Subject to a series of conditions to mitigate noise and vibration during deconstruction and construction and operational phases of development, the proposed development would comply with policies D13 and D14 of the London Plan and policy DM15.7 of the local plan and policy HL3 and HS3 of the emerging City Plan 2040.

#### Overlooking to residential Properties

1628. Local Plan policy DM21.3 and emerging City Plan 2040 policy seek to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and emerging City Plan 2040 assess residential amenity and not the amenity of office occupiers.

1629. Consideration has to be given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.

1630. The proposed amenity terraces for the office accommodation on levels 30 and 48 due to their height would not result in overlooking and loss of privacy to nearby residential properties.

1631. The proposed balconies on the southern elevation at levels 14 to 29 and on the western elevation from levels 32 to 45, due to their siting would not result in overlooking and loss of privacy to nearby residential properties.

1632. The proposed Level 11 Podium Garden which would be open to the public between 7am and 11pm would be situated at height of 42m. Given the height of the Level 11 Podium Garden and the siting of nearby residential properties, the proposed Level 11 Podium Garden would not result in overlooking and loss of privacy to nearby residential properties.

1633. In the 2023 revised scheme, the lift lobby for Levels 72 and 73 would be at first floor level, along with the lifts for the public podium uses; opposed to be at ground floor level in the 2023 scheme. The elevations of the lobby area would be glazed. Whilst there are some residential properties situated to the north, given the siting of these properties, the lobby would not result in overlooking and loss of privacy to nearby residential properties.

1634. The proposals would not result in any undue overlooking or loss of privacy and as such would comply with Local Plan policy DM21.3 and CS5 and policies HS3 and S23 of the emerging City Plan 2040.

### **Contaminated Land**

1635. Local Plan policy DM15.8 and emerging City Plan 2040 policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential of pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

1636. Policy S1 of the emerging City Plan 2040 expects developers to address land contamination.

1637. The Environmental Statement at Chapter 10 and appendix 10.1 assess the impact on ground conditions associated with the proposed development, including potential effect on construction workers, potential effect on adjacent sensitive users, potential effect on controlled waters and potential effect on groundwater and recharge during operations. The Environmental Statement concludes that subject to mitigation, no likely significant effects have been identified. The Environmental Statement Addendum sets out that the revised 2023 scheme is not anticipated to result in any new or different effects than those identified in Chapter 10 of the Environmental Statement.

1638. The submission has been reviewed by Environmental Health Officers who have suggested a series of conditions in respect of site investigation and a risk assessment to establish if the site is contaminated and a condition in respect of the process/remediation if contamination is found when carrying out works. Thames Water have also requested a condition in respect of a piling method statement. Subject to the imposition of conditions, the proposal is in accordance with Local Plan 2015 policy DM 15.8 and policies S1 and HL4 of the emerging City Plan 2040.

### **Sustainability**

#### **Circular Economy**

1639. London Plan Policy S17 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 set out the City's support for circular economy principles.

1640. The application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.

1641. The existing office building was completed in 1969 as part of a complex of two buildings across the site with a high-level pedestrian walkway connection. The towers were badly damaged by a bombing in 1992, and the external glazing system was completely replaced with a modern system. The lower building and high-level walkway were demolished in 2007 to make way for the redevelopment of the Leadenhall Building.

1642. The existing 28-storey tower is 118m tall. It is supported by a central reinforced concrete core. There are two plant rooms, one located at the mid-height and one at the top of the tower, and each contains steel frame cantilevering from the core to support trusses and girders around the perimeter of the building. The building is top-hung which comprises steel hangers within the external walls that are suspended from the trusses and girders around the plant rooms, and they support the outer ends of the steel beams that are carried by the concrete core. Twelve office floors are supported by the hangers in the upper portion, and eleven office floors, an open podium and a mezzanine are suspended from the hangers in the lower half of the building. The typical, existing structural floor (top of slab) to ceiling (underside of slab) height is approx. 3.46m. The existing unitised curtain wall façade system is likely to have been replaced at least in parts after the 1992 Baltic Exchange Bombing by the IRA.

1643. The building has five levels of basements beneath the main tower containing plant and ancillary spaces. The remaining area of the site has an extensive two storey basement extending under the whole of St Helen's Square and the space to the west and north of the tower. This two-storey basement contains ancillary office space, loading bay, car park, storage, and plant areas.

1644. The current building has an EPC rating of F. Given the lack of energy performance and the age of the existing elements, the MEP and façade components are deemed to have come to the end of their useful life and are in need of replacement.

### *Optioneering*

1645. A pre-redevelopment audit has been undertaken that includes details of the optioneering process to address circular economy in this section, and whole life-cycle carbon considerations in the Whole life-cycle carbon emissions section of

this report. This exercise is designed to establish the potential of retention, reuse of materials and carbon impacts of the options. The options are also evaluated with regard to their opportunities for wider environmental benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2023, chapter 2, paragraph 8.

1646. The optioneering exercise undertaken for this site includes 4 options:

- Option 1: Minor refurbishment - retained structure: 100%; 51,662 m2 GIA
- Option 2: Major refurbishment - retained structure: 100%; 51,662 m2 GIA
- Option 3: Major refurbishment with vertical extension – retained substructure: 40%, retained superstructure: 100%; AOD 229m – 54 floors; 157,510 m2 GIA
- Option 4: New development – retained substructure: 40%, retained superstructure: 0%; AOD 309.6m – 74 floors; 183,142 m2 GIA.

1647. The analysis of the options with regard to circular economy demonstrates that the minor and major refurbishment options offer maximum potential for retention and would extend the lifespan of the building and its resilience. However, a refurbishment would not be able to offer highest quality office floorspace including easily accessible urban greening, and it would fail to optimise the floorspace potential of the Eastern Cluster site. Option 3 would retain the majority of the structure, however, it would require a new stability system and associated foundations to support a taller building, resulting in a high level of structural intervention. The new built option 4 would retain the basement and foundations only, while the new build design above ground would be able to incorporate the relevant circular economy principles relating to adaptability, flexibility, longevity and disassembly for new buildings.

1648. Overall, the explored refurbishment, extension, and new build options are considered to comply with the GLA's Circular Economy Statement guidance requiring a robust exploration of options as part of a redevelopment audit. Although the redevelopment option 4 would result in the highest quantity of demolition waste and the highest absolute carbon emissions of the assessed options due to its largest size, it would offer substantial environmental benefits that are required to future proof the City as a highly sustainable location. Given the constraints relating to structural complexity and quality of the retained floor levels associated with option 3 and the similar per square meter carbon impacts of options 2 and 3, option 4 is considered to offer the overall best balance of benefits relating to user comfort, wellbeing, high quality design including flexibility and adaptability, urban greening and climate resilience as well as public realm improvement. This option therefore has been further developed for the application scheme.

1649. The evaluation of the carbon intensity of the options is discussed in the Whole life-cycle carbon emissions section of this report.

*The application proposal:*

1650. The submitted Circular Economy Statement for the planning application scheme describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance. The changes to the 2023 scheme set out in the early chapters of this report would:

- not result in significant changes to internal finishes, MEP services and facades
- result in a small uplift in terrace finishes and substructure
- result in a proposed GIA uplift of 13 sqm overall

These changes would lead to minor alterations to the planning stage results and not affect the overall circular economy strategy of the proposal set out in the following paragraphs.

1651. A pre-demolition audit has been carried out to identify opportunities of recovery, reuse and recycling. The best reuse opportunities exist for items such as raised access flooring, metal ceiling tiles, internal glass partitions, some MEP equipment, as well as kitchens and gym equipment for donation to charity.

1652. The strategy includes measures to support reuse and recycling of existing materials within the new built elements as well as durable materials and construction and sustainable procurement, to include the following principles that will be further developed in the detailed design:

- Utilising 22% of the existing foundations (by mass), to include basement 2 slab, basement retaining walls, the basement 4 raft and piles beneath, subject to future surveys of slab and wall thicknesses
- Use of least 20% of recycled materials in the construction process, to include cement replacement and recycled steel, as well as recycled raised access floors
- Reducing required material volumes, e.g. by carrying out a detailed lateral stability study to reduce the core thickness, and by optimising loading criteria to avoid overdesign
- Façade design to prioritise longevity, low maintenance, thermal performance and low embodied carbon impacts overall, currently considering natural zinc cladding at upper floors, vitreous enamelled steel for spandrels and brise soleil, anodised aluminium for unitised cladding systems and glazed ceramic for podium levels and soffits

- Designing a robust building services system that is compatible with emerging technologies and energy networks
- Designing to standard dimensions to reduce off-cuts and waste on site
- Design for disassembly and recycling, to include lifts, structures, glass balustrades, facades and steel frames.

1653. In addition, the structure allows for adaptation for double height volumes, soft spots, interconnecting stairs, terraces, deeper floorplate for flexible occupier uses, enlarged amenity floors, amenity landscaped terraces, wintergardens, and additional urban greening at plant levels. All MEP services are designed to allow for future expansion and adaptation and are located to minimise ductwork distribution.

1654. Material passports are being explored for the cataloguing of new elements and further facilitating their reuse in the future.

1655. An update to the Circular Economy Statement including results from the detailed design phase and a post-completion update in line with the GLA guidance on Circular Economy Assessments to confirm that high aspirations can be achieved are required by condition.

#### Operational energy strategy and carbon emissions

1656. The Energy Statement of the revised 2023 scheme sets out the façade and fabric performance of the new façade types at the base of the building. There are no significant changes resulting from the reconfiguration of the façade types retained from the original 2023 scheme. Other key adjustments relate to the building's layout, space allocation, overall shape and modifications to some building elements. Some of these changes, such as slightly smaller footprint to envelope ratio at the base and larger areas of energy intense public amenity would lead to increases in energy demand.

1657. The Energy Statement of the revised 2023 scheme is based on a more detailed thermal model that reflects updates to the early design stage and demonstrates that the proposed development has been designed to achieve an overall 9% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building. This is a reduction of carbon savings from 11% of the 2023 scheme due to the changes to the scheme and further detail and accuracy applied.

1658. Energy demand and the risk of overheating would be reduced by including the following key passive design measures:

- Optimised glazing ratios and external shading using brise soleils and different glazing types

- On floor air handling units with heat recovery, improving flexibility and control
- Low energy lighting with lighting controls, including daylight dimming where appropriate.

The strategy would reduce the new building's operational carbon impact by over 5% beyond Part L 2021, compared to 7% in the 2023 scheme.

1659. There is currently no available district heating network close enough to the site, and the opportunity to connect into a future district heating network would be incorporated into the basement of the proposed development.

1660. In relation to low and renewable energy technologies, a system of air source heat pumps and water source heat pumps, including thermal stores, and rooftop mounted PV array of 130 sqm would provide low carbon and renewable energy, reducing the operational carbon emissions by 4% compared to a Building Regulations 2021 compliant building.

1661. The energy strategy demonstrates that the whole development on site has been designed to achieve an overall 9% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building. This level of operational carbon savings does not reach the GLA's 35% target, due to the proposed building's mix of uses, form, arrangement and design being highly unique. The bespoke energy efficient design cannot be considered appropriately in the Building Regulations Part L methodology due to the limitations of comparing the building's performance with a notional building performance rather than basing the operational carbon performance on the modelled whole building energy use intensity (EUI).

1662. In addition, the two churches to the north (St Helen's Church, Bishopsgate) and east (St Andrew Undershaft Church) of the site could potentially receive waste heat from the new development. An assessment of opportunities to facilitate such a heat transfer will be prioritised during the detailed design stage, and confirmation of measures will be required and secured through the Section 106 agreement.

#### *Energy Use Intensity (EUI)*

1663. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m<sup>2</sup>(GIA)/year and a space heating demand of 15 kWh/m<sup>2</sup>(GIA)/year. The estimated EUI from the offices of the proposed development is 81.4



kWh/m<sup>2</sup>/year, down from 91.4 kWh/m<sup>2</sup>/year due to the amendments of the revised scheme that have been modelled more detailed and accurately as a result of the more advanced design stage, compared to the 2023 scheme. The space heating demand would be 2.17 kWh/m<sup>2</sup>/year compared to 2.18 kWh/m<sup>2</sup>/year in the 2023 scheme, remaining particularly low as the building would be cooling-led due to the internal gains from occupancy, small power, lighting and solar gain.

1664. The operational energy performance – including unregulated energy use - of the building is dependent on the level of occupancy and operation of the building. These energy loads include tenant IT server rooms and small power loads. During subsequent design stages, cloud-based server solutions will be evaluated.

1665. These are conservative estimates at this stage as the whole building will be tenanted and energy use is dependent on future occupiers. However, the energy consumption is anticipated to decrease with further design and, at in use stage, in collaboration with tenants, monitoring and optimisation including a tenant fit out guide.

#### *Energy strategy conclusion*

1666. The site-wide energy strategy would not meet the London Plan target of 35% carbon emission savings compared to a Part L 2021 compliant scheme (London Plan policy S1 2C). The overall carbon emissions savings are calculated at 9% which does not achieve the GLA's 35% target.. The GLA acknowledges in a note released in 2022 that "Initially, non-residential developments may find it more challenging to achieve significant onsite carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35% improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments." In addition to this, the proposed building's form, design and mix of uses are highly unique and the energy efficiency of the design cannot be appropriately reflected in the calculations of the Part L methodology.

1667. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

#### **BREEAM**

1668. The proposed development has been pre-assessed under BREEAM New Construction v6 - shell & core (office); shell & core (retail) and shell & core (non-residential institution). All uses target an “outstanding” rating, 86.44% for the offices, 86.82% for retail and non-residential institution. The pre-assessments are on track to achieve a high number of credits in the City of London’s priority categories of Energy, Water, Pollution, Materials and Waste.

1669. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. Post construction BREEAM assessments are required by condition.

### Whole life-cycle carbon emissions

1670. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building’s operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building’s life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor’s net-carbon city target.

#### *Carbon options:*

1671. 4 options have been assessed with regard to their carbon impacts, environmental and wider planning benefits and constraints:

- Option 1: Minor refurbishment - retained structure: 100%; 51,662 m2 GIA
- Option 2: Major refurbishment - retained structure: 100%; 52,662 m2 GIA
- Option 3: Major refurbishment with vertical extension – retained substructure: 40%, retained superstructure: 100%; AOD 229m – 54 floors; 157,510 m2 GIA
- Option 4: New development – retained substructure: 40%, retained superstructure: 0%; AOD 309.6m – 74 floors; 183,142 m2 GIA.

