Memo

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

From District Surveyors Office
Environment Department
Telephone [redacted]
Email [redacted]

Date 14 October 2024
Our Ref DS/FS24/0046
Your Ref PT_EB/24/01015/FULL
Subject 9 Newbury Street London EC1A 7HU

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

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

I consider that policies D5 and D12 have been met.

LPA Ref: 23/01423/FULEIA

London City Airport Ref: 2024/LCY/019

Date: 25/01/24

Dear Gemma Delves,

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

LPA Reference	23/01423/FULEIA
Proposal	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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.
Location	1 Undershaft London EC3A 8EE
Borough	City of London
Case Officer	Gemma Delves

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

Radar Mitigation Condition

No Development can take place until:

> -mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 Radar located at Heathrow Airport but utilised by London City Airport.

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.

Construction Methodology Condition

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.

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.

Instrument Flight Procedures (IFPs) Impact Condition

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 cranage.

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.

Building Obstacle Lighting Condition

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.

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

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

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

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,

Simon Vince
On behalf of London City Airport

Memo

To Department of Planning & Transportation

From Paul Jones
Contract and Drainage Service
Department of the Built Environment
Telephone 0207 332 1545
Email paul.jones@cityoflondon.gov.uk

Date 26 January 2024

Subject GREASE TRAP REQUIREMENT

For action

Application No. PT_GD/23/01423/FULEIA

Address: **1 Undershaft, London, EC3A 8EE**

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

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

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

Paul Jones

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

Gemma Delves
City of London
By email

26/01/24

Dear Gemma,

Planning Reference: 23/01423/FULEIA

Re: 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

Location: 1 Undershaft London EC3A 8EE

Our Ref: LHR5805

We refer to your email dated 24 January 2024, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria. Heathrow Airport request for the following conditions to be applied to any subsequent planning permission.

H10 Radar Mitigation Condition
No Development can take place until:

- 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.

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.

Instrument Flight Procedures (IFPs) Impact Condition
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 cranage.

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.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

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

Crane Obstacle Lighting
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.

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

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited

Transport for London

PLNComments@cityoflondon.gov.uk

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

26 January 2024
Crossrail Ref: CRL-IP-3082

Dear Gemma Delves,

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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

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

Thank you for your letter dated 24 January 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no comment on the application.

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

Yours sincerely,

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

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

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

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

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

creating a better place

Environment Agency

Gemma Delves
City of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136666/01
Your ref: 23/01423/FULEIA

Date: 26 January 2024

Dear Gemma,

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, 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.

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

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

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

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

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

Pre Application Advice
Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish

Cont/d..

INVESTOR IN PEOPLE

to request a document review or meeting, please contact our team email address at HNLSustainablePlaces@environment-agency.gov.uk.

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

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

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk

End

Begum, Shupi

From: Active Travel England Planning <planning-consultations@activetravelengland.gov.uk>
Sent: 29 January 2024 15:17
To: PLN - Comments
Subject: LPA Reference: 23/01423/FULEIA Standing Advice Response

THIS IS AN EXTERNAL EMAIL

LPA Reference: 23/01423/FULEIA

ATE Reference: ATE/24/00127/FULL

Site Address: 1 UNDERSHAFT, LONDON, EC3A 8EE

Proposal: 23/01423/FULEIA | 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, 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. | 1 Undershaft London EC3A 8EE

Standing Advice

Dear Sir/Madam,

Thank you for your email.

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. Our standing advice can be found here:

https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter **@activetraveleng**

Instagram **@activetravelengland** and on **LinkedIn**
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[ref:a0zTw0000002sKTIAY;b5b492d7301c4a298aef59b5ba807fa2:ref]

Corporation of London Department of Planning & Transportation POOur DTS Ref: 75572 Your Ref:
Box 270 Guildhall London EC2P 2EJ 23/01423/FULEIA
30 January 2024

Dear Sir/Madam

Re: 1, UNDERSHAFT, -, LONDON, -, EC3A 8EE

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

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

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

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

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

information : www.thameswater.co.uk/help

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

Water Comments
Thames Water are currently working with the developer of application 23/01423/FULEIA to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 25,000 sqm of Commercial premises at 1.5 l/s but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 25,000 sqm of Commercial premises until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.Reason - The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

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

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

Yours faithfully

Development Planning Department

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

Westminster City Council

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

westminster.gov.uk

City of Westminster

Your ref:
My ref: 24/00478/OBS

Please reply to: Matthew Pendleton
Tel No: [redacted]
Email: [redacted]

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

Gemma Delves
City of London
PO Box 270, Guildhall, London EC2P 2EJ

9 February 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

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

SCHEDULE

Application No.: 24/00478/OBS **Application Date:**

Date Received: 24.01.2024 **Date Amended:** 24.01.2024

Plan Nos: 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;

Whole Life Carbon Assessment, prepared by WSP;

Environmental Statement; and

Non-Technical Summary, prepared by Aecom.

Address: 1 Undershaft, City Of London, London, EC3A 8EE

Proposal: 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

Yours faithfully

[redacted]

Deirdra Armsby
Director of Town Planning & Building Control

Note:

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

4635 Crystal Mark
Clarity approved by Plain English Campaign

Note:

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

4635 Crystal Mark
Clarity approved by Plain English Campaign

Historic England

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

Your Ref: 23/01423/FULEIA
Our Ref: 219000

Contact:
Helen Hawkins
[redacted]

13th February 2024

Dear Ms Delves,

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

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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

Recommend Two Archaeological Conditions

Thank you for your consultation received on 24th January 2024.