1672. The following graph and table present the whole life-cycle carbon results from the 4 options:





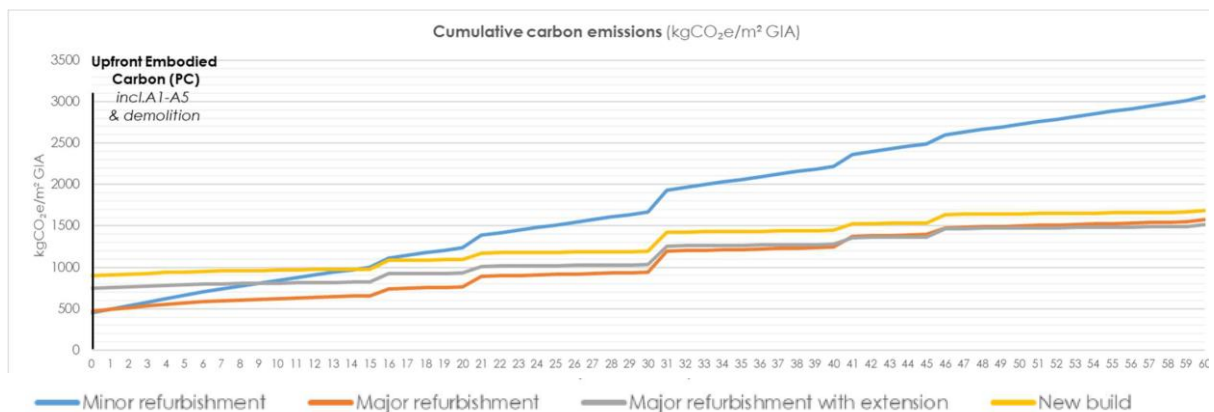
	Option 1 Minor Refurb	Option 2 Major Refurb	Option 3 Major Refurb with Extension	Option 4 New Build
				
<b>Structure</b>	Full retention	Full retention	Full retention of superstructure, partial retention of substructure, extension	Demolition of existing superstructure, partial retention of basement and foundations
<b>Façade</b>	Full Replacement, retaining current aesthetic	Full Replacement, retaining current aesthetic	New unitised façade	New unitised façade
<b>MEP</b>	Full replacement, retaining current % gas and % electric split	New MEP, 100% electric	New MEP, 100% electric	New MEP, 100% electric
<b>Finishes and FF&amp;E</b>	New Finishes and FF&E	New Finishes and FF&E	New Finishes and FF&E	New Finishes and FF&E
<b>GIA, m2</b>	51662	51662	157510	183142
<b>Reference Study Period, years</b>	60	60	60	60
<b>Upfront Embodied Carbon (A1-A5), kgCO2e/m2 GIA</b>	450	469	744	900
<b>% Substructure retained relative to existing (by mass)</b>	100%	100%	40%	40%
<b>% Superstructure retained relative to existing (by mass)</b>	100%	100%	100%	0%
<b>% Façade retained relative to existing (by mass)</b>	0%	0%	0%	0%
<b>Lifecycle Embodied Carbon (A-C Excl. B6-B7), kgCO2e/m2 GIA</b>	1218	1271	1376	1548
<b>Operational Energy (B6), kgCO2e/m2 GIA</b>	1842	305	137	137
<b>Total WLCA (A-C excl. B7)+pre-demolition, kgCO2e/m2 GIA</b>	3060	1576	1516	1697

Table: Whole life-cycle carbon results for the options



Graph: Whole life-cycle carbon emissions per square over 60 years

1673. The options can be analysed in terms of their carbon emissions, opportunities and constraints throughout the GLA's reference period of a 60 year life-cycle as follows:

1674. Option 2 would have the lowest carbon impact of all 4 options in absolute terms, due to the level of retention and to the conversion to an all electric MEP system while option 1, as a minor refurbishment, would replace the existing MEP plant with new gas and electricity based systems. Option 2 would however have a similar whole life-cycle carbon impact per square meter as options 3 and 4, with significant lower upfront embodied carbon impacts but higher in use and operational carbon impacts. Both option 1 and 2, and to a lower degree option 3, would save material resources by retaining a substantial percentage of building structure.

1675. Due to the higher level of retention and lower floorspace uplift in option 3, the upfront embodied carbon is lower than in option 4 on a square meter basis, however, the requirement of a new stability system and foundations for a taller building (converting the top-hung structure to a base-supported structure with new columns around the perimeter that free up load bearing capacity of the existing core for an additional 24 floors) would add complexity, and with this increased construction costs and an extended delivery program. Option 4 would have the overall highest whole life-cycle carbon emissions due to its larger floorspace size. Options 3 and, more so, option 4 would provide opportunities to offer additional environmental benefits such urban greening and biodiversity across the site and building as well as climate resilience measures to intrinsically address local flooding (and the need for SuDS), overheating and urban heat island effects and saving water resources.

1676. Options 3 and 4 would offer significant operational carbon emissions through the new build design concept of envelope and building services systems that the major refurbishment option 2 cannot achieve.

1677. Inefficiencies in the building design of option 3 including technical complications of retaining the existing superstructure and limitations to the increase in height would constrain this option compared to option 4 that would be able to deliver maximum floorspace increase in this central cluster location, along with maximising the environmental quality of the building, external amenity spaces and the public realm. In particular the 'organic' architectural form of the building below the podium garden would improve the wind microclimate conditions across St. Helen's Square. Option 4 would unlock the greatest number of benefits that would contribute significantly to futureproofing the development and benefit the sustainability of the City as a whole, and therefore has been further developed for the application scheme.

1678. The optioneering approach set out in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on circular economy and whole life-cycle carbon emissions, and with the more detailed methodology set out in the City of London's Carbon Options Guidance to establish and evaluate the carbon impact of development options.

1679. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2023 stating in paragraph 157 that the planning system should support the transition to a low carbon future and that it should help to, amongst others, encourage the reuse of existing resources, including the conversion of existing buildings. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

*The application proposal:*

1680. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. The tall building structure and design present particular challenges to the need to reduce whole life-cycle carbon emissions, and the consideration of design options has determined the design to include:

- Optimising the structure by reducing the number of primary columns, the use of a 4-storey transfer truss above the podium garden and outriggers at each building setback at levels 29 and 47 to stabilise the structure.
- Optimising the internal column layout to reduce embodied carbon
- Design of the new substructure to facilitate the retention of as much of the existing basement and piles as possible, and new piling through the existing concrete raft for the new core
- New basement slabs necessary to improve basement floor to ceiling heights and slab thickness
- Façade designed to be lightweight to reduce load on the structure
- Façade designed for off-site prefabrication, to include a unitised curtain wall system of PPC aluminium frames, solid steel and zinc panels with high longevity and large glazed sections to reduce embodied carbon from aluminium framing. The replacement of glazing/gaskets likely only. In addition, a horizontal steel brise soleil system to reduce solar gains and cooling loads. This façade system would be fixed to a 'mega-grid' made of zinc sheets (rather than steel, to reduce weight) and supported by aluminium substructure.

1681. The amendments to the 2023 scheme result in a small uplift in terrace finishes and substructure (due to a small increase in public external space and basement

area), however, there are no significant changes in whole life-cycle carbon emissions from internal finishes, the MEP services or the facades.

1682. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development can achieve a result close to the GLA's Standard Benchmark. The measures listed above contribute to an excellent upfront embodied carbon result below the Standard Benchmark, while the in use embodied carbon emissions would clearly miss the benchmark's threshold due to the maintenance, repair and replacement of MEP and structural and façade elements over the lifetime of the building.

1683. Further opportunities to reduce embodied carbon emissions will be considered during detailed design stages and include the use of:

- Alternate CLT slabs instead of steel and concrete
- Lower carbon concrete mixes
- Reclaimed steel sections
- Low carbon glass and aluminium with high recycled content
- Low global warming potential (GWP) refrigerants to run heat pumps
- Reclaimed raised access floors.

1684. The table below shows whole life-cycle carbon emissions per square meter for the whole site and for the various buildings in relation to the GLA benchmarks for offices at planning application stage (including cultural uses – the GLA guidance advises to select the most relevant building use in providing data). The revised 2023 scheme data are shown in bold, and the 2023 scheme data (where different from the revised scheme) in brackets:

Scope	Proposed Redevelopment	Benchmark	GLA Benchmark
RICS components	kgCO2/m2	kgCO2/m2	
A1-A5	<b>884</b> (883)	< 950	GLA Standard
		< 600	GLA Aspirational
B-C (excl. B6/B7)	<b>622</b> (623)		
A-C (excluding B6-B7)	<b>1,501</b>	< 1400	GLA Standard
		< 970	GLA Aspirational
B6+B7	<b>746</b>		
A-C (including B6-B7)	<b>2,247</b>		

1685. The proposed whole site development would result in overall whole life-cycle carbon emissions of 405,284,965 kgCO<sub>2</sub> being emitted over a 60-year period. Of this figure, the operational carbon emissions would account for 134,469,105 kgCO<sub>2</sub> (33.2% of the building's whole life-cycle carbon), and the embodied carbon emissions for 270,815,860 kgCO<sub>2</sub>, (66.8% of the building's whole life-cycle carbon).

1686. A detailed whole life-cycle carbon assessment and a confirmation of the post-construction results are required by conditions.

1687. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic policy CS15 Sustainable Development and Climate Change as well as emerging City Plan 2040 policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to a low carbon future in accordance with NPPF (2023) paragraphs 157 and 159.

### Urban Greening

1688. London Plan policy (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design of the site. An urban greening factor of 0.3 is recommended for non-residential developments. Emerging City Plan 2040 policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.

1689. The proposals in respect of greening have been developed in the revised 2023 scheme. Landscaping is proposed at street level in both St Helen's Square and Undershaft Square and on the Level 11 Podium Garden. St Helen's Square as a flexible space would incorporate a grove of tree incorporating shade tolerant, multi-species trees. Undershaft Square would a series of five planting beds are proposed housing a range of habitat typologies, mosses, fallen trees and stone elements. The Level 11 Podium Garden would host a comprehensive landscaping scheme, incorporating planting and trees suited for the sunnier conditions. Further amenity terraces with landscaping are located where the tower structures sets back at level 30, with lowland heathers for more resilient planting in windy conditions, and at level 48 with more robust upland heathers. In addition, a hanging garden (based on planters on each floor above the podium garden up the level 48 terrace) would be established in the west elevation.

1690. The proposals would potentially achieve an Urban Greening Factor of 0.50 without the hanging gardens. If the hanging gardens are included, the Urban Greening Factor would be 0.58.

1691. The site currently includes, on St Helen's Square, shrubs in raised planters and seven young to semi-mature trees including two common lime and five oriental steetgum trees. All existing soft landscaping and trees would be removed as part of the proposals.

1692. Policy CS19 of the Local Plan 2015 seeks to protect the amenity value of trees, retaining and planting more trees wherever practicable and policy DM19.2 states that developments should promote biodiversity and contribute to urban greening. Local Plan paragraph 3.19.17 states that "where existing green infrastructure is disturbed, removed or damaged as result of the development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure. Existing trees should be replaced with trees of an equivalent quality". The emerging City Plan 2040 seeks to increase the number of trees and their overall canopy cover through a number of measures "other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed requiring their replacement with trees that can attain an equivalent value".

1693. In considering the loss of trees in relation to policy, policy CS19 requires the amenity value of trees to be protected and the retaining and planting of trees wherever practicable. It is not considered that it would be practicable to facilitate the proposed public realm enhancements and retain the existing trees on site in this instance. Furthermore, the existing trees are not considered to be high quality. The Landscape Architects consider that the existing trees are either category C 'Trees of low quality' or category R deemed to be of no value within 10 years of the assessment and should be removed. In line with policy CS19 and DM19.2 of the local plan, a greater level of tree planting is proposed across the enhanced ground level public realm, the Level 11 Podium Garden and the upper-level amenity terraces. The proposed tree planting would comprise the following:

- 17 trees at ground level to the south and along St Mary Axe
- 51 trees of different sizes at the podium garden on level 11
- Nine trees of different sizes in the tenant gardens at level 30.
- Nine trees of different sizes in the tenant gardens at level 48.

1694. Conditions are recommended to require further details of the proposed trees to ensure that they would be at least of an equivalent quality and size to the existing trees and to require details of the potential re-use of wood from the existing trees. Policy OS5 of the emerging plan states that other than in exceptional circumstances only permitting the removal of trees which are dead, dying or



dangerous. The proposed circumstances are considered exceptional with regard to the loss of the trees in that a development is being secured that would deliver a significant uplift in office floorspace alongside enhanced public realm. Taking into consideration the quality of the existing trees, the circumstances of the development and that a greater level of tree planting would be delivered as part of the proposal it is considered that the policy tests of CS19 and DM19.3 of the Local Plan and policy OS5 of the emerging City Plan 2040 have been complied with regarding the loss of trees.

### Biodiversity Net Gain

1695. Schedule 7A of the Town and Country Planning 1990 (inserted by the Environment Act 2021) requires biodiversity net gain which is for development to deliver a least 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat.

1696. The revised 2023 scheme would achieve very high levels of net gain of 527.63%, it is noted that this is a reduction compared to the 2023 scheme (960.65%). Regardless of the reduction, the net gain is still considerably high and is provided through a range of accessible at ground and above.

1697. Pell Frischmann were commissioned to undertake a third-party review of the ecology and biodiversity assessments submitted on the both the 2023 scheme and the revised 2023 scheme. Overall, the review concluded that scope of the assessment is pertinent in relation to the nature and location of the development and in line with good practice.

1698. Specific issues were identified with the consistency in the area and number of trees being proposed between the different documentation, which could result in a change of the predicted net gain. Pell Frischmann stated that this does introduce some uncertainty as to what is being proposed and relative biodiversity value of what is being proposed. However, achieving the required net gain and ecological enhancement seems feasible due to the substantial proportional gain identified (+527.63%). The applicant team provided clarification/responses to the comments made by Pell Frischmann. Given that the updated Biodiversity Net Gain assessment (required to be submitted prior to commencement (excluding demolition)) would be secured by condition, combined with the estimated uplift, this is considered to be acceptable.

1699. In respect of the proposed trees, questions were made in respect in their contribution to Biodiversity Net Gain due to the assumed diameter size within the 30 year timeframe and that it is unrealistic for the trees to achieve the medium size (as considered under the BNG criteria). This matter relates to the value attributed to the value of the proposed trees under the BNG criteria. However,

given the low baseline value of the site, this would not effect the ability to achieve the 10% increase in biodiversity value.

1700. The review made comments in respect of required updates the Construction Environmental Management Plan (CEMP), an updated CEMP would be secured by condition.

1701. Pell Frischmann in their review concluded that the revised 2023 scheme does not materially change the findings or recommendations required.

### Climate Resilience

#### *Overheating and the urban heat island effect*

1702. Overheating mitigation has been considered for the development. The use of brise soleil is incorporated within the design and this will reduce internal heat gains and the inclusion of the vertical greening on the western façade will reduce thermal massing.

1703. The thermal comfort study addresses increases to the average maximum temperature and the study deems that the development is within a suitable range. The introduction of the grove of trees within the public realm to the south of the building would provide a shaded canopy.

1704. TM52 modelling for internal thermal comfort has been carried out.

#### *Flooding*

1705. The application site is located within Flood Zone 1 and is therefore identified as being an areas at low risk of fluvial and tidal flooding.

1706. The drainage rates will be reduced to 4.8% to account for a 1 in 100 year event, which is a greenfield rate of 4.5 litres per second.

1707. A SuDS feasibility study has been undertaken by WSP and the options included within this include blue roofs and rainwater harvesting, attenuation in green infrastructure features such as a raingarden, bio retention, permeable paving and below ground storage.

#### *Water stress*

1708. The Environmental Statement identifies low flow features as measure to reduce the operational carbon emissions including low flushes and low flow regulators.

1709. The goals for water efficiency outline the use of greywater and rainwater re-use throughout the proposed development, this includes the collection of

greywater for flushing and rainwater use for irrigation. Water leak detection will be implemented. The development will achieve BREEAM Excellent standard for WAT 01.

#### *Biodiversity and pests and diseases*

1710. The proposed development would achieve very high levels of net gain of 527.63%; it is noted that this is reduction compared to the 2023 scheme (960.95%). Regardless of the reduction, the net gain is still considerably high and is provided through a range of accessible areas at ground and above.

1711. The UGF score has been recalculated for the revised 2023 scheme and this would be 0.50 (0.58 when the hanging garden is considered), this is though the public realm, and terrace greening at levels 11, 30 and 48. The ground level planting would be within standard tree pits. The level 11 podium garden is expected to contribute to the largest increase in green infrastructure through the provision of semi-natural vegetation, green roofs, standard trees, perennial planting, rain gardens, and other lower planting.