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

Positive about disabled people
Stonewall Diversity Champion

Assessment of Significance and Impact

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

An archaeological desk-based assessment and ES chapter (AECOM 2023) have been submitted with the planning application. Drawings showing areas of proposed impact from the new development have been submitted elsewhere in the ES but are not referenced in the ES chapter.

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 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.

The desk-based assessment has indicated that although extensive basements are present across the majority of the site, there are two areas in the north-east and in 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 of these basements. AECOM have confirmed that there are no new services or landscaping proposals that will affect land that has not already been affected by the current basements.

Planning Policies

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

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

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

Recommendations

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

I therefore recommend attaching conditions as follows:

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

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

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

Informative Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater

London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Condition 2

No works except demolition to basement slab level shall take place before 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

REASON To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4

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

I envisage that the archaeological fieldwork would comprise, in the first instance, the following:

Evaluation

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

Public Benefit

In order to fulfil part B of Condition 1, the results of the archaeological work should be included in any exhibition provided as part of the Cultural Strategy. Results of the archaeological work should also feed into the design of the public realm.

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

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

Yours sincerely

Helen Hawkins

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

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone 020 7332 1949
Email ella.brown@cityoflondon.gov.uk

Date 12th February 2024
Our Ref DS/SUDS24/0009
Your Ref PT_GD/23/01423/FULEIA
Subject 1 Undershaft London EC3A 8EE

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

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

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, 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^3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;

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

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

Date: 19 February 2024
Our ref: 465689
Your ref: 23/01423/FULEIA

PLNComments@cityoflondon.gov.uk.

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir/Madam,

Planning consultation: 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, 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.
Location: 1 Undershaft London EC3A 8EE

Thank you for your consultation on the above dated 24 January 2024 which was received by Natural England on 24 January 2024.

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

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

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

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

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

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

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

Yours faithfully,

Danny Whitehead
Consultations Team

NATS Safeguarding Office
4000 Parkway
Whiteley
Fareham PO15 7FL

T: [redacted]
E: [redacted]
W: http://www.nats.aero

Gemma Delves
Development Division
City of London
PO Box 270
Guildhall
London EC2P 2EJ

21 February 2024

NATS Ref: SG22212

Sent via email: PLNComments@cityoflondon.gov.uk

Dear Ms Delves,

23/01423/FULEIA, Demolition of the existing buildings, retention and partial expansion of existing basement plus construction of a ground, plus 73 storey building ¦ 1 Undershaft London EC3A 8EE

I refer to the application quoted above. 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. The conditions are detailed overleaf.

NATS (En Route) plc Aviation Planning Conditions

1. 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.

2. 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.

3. 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".

4. 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.

REASON: In the interests of the aviation safety.

For the purpose of the conditions above;

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

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

"Crane Operation Plan" means a detailed construction plan agreed with the Operator which defines the type of crane and the timing/dates and duration of all crane works to be carried out at the site in order to manage and mitigate at all times the impact of the development on the air traffic management operations of the Operator.

We would like to take this opportunity to draw your attention 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 recommendations (including those relating to conditions) made by NATS (En-Route) plc are not accepted.

I trust our position is clear and acceptable to the Planning Authority. However, should there be any queries, do not hesitate to contact me.

Yours faithfully

[redacted]

Mr Sacha Rossi
For and on behalf of NATS En-Route plc

Historic England

Ms Gemma Delves
Corporation of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3762

Our ref: P01571750

22 February 2024

Dear Ms Delves

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

1 UNDERSHAFT LONDON EC3A 8EE
Application No. 23/01423/FULEIA

Thank you for your letter of 24 January 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England was consulted on this scheme at pre-application stage. Since that time, some modifications have been made to the form of the building, but we do not consider these to have notably altered the impact of the scheme on the historic environment. The additional, more detailed views now seen with this application have made clear the full extent of impacts on surrounding streets and buildings, and our position has been refined in response to this.

Summary
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. 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 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. We consider that

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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 in how the passer-by can appreciate these layers of history while moving around its streets. Many of its earliest and most significant historic buildings, often medieval and post-fire churches, are seen in contrast with building of much larger scale, but they usually maintain their dignity and presence in close views. This dense cityscape is punctuated with small open spaces - churchyards, squares and plazas - which are an important part of the City's character. They give much-needed space to pause and allow the contrasts of the townscape to be appreciated without overwhelming.

The current building on the site, St Helen's Tower, is an unlisted building outside a conservation area, which has a current 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' masterpiece of 1980s high-tech architecture, the Lloyd's building. They are integral and outstanding elements of the City's built environment and its multi-layered, complex history, and are all listed at Grade I.

St Andrew Undershaft is a rare surviving early sixteenth-century rubble and stone church incorporating an earlier tower, at the bottom of St Mary Axe to the southeast of the site. Originally sitting in narrow streets, St Andrew's now maintains some of its historic landmark qualities despite the scale of its surroundings in views from or across

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St Helen's Square, and from Leadenhall. It sits in close juxtaposition with 22-24 Lime St ('The Scalpel') and 30 St Mary Axe ('The Gherkin').