1712. A range of acceptable native species are proposed with the correct management could provide high level biodiversity value.

1713. The proposed planting palette does not include species that are under threat from pests and disease proliferation.

1714. A series of conditions are recommended to be secure the implementation and management of the proposed urban greening measures.

#### *Food, Trade and Infrastructure*

1715. The proposed development would make a positive contribution to the City of London, with the potential to mitigate some of the wider impacts of climate change.

1716. The proposed development would include facilities that are directly beneficial, such as the retail, cultural/community spaces. The proposed facilities would enable occupiers to use active transport including cycling and reducing the dependence on transport infrastructure.

1717. The proposed development is set up to reduce the overall energy demand and peaks, using passive designs, low energy lighting and energy recycling.

1718. The strategies of the proposed MEP services aim to enhance the longevity, adaptability and flexibility of the MEP services. This includes enabling de-

commissioning and reusing or recycling MEP items, enabling the replacement of specific equipment such as chillers and air handling units, and making the infrastructure more adaptable.

### *Conclusion on Sustainability*

1719. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaptation measures, urban greening and promoting biodiversity and minimising waste.

1720. The proposed development would deliver the tallest building within the Eastern Cluster of the City of London, optimising the quantity of floorspace for offices and a mix of publicly accessible uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

1721. Compared to the approved tall building scheme on site, this application includes a design incorporating circular economy principles and a strategy to reduce embodied carbon emissions for the tall building typology, reducing overall embodied carbon emissions close to the GLA's Standard Benchmark for commercial buildings. The energy strategy has been updated to provide an all electric MEP system, and the proposed design is on track to address climate adaptation and mitigation positively by targeting a BREEAM 'outstanding' rating and providing a robust structural and façade design, MEP strategy and urban greening for biodiversity, climate resilience, health and wellbeing. Circular economy measures have been incorporated, such as retaining part of the basement, including significant carbon savings as a result, as well as designing for longevity, adaptability and low maintenance. The proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA. In addition to this, the proposed building form, design and use are highly unique and cannot be appropriately reflected in the calculations of the Part L methodology.

1722. However, the proposal is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

## **Security**

1723. London Plan Policy D11 (Safety, security and resilience to emergency) states that development should include measures to design out crime that – in proportion to the risk – defer terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and wider area.

1724. Local Plan Policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism.

1725. Local Plan Policy DM3.2 (Security measures in new developments and around existing buildings) seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 (Crowded places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to nighttime uses.

1726. The submission sets out that security proposals to protect the building and its users and public realm have been developed in consultation with City of London Police representatives.

1727. The proposals for the public realm remain as proposed in the 2023 scheme. The site would be protected by a 'security line', to the north and west along Undershaft there would be a line of HVM bollards. HVM measures are also required to Leadenhall Street and southern section of St Mary Axe, this would be through a mix of bollards and HVM with landscape features and furniture. The design of the reception enclosure reduces the need for bollards or barrier along this length of St Mary Axe. The vehicle lifts are accessed directly from St Mary Axe, HVM measures such as road-blockers would be located in front of vehicle lift entrances. The revised 2023 scheme introduces a screen in the public realm and a public WC which is accessible externally. The submitted Security Statement Addendum sets out that whilst the introduction of the screen would increase footfall, the aforementioned HVM is in place to protect this space and it

is recommended that robust operational security management plan is created for the public realm. In respect of the public WC, the Security Statement Addendum recommends that these facilities are closed out of hours and that robust monitoring and maintenance regime will be required to ensure the facilities are kept clean and safe for uses. These measures would be secured within the Public Realm Management Plans secured within the S106 Agreement.

1728. From a security perspective the development will be designed so that access to the office accommodation including private amenity terraces/balconies will only be accessible to tenants and their authorised visitors. The access control system would be a layered approach through the deployment of a manned reception/lobby area with trained personnel at the security speed gates and video security systems will be operation. There would be additional lines of security through the building to prevent unauthorised access to various areas of the building including tenant floorplates to ensure that occupiers cannot access subsequent floors when using the fire escape cores. There would be security turnstiles at basement level 3 to prevent cycle users from accessing the buildings from the lower levels. Access control cards would be required so that members of the public cannot access the office accommodation within the podium levels of the building.

1729. Accessibility for the general public will be restricted to the publicly accessible parts of the building, namely, the Education and Museum spaces at levels 72 and 73 and the public amenity spaces at levels 2, 3 and 11 and the restaurant on level 2.

1730. Due to the design changes in the revised 2023 scheme, the approach to security has been amended for the publicly accessible internal areas of the building. Both the public lifts for the Level 11 Podium Garden and cultural spaces at Level 2 and 3 and Education and Museum Spaces at Levels 72 and 73 would be situated at first floor level, which can be access via stairs or lifts on the southern elevation. The public lobby at first floor for these spaces has been designed to accommodate queuing spaces and zones for security. The space has been designed to accommodate security for low and heightened threat levels. In times of low threat levels, for the Education and Museum Spaces at Levels 72 and 73, two scanners would be situated to the north of the lobby area and the publicly accessible spaces at levels 2, 3 and 11 would have direct access with a queuing system. In times of heightened threat levels, up to three scanners would be introduced for screening to access levels 2, 3 and 11. The Design and Access Statement Addendum illustrates how the measures for both the low and heightened threat levels can be accommodated within this lobby area. It is highlighted, that due to the completion timescales for a development of this nature, there could be smarter/faster technologies/equipment available at this time. The full details of the future security measures will be captured within an

overall security strategy condition and St Helen's Square Strategy and Level 11 Public Podium Garden Strategy which would be secured in the S106 agreement.

1731. Further details of the overall security strategy will be required by condition and a St Helen's Square Strategy and Level 11 Public Podium Strategy and Education and Museum Space Management and Promotion Plan will be required by the S106 agreement which will detail more specifically the measures to protect the building and its different user groups.

1732. The proposal, subject to conditions and S106 obligations is considered to be in accordance with London Plan policy D11 and Local Plan 2015 policies DM3.2, DM3.3 and DM3.5.

### **Suicide Prevention**

1733. Policy DM3.2 'Security measures in new development and around existing buildings' aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. Policy DE4 'Terraces and Elevated Public Space' of the emerging Local Plan 2040 advises that appropriate safety measures should be included in high rise buildings to prevent people from jumping or falling. The City of London Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrence capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1734. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building regulation K2 states the following:

K2 –(A) Any stairs, ramps, floors and balconies and any roof to which people have access, and

(B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1735. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS6180: Barriers in and around buildings.

1736. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advised a barrier height of at least 2.5m high, no toe or foot holes, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale off from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with building regulations standards, and where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.

1737. The proposals include a podium garden at level 11, office amenity terraces at level 30 and 48 and balconies. Glazed balustrades of a height of 2.5m are proposed for the terraces at levels 30 and 48 and a minimum of a 2.5m high glazed balustrade on the podium garden at level 11. The balconies would incorporate balustrades of 1.5m high. The height proposed for the glazed balustrades exceeds the minimum height set out in Approved Document K and the British Standard and is in line with the height recommended by the UKHSA. The proposals have been reviewed with the City's advisor and the principles are acceptable the full details should be secured by condition.

1738. Full details regarding suicide prevention and the associated risk assessment would be secured by condition. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the emerging City Plan 2040.

### **Health Impact Assessment**

1739. Policy HL9 of the emerging City Plan 2040 requires major development to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.



1740. Policy GG3D of the London Plan states that “to improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments”.

1741. The application is accompanied by a Health Impact Assessment (HIA) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health effect. The submission sets out that the 2023 scheme is not expected to give rise to any new or materially different human health effects, and that the conclusions of the December 2023 HIA on the 2023 scheme remain valid.

1742. The HIA has been based on the London Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on wider determinants of health. The HIA concludes that the development overall has a positive impact on health. Positive impacts include:

- The employment creation during the construction period and the provision of new jobs associated with the uplift in commercial floorspace.
- The proposed development would promote active travel and exercise through the provision of cycle parking facilities and integration with existing walking/cycling routes.
- The improvement of public realm which would further encourage/incentivise walking and going outdoors.
- The inclusion of renewable technological and sustainable urban drainage techniques.
- The provision of renewable technologies and sustainable urban drainage techniques.
- The provision of areas for community use and office amenity.

1743. The HIA proposes recommendations with the aim of ensuring the potential benefits of the proposed development are maximised and potential adverse effects are avoided, for example by:

- Ensure that a Public Realm Management adequately covers how open space will be managed and is fully implemented.
- The LEMP should be updated by the owner of the building.
- The mitigation measures set out in the Construction Environmental Management Plan (CEMP), Chapter 8: Air Quality and Chapter 9: Noise and vibration are fully implemented.

- The measures set out in the Design and Access Statement and Travel Plan are fully implemented.
- The safety features set out in the Design and Access Statement are fully incorporated in the proposed development's design.
- The applicant should consider the provision of space for managed and affordable workspaces for local businesses.
- The applicant should consider promoting the hiring of local residents in the construction phase.
- The applicant should consider the provision of a Travel Plan.
- The applicant should seek to work with the local community to identify opportunities for voluntary and community uses in the proposed development.
- The mitigation measures set out in the Site Waste Management Plan to be prepared by the appointed contractor, are fully implemented.

1744. Potential impacts identified would be mitigated as so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.

1745. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable and the proposals would comply with London Plan Policy GG3 and emerging City Plan Policy HL9.

### **Fire Statement**

1746. An updated Fire Statement has been submitted outlining the fire safety strategy for the building on the 2023 revised scheme. The City's District Surveyor's Office has reviewed the submitted statement and has confirmed that this is in accordance with Polices D5 and D12 of the London Plan. The Fire Statement is therefore acceptable for the planning stage and would be secured by condition.

### **Assessment of Public Benefits and paragraph 208 NPPF balancing exercise**

1747. Under s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for a development which affects the setting of a listed building/s the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess.

1748. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paragraphs 205 and 206).

1749. Officers did not identify harm to designated heritage assets arising from the consented 2019 scheme and the assessment of public benefits as a planning balance was not required. Conversely, this proposal would result in low and very low levels of less than substantial harm via indirect setting impacts to the significance of one listed building and a conservation area, as follows:

- Church of St Helen's Bishopsgate (Grade I) – low level of less than substantial harm through the proposals' assertive new presence immediately to the south of the church.
- St Helen's Place Conservation Area – slight level of less than substantial harm due to the proposal detracting to some extent from the primacy of the Church in some views from the churchyard and St Helen's Place, to the west.

1750. Given the proposal would result in harm to the significance of a Grade I listed building and a conservation area, there is a strong presumption against the granting of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits.

1751. The proposal would trigger paragraph 208 of the NPPF, which states 'where a development proposal will lead to less than substantial harm to the significance of designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'.

1752. London Plan policy D9C(1)(d) is also engaged; that policy states '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, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area'.

1753. Historic England in their consultation response 22 February 2024 to be read along their response of 7 June 2024 question whether the benefits of the scheme, which in their view would "*diminish some of the City's finest historic and modern buildings, could be considered to outweigh the harm*". This is reiterated in their objection dated 12 November 2024.

1754. Officers reach different conclusions to Historic England and other objectors as regards impacts on other designated heritage assets and regarding the quality of the roof terraces and public spaces and this is robustly set out in details in the report.

1755. The GLA in their consultation report 4 March 2024 states that the harm identified should be weighed against the public benefits of the scheme and "*if robustly secured by condition and/or S106 obligation, GLA officers consider it is*

*likely that the harms identified would be outweighed by the public benefits of the proposal. The public benefits package could be further supported by an affordable workspace offer".* While officers reach different conclusions to the harm to designated heritage assets identified by the GLA, they also believe the harm identified can be outweighed by the public benefits of the scheme. Affordable workspace, as per the GLA advice, has been provided as set out below, under economic benefits.

1756. Officers have negotiated and identified multi-faceted benefits stemming directly from the proposals. The key economic, environmental and social benefits are considered to be:

### **Economic:**

- The provision of 153,602 sqm (GIA) of Grade A office floorspace, will contribute 6.53% of the overall projected office floorspace requirements for the City delivering an estimated 8.759 FTE employees and dramatically increasing footfall. This uplift will contribute significantly to inward investment in the Square Mile and supports the strategic objective to maintain a world class city which is competitive and promotes opportunity.
- The multi-level publicly accessible spaces, the podium garden at level 11 and London's highest public observation gallery/educational experience at level 72 and 73 supported by retail and food and cultural offers at levels 2,3 and 11 alongside cultural events and programmable activities within the ground floor public realm would drive footfall in the wider area during the day, evenings and weekends. The development would become a significant destination within the City Cluster contributing to the EC Business Improvement District. Occupiers on the site and in the locale would benefit from the increase in footfall and the high-quality amenities provide by the proposed development as well as provide amenity space for the wellbeing of workers, residents and visitors.
- The 400sqm (GIA) of affordable workspace within levels 4-10 of the building (precise location to be confirmed) is secured at 50% market rents and would be an inclusive offer which will attract smaller and more diverse businesses including SMEs to the City Cluster.
- The 30sqm (GIA) of affordable cultural space within levels 2-3 or 11 of the building (precise location to be confirmed) secured at 50% market rents and would be an inclusive offer which would attract a smaller and more diverse cultural offer to the City Cluster.
- The provision of improved and increased external public realm across the site, with additional improvements to St Mary Axe, Undershaft and part of Leadenhall Street, which would transform the streets and spaces in the City Cluster in terms of appearance and function, by making the area more

attractive and enticing for people to visit, stop and dwell, this would drive footfall and increase spending across the City.

- The overall quality of the development and proposals would attract visitors, increase tourism, support and improve work productivity and enhance the image of the area.

1757. Collectively, given the nature and extent of these benefits, **substantial** weight should be attributed to them.

#### **Environmental:**

- The proposal would assist in consolidating the City Cluster of tall buildings resulting in some minor to modest enhancements of strategic and local neighbouring boroughs' views which are important to the character and identity of London including LVMF views from Alexandra Place (1A); Primrose Hill (2A); Kenwood (3A); Primrose Hill (4A); Greenwich Park (5A); Blackheath Point (6A).
- The scheme would deliver growth on a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- At local ground level the proposal would result in significant enhancement of the public realm re-designing St Helens Square and the western public space (Undershaft Square) delivering an enhanced permeable route for pedestrians and more attractive public space. These spaces would support active and cultural uses and temporary pop ups which will enhance the vitality, character and distinctiveness of the site and wider City Cluster, including new views and heritage appreciation all of which align with Destination City aspirations.
- The improvements to the public realm for pedestrians and cyclists, including pavement widening and streetscape enhancements to St Mary Axe, Undershaft and part of Leadenhall Street would mitigate the impact of the development and would improve pedestrian priority, the function and appearance of the street. Active travel would be encouraged as well as supporting the wellbeing of users, constituting a key social and environmental benefit in a highly congested area, subject to the detail being confirmed through a S278 agreement and S106 financial contributions for the enhancement of streets and spaces.
- The proposal would incorporate a significant uplift in greening and biodiversity benefits across the ground floor level and the proposed terraces. They would support the creation of biodiversity corridors across the City.