St Helen's Bishopsgate is a medieval, multi-phase church originating in the twelfth to thirteenth centuries, in rubble part-faced in render, brick and stone. As with St Andrew's it is a valuable survivor illustrating the City's long and distinguished history. St Helen's is tucked behind the present St Helen's Tower; its west end and cupola are appreciated well across the small former churchyard from Great St Helen's, and its characterful south and east frontages can be appreciated from Undershaft, albeit blighted by the unattractive road ramp immediately in front of it. It forms the south side of the St Helen's Place Conservation Area.

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. Its clearly expressed lift and stair towers shape its exterior and give the building a distinctive roof line. It has become gradually more hemmed in by taller development, though the Leadenhall Market Conservation Area to the south remains of generally lower scale. Good views of its form as a whole can be seen from St Helen's Square, and south along St Mary Axe.

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

This application is for a tall building 309m in height, predominantly for office use, which would be the tallest building in the City Cluster. It would not only be much taller but also much bulkier than the existing building. The footprint of the building would project notably further south than the existing tower, into the current open plaza of St Helen's Square. Above this, eleven floors would step out as they rise, up to a publicly

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accessible podium garden projecting out to the full depth of the plot. The upper sections would project out 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, Cor-ten 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

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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 we 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. We considered the thoughtful and responsive approach to public space and

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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 Planning (Listed Buildings and Conservation Areas) Act 1990 imposes a statutory duty on local planning authorities to consider the impact of proposals upon listed buildings and their settings, and to pay special regard to preserving or enhancing the character or appearance of conservation areas.

Section 12 of the National Planning Policy Framework (NPPF) 2021 deals with a fundamental objective of the planning process: achieving well-designed places. Planning decisions should ensure that developments will add to the quality of the area, are visually attractive, sympathetic to local character and history, and maintain - through the arrangement of streets, spaces and buildings - a strong sense of place (para.135). It states that the National Design Guide should be used to guide decisions in the absence of local design guides (para.134) and that local authorities should make use of and have regard to the recommendations of design review panels (para.138).

The National Design Guide defines ten important characteristics which should be brought together in a well-designed place. It explains the importance of a development responding positively to a site and integrating into its surroundings ('Context'), and of considering the way buildings, streets and spaces combine ('Identity'). It stresses the importance of public spaces being attractive places which are open to all, and notes that ideally they would be places that people naturally pass through ('Public Spaces').

Section 16 of the NPPF deals with the historic environment. When considering the impact of a scheme, the significance of the asset should be considered, and any conflict with its conservation should be avoided or minimised (para.201). Great weight should be given to a heritage asset's conservation, and this weight should be greater for the most important assets (para.205) including Grade I listed buildings and landscapes and World Heritage Sites. Clear and convincing justification should be provided for any harm caused to a designated heritage asset, including development within its setting (para.206), and any harm should be weighed against the public benefits of the scheme (para.208). The NPPF describes setting 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." Setting is further explored in the Government's Planning Practice Guidance and in Historic England's The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning: 3).

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The London Plan forms part of the development plan, and its policy HC1(C) on heritage conservation and growth reinforces the requirement for development proposals affecting heritage assets to be sympathetic to their significance, and to avoid harm. It justifies this position by explaining the unique sense of place created by London's historic environment, and the irreplaceable nature of its heritage assets. Its policy D8 on public realm states that development should "ensure the public realm is well-designed…accessible…attractive…related to the local and historic context, and easy to understand…". It notes that some internal or elevated spaces, particularly in areas of higher density, can also be considered as part of the public realm.

The City of London Local Plan (adopted 2015) includes core policies on tall buildings, public spaces, the historic environment, and design.

Core strategic policy CS14: Tall Buildings sets out that tall buildings will be permitted on suitable sites in the Eastern Cluster, taking account the skyline, the character and amenity of their surroundings, and the significance and setting of heritage assets. Its supporting text explains that proposals should "maintain and enhance the provision of public open space around the building", and the open space on the site at present is identified in their policy map.

Core strategic policy CS12: Historic Environment focuses on the conservation and enhancement of the significance of the City's heritage assets, and links them with the need to provide an attractive environment.

Core strategic policy CS10: Design, stresses that the design of buildings - including bulk, height, scale, massing, quality of materials and detailed design - should be appropriate and relate well to the character of the City and the setting and amenities of surrounding buildings and spaces. It notes the importance of development having an appropriate street level presence, and a positive relationship to neighbouring buildings and spaces. Associated policy DM1.3 encourages high quality roof gardens and terraces where they do not impact on identified views.

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

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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 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. We question 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.

We 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. We 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. We question whether a scheme with the design issues raised, which would diminish some of the

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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 your 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. We 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.

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

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority. The full GLAAS consultation criteria are on our webpage at the following link: https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/

Yours sincerely

Kathy Clark
Principal Inspector of Historic Buildings and Areas
E-mail: [redacted]

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

Twentieth Century Society

Emailed: [redacted]

26 February 2023

Dear Gemma Delves

SITE: 1 Undershaft, London, EC3A 8EE

REF: 23/01423/FULEIA

The Twentieth Century Society has been notified of the above planning application for the demolition of the existing 28 storey office building (St Helen's/Aviva Tower) and construction of a 74 storey building principally for office use. The Society strongly objects to the proposed demolition of St Helen's/Aviva Tower which should be identified as a Non-Designated Heritage Asset (NDHA).

Significance

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.

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.

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 *The Times* of the delivery of 'curtain-walled office blocks as stylish as the best in America.' The *Architects' Journal* described the visual '*tour de force* 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.

Two structural techniques are applied to create the distinctive architectural character. Firstly, the 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 (NDHA) and we urge the City to officially recognise it as such. The following heritage policies in section 16 of the National Planning Policy Framework (NPPF, 2023) should apply

- "Heritage assets range from sites and buildings of local historic value to those of the highest significance […] These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations." (paragraph 195)
- "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." (paragraph 203)
- "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." (paragraph 209).

Paragraph 157 in section 14 of the NPPF concerning 'Meeting the challenge of climate change…' 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.

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.

Yours sincerely,

[redacted]

Coco Whittaker

Senior Caseworker

The Twentieth Century Society
70 Cowcross Street
London, EC1M 6EJ

[redacted]

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is

[redacted]

acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005,* all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

LONDON BOROUGH OF RICHMOND UPON THAMES
ENVIRONMENT DIRECTORATE

PLANNING REPORT

Printed for officer by
Sukhdeep Jhooti on 30 January 2024

Application reference: 24/0189/CON

Date application received	Date made valid	Target report date	8 Week date
24.01.2024	24.01.2024	20.03.2024	20.03.2024

Site:
1 Undershaft, London, EC3A 8EE,
Proposal:
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, public realm improvement works, ancillary basement cycle parking, servicing, plant,
highway works and other works associated with the proposed development.

Status: Pending Decision (If status = HOLD please check that all is OK before you proceed any further with this application)

APPLICANT NAME
City Of London
City Of London
PO Box 270
Guildhall
London
EC2P 2E

AGENT NAME

DC Site Notice: printed on and posted on and due to expire on

Consultations:
Internal/External:

Consultee	Expiry Date

Neighbours:

-

History: Planning – Appeal – Enforcement – Building Control

No History Dummy UPRN
No History Dummy UPRN
No History Dummy UPRN
No History Dummy UPRN

24/0189/CON
1 Undershaft
London
EC3A 8EE

Contact officer:
Sukhdeep Jhooti

Proposal:
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, public realm improvement works, ancillary basement cycle parking, servicing, plant,

highway works and other works associated with the proposed development.

Site description and surrounding:
The site of the proposed 1 Undershaft development lies at the junction of St Mary Axe and Leadenhall Street. The site is over an area of 0.72ha and abuts Leadenhall Street to the south, St Mary Axe to the east, St Helen's Church to the north and the Leadenhall Building and 22 Bishopsgate to the west.

Public representations:
No neighbour consultation exercise was undertaken by the London Borough of Richmond upon Thames.

Professional comment
Design , Siting and Protected Views

The works are on the north side of the Thames. An illustration of the proposed development within the city of London is demonstrated in design and access statement, submitted to the Corporation and its context within the City is also noted on the visual below:

King Henry VIII's Mound to St Paul's Cathedral is the subject of 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 Pauls is also listed within the Mayor of London - London View Management framework (LVMF), within the Adopted Local Plan urban design Study: view 16, within the Royal Parks' management Plan (2019 – 2029) and under the Richmond Park Conservation Area. It is also clearly referenced in the Consultation Draft Local View SPD as View E3.1. The LVMF policy of the Mayor is expressly designed to safeguard the clear skyline view of the

Policy LP5 of the Richmond Adopted Local Plan references this view and requires at part 4 that development respects the setting of a landmark, taking care not to create intrusive elements in its foreground, middle ground or background and noted that *"The protection and enhancement of the strategic view from King Henry's Mound to St Paul's will be achieved by consultation between the relevant planning authorities in London, including the Greater London Authority. The London View Management Framework SPG will be used when considering applications affecting protected views."*

The view is designated as a Linear view from King Henry's mound to St Pauls Cathedral, which is a distance of around 10 Miles (15.6 KM), as recorded in the Mayors London View Managmeent Framework. Policy HC4 of The Mayors London Plan, notes at part D 3 that Townscape and Linear views should be managed so that the ability to see specific buildings, or groups of buildings, in conjunction with the surrounding environment, including distant buildings within views is preserved.

The LVMF policy of the Mayor is expressly designed to safeguard the clear skyline view of the St Pauls landmark, including the background of it. The view below is an image of the respective view and the permanent impact to that view that was done by the development of the Manhattan Lofts development, which lies in Stratford in East London, is also clear in the below image.