1758. Collectively these are attributed a **Moderate** level of weight.

## Social:

- The proposal would deliver a remodelled and improved social spaces at ground level, a new public space at level 11 and new viewing gallery at level 73 in an area with limited external public realm for workers, visitors, and residents, this would provide opportunities for socialising, relaxation and leisure and would provide people new views of London.
- The proposals would deliver a unique civic learning and educational opportunity with an access from first floor level to levels 72 and 73 (viewing gallery and education space 3,134 sqm sui generis use) operated in partnership with the London Museum. These large spaces could contribute towards delivering learning programmes as outlined in the Mayor's London Curriculum supporting teachers bringing the national curriculum to life inspired by the capital and covering subjects including art, English, geography, history and music simultaneously providing an opportunity for breathtaking 360 degree experience from London's highest viewing terrace.
- The unique combination of improved public space and new accessible public spaces at level 2, 3 and 11 have been flexibly designed to support cultural and food and beverage use promoting socialising and wellbeing. The proposal will include the provision of spaces which can accommodate Cultural Events to bring a new dynamic to the City and facilitate a 7 day a week Destination City the details of this will be included in a Cultural Space Management Plan.
- The proposal would secure a S106 obligation of £6,499,152 (excluding monitoring) towards affordable housing provision.

1759. Collectively these are attributed a **substantial** level of weight.

1760. In carrying out the paragraph 208 NPPF and London Plan policy D9C(1)(d) balancing exercise, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings. The proposal would cause a low level of less than substantial harm to the significance of the Grade I listed church of St Helen's Bishopsgate. In assessing the weight to be given to that harm in the balancing exercise the extent of the assessed harm (low level) and heritage value of the asset in question (high as a Grade I listed building) must be taken into account. In addition, slight less than substantial harm would be caused to the significance of St Helen's Place Conservation Area. Great weight must be given to the conservation of all designated heritage assets including St Helen's Bishopsgate and the St Helen's Place Conservation Area. It is the view of officers that great weight should be given to the harm to the significance of St Helen's Bishopsgate and to the harm to the St Helen's Place Conservation Area in the balancing exercise.

1761. It is the view of officers that the collective package of the public benefits secured would, giving great weight to the heritage harm, outweigh the heritage harm identified. On that basis there is clear and convincing justification to the harm, and the presumption against granting planning permission is rebutted, the outcome of the paragraph 208 NPPF heritage balance falls in favour of the proposal, and policy D9C(1)(d) in the London Plan is complied with.

## **Planning Obligations and Community Infrastructure Levy**

### **CIL and Planning Obligations**

1762. 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.

1763. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

1764. 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).

1765. CIL contributions and City of London Planning obligations are set out below.

### **MCIL2**

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£22,426,064.16	£21,529,021.60	£897,042.56

### **City CIL and S106 Planning Obligations**

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£9,847,200.00	£9,354,840.00	£492,360.00
<b>City Planning Obligations</b>			
Affordable Housing	£6,564,800.00	£6,499,152.00	£65,648.00
Local, Training, Skills and Job Brokerage	£3,938,880.00	£3,899,491.20	£39,388.80
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£1,426,995.00	£1,426,995.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£280,000.00	£280,000.00	£0
Security Measures Contribution (Eastern City Cluster)	£1,312,960.00	£1,299,830.40	£13,129.60
S106 Monitoring Charge (Non-Standard Obligations)	£7,000.00	£0	£7,000.00
<b>Total liability in accordance with the City of London's policies</b>	<b>£23,377,835.00</b>	<b>£22,760,308.60</b>	<b>£617,526.40</b>

### City's Planning Obligations

- 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. Please note that these may be subject to change: Highway Reparation and other Highways obligations
- Local Procurement Strategy
- Employment and Skills Plan (Demolition and Construction)
- Delivery and Servicing Management Plan (including Consolidation)



- Service Vehicle Lift Maintenance Strategy
- Active Travel Plan incorporating Cycle Promotion Plan
- Construction Monitoring Costs (£53,820 for First Year of development and £46,460 for Subsequent Years)
- Carbon Off-Setting
- 'Be Seen' Energy Performance Monitoring
- Utility Connections to the Development
- S278 and S38 Agreement (CoL)
- Legible London Contribution (£50,000.00)
- Cycle Hire Contribution (£220,000.00)
- Public Viewing Gallery Management Plan
- Public Routes (Specification, Public Access & Management Plan)
- Level 11 Public Podium Strategy (Specifications, Public Access/Signage Arrangements including 07:00 to 23:00 Operation Hours & Management Plan)
- Public Realm and Public Viewing Screen Strategy (Specification & Management Plan)
- Cultural Implementation Strategy
- Cultural Management Plan
- Television Interference Survey
- Wind Audit
- Solar Glare Assessment
- Education and Museum Space Management and Promotion Plan
- TfL A10 Contribution
- Affordable Retail Space Management Plan
- Affordable Workspace Management Plan
- Archaeological Remains Management Plan
- St Helen's Church Heat Transfer Strategy and Arrangements
- City Events and Cultural Contribution (£500,000.00)

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.

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

### **Undershaft**

- Construction of new road and associated pedestrian crossing points
- Provision of new road marking and associated traffic orders
- Improved street furniture including resting points
- Improved lighting
- Reconstruction of footways and associated kerbs
- Improved drainage
- Works to facilitate the St Helen's Church Heat Transfer

### **Leadenhall**

- Reconstruction of existing footways
- Resurfacing of the carriageway
- Provision of road markings and other associated traffic orders
- Improvements to drainage
- Reinstatement and improvement of street furniture including resting points
- Reinstatement of pedestrian crossing in accordance with agreed Construction Logistics Plan, upon the completion of construction works

### **St Mary's Axe**

- Reconstruction of the carriageway to provide a pedestrian priority route
- Reconstruction of footways in Yorkstone paving
- Tree planting and urban greening (subject to feasibility and agreement with City of London)
- Improved and enhanced crossings
- Improvements to lighting
- Improvements of drainage
- Incorporation of loading bays
- Improvements to seating including resting points
- Revision and review of existing parking arrangements and associated traffic orders
- Works to facilitate timed closure (subject to feasibility and consultation works)

And any other associated works deemed necessary to deliver the above scope of works

### **Monitoring and Administrative Costs**

1766. 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.

1767. 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.

### **The Public Sector Equality Duty (Section 149 of the Equality Act 2010)**

1768. The City, as a public authority, must, in exercise of its function, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

1769. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would reduce barriers to access for disabled people through the provision of an enhanced and step-free public realm at grade. It is also the view of officers that the 2no. blue badge spaces in the basement and 1no. at street level acceptable, and the provision of accessible floorspaces, and publicly accessible podium garden, education space and viewing gallery would advance equality of opportunity.

1770. Whilst this report identified that the proposed development would less than substantial harm to the heritage significance of St Helen's Bishopsgate, this less than substantial harm does not result in an adverse impact on the ability to use the church as a place of worship and religious observance and that therefore no impact on those who share the protected characteristic.

### **Human Rights Act 1998**

1771. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention Right (being the rights set out in the European Convention on Human Rights ("ECHR")).

1772. Insofar as the grant of planning will result in interference to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposals would result in an unacceptable impact on the existing use of nearby residential properties. As such the extent of the harm is not considered to be unacceptable. and does not cause the proposals to conflict with Local Plan 2015 policy DM10.7 and policy DE7 of the emerging City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs the Minor to Major Adverse impacts on nearby residential properties and Places of Worship and that such impact is necessary in the interest of economic well-being of the country and is proportionate.

1773. Insofar as the grant of planning permission will interfere with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

1774. Insofar as the grant of planning permission will result in the interference with freedom of thought, conscience and religion (Article 9 of the ECHR), including the ability of people to attend or wishing to attend St Helen's Bishopsgate Church to manifest their religion or belief in worship, teaching, practice and observance, it is the view of officers that the less than substantial heritage harm that has been identified will not impact upon the ability of people to attend or wishing to attend St Helen's Bishopsgate Church to manifest their religion or belief in worship, teaching, practice and observance.

### **Conclusion and Overall Planning Balance**

1775. The revised 2023 proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

1776. As set out in the main body of this report, the scheme was deferred by Members of the Planning Sub Committee on the 2 July 2024. The applicant has addressed the reasons for deferral and the design of lower levels of the building and the public realm has been revised resulting in scheme that would have an

activated and enlivened base to the building with less of an impact on St Helen's Square.

1777. The proposed development comprises the demolition of the existing building on site and its replacement with an office-led tower incorporating high-quality, flexible public realm at ground and level 11, related cultural and retail uses at levels 1,2 and 3 and a stellar new public viewing terrace and bespoke educational and gallery space at levels 72 and 73. The proposal would deliver a high quality, office-led development in the emerging City Cluster, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world leading business centre.

1778. Objections and comments have been received to the scheme from statutory consultees including Historic England, the 20th Century Society, LB of Tower Hamlets and third parties, relating to the design of the development, its impact on designated heritage assets and the impact on the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

1779. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is central to the City's growth modelling and would deliver nearly 6.53% of growth demand until 2040. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.

1780. The scheme would provide 153,602 sq.m (GIA) of office floorspace (Use Class E(g), which would be flexible, sustainable Grade A commercial office floorspace suitable for circa 8759 FTE City workers. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers. Furthermore, 400 sqm of affordable workspace is proposed, the final details of which would be provided as part of the S.106 agreement.

1781. Officers consider the site to be clearly appropriate for a tall building and a strategic delivery site supporting the consolidation of the City Cluster, of which it would be the totemic centrepiece. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, B, C and D, Local Plan Policy CS 14, CS7 (1,2, 4-7), emerging City Plan S12 (1,2, 4-10) S21 (1-4, 6-15-). There is some conflict with Local Plan policy CS 7 (3) and emerging City Plan 2040 S21 (5) due to impacts on two designated heritage assets and a degree of conflict with emerging policy S12 (3) on the matter of height.

1782. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, emerging City Plan 2040 DE2, London Plan D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

1783. The proposed development would be a sophisticated interplay of geometry and functionality, combining office, public and cultural spaces within a visually cohesive and engaging form. The design throughout integrates public amenities and green spaces, contributing to the landmark qualities of the building, befitting the pivotal location of the site at the heart of the City Cluster. This is in accordance with London Plan policies D3 (D1- 4, 11-14C), City Plan policies S10 and DM 10.1, and emerging City Plan 2040 policies S8 (7 & 8, 21) and London Plan D4, relevant sections of the NPPF, including paragraph 135, and the National Design Guide.

1784. The development will provide an increase in inclusive, inviting, and animated spaces, with extensive urban greening in the heart of the City Cluster for people to pass through and linger. In terms of design and provision of public realm, while the proposal would result in the loss of some ground floor public space in St Helen's Square, this loss is offset by the quality and quantum of the proposed public realm and therefore the proposals represent compliance with Policies D3, D8, T1, T2, T4 and G4 of the London Plan 2021, as well as DM3.3, CS7, CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.1, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies S10, AT1, S8, OS1, S14, S21, DE2, DE3 and DE4 of the emerging City Plan 2040, and, the City of London Public Realm SPD, the Open Space Strategy SPD and the City Public Realm Toolkit. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm proposals are considered by officers to be a benefit of the scheme.

1785. The proposal would not harm the attributes or components of the Outstanding Universal Value, Significance, authenticity and integrity of the Tower of London World Heritage Site, in accordance with the relevant parts of Local Plan Policy CS12, CS13 (3) Emerging City Plan Policy S11, HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.

1786. The scheme would comply with London Plan Policy HC4, Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 and associated guidance in the LVMF SPG and Protected Views SPD. In LVMF pan-London panoramas and some local views from the London Boroughs of Southwark and Lambeth, Officers conclude the development would consolidate and enhance the visual appearance of the City Cluster on the skyline.

The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging roof terraces which are also important to the character of the City of London.

1787.

1788. The proposal would, via change in their settings, cause a low level of less than substantial harm to the Church of St Helen's Bishopsgate and a slight level of less than substantial harm to the significance of the St Helen's Place Conservation Area. As it would fail to preserve the significance/special interest or setting of these two designated heritage assets, there would be conflict with Local Plan policies CS12 (1 and 2), DM12.1 (1), emerging City Plan 2040 S 11 (2) and London Plan HC1 (C) and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF policies. The proposals would otherwise comply with Local Plan policies CS 12 (3-5) CS13, CS14 and DM12.1 (2-5), DM12.2, DM12.5, emerging City Plan 2040 S11 (1,3-5), S 13, Policies HE1 and London Plan HC 1 (A, B, Dand E), HC2, HC3 and HC4. The proposal would preserve the special interest/significance and setting of the listed buildings at the Tower of London, St Peter ad Vincula, Leadenhall Market, The Monument, 7-9 Gracechurch Street, Cannon Street Station Towers, Former Port of London Authority Building, St Botolph Bishopsgate, The Guildhall, St Mary Aldermanbury, St Lawrence Jewry, St Augustine, St Giles Cripplegate, Tower Bridge, Royal Exchange, 37-38 Threadneedle Street, 46-48 Bishopsgate, National Bank Lothbury, 12 -14 Austin Friars, 23 Austin Friars, 13 Bishopsgate, 3-5 Bishopsgate (Royal Bank of Scotland) 7-9 Bishopsgate and 39 Threadneedle Street, Guildhall Church of St Ethelburga, Church of St Helen, City of London Club, Liverpool Street Station, Great Eastern Hotel, Ministry of Defence, War Office, Horse Guards and Whitehall Court. It is considered St James' Park, Finsbury Circus, and Bunhill Fields Registered Historic Park and Gardens would be unharmed. It is considered the significance of the Creechurch, Bank, Guildhall, New Broad Street, Bishopsgate, Finsbury Circus, Leadenhall Market, Bunhill and Finsbury Square, Tower of London Conservation Areas would be unharmed.

1789. The proposal would preserve the significance of non-designated heritage assets: 113-116 Leadenhall Street; 33-34 Bury Street; 18-20 Creechurch Lane (Cree House), 24 Creechurch Lane (Fibi House), 12-14 Mitre Street (Mitre House), 27-31 Mitre Street; Liverpool Street Arcade; and 30 St Mary Axe.

1790. The proposals comply with the required initial steps of archaeology investigation Local Plan DM 12.4, emerging City Plan 2040 HE2 13, Policies HE1 and London Plan HC1 subject to a two stage archaeology condition.

1791. Working with the London Museum as a potential or other content partner for levels 72 and 73 of the development, the development will deliver a highly significant cultural asset to the City of London which will have a curated narrative through all three public experiences from ground to roof top. This will support the aspirations of the Eastern Cluster BID and Destination City to increase footfall and become a 7 day a week inclusive destination. The cultural space on the top levels of the building would be supported by the flexible cultural space at podium level.

1792. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission. Further to this, in the cumulative scenario only, three amenity spaces (Devonshire Square 2; Cutler's Gardens Estates; and Royal Fusiliers) would not comply with BRE guidance as there would be 100% losses in terms of the area of these spaces receiving at least 2 hours of direct sunlight on the 21<sup>st</sup> March. The impact on these spaces is acknowledged and officers consider the benefits of the proposal outweigh the harm caused to these spaces.

1793. In transportation terms the proposal would align with aspirations set out in the City's Transport Strategy. Acceptable levels of cycle parking and facilities are proposed, which would encourage active travel to the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistic guidance. The servicing of the site has been discussed in depth during the planning stage and would subject to stringent controls details of which would need to be set out in a delivery and servicing management plan, it is considered at this stage that the proposed servicing arrangement would be acceptable.



1794. Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. While the retention and retrofit of the existing tower would result in some improvements, it is considered that only the redevelopment option would be able to overcome inefficiencies in the design, construction, operation and quality constraints of the minor and major refurbishment options to unlock the greatest number of benefits that would contribute to the wider sustainability and future proofing of the City.