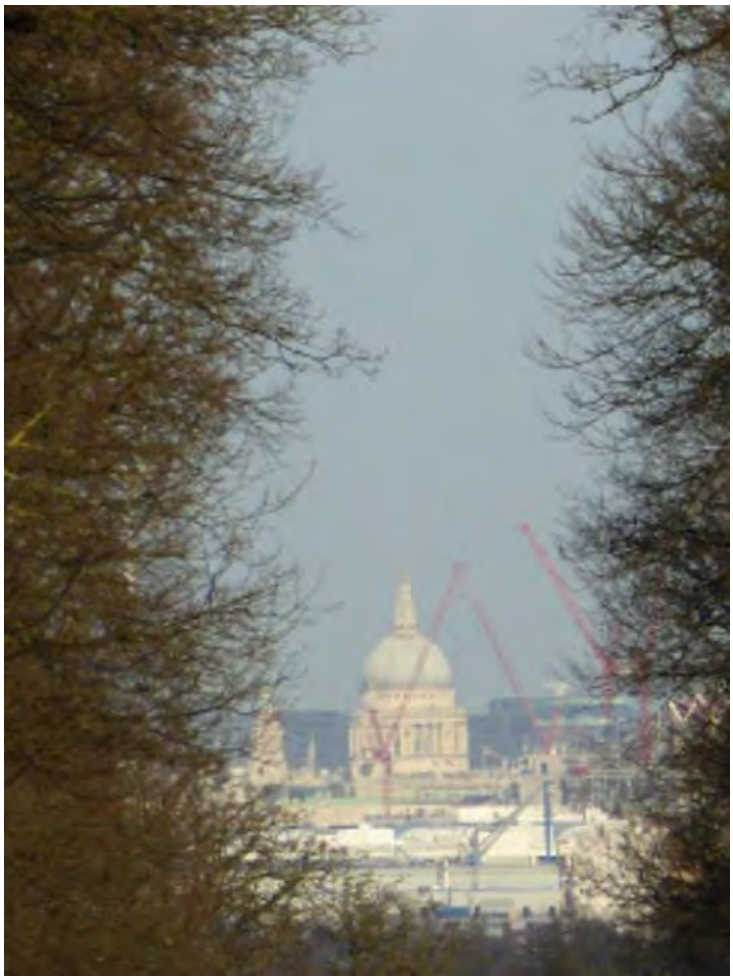

Figure 1 – Zoomed in view of St Pauls Cathedral from King Henry's VIII's Mound in Richmond Park.

Figure 2 – Existing linear views of St Pauls Cathedral from King Henry's VIII's Mound in Richmond Park.

Figure 3 – Proposed view of St Pauls Cathedral from King Henry's VIII's Mound in Richmond Park with the proposed development dotted in blue being in the periphery. This visual has been taken from page 431 of the Applicant's Townscape, Heritage and Visual Impact Assessment which accompanies the planning application.

The Council notes the previous permission in November 2019. The revised scheme would be approx. one storey higher than the 73 storey building approved at the application site under LPA reference: 16/00075/FULEIA by the Corporation on 8 November 2019.

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 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 VIIIs 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 threshold 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 VIIIs 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 provisios 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 VIIIs 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 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 VIIIs Mound to St Pauls Cathedral and take all necessary steps and precautions to ensure that this is in accordance with the limitations imposed.

<u>Residential Amenity</u>
Given the distance from this Borough, the proposal would not impact upon the residents within this Borough.

Recommendation:
No objection, subject to provisios

Case Officer (Initials): ……SJH

Dated: ……26.02.2024

I agree the recommendation:

Senior Planner: VAA

Dated: 26.02.24

Place Division / Development Management
Web: www.richmond.gov.uk/planning
Email: envprotection@richmond.gov.uk
Tel: 020 8891 1411
Textphone: 020 8891 7120

LONDON BOROUGH OF RICHMOND UPON THAMES

City Of London
City Of London
PO Box 270
Guildhall
London
EC2P 2E

Letter Printed 26 February 2024

FOR RECOMMENDATION DATED
26 February 2024

The Town and Country Planning Act 1990, (as amended)
Consultation – Raise no Objection

Application: **24/0189/CON**
Your ref: 23/01423/FULEIA
Our ref: DC/SJH/24/0189/CON/CON
Applicant: City Of London
Agent:

LOCATION
1 Undershaft London EC3A 8EE

for

PROPOSAL
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, public realm improvement works, ancillary basement cycle parking, servicing, plant,
highway works and other works associated with the proposed development.

I refer to your consultation regarding the above mentioned proposal.

My Council's observations are as follows:

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

Yours faithfully,

Robert Angus
Head of Development Management

Memo

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

From Donal Rooney
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone 07592120750
Email donal.rooney@cityoflondon.gov.uk

Date 08 March 2024
Our Ref 24/00586/NPLN
Your Ref 23/01423/FULEIA

Subject 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, 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.

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

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

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

The roof terraces on hereby permitted 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.

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

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

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

(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.

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

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

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

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

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

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

No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

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

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

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

All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of ‘Control of Odour & Noise from Commercial Kitchen Extract Systems’ dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

Regards

Donal Rooney

Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Mob: 07592120750

GREATER**LONDON**AUTHORITY

Planning report GLA/2024/0051/S1/01
4 March 2024

1 Undershaft

Local Planning Authority: City of London
Local Planning Authority reference: 23/01423/FULEIA

Strategic planning application stage 1 referral

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

The proposal

Demolition of St Helen's Tower and the construction of a ground plus 73 storey office building including elements of retail, food and beverage, and education and/or viewing gallery space; public amenity space including a podium garden; public realm improvements.

The applicant

The applicant is **Aroland Holdings Limited,** and the architect is **Eric Parry Architects**.

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 in paragraph 88. Possible remedies set out in this report could address these deficiencies.

Context

1. On 29 January 2024 the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2. The application is referable under the following categories of the Schedule to the Order 2008:

   Category 1(B): Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings – in the City of London and with a total floorspace of more than 100,000 square metres; and

   Category 1(C): Development which comprises or includes the erection of a building in the City of London and more than 150 metres high.

3. Once the City of London Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Corporation to determine it itself.

4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

5. The Mayor of London's statement on this case will be made available on the GLA's public register: https://planapps.london.gov.uk/

Site description

6. The application site is located inside the City of London's Eastern Cluster of very tall buildings. It lies to the south of Undershaft and to the west of St Mary Axe. The site is currently occupied by a 28-storey office building, St Helen's Tower, which was built in the late 1960s and retrofitted with a modern external glazing system in the 1990s.

7. The application's red line boundary (Figure 1) includes areas of public realm to the west and south of the tower, known as St Helen's Square. It also includes the highway on Undershaft, and a vehicle access ramp next to St Helen's Bishopsgate church.

8. The immediate surrounds are characterised by the juxtaposition of modern tall buildings and historic buildings. In addition to St Helen's Bishopsgate (Grade I), St Andrew Undershaft to the east and the Lloyds Building to the south are also Grade I listed. The site is adjacent to the St Helen's Place Conservation Area

and the Bank Conservation Area. The wider surrounding area contains a further five conservation areas. The Tower of London World Heritage Site lies to the southeast of the Cluster with LB Tower Hamlets.

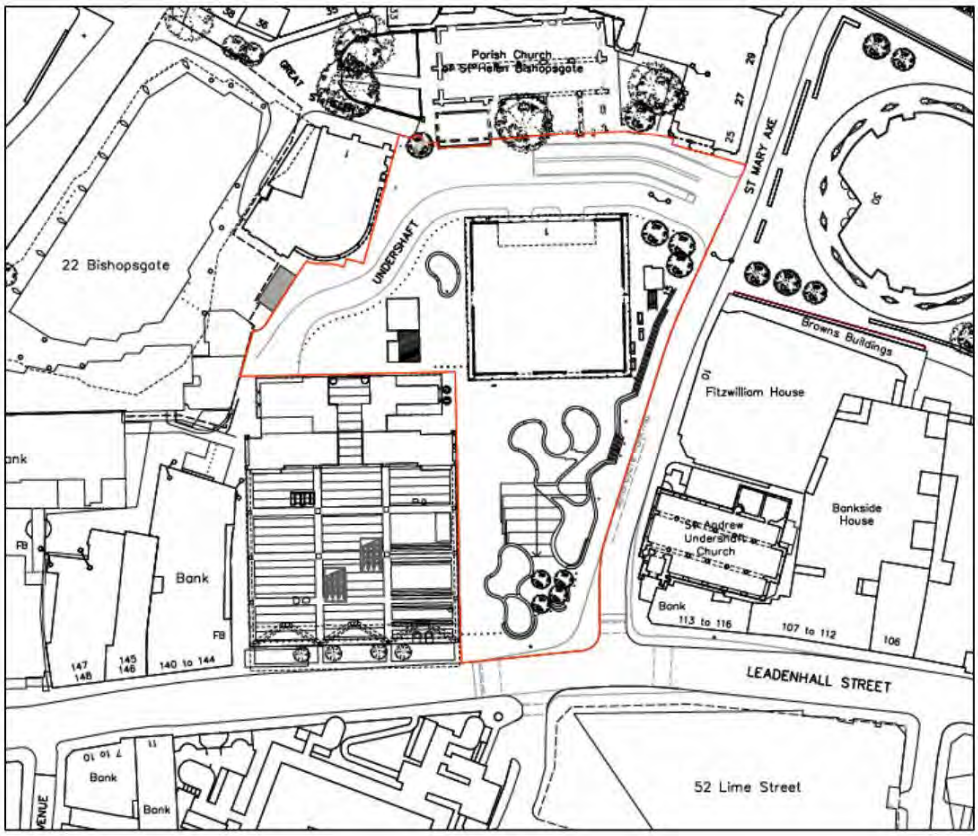

Figure 1: Application site red line boundary

Details of this proposal

9. The proposal is to demolish St Helen's Tower above ground level, retaining part of the basement structure, and construct a new ground plus 73 storey (309.6 metres AOD) office building which would be the tallest in the Eastern Cluster.

10. Whilst the new building would principally comprise office space (Class E), other uses are also proposed including a viewing gallery with ancillary education space (Sui Generis), retail/ food and beverage (Class E) and a publicly accessible podium garden at Level 11.

11. An overview of the existing and proposed uses is provided in Table 1 below.

Land use	Existing	Proposed
Office (Class E(g))	49,093	154,156
Public gallery/ education (Sui Generis)	0	1,337
Retail/ Food and Beverage (Class E(a) and E(b))	0	3,134
Public amenity (Flexible Class E(a)-(d) and Class F1/ Sui Generis	0	3,479
Public Cycle Hub	0	526
Plant	N/a	17,734
	49,093	180,366

Table 1: Existing and proposed uses (square metres GIA)

12. The publicly accessible areas of the building would comprise the following:

    (i) The podium garden at Level 11;

    (ii) A public restaurant at Level 10;

    (iii) As-yet-unspecified public uses at Levels 10-12 (sought as flexible Class E (a)-(d)/ Class F1/ Sui Generis);

    (iv) A public viewing gallery and education spaces at Levels 72 and 73.