1795. Compared to the 2019 consent for a tall building scheme on the site, this proposal now incorporates circular economy principles, such as substantial basement retention, and a strategy to reduce embodied carbon emissions for the tall building typology, reducing overall embodied carbon emissions close to the GLA's Standard Benchmark for commercial buildings. The energy strategy has been updated to provide an all electric MEP system, and the proposed design is on track to address climate adaptation and mitigation positively by targeting a BREEAM 'outstanding' rating and providing a robust structural and façade design, MEP Strategy and an urban greening strategy for biodiversity, climate resilience, health and wellbeing. In addition, the two churches to the north (St Helen's Church, Bishopsgate) and east (St Andrew Undershaft Church) of the site could potentially receive waste heat from the new development. An assessment of opportunities to facilitate such a heat transfer will be prioritised during the detailed design stage, and confirmation of measures will be required and secured through the Section 106 agreement.

1796. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Eastern Cluster and public realm would be complied with, that notwithstanding the conflict with CS7(3) (Eastern Cluster), CS12 (1 and 2) (Historic Environment), DM12.1 (1) Managing Change affecting all heritage assets and spaces), emerging City Plan Policies 2040 S11 (2) (Historic Environment), S12 (3) (Tall Buildings), S21 (5) (City Cluster), and London Plan HC1 (C) ( Heritage Conservation and Growth ), the proposals comply with the development plan when considered as a whole.

1797. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies.

1798. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and

proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

1799. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with as well as policies relating to office floor space delivery, environmental impacts, provision of a cultural offer and public realm delivery would be complied with, and as the relevant design policies, and the criteria in London Plan policy D9C and D are satisfied, the proposals would comply with the development plan when considered as a whole.

1800. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

1801. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S.106 agreement.

1802. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.

1803. As set out in paragraph 205 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be).

1804. In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 208 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.

1805. National Planning Guidance advises that conflict between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs as guided by the NPPF.

1806. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

## **Background Papers**

### **Revised 2023 Scheme**

- Revised Application Form;
- Revised Additional CIL Form;
- Architectural Drawings and Drawing Schedule, prepared by EPA;
- Design and Access Statement Addendum including Accessibility and Landscape, prepared by EPA, SLA Landscape Architects and David Bonnet Associates;
- Circular Economy Strategy Addendum, prepared by WSP;
- Cultural Strategy Addendum, prepared by Hatch;
- Energy Statement Addendum, prepared by WSP;
- Fire Statement Addendum, prepared by WSP;
- Overshadowing Report, prepared by GIA;
- Biodiversity Net Gain Assessment, prepared by Aecom;
- Pedestrian Movement Assessment Addendum, prepared by Space Syntax;
- Ecological Appraisal Addendum, prepared by WSP;
- Security Statement Addendum, prepared by WSP;
- Planning Statement Addendum, prepared by DP9;
- Statement of Community Involvement Addendum, prepared by DP9;
- Sustainability Statement Addendum (an BREEAM Pre-Assessment), prepared by WSP;
- Thermal Comfort Study Addendum, prepared by WSP;
- Wind Microclimate CFD Assessment, prepared by GIA;
- Transport Assessment Addendum, prepared by WSP;
- Spreadsheet: Statutory Biodiversity Metric, prepared by DP9;
- Spreadsheet: Circular Economy Statement template
- Spreadsheet: Whole Life-Cycle Carbon (WLC) Assessment
- Ecology Addendum Review, prepared by Pell Frischmann
- Ecology Addendum Review- Response to Comments Received from Pell Frischmann on behalf of the City of London, prepared by AECOM
- Email: Additional Information for the Energy Statement, prepared by WSP
- Spreadsheet: GLA Carbon Emissions Reporting Spreadsheet
- Email: Breakdown of Responses: Updates to the EUI, prepared by WSP
- Environmental Statement – Response to Comments Received from the City of London Air Quality Officer, prepared by AECOM

### **Environmental Statement**

- Second Environmental Statement Volume 1: Main Text, Revision 2, prepared by Aecom
- Environmental Statement Volume Two: Townscape Heritage and Visual Impact Assessment: Second Addendum, prepared by Tavernor;

- Second Environmental Statement Addendum Volume III: Appendices, Revision 1, prepared Aecom
- Second Environmental Statement Addendum Revised Non-Technical Summary, prepared by Aecom

Representations/ Consultations Responses

22/10/2024 NATS Safeguarding

23/10/2024 Active Travel England

23/10/2024 Heathrow Airport Safeguarding

23/10/2024 Environment Agency

24/10/2024 London City Airport Safeguarding

25/10/2024 Crossrail Safeguarding

28/10/2024 District Surveyors Office- Fire Statement

28/10/2024 Royal Borough of Greenwich

28/10/2024 London Gatwick Airport

31/10/2024 Thames Water

31/10/2024 Thames Water

05/11/2024 Natural England

07/11/2024 Historic England

12/11/2024 Lead Local Flood Authority

14/11/2024 Twentieth Century Society

15/11/2024 Southwark Council

18/11/2024 London Borough of Tower Hamlets

19/11/2024 Caroe Architects Ltd (Surveyor to the Fabric of St Paul's)

19/11/2024 Cleansing Services

19/11/2024 Greater London Authority

20/11/2024 Environmental Health

25/11/2024 Air Quality Team

27/11/2024 Environment Resilience Officer

27/11/2024 Transport for London

31/10/2024 Westminster City Council

## Representations –Members of the Public

23/10/2024 Email (objection) Peter Rose

11/11/2024 Email (objection) Jude Goffe

## Representations

05/11/2024 Email (objection) Evershed Sutherland (International) LLP (on behalf of The Wardens and Society of the Mistery or Art of the Leathersellers)

12/11/2024 Letter (no objections) City of London Conservation Area Advisory Committee

21/11/2024 Email (objection) Deloitte LLP (on behalf of Universities Superannuation Scheme Ltd)

26/11/2024 Comment (support) Mr S Reginald

## **Representations received between the Committee Deferral and Revised Submission**

16/07/2024 Email (objection) Ben Allen

16/07/2024 Email (objection) Rupert Booth

15/08/2024 Letter (objection) JDA Planning Consultancy (on behalf of C C Land)

## **2023 Scheme**

### December 2023 Submission

- Completed Application Form, submitted via the planning portal;
- Additional CIL Information Form;
- Architectural Drawings and Drawing Schedule, prepared by EPA;
- Design and Access Statement, prepared by EPA;
- Aviation Safeguarding Report, prepared by Avia Solutions;
- Car and Cycle Management Plan, prepared by WSP;
- Circular Economy Statement, prepared by WSP;
- Cultural Strategy, prepared by Hatch;
- Draft Construction Environmental Management Plan, prepared by Real PM;
- Outline Drainage Strategy, prepared by WSP;
- Ecological Appraisal, prepared by Aecom;
- Energy Statement, prepared by WSP;
- Equalities Statement, prepared by Aecom;
- Flood Risk Assessment, prepared by Aecom;
- Fire Statement (and Fire Engineering Statement), prepared by WSP;
- Framework Travel Plan, prepared by WSP;
- Biodiversity Net Gain Report, prepared by Aecom;
- Geo-Environmental and Preliminary Environmental Risk Assessment, prepared by WSP;
- Health Impact Assessment, prepared by Aecom;

- Pedestrian Movement Assessment, prepared by Space Syntax;
- Planning Statement, prepared by DP9;
- Public Realm Management Plan, prepared by SLA Landscape Architects;
- Security - Hostile Vehicle Mitigation Strategy, prepared by WSP;
- Statement of Community Involvement, prepared by Kanda Consulting;
- Sustainability Statement, (including BREEAM Pre-Assessment), prepared by WSP;
- Thermal Comfort Study, prepared by WSP;
- Transport Assessment, prepared by WSP;
- Utilities Statement, prepared by WSP;
- Ventilation and Extraction Statement , prepared by WSP;
- Waste Management Strategy, prepared by WSP; and
- Whole Life Carbon Assessment, prepared by WSP.

### Environmental Statement

- Volume 1: Main Report, prepared by Aecom, comprising: -
  - i. Chapter 1: Introduction, prepared by Aecom
  - ii. Chapter 2: EIA Methodology, prepared by Aecom
  - iii. Chapter 3: Alternatives & Design Evolution, prepared by Aecom
  - iv. Chapter 4: The Proposed Development, prepared by Aecom
  - v. Chapter 5: Deconstruction and Construction, prepared by Aecom;
  - vi. Chapter 6: Socio-Economics, prepared by Aecom
  - vii. Chapter 7. Transport and Access, prepared by WSP
  - viii. Chapter 8. Air Quality, prepared by Aecom
  - ix. Chapter 9. Noise and Vibration, prepared by Aecom
  - x. Chapter 10: Ground Conditions, prepared by WSP
  - xi. Chapter 11: Wind Microclimate, prepared by WSP
  - xii. Chapter 12: Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare, prepared by Gordon Ingram Associates
  - xiii. Chapter 13: Electronic Interference, prepared by G Tech Surveys
  - xiv. Chapter 14: Archaeology, prepared by Aecom
  - xv. Chapter 15: Climate Change, prepared by Aecom
  - xvi. Chapter 16: Effect Interactions, prepared by Aecom
  - xvii. Chapter 17: Summary of Mitigation, prepared by Aecom
  - xviii. Chapter 18: Residual Effects and Conclusions, prepared by Aecom
- Non-Technical Summary, prepared by Aecom.

### May 2024 Submission

- Application Drawings
- Covering Letter
- Design and Access Statement Addendum
- ES Addendum Volume I: Text and Appendices
  - Chapter 1: Introduction
  - Chapter 2: EIA Methodology
  - Chapter 4: Updates to the Proposed Development
  - Chapter 11: Updates to Wind Microclimate
  - Chapter 16: Updates to the Effect Interactions
  - Chapter 17: Updates to the Summary of Mitigation
  - Chapter 18: Updates to the Residual Effects and Conclusions
  - Appendices:
    - Appendix 2.1: City of London Consultation THVIA Addendum
    - Appendix 8.1: City of London Consultation and Air Quality Technical Memo
    - Appendix 8.2: GLA Consultation and Air Quality Technical Memo
    - Appendix 9.1: City of London Consultation and Noise and Vibration Technical Memo
    - Appendix 11.1: Wind Microclimate Technical Report
    - Appendix 11.2: Third Party Review of Wind Microclimate Study
    - Appendix 12.1: City of London Consultation and Daylight and Sunlight Technical Memo
    - Appendix 15.1: City of London Consultation Climate Change Technical Memo
- ES Addendum Volume 2: Townscape, Heritage and Visual Impact Assessment
- ES Addendum Volume 4: Non-Technical Summary
- Pedestrian Movement Assessment Addendum
- Thermal Comfort Assessment Addendum
- Transport Assessment Addendum

### Representations/ Consultations Responses

25.01.2024 Letter London City Airport

26.01.2024 Letter Environment Agency

26.01.2024 Letter Heathrow Airport

26.01.2024 Letter Transport for London Crossrail Safeguarding Direction

29.01.2024 Email Active Travel England

30.01.2024 Letter Thames Water

09.02.2024 Letter City of Westminster

11.04.2024 Letter Transport for London

12.02.2024 Letter Lead Local Flood Authority

13.02.2024 Letter Historic England (GLAAS)

19.02.2024 Letter Natural England

21.02.2024 Letter NATS Safeguarding Office

22.02.2024 Letter Historic England

26.02.2024 Letter London Borough of Richmond Upon Thames

26.02.2024 Letter Twentieth Century Society

04.03.2014 Letter Greater London Authority

20.03.2024 Letter London Borough of Camden

02.04.2024 Letter Surveyor to the Fabric

23.04.2024 Letter Royal Borough of Greenwich

14.05.2024 Email NATS Safeguarding

15.05.2024 Letter Heathrow Airport

15.05.2024 Letter London City Airport

16.05.2024 Email Active Travel England

17.05.2024 Letter Transport for London

21.05.2024 Letter Environment Agency

21.05.2024 Email Transport for London (Infrastructure Protection)

22.05.2024 Letter City of Westminster

24.05.2024 Email Historic England (GLAAS)

03.06.2024 Letter London Gatwick Airport

07.06.2024 Letter Historic England

07.06.2024 Letter London Borough of Lambeth

19.02.2024 Letter Natural England



## Internal

24.01.2024 Memo District Surveyors Office  
08.03.2015 Memo Environmental Health  
08.05.2024 Memo Air Quality Officer  
11.06.2024 Letter London Borough of Tower Hamlets  
19.06.2024 Letter Historic England  
20.06.2024 Email Greater London Authority

## Representations – Members of the Public

02.02.2024 Comment (objection) Martyn Werrett  
04.02.2024 Comment (objection) Trevor Saville  
05.02.2024 Comment (objection) Yvonne Courtney  
19.02.2024 Email (objection) Yvonne Courtney  
12.03.2024 Email (objection) Yarema Ronish  
27.05.2024 Email (objection) Peter Rose  
30.05.2024 Comment (objection) Mark Richardson-Griffiths  
03.06.2024 Comment (objection) S Reginald  
                    Comment (objection) Luke Bligh  
18.06.2024 Comment (support) Noor Dabbous  
18.06.2024 Comment (support) Steven Jacobs

## Representations

06.02.2024 Comment (objection) Simon Stone  
23.02.2024 Email Washbourne Consulting Limited on behalf of St Helen's  
Bishopsgate and St Andrew Undershaft  
21.03.2024 Letter Deloitte LLP on behalf of USS  
23.04.2024 Letter CC Land  
14.05.2023 Email London Oriental

11.06.2023 Letter The Wardens and Society of the Mistery or Art of the  
Leathersellers

19.06.2024 Letter CC Land

## **Appendix A**

### **REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS**

#### **Reasoned Conclusions**

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in this report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

#### **Monitoring Measures**

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Lift Vehicle Maintenance Strategy, a Cycling Promotion Plan. Mitigation measures should be secured including wind mitigation to the Level 11 Podium Garden. These as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreement. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

## **Appendix B**

### **London Plan Policies**

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement Development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspaces
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI6 Digital connectivity Infrastructure

- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

### **Relevant GLA Supplementary Planning**

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016)
- Mayor's Transport Strategy (2018)

### **Emerging City Plan 2040**

- Emerging Policy Strategic Policy S1: Health and Inclusive City
- Emerging Policy HL1: Inclusive buildings and spaces
- Emerging Policy HL2: Air quality
- Emerging Policy HL3: Noise
- Emerging Policy HL4 Contaminated land and water quality
- Emerging Policy HL5: Location and protection of social and community facilities
- Emerging Policy HL6: Public Toilets
- Emerging Policy HL7 Sport and Recreation
- Emerging Policy HL8 Play areas and facilities
- Emerging Policy HL9: Health Impact Assessment (HIA)
- Emerging Strategic Policy S2: Safe and Secure City
- Emerging Policy SA1: Publicly accessible locations
- Emerging Policy SA2 Dispersal Routes

- Emerging Policy SA3: Designing in Security
- Emerging Strategic Policy S3: Housing
- Emerging Policy HS3: Residential Environment
- Emerging Strategic Policy S4: Offices
- Emerging Policy OF1: Office Development
- Emerging Policy OF2: Protection of Existing Office Floorspace
- Emerging Policy OF3 Temporary 'Meanwhile' Uses
- Emerging Strategic Policy S5 Retail and Active Frontages
- Emerging Policy RE2 Active Frontages
- Emerging Policy RE3 Specialist Retail Uses and Clusters
- Emerging Strategic Policy S6: Culture and Visitors
- Emerging Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Emerging Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Emerging Policy CV3: Provision of Visitor Facilities
- Emerging Policy CV5 Evening and Night-Time Economy
- Emerging Policy CV6 Public Art
- Emerging S7: Infrastructure and Utilities
- Emerging Policy N1 Infrastructure Provision and Connection
- Emerging Policy IN1: Infrastructure Capacity
- Emerging Strategic Policy S8: Design
- Emerging Policy DE1: Sustainable Design
- Emerging Policy DE2: Design Quality
- Emerging Policy DE3: Public Realm
- Emerging Policy DE4: Terraces and Elevated Public Spaces
- Emerging Policy DE5 Shopfronts
- Emerging Policy DE6 Advertisements
- Emerging Policy DE7: Daylight and Sunlight
- Emerging Policy DE8: Lighting
- Emerging Strategic Policy S9: Transport and Servicing
- Emerging Policy VT1: The impacts of development on transport
- Emerging Policy VT2 Freight and Servicing
- Emerging Policy VT3: Vehicle Parking
- Emerging Policy VT5: Aviation Landing Facilities
- Emerging Strategic Policy S10: Active Travel and Healthy Streets
- Emerging Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Emerging Policy AT2: Active Travel including Cycling
- Emerging Policy AT3: Cycle Parking
- Emerging Strategic Policy S11: Historic Environment
- Emerging Policy HE1: Managing Change to Historic Environment Development
- Emerging Policy HE2: Ancient Monuments and Archaeology
- Emerging Policy HE3: Setting of the Tower of London World Heritage Site

- Emerging Strategic Policy S12: Tall Buildings
- Emerging Strategic Policy S13: Protected Views
- Emerging Strategic Policy S14: Open Spaces and Green Infrastructure
- Emerging Policy OS2: City Urban Greening
- Emerging Policy OS3: Biodiversity
- Emerging Policy OS4: Biodiversity Net Gain
- Emerging Policy OS5 Trees
- Emerging Strategic Policy S15: Climate Resilience and Flood Risk
- Emerging Policy CR1: Overheating and Urban Heat Island Effect
- Emerging Policy CR3 Sustainable Drainage Systems (SuDs)
- Emerging Policy CR4 Flood Protection and Flood Defences
- Emerging Strategic Policy S16: Circular Economy and Waste
- Emerging Strategic Policy S21: City Cluster
- Emerging Strategic Policy S26 Planning Contributions

### **Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)**

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD,
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

### **Relevant Local Plan Policies**

***CS1 Provide additional offices***

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

### ***CS2 Utilities infrastructure***

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

### ***CS3 Security and Safety***

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

### ***CS4 Planning contributions***

To manage the impact of development, seeking appropriate developer contributions.

### ***CS7 Eastern Cluster***

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City, by:

1. Increasing the provision of sustainable, energy-efficient, attractive, high quality office floorspace in a range of accommodation types, that meet the varied needs of office occupiers and achieve modernisation of office stock.
2. Promoting the Eastern Cluster as a location for inward investment, providing assistance to potential developers, investors and occupiers.
3. Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, while adhering to the principles of sustainable design,



conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views.

4. Ensuring the safety of businesses, workers, residents and visitors, promoting natural surveillance of buildings, open spaces and streets and protecting against crime and terrorism.
5. Enhancing streets, spaces, and the public realm for pedestrians, providing new open and public spaces where feasible, increasing connectivity with surrounding areas and improving access to facilities and services, particularly in the Cheapside and Aldgate areas and towards the City Fringe.
6. Ensuring the provision of high quality utilities (including CCHP where feasible) and communications infrastructure, encouraging early engagement and joint working between developers and utility providers and maximising the space under the streets, particularly through the use of pipe subways.
7. Delivering improvements to public transport to cope with the demands of the growing numbers of workers and visitors, implementing street and traffic management measures and ensuring that improvements do not compromise the quality of the environment.

### ***CS10 Design***

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

### ***CS11 Visitor, arts and culture***

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

### ***CS12 Historic environment***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

### ***CS13 Protected views***

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

### ***CS14 Tall Buildings***

To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by:

1. Permitting tall buildings on suitable sites within the City's Eastern Cluster.
2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.
4. Ensuring that tall building proposals do not adversely affect the operation of London's airports

### ***CS15 Sustainable development and climate change***

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

### ***CS16 Public transport, streets and walkways***

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

### ***CS17 Waste***

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

### ***CS18 Flood risk***

To ensure that the City remains at low risk from all types of flooding.

### ***CS19 Open Spaces and Recreation***

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

### ***CS20 Retailing***

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

### ***CS21 Housing***

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

### ***CS22 Social infrastructure and opportunity***

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

### ***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

### ***DM1.5 Mixed uses in commercial areas***

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

### ***DM2.1 Infrastructure provision***

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
  - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
  - b) reasonable gas and water supply considering the need to conserve natural resources;
  - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
  - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
  - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

### ***Policy DM 3.1 Self-containment in mixed use developments***

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

### ***DM3.2 Security measures***

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

### ***DM3.3 Crowded places***

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

### ***DM3.4 Traffic management***

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

### ***DM3.5 Night-time entertainment***

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
- b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

### ***DM10.1 New development***

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;

- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design

### ***DM10.2 Design of green roofs and walls***

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

### ***DM10.3 Roof gardens and terraces***

- 1) To encourage high quality roof gardens and terraces where they do not:
  - a) immediately overlook residential premises;
  - b) adversely affect rooflines or roof profiles;
  - c) result in the loss of historic or locally distinctive roof forms, features or coverings;

- d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

#### ***DM10.4 Environmental enhancement***

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

#### ***Policy DM 10.5 Shopfronts***

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- respect the quality and architectural contribution of any existing shopfront;
- respect the relationship between the shopfront, the building and its context;
- use high quality and sympathetic materials;
- include signage only in appropriate locations and in proportion to the shopfront;
- consider the impact of the installation of louvres, plant and access to refuse storage;
- incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;



- not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- resist external shutters and consider other measures required for security;
- consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

### ***Policy DM 10.6 Advertisements***

1. To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.
2. To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

### ***DM10.7 Daylight and sunlight***

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

### ***DM10.8 Access and inclusive design***

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

### ***DM11.2 Public Art***

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

### ***DM12.1 Change affecting heritage assets***

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

### ***DM12.4 Ancient monuments and archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

### ***DM15.1 Sustainability requirements***

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - a) BREEAM or Code for Sustainable Homes pre-assessment;
  - b) an energy statement in line with London Plan requirements;
  - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

### ***DM15.2 Energy and CO2 emissions***

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
  - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
  - d) anticipated residual power loads and routes for supply.

### ***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

#### ***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated onsite will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

#### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NO<sub>x</sub>).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

### ***DM15.7 Noise and light pollution***

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation

### ***DM15.8 Contaminated land and water quality***

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

### ***DM16.1 Transport impacts of development***

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
  - a) road dangers;
  - b) pedestrian environment and movement;
  - c) cycling infrastructure provision;
  - d) public transport;
  - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

### ***DM16.3 Cycle parking***

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

#### ***Policy DM 16.6 Public car parks***

No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

#### ***DM17.1 Provision for waste***

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

#### ***DM17.2 Designing out construction waste***

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

#### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
  - b) the benefits of the development outweigh the flood risk to future occupants;
  - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
  - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
  - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***Policy DM 18.3 Flood protection and climate change resilience***



1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;
  - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
  - d) have regard to biodiversity and the creation of green corridors;
  - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### ***DM19.2 Biodiversity and urban greening***

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

### ***Policy DM 20.4 Retail unit sizes***

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000m<sup>2</sup>) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

### ***DM21.3 Residential environment***

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered

### ***Policy DM 22.2 Provision of public toilets***

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

## Appendix C

### Methodologies for Assessing Daylight, Sunlight and Overshadowing

#### Existing Buildings

##### Daylight to Existing Buildings

The BRE guidelines (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

**1. Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.

**2. Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the 492 proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE guidelines recommends compliance with both the VSC and daylight distribution (NSL) assessment criteria.

##### Sunlight to Existing Buildings

**Sunlight to windows: Annual Probable Sunlight Hours (APSH):** Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

### **Interpreting Assessment Data**

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which 493 are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

It should be noted that where there are existing low levels of daylight in the baseline figures, any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Proportionate Percentage change (10% reduced to 8% = 20% reduction); and
- Actual / Absolute change (10% reduced to 8% = 2% change).

### **Open Spaces**

#### **Overshadowing**

**Sunlight to open spaces: Sunlight Hours on the Ground (SHOG):** The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21 March.

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun 494 is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

### **Assessing the Cumulative Impact of Development Proposals**

Paragraph 3.10.41 of the Local Plan and paragraph 6.1.59 of the emerging City Plan state that “when considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals”. The impact of a proposed development on the daylight and sunlight received by neighbouring properties and open spaces is assessed against the light levels in the existing scenario. When assessing the cumulative impact of development proposals, the impact of the proposed development would be assessed alongside any other nearby developments with either full planning permission, a resolution to grant consent, those development proposals that have been submitted but not yet determined and / or potential future applications that due to be submitted (none of which have been completed). In undertaking an assessment of the cumulative impact of such development proposals it can be determined the extent to which the impact of each development proposals can be attributed. It should be noted that previous completed developments are considered to form part of the existing baseline against which the development proposals would be assessed.

## SCHEDULE

Application: 23/01423/FULEIA

### 1 Undershaft, London, EC3A 8EE

Demolition of the existing buildings, retention and partial expansion of existing basement plus construction of a ground, plus 73 storey building (plus plant) for office use (Use Class E(g)); Retail/food and beverage (Use Class E(a)-(b)); Public amenity space (Flexible Class E(a)-(d) / Class F1 / Sui Generis); publicly accessible education space and viewing gallery at levels 72 and 73 (Sui Generis); public cycle hub (Sui Generis); plus podium garden at level 11, installation of a digital screen, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

The application is accompanied by an Environmental Statement. Members of the public may obtain copies of the Environmental Statement at a charge from AECOM at [environmentadmins@aecom.com](mailto:environmentadmins@aecom.com).

RE-CONSULTATION due to a revised description of development and submission of additional information and revised drawings to: reduce the footprint of the building to enlarge St Helen's Square, incorporate a screen at the ground floor level of the building; revise access arrangements plus associated design alterations and amendments to the location and layout of uses proposed within the building as outlined in the Planning Statement Addendum.

## CONDITIONS

Time Limit for Commencement	
1	<p><b>Time Limit</b></p> <p>The development hereby permitted shall be begun before the expiration of five years from the date of this permission.</p> <p>Reason: To ensure compliance with the 91 of the Town and Country Planning Act 1990.</p>
Environmental Health	
2	<p><b>Scheme of Protective Works</b></p> <p>Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has</p>

	<p>been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).</p> <p>REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.</p>
3	<p><b>Opening Hours – Terraces and Balconies</b></p> <p>The roof terraces hereby permitted on levels 30 and 48 and balconies shall not be used or accessed between the hours of 22:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.</p> <p>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.</p>
4	<p><b>Opening Hours – Level 11 Podium Garden</b></p> <p>The Level 11 Podium Garden shall not be used or accessed between the hours of 23:00 on one days and 07:00 on the following day.</p> <p>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.</p>
5	<p><b>Amplified Music</b></p> <p>No amplified or other music shall be played on the roof terraces, balconies or Level 11 Podium Garden.</p> <p>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.</p>
6	<p><b>Plant Noise</b></p>

	<p>(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the plant is or may be in operation.</p> <p>(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.</p> <p>(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.</p> <p>REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
7	<p><b>Sound Insulation Office/Non-Office</b></p> <p>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.</p> <p>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.</p> <p>REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.</p>
8	<p><b>Commercial cooking – flume extract arrangement</b></p> <p>No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.</p>



	<p>REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.</p>
9	<p><b>Mounting of plant</b></p> <p>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.</p> <p>REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.</p>
10	<p><b>Maintenance of ventilation and extraction equipment</b></p> <p>All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour &amp; Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.</p> <p>Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3.</p>
11	<p><b>Contamination</b></p> <p>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'.</p> <p>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.</p> <p>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.</p>

	<p>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.</p>
12	<p><b>Contamination</b></p> <p>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'.</p> <p>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.</p> <p>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.</p> <p>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.</p>
13	<p><b>Screen – Hours of operation</b></p> <p>The screen hereby permitted shall not be in operation or open to the public between the hours of 23:00 on one day to 07:00 on the following day.</p>

	<p>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.</p>
14	<p><b>Screen – Noise</b></p> <p>Noise from the screen hereby approved should not be audible at the façade of any residential property.</p> <p>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.</p>
<b>SuDS/Water</b>	
15	<p><b>SuDS</b></p> <p>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:</p> <p>(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 4.5 l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 715 m<sup>3</sup> ;</p> <p>(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.</p> <p>(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.</p> <p>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.</p>
16	<p><b>SuDS Maintenance</b></p> <p>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</p>

	<p>the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>(a) A Lifetime Maintenance Plan for the SuDS system to include:</p> <ul style="list-style-type: none"> <li>- A full description of how the system would work, it's aims and objectives and the flow control arrangements;</li> <li>- A Maintenance Inspection Checklist/Log;</li> <li>- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.</li> </ul> <p>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.</p>
17	<p><b>Thames Water</b></p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ul style="list-style-type: none"> <li>- all water network upgrades required to accommodate the additional demand to serve the development have been completed;</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>- 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.</li> </ul> <p>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</p>
18	<p><b>Thames Water – Piling Method Statement</b></p> <p>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</p>

	<p>must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.</p> <p>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</p>
<b>Archaeology</b>	
19	<p><b>Timetable and Scheme of Archaeological Monitoring</b></p> <p>Unless otherwise agreed in writing with the Local Planning Authority, no geotechnical site investigation shall be carried out before a timetable and scheme of archaeological monitoring has been submitted to and approved in writing by the Local Planning Authority. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
20	<p><b>Stage 1 Written Scheme of Investigation</b></p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>B. Where appropriate, details of a programme for delivering related positive public benefits</p> <p>C. The programme for post-investigation assessment and subsequent analysis, publication &amp; dissemination and deposition of resulting material.</p>

	<p>This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>The WSI 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.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
21	<p><b>Foundations and piling configuration</b></p> <p>No works expect demolition to basement slab level shall take place before the details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
<b>Aviation</b>	
22	<p><b>Aviation- Radar Mitigation Scheme</b></p> <p>No construction work, excluding demolition and ground preparation works shall commence on site until a Radar Mitigation Scheme (RMS), including a timetable for its implementation during construction, has been submitted to and approved in writing by the Local Planning Authority, in consultation with the Operator NATS (En-Route) plc.</p> <p>REASON: In the interests of the aviation safety</p>
23	<p><b>Aviation – Radar Mitigation Scheme Implementation</b></p> <p>No construction work shall be carried out above a datum height of 126 metres unless and until the approved Radar Mitigation Scheme has been implemented. The development shall thereafter be operated fully in accordance with such approved Scheme.</p> <p>REASON: In the interests of the aviation safety</p>
24	<p><b>Crane Operation Plan</b></p>

	<p>No construction work shall be carried out above a datum height of 126 metres until the Developer has agreed a "Crane Operation Plan" which has been submitted to and approved in writing by the Local Planning Authority in consultation with the "Radar Operator" NATS (En-Route) plc. Construction at the site shall thereafter be operated strictly in accordance with the approved "Crane Operation Plan".</p> <p>REASON: In the interests of the aviation safety</p>
25	<p><b>NATS Notification</b></p> <p>Prior to any works commencing on site; the developer shall notify NATS (En Route) plc of the following: i) the date construction starts and is due to end; ii) the location, dates and maximum height of all construction equipment rising above 150 metres above ground level.</p> <p>REASON: In the interests of the aviation safety</p>
26	<p><b>Heathrow – Radar Mitigation</b></p> <p>No Development can take place until:</p> <ul style="list-style-type: none"> <li>- mitigation for radar software adaptation has been agreed and put in place to ensure that the proposed development will have no impact on the SSR Radar at Heathrow Airport.</li> </ul> <p>Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through interference with communication, navigational aids and surveillance equipment.</p>
27	<p><b>Heathrow – Instrument Flight Procedures (IFPs) Impact</b></p> <p>No construction works above ground level shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment has been commissioned and completed by an CAA Approved Procedures Design Organisation and approved in writing by the Local Authority in consultation with Heathrow Airport. The IFP assessment must consider all tall buildings and proposed construction crange.</p> <p>Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport through an unacceptable impact on the IFP's.</p>
28	<p><b>City Airport – Radar Mitigation</b></p> <p>No Development can take place until:</p> <ul style="list-style-type: none"> <li>-mitigation has been agreed and put in place to ensure that the proposed</li> </ul>

	<p>development will have no impact on the H10 Radar located at Heathrow Airport but utilised by London City Airport.</p> <p>Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through interference with communication, navigational aids and surveillance equipment.</p>
29	<p><b>City Airport – Construction Methodology</b></p> <p>No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport.</p> <p>Reason: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and therefore they must be assessed before construction.</p>
30	<p><b>City Airport – Instrument Flight Procedures (IFPs) Impact</b></p> <p>No construction works above ground level shall be carried out until a detailed Instrument Flight Procedures (IFPs) assessment has been commissioned and completed by Airport’s Approved Procedures Design Organisation (NATS) and approved in writing by the Local Authority in consultation with London City Airport. The IFP assessment must consider all tall buildings and proposed construction cranes.</p> <p>Reason: To ensure the development does not endanger the safe movement of aircraft or the operation of London City Airport through an unacceptable impact on the IFP’s associated to London City Airport.</p>
31	<p><b>City Airport – Building Obstacle Lighting</b></p> <p>Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR-DSN Chapter Q ‘Visual Aids for Denoting Obstacles’ and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.</p> <p>Reason: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.</p>



## Sustainability

32

### **Circular Economy**

- (a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. In addition, the audit shall include a strategy to recycle the various concrete elements from deconstruction on site following in depth surveys of the structure and quality. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
- (b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 ; S16, CEW 1, emerging City Plan 2040 policy DE1.