13. Figure 2 provides a cross-section of the building with the uses proposed for each floor.

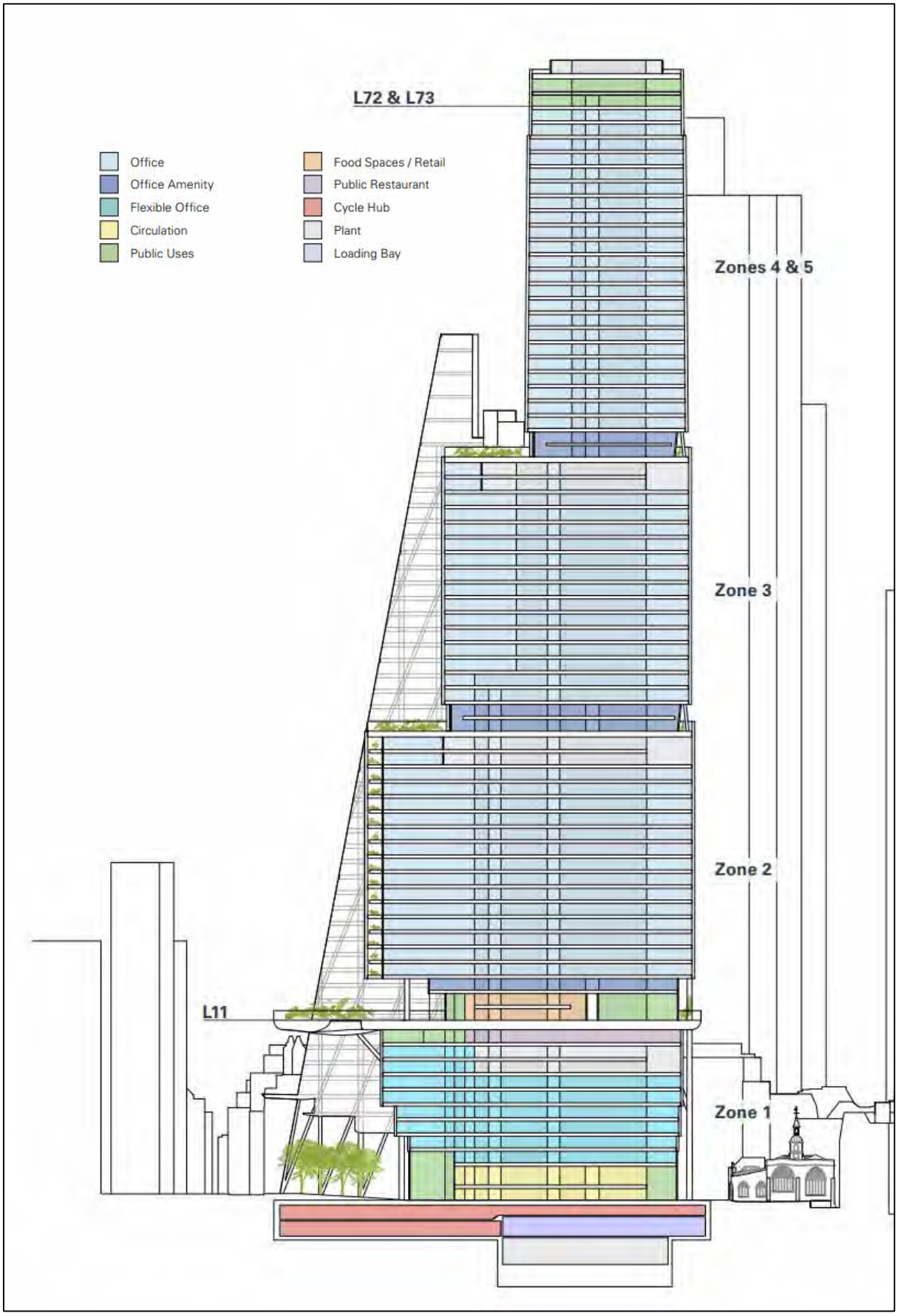

Figure 2: Proposed section with land uses

Case history

14. Planning permission was granted in November 2019 for a singular 73-storey office tower (AOD 304.94 metres) with a square plan form. The existing planning permission is required to be implemented within 5 years or expires in November 2024. This permission has not yet been implemented. Since 2019, there have been no new planning applications of relevance to the consideration of the current proposal.

15. GLA Officers provided pre-application advice on the new scheme on 18 August 2023. The pre-application proposals were broadly supported by GLA officers in strategic planning terms and have not changed in nature and scale since that time, although the detailed design and materials of the tower have evolved since the pre-application meeting. It was noted that the intensification of office floorspace in a development of this scale would support the function of the Central Activities Zone and London's position as a World City.

Strategic planning issues and relevant policies and guidance

16. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015) and Local Plan Proposals Map (2015) and the London Plan 2021.

17. The City of London Corporation is in the process of producing a new Local Plan ('City Plan 2040') and consulted in the Regulation 19 version between March and May 2021. After deciding to pause work on the new Local Plan, the Corporation is currently in the process of preparing revised Regulation 19 version to be published for consultation later this year. The most recent version was considered by the Local Plans Sub Committee in October 2023, when Members put forward a number of suggested amendments to the draft which are currently being explored by City Officers.

18. The following are also relevant material considerations:

    The National Planning Policy Framework and National Planning Practice Guidance;

    National Design Guide;

    Draft City of London Local Plan Regulation 19 version (October 2023 pre-consultation draft).

19. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

    Good Growth - London Plan;

    World City role - London Plan;

Economic development - London Plan; the Mayor's Economic Development Strategy; Employment Action Plan;

Central Activities Zone - London Plan;

Office and commercial uses – London Plan;

Urban design - London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG;

Fire Safety – London Plan; Fire Safety draft LPG;

Strategic views - London Plan, London View Management Framework SPG;

Heritage - London Plan; World Heritage Sites SPG;

Inclusive access - London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG

Sustainable development - London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance 2022; Mayor's Environment Strategy;

Air quality - London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air Quality Positive LPG; Air Quality Neutral LPG;

Transport and parking - London Plan; Sustainable Transport, Walking and Cycling LPG, the Mayor's Transport Strategy;

Green Infrastructure - London Plan; the Mayor's Environment Strategy; All London Green Grid SPG; Urban Greening Factor LPG.