33

### **Post-Construction Circular Economy**

No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the 501 proposed targets stated in the approved Circular Economy Statement for the development. The statement shall also be submitted to the GLA at: [circulareconomystatements@london.gov.uk](mailto:circulareconomystatements@london.gov.uk).

	<p>REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.</p>
34	<p><b>Whole life-cycle carbon emissions</b></p> <p>Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark (as current at the time of submission) set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on whole life-cycle carbon assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life-cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, emerging City Plan 2040 policy DE1.</p>
35	<p><b>Post-construction whole-life cycle carbon emissions</b></p> <p>Once the as-built design has been completed (upon commencement of RIBA Stage 6 the <b>post-construction Whole Life-Cycle Carbon (WLC) Assessment</b> (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: <a href="mailto:ZeroCarbonPlanning@london.gov.uk">ZeroCarbonPlanning@london.gov.uk</a></p> <p>REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.</p>
36	<p><b>Façade System</b></p>

	<p>Prior to the commencement of the development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles, is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings.</p> <p>REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the e Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policies DE1.</p>
37	<p><b>District Heating Network Connection</b></p> <p>The development shall be designed to enable connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site.</p> <p>REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.</p>
38	<p><b>Climate Change Resilience Sustainability Statement</b></p> <p>Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, overheating, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. In The CCRSS shall also demonstrate how the development will be operated and</p>

	<p>managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated &amp; managed in accordance with the approved CCRSS for the life of the development.</p> <p>REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.</p>
39	<p><b>Climate Change Resilience Measures – completion details</b></p> <p>Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.</p> <p>REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.</p>
40	<p><b>BREEAM</b></p> <p>A post construction BREEAM assessment for each use demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.</p> <p>REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.</p>
41	<p><b>Updated Biodiversity Net Gain</b></p> <p>Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS4. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.</p>
42	<p><b>Ecological Management Plan</b></p>

	<p>Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following:</p> <ul style="list-style-type: none"> <li>• details of ecological landscaping, along with associated management and monitoring</li> <li>• detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided</li> <li>• details of habitat created for solitary bees</li> <li>• details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided</li> <li>• Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible).</li> </ul> <p>The plan should address all the recommendations from the Independent Third Party review undertaken by Pell Frischmann.</p> <p>The measures as set out in the plan shall be carried out and so maintained.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.</p>
43	<p><b>Post Construction UGF and BNG</b></p> <p>Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.</p>
<b>Design/Public Realm including Lighting</b>	
44	<p><b>AOD Height of Building</b></p> <p>The maximum height of the approved building shall be as follows: to the uppermost point 309.6m AOD,</p> <p>REASON: In the interests of visual amenity and heritage protection in accordance with the following policies of the Local Plan: DM10.1, CS12</p>

	and CS14.
45	<p><b>Design and materials</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>(a) particulars and sample including colour and texture finishes of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces including jointing and any necessary expansion/movement joints;</p> <p>(b) typical bay details of the proposed typical elevations levels 12-48 including the mega grid and west green planted elevations. These should include a mock up, jointing materials and colour finish, as well as details of planters and soffits;</p> <p>(c) typical bay details of the lower podium levels from the ground floor to the podium garden level 11, including a mock up, jointing materials, colour finish and details of soffits;</p> <p>(d) details of weathering steel tridents, struts and columns for all relevant levels including mock up samples and interface in the public realm;</p> <p>(e) details of the recessed elevations and soffits to level 30 and level 48;</p> <p>(f) details of the servicing bay entrance including bespoke entrances, mock up samples and interface in the public realm;</p> <p>(g) mock up sample of the glazing system to test solar glare;</p> <p>(h) details of the rooftop including plant equipment and enclosure solar panels;</p> <p>(i) details of podium floor elevations including all entrances, lifts and façade materials;</p> <p>(j) details of the public staircase and public lifts at the south-west part of the building;</p> <p>(k) details of the external and internal public entrance at Level 1 (south-west)</p> <p>(l) details of all soffits, handrails and balustrades, including samples of all glass balustrades in the podium garden and all external terraces and the oculus, including reflectivity experience from ground and high levels and iron content;</p> <p>(m) details of the cantilevered podium including soffits, junction, with the main tower and tridents, materials including typical mock up;</p> <p>(n) details of all ground floor elevations up to the base including entrances;</p> <p>(o) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at amenity gardens and roof level including within the plant rooms;</p> <p>(p) details of all drainage, irrigation and rainwater harvesting;</p>

	<p>(q) details of the integration of M&amp;E and building services into the external envelope;</p> <p>(r) details of any canopies.</p> <p>(s) details of all wind mitigation measures, including location and detailed design.</p> <p>(t) details of the digital screen at the south elevation</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.</p>
46	<p><b>Crown of 1 Undershaft</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>Detailed drawings of the external ‘crown’ of the building, comprising the upper 4 floors, including samples of all proposed materials and colour finishes for the panoramic glazing and shading fins, a 1:1 mock up samples (or alternative scale as agreed in writing) of typical bays to include dichroic coating treatment and palette of materials and finishes.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM10.1</p>
47	<p><b>Ground floor lobby entrance to the Cycle Hub</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>Details of the internal ground floor north-western lobby entrance spaces including the lifts, elevations, soffits layout, samples of materials, artwork, signage, canopies and lighting and interface details with the public realm.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM10.1</p>
48	<p><b>Public lobby at Level 1</b></p>

	<p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>Details of the internal level 1 lobby entrance space which provides access to the public areas in the building including the lifts, elevations, layout, including security layout, soffits layout, samples of materials, artwork, signage and lighting.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10, DM10.1</p>
49	<p><b>Internal lobby areas to elevated public spaces</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>Details of all internal public lobby spaces in the building Level 2, Level 3, Level 11 and Levels 72 and 73, including general arrangement elevations, soffits layout, samples of materials and lighting and interface details with the public realm where relevant.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10 and DM10.1</p>
50	<p><b>Historic cannon embedded in the paving</b></p> <p>Before any works thereby affected are begun, the historic cannon embedded in the paving to the south of St Helen's Church should be carefully removed and safely stored for future use. Details of its removal, storage and future use should be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS10 and DM10.1</p>
51	<p><b>Parish Markers and Commemorative Plaques</b></p>



	<p>Before any works thereby affected are begun, all Parish Markers and commemorative plaques on the existing building shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.</p>
52	<p><b>Balustrades</b></p> <p>Before any works thereby affected are begun, details of all balustrades of all external terraces and associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2</p>
53	<p><b>Hanging garden elevation</b></p> <p>Before any works thereby affected are begun, further details of all the proposed 'hanging wall' on the western elevation and any other proposed green walls shall be provided which shall include full details of the proposed irrigation and additional work to demonstrate the fire safety of the green walls shall be submitted to and approved in writing with the local planning authority, in consultation with the Greater London Authority and London Fire Brigade.</p> <p>REASON: To ensure that the development incorporates the necessary fire safety measures.</p>
54	<p><b>Mock up sample panels</b></p> <p>Before the works thereby affected are begun, mock up 1:1 sample panels (or alternative scale as agreed in writing) of agreed sections of the facades shall be built, agreed on-site (or alternative agreeable location) and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.</p>
55	<p><b>Suicide Prevention</b></p>

	<p>Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan, CS3, DM3.2 DM10.1 and DM12.2.</p>
56	<p><b>Public art strategy</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>Details of a new public art strategy within the public realm or on buildings where appropriate and which is of artistic merit, is deliverable and can be maintained shall be submitted to and approved in writing by the Local Planning Authority. The public art installations shall be carried out as approved and so maintained.</p> <p>REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2.</p>
57	<p><b>Urban Greening</b></p> <p>Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for</p> <ul style="list-style-type: none"> <li>a. planters, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;</li> <li>b. the incorporation of blue roofs into roof surfaces; and</li> <li>c. the landscaping of the public realm</li> </ul> <p>Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.</p> <p>REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.</p>

58	<p><b>Street lighting</b></p> <p>Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.</p> <p>REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.</p>
59	<p><b>Lighting including aviation</b></p> <p>Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:</p> <ul style="list-style-type: none"> <li>- lighting layout/s;</li> <li>- details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);</li> <li>- a lighting control methodology;</li> <li>- proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;</li> <li>- all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;</li> <li>- details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.</li> <li>- details of aviation lights including locations</li> </ul> <p>All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15.</p>
60	<p><b>Landscaping</b></p>

	<p>All landscaping, including the ground floor and external terraces, shall be treated in accordance with a landscaping scheme, including details of:</p> <ul style="list-style-type: none"> <li>a. Irrigation;</li> <li>b. Provision for harvesting rainwater run-off from road to supplement irrigation;</li> <li>c. Spot heights for ground levels around planting pit;</li> <li>d. Soil;</li> <li>e. Planting pit size and construction;</li> <li>f. Tree guards; and</li> <li>g. Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.</li> </ul> <p>To be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.</p> <p>REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.</p>
61	<p><b>Public realm details</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>a. St Helen's Square <ul style="list-style-type: none"> <li>i. full details of the of the public spaces, including flooring, street furniture, boundary treatments, seating, lighting, soffits, bollards, cycle storage, and any infrastructure required to deliver programmed and varied uses and public art;</li> <li>ii. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access;</li> <li>iii. details of handrails and balustrades and staircases and steps;</li> <li>vi. Details and locations of the drinking fountains;</li> <li>v. details of all drainage, irrigation and rainwater harvesting;</li> <li>vi. details of the supporting columns including the interface at ground level;</li> </ul> </li> </ul>

	<p>vii. details of gradients and levels</p> <p>b. Undershaft Square</p> <p>i. full details of the public spaces, including flooring, entrances, planters, seating, lighting, soffits, walls, railings, hand rails, balustrades and any infrastructure required to deliver programmed and varied uses;</p> <p>ii. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access;</p> <p>iii. details of all drainage, irrigation and rainwater harvesting;</p> <p>vi. details of the supporting columns including the interface at ground level</p> <p>v. full details of the water features</p> <p>vi. details of gradients and levels</p> <p>c. The level 11 terrace</p> <p>i. full details of the terrace, including flooring, entrances, planters, seating, oculus, lighting, soffits, drainage, walls, railings, irrigation, hand rails, balustrades, and any infrastructure required;</p> <p>ii. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access, including external ground and upper level surfaces;</p> <p>iii. details of all drainage, irrigation and rainwater harvesting;</p> <p>iv. Any other public spaces on the curtilage of the site</p> <p>v. full details, including flooring, entrances, planters, seating, lighting, soffits, drainage, walls, railings, irrigation, hand rails, balustrades, and any infrastructure required;</p> <p>vi. particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access, including external ground and upper level surfaces;</p> <p>vii. details of all drainage, irrigation and rainwater harvesting;</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2, CS10, DM10.1, DM10.4 and DM12.2</p>
<b>Accessibility</b>	
62	<p><b>Wayfinding Strategy</b></p> <p>Prior to commencement excluding demolition, a signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural uses and any other relevant uses or historic sites shall be submitted to and approved in writing by the Local Planning Authority.</p>

	<p>REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.</p>
63	<p><b>Inclusion and accessibility</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>a) entrance to accessible parking including siting of controlled entry system at a scale of no less than 1:20</li> <li>b) all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate</li> <li>c) An inclusive play strategy with details of equipment</li> <li>d) Details of inclusive gym facilities</li> <li>e) security measures including provision of wider aisle gates at all controlled points of entry</li> <li>f) Planting to all public landscape areas including path widths and seating and demonstrating how unwelcome touch and scent can be avoided</li> <li>g) Glare analysis including for dichroic cladding and the oculus</li> <li>h) Wayfinding and signage strategy</li> <li>i) An inclusive entrances strategy including details of doors, opening mechanisms, surface contrast and any control points.</li> <li>j) Public Realm at grade and Level 11 Podium Garden details including: recesses in seating for wheelchair users and buggies and assistance animals; seating at a range of heights; seating should allow for wheelchair users to transfer; back rest and arm rests for support when rising; and single and group seating.</li> <li>k) Details of the lift entrance including cladding material and colour; and details of the screen and displays including glare analysis, siting, hours of operation and maximum volumes. This should be informed by engagement with relevant user groups and identification of alternative low stimulus routes during hours of operation, to minimise potential barriers to people with sensory and/or information processing difference.</li> <li>l) Lifts showing internal fit out, size, capacity and that they can accommodate people using larger motorised wheelchairs and Class C mobility scooters and stair access.</li> <li>m) Horizontal movement through the building demonstrating that there is sufficient space for wheelchair users to pass, rest points, colour contrast of 30 LRV and clear wayfinding through the building.</li> <li>n) Inclusive Toilet Strategy including details of the fit-out of the Changing Places, facilities, wheelchair accessible, ambulant accessible and larger</li> </ul>

	<p>toilets, single sex toilets, baby changing facilities and assistance animal spend areas.</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan</p>
64	<p><b>Access Management Plan</b></p> <p>Before any works thereby affected are begun the following an Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:</p> <p>1)Website information including photos and an easy read version with information on:</p> <ul style="list-style-type: none"> <li>a) Travel distances from key points of arrival and rest points</li> <li>b) Location of dropped kerbs</li> <li>c)Facilities available on site including dimensions and photos for (as appropriate): <ul style="list-style-type: none"> <li>i)Entrance to accessible parking and details of how to reserve spaces</li> <li>ii)entrances, lift access and queues and how these will be managed</li> <li>iii)controlled entry points (showing wider gates)</li> <li>iv)accessible toilets including access to keys for operation including at ground floor and</li> <li>v)Changing Places toilets provision including but not exclusively at ground floor and for the other publicly accessible areas</li> <li>vi)Baby changing facilities including at ground floor and for the other publicly accessible areas</li> <li>vii)'universal', female and male toilet provision at ground floor and for the other publicly accessible areas</li> <li>viii)facilities for assistance animals</li> <li>ix)equipment loan</li> <li>x)assistive listening system and other assistive technology</li> <li>xi)rest and recovery facilities</li> <li>xii)room for reflection/quiet room</li> <li>xiii)culture space</li> <li>xiv)plant species</li> <li>xv)Spend areas for assistance animals</li> </ul> </li> </ul> <p>2) Booking information for viewing gallery including arrangements for:</p>

	<p>i) Alternatives to online booking  ii) queuing eg for people who are not able to stand for periods  iii) security  iv) essential companions  v) assistance animals  vi) places for rest and recovery</p> <p>3) Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering.</p> <p>4) Inclusive Entrances Strategy</p> <p>The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan</p>
65	<p><b>Demolition and Construction Methodology Statement</b></p> <p>Prior to the commencement of development a Demolition and Construction Methodology and Structural Assessment (prepared by a Heritage Accredited Structural Engineer), assessing implications of the demolition and construction phase, as well as any medium and longterm structural and non-structural implications for the listed buildings St Andrew Undershaft (Grade I) and St Helens Bishopsgate (Grade I), including a detailed methodology and specification of works which seek to mitigate any damage, shall be submitted and approved in writing by the Local Planning Authority and those relevant works carried out in accordance with the approved details.</p> <p>REASON: In order to safeguard the structure and the special architectural or historic interest of the listed buildings at St Andrew Undershaft and St Helens Bishopsgate in accordance with the following policies of the Local Plan: CS12, DM12.1.</p>
<b>Highways and Transportation</b>	
66	<p><b>Refuse/ Recycling Storage and Collection</b></p> <p>Refuse and recycling, storage and collection facilities shall:</p> <p>(a) be provided within the curtilage of the site to serve each part of the development in accordance with details, which must be submitted to</p>



	<p>and approved in writing by the Local Planning Authority prior to work commencing; and</p> <p>(b) thereafter be maintained as approved throughout the life of the building.</p> <p>REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. 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.</p>
67	<p><b>Restricting numbers of deliveries/servicing</b></p> <p>There shall be no more than 193 delivery and servicing motorized vehicles daily trips in total over any 24-hour period (accounting for a consolidation rate of at least 50% and 10% of trips via cargo bike).</p> <p>REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.</p>
68	<p><b>Restricting Hours of deliveries and servicing</b></p> <p>No deliveries and servicing trips to the premises shall be carried out between the hours of 7:00 to 9:00, 12:00 to 14:00 and 14:00-18:00, Monday to Sunday, including Bank Holidays.</p> <p>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: CS16, DM15.7, DM16.2, DM 16.1, DM21.3.</p>
69	<p><b>Site Condition Survey</b></p> <p>Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and detailed report of the findings must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.</p> <p>REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory</p>

	<p>treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
70	<p><b>Demolition and Construction Management Plan</b></p> <p>Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include:</p> <ul style="list-style-type: none"> <li>•Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.</li> <li>•Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.</li> <li>•Construction vehicle routes to and from the site to be approved with CoL Highways</li> <li>•Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).</li> <li>•Construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request.</li> <li>•encouraging the use of cargo bike deliveries throughout the construction process.</li> <li>•Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.</li> <li>•A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.</li> <li>•The site should be registered with the Considerate Constructors Scheme.</li> </ul> <p>We will also expect the proposed works to be undertaken in accordance with</p>

	<p>the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: <a href="http://www.clocs.org.uk/standard-for-clocs/">http://www.clocs.org.uk/standard-for-clocs/</a>.</p> <p>REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.</p>
71	<p><b>Car Parking</b></p> <p>Two car parking spaces suitable for use by people with disabilities shall be provided on the premises in accordance with details to be submitted to and approved in writing by the Local Planning Authority before any works affected thereby are begun and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking. Electric Vehicle charging facilities should be provided for the two spaces.</p> <p>REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.</p>
72	<p><b>Car Parking Management Plan</b></p> <p>A Car Parking Management Plan (CPMP) shall be submitted and approved in writing by the Local Planning Authority, 6 months prior to the occupation of this development. The CPMP shall include details on managing of the disabled car parking spaces and maintaining the area reserved for parking thereafter. The plan to include, details on:</p> <ul style="list-style-type: none"> <li>•booking system for the spaces, keeping records and managing the demand, enforcement measures</li> <li>•measures required to control the access to the parking area including access to the lifts</li> <li>•directional and entrance signage to the car parking area.</li> <li>•levels within the car parking area, show structural columns on a drawing (if any), include visibility splays and vehicle circulatory movements, provide clear and unobstructed headroom.</li> <li>•A Health &amp; Safety audit and risk assessment for the disabled users of the car park, is required.</li> </ul> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the operation of the car park would not be adversely affected in accordance with Local Plan: DM16.1 and DM16.5.</p>

73	<p><b>Vehicle Lifts</b></p> <p>A level clear standing area shall be provided and maintained entirely within the curtilage of the site at street level in front of any vehicle lift sufficient to accommodate the largest size of vehicle able to use the lift cage.</p> <p>REASON: To prevent waiting vehicles obstructing the public highway in accordance with the following policy of the Local Plan: DM16.5.</p>
74	<p><b>Cycle Parking Facilities</b></p> <p>Details of the cycle parking facilities shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. These shall comprise long stay cycle parking of 2,264 spaces and short stay cycle parking of 178 spaces. 5% of long and short term spaces to accommodate larger, and adapted cycles with suitable cycle lifts and other associated facilities.</p> <p>The cyclist facilities shall thereafter be retained and operated in accordance with the approved details for the life of the building. The cycle parking provided within the buildings must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network and inclusive end of trip facilities.</p>
75	<p><b>Changing Facilities and Showers</b></p> <p>Details of the changing facilities, showers and lockers shall be submitted and approved by the Local Planning Authority. The areas shall be implemented and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.</p> <p>REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.3</p>
76	<p><b>Travel Plan</b></p> <p>An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the</p>

	<p>approved Travel Plan for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: CS16, DM16.1.</p>
77	<p><b>HVM</b></p> <p>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.</p> <p>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. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
<b>Air Quality</b>	
78	<p><b>Generators</b></p> <p>Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest engine stage available. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.</p> <p>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.</p>
79	<p><b>Flues</b></p> <p>Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the</p>

	<p>development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.</p> <p>REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.</p>
80	<p><b>NRMM</b></p> <p>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.</p> <p>REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.</p>
<b>Fire</b>	
81	<p><b>Fire Safety</b></p> <p>The development shall be carried out in accordance with the approved details within the Fire Statement, Fire Engineering Statement and Fire Statement – Second Addendum, prepared by WSP.</p> <p>REASON: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan policies D5 and D12.</p>
<b>Use Classes</b>	
82	<p><b>Offices</b></p> <p>The areas shown on the approved drawings as offices and as set out in Floor Area Condition of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose on Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as</p>

	<p>amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020).</p> <p>Reason: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.</p>
83	<p><b>Uses</b></p> <p>The development shall provide (all figures GIA excluding plant):</p> <ul style="list-style-type: none"> <li>- Office (Class E(g)) 153,602 sqm</li> <li>- Public gallery/education (Sui Generis) – 3,134 sqm</li> <li>- Retail/Food and Beverage (Class E(a)-(d)/Class F1/Sui Generis) – 1,400 sqm</li> <li>- Cultural/public amenity (Flexible Class E(a)-(d)/Class F1/Sui Generis – 3,942 sqm</li> <li>- Public Cycle Hub 17,775 sqm</li> </ul> <p>REASON: To ensure the development is carried out in accordance with the approved plans.</p>
<b>Relocation of existing benches</b>	
84	<p><b>Relocation of existing benches</b></p> <p>Prior to the affected works, a plan must be submitted and approved in writing by the Local Planning Authority showing the relocation of existing benches on Undershaft by St Helen’s Bishopsgate Church (S6 on the CFD Analysis) to an area that is suitable for seating as shown in the CFD Analysis/Wind Tunnel Testing. The relocated benches shall be retained thereafter.</p> <p>Reason: To ensure that the provision of benches are in acceptable microclimatic conditions and to comply with Policy DM10.1 of the Local Plan 2015 and polices S8 and DE2 of the emerging City Plan 2040.</p>
<b>Approved Plans</b>	
85	<p><b>Approved Plans</b></p> <p>The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this permission:</p> <p>Deconstruction – Plans</p> <p>1US-EPA-B1-B5-DR-AR-010055 REV P00 1US-EPA-B1-B5-DR-AR-010050 REV P00</p>

1US-EPA-B1-B4-DR-AR-010060 REV P00  
1US-EPA-B1-B3-DR-AR-010070 REV P00  
1US-EPA-B1-B2-DR-AR-010080 REV P00  
1US-EPA-B1-B1-DR-AR-010090 REV P00  
1US-EPA-B1-00-DR-AR-010100 REV P00  
Demolition – Elevations

1US-EPA-B1-ZZ-DR-AR-010860 REV P00  
1US-EPA-B1-ZZ-DR-AR-010870 REV P00

Planning Drawings/ Reserves Matters/ Fire

Planning Proposed Building – General Arrangement Plans

1US-EPA-B1-00-DR-AR-050000 REV P03  
1US-EPA-B1-00-DR-AR-050010 REV P03  
1US-EPA-B1-00-DR-AR-050011 REV P04  
1US-EPA-B1-11-DR-AR-050012 REV P02  
1US-EPA-B1-B3-DR-AR-050070 REV P00  
1US-EPA-B1-B2-DR-AR-050080 REV P01  
1US-EPA-B1-B1-DR-AR-050090 REV P01  
1US-EPA-B1-00-DR-AR-050100 REV P04  
1US-EPA-B1-01-DR-AR-050110 REV P03  
1US-EPA-B1-02-DR-AR-050120 REV P02  
1US-EPA-B1-03-DR-AR-050130 REV P02  
1US-EPA-B1-04-DR-AR-050140 REV P02  
1US-EPA-B1-06-DR-AR-050160 REV P02  
1US-EPA-B1-08-DR-AR-050180 REV P02  
1US-EPA-B1-09-DR-AR-050190 REV P02  
1US-EPA-B1-10-DR-AR-050200 REV P02  
1US-EPA-B1-11-DR-AR-050210 REV P02  
1US-EPA-B1-12-DR-AR-050220 REV P01  
1US-EPA-B1-13-DR-AR-050230 REV P01  
1US-EPA-B1-14-DR-AR-050240 REV P00  
1US-EPA-B1-18-DR-AR-050280 REV P00  
1US-EPA-B1-28-DR-AR-050380 REV P00  
1US-EPA-B1-29-DR-AR-050390 REV P00  
1US-EPA-B1-30-DR-AR-050400 REV P00  
1US-EPA-B1-31-DR-AR-050410 REV P00  
1US-EPA-B1-32-DR-AR-050420 REV P00  
1US-EPA-B1-33-DR-AR-050430 REV P00  
1US-EPA-B1-34-DR-AR-050440 REV P00  
1US-EPA-B1-46-DR-AR-050560 REV P00  
1US-EPA-B1-47-DR-AR-050570 REV P00



1US-EPA-B1-48-DR-AR-050580 REV P01  
1US-EPA-B1-49-DR-AR-050590 REV P01  
1US-EPA-B1-50-DR-AR-050600 REV P00  
1US-EPA-B1-61-DR-AR-050710 REV P00  
1US-EPA-B1-62-DR-AR-050720 REV P00  
1US-EPA-B1-64-DR-AR-050740 REV P00  
1US-EPA-B1-65-DR-AR-050750 REV P00  
1US-EPA-B1-70-DR-AR-050800 REV P01  
1US-EPA-B1-72-DR-AR-050820 REV P01  
1US-EPA-B1-73-DR-AR-050830 REV P01  
1US-EPA-B1-74-DR-AR-050840 REV P01  
1US-EPA-B1-RF-DR-AR-050850 REV P01

#### Planning Proposed Building – Context and General Arrangement Elevations

1US-EPA-B1-ZZ-DR-AR-050860 REV P02  
1US-EPA-B1-ZZ-DR-AR-050870 REV P02  
1US-EPA-B1-ZZ-DR-AR-050880 REV P03  
1US-EPA-B1-ZZ-DR-AR-050890 REV P03

#### Planning Proposed Building – General Arrangement Sections

1US-EPA-B1-ZZ-DR-AR-050900 REV P02  
1US-EPA-B1-ZZ-DR-AR-050901 REV P02

#### Elevation Bays

1US-EPA-B1-ZZ-DR-AR-050862 REV P00  
1US-EPA-B1-ZZ-DR-AR-050871 REV P02  
1US-EPA-B1-ZZ-DR-AR-050872 REV P01  
1US-EPA-B1-ZZ-DR-AR-050873 REV P01  
1US-EPA-B1-ZZ-DR-AR-050881 REV P00  
1US-EPA-B1- ZZ-DR-AR-050891 REV P01  
1US-EPA-B1-ZZ-DR-AR-050892 REV P02  
1US-EPA-B1-ZZ-DR-AR-050920 REV P02

#### Façade Details

1US-EPA-B1-ZZ-DR-AR-050930 REV P00  
1US-EPA-B1-ZZ-DR-AR-050935 REV P00  
1US-EPA-B1-ZZ-DR-AR-050937 REV P00  
1US-EPA-B1-ZZ-DR-AR-050945 REV P01  
1US-EPA-B1-ZZ-DR-AR-050950 REV P02  
1US-EPA-B1-ZZ-DR-AR-050955 REV P02

<p>1US-EPA-B1-ZZ-DR-AR-050975 REV P00 1US-EPA-B1-ZZ-DR-AR-050980 REV P01</p> <p>REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.</p>
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### **Informatives**

1.	<p>CAA Building Notification</p> <p>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 &amp; Military Explosives Storage Areas'.</p>
2.	<p>Crane Obstacle Lighting</p> <p>We would like to advise the developer that if a crane is required for construction purposes, then red static omnidirectional lights will need to be applied at the highest part of the crane and at the end of the jib if a tower crane, as per the requirements set out by CAP1096.</p>
3.	<p>Thames Water</p> <p>A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing <a href="mailto:trade.effluent@thameswater.co.uk">trade.effluent@thameswater.co.uk</a> . Application forms should be completed on line via <a href="http://www.thameswater.co.uk">www.thameswater.co.uk</a>. Please refer to the Wholesale; Business customers; Groundwater discharges section.</p>
4.	<p>NPPF</p> <p>In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:</p>

	<p>detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;</p> <p>a full pre application advice service has been offered;</p> <p>where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.</p>
5.	<p>CIL</p> <p>The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.</p> <p>The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:</p> <p>Office 185GBP per sq.m</p> <p>Retail 165GBP per sq.m</p> <p>Hotel 140GBP per sq.m</p> <p>All other uses 80GBP per sq.m</p> <p>These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.</p> <p>The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses.</p> <p>The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.</p> <p>Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: <a href="http://www.planningportal.gov.uk/cil">www.planningportal.gov.uk/cil</a>).</p>

	<p>Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.</p>
6	<p>Roof Gardens</p> <p>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.</p>
7	<p>Compliance with the Clean Air Act 1993</p> <p>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.</p>
8	<p>Generators and combustion plant</p> <p>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 (<a href="http://www.gov.uk">www.gov.uk</a>)</p>
9	<p>Design Team</p> <p>The current design team or an equivalent team in quality and experience shall be retained for the construction and completion stage of the development to meet London Plan D4 (F) part 4.</p>