20. The strategic planning issues for this development are considered to be land use, tall building impacts (including on strategic views), impacts on the strategic transport network, carbon, climate change and sustainable development, and air quality. The GLA's initial assessment of the proposals against the London Plan follows.

Land use principles

Uplift in office floorspace

21. The site is within the Central Activities Zone (CAZ) and the principle of the development would be supported by London Plan Policy SD5, which states that higher priority should be given to strategic functions such as offices within the CAZ, to meet demand for office space and facilitate London's continuing role as a World City. At the local level, the City of London's Eastern Cluster is identified

in the Local Plan (2015) as having the capacity for significant growth in office floorspace through the delivery of tall buildings on appropriate sites. The intensification of office floorspace in a development of this scale would support the function of the Central Activities Zone and London's position as a World City.

Flexible and affordable workspace

22. The proposed development would deliver a range of floorplate sizes between c.1,100 square metres and 2,450 square metres, all of which are designed to be sub-divided into multiple tenancies if required. Flexibility is supported by London Plan Policy E2, but the applicant is encouraged to go further in providing smaller spaces suitable for individual co-working or micro-businesses, in addition to established SMEs and traditional anchor tenants.

23. The development does not propose any affordable workspace at discounted rates. The London Plan and the draft City Plan 2040 encourage developers to provide affordable workspace to meet demand, in particular from new and emerging sectors of the economy and creative industries. The applicant is encouraged to continue discussions with the City Corporation to identify a suitable affordable workspace provision.

Public access

24. The Public London Charter principles should also be fully applied to the publicly accessible open spaces around and inside the building, particularly the podium garden and the high level viewing gallery given these spaces are intended to (in part) compensate for the fact that the northern part of St Helen's Square would be built over. GLA Officers recommend that access to the podium garden is strongly weighted in favour of the general public for extended hours, and ticketing restrictions or closures for exclusive events should be exceptional. The viewing gallery/educational space and podium garden should both be subject to a management plan, with a commitment to implementation of the Charter principles and access and maintenance arrangements suitably secured in the S106 agreement.

Tall building impacts

Policy D9 locational principles

25. 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.

26. 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).

Visual impacts

27. At 75 storeys (including ground and plant) or 306.9 metres AOD, the proposed building would be the tallest in the Eastern Cluster, forming its apex. This is appropriate in principle, given site's central position within the Cluster and the need to maintain a variation of heights around a central pinnacle, to ensure a distinctive and interesting skyline and cluster form. For this reason, the cumulative visual impacts are acceptable.

Architecture, design and materials

28. GLA Officers note that the proposed materiality of the tower now sees natural zinc tones on the main part of the tower and weathered steel on the crown and the base below the podium garden (contrasting with the pre-application proposals which saw weathered steel framing across the whole tower). It is, however, felt that the current appearance of the podium garden/ viewing platform overhang, in particular its bright white colour, could detract from the overall architectural quality of the building and would benefit from being toned down.

29. One other result of this change is that the top of the building does not function as successfully as it could, as a distinctive and celebratory 'crown' not just for 1 Undershaft but for the Eastern Cluster as a whole. GLA Officers' view is that the use of a different material is not necessarily sufficient to distinguish the top of the building from the rest of the tower. The applicant is strongly encouraged to further differentiate the crown from the grid below by exploring changes to the rhythm, spacing and proportions of the openings. This may include removing some of the horizontal elements and strengthening the verticals to distinguish and celebrate the crown in other ways.

Impact on strategic views

30. The building would be prominent in long-range views from across London, including the following London View Management Framework (LVMF) views:

    London Panorama 1A: Alexandra Palace
    London Panorama 2A: Parliament Hill
    London Panorama 3A: Kenwood
    London Panorama 4A: Primrose Hill
    London Panorama 5A: Greenwich Park
    London Panorama 6A: Blackheath Point
    River Prospect 10A: Tower Bridge
    River Prospect 11B: London Bridge
    River Prospect 13B: Thameside at Tate Modern
    River Prospect 15B: Waterloo Bridge

River Prospect 16B: South Bank

River Prospect 17B: Golden Jubilee/ Hungerford footbridges

Townscape View 25A: The Queen's Walk to Tower of London

Townscape View 26A: St James's Park to Horse Guards Road

31. Within all of these views, 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, GLA Officers do not identify any conflicts between a proposed tower in this location and the LVMF view management guidance for the above views.

Figure 3 (above): CGI of the proposed development (eastern elevation) Figure 4 (below): CGI of the proposed development in context with the Eastern Cluster

Public realm

32. Compared to the existing St Helen's Tower the proposed footprint of the new building would be almost doubled, reducing the amount of public open space at ground floor level to the south of the site. This would be partly, but not entirely, compensated for by the podium garden, which would be publicly accessible but possibly with greater 'obstacles' to entry (such as timed/ticketed access, restricted capacity, and security checks) compared to the ground floor public realm, which is freely accessible and extremely well-used, particularly in summer.

33. The remaining ground floor public realm to the south and west of the site would be almost entirely over-sailed the podium garden at Level 11, although the podium would include an 'oculus' to allow some sunlight to filter to the ground floor during the summer months. City of London Officers should 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.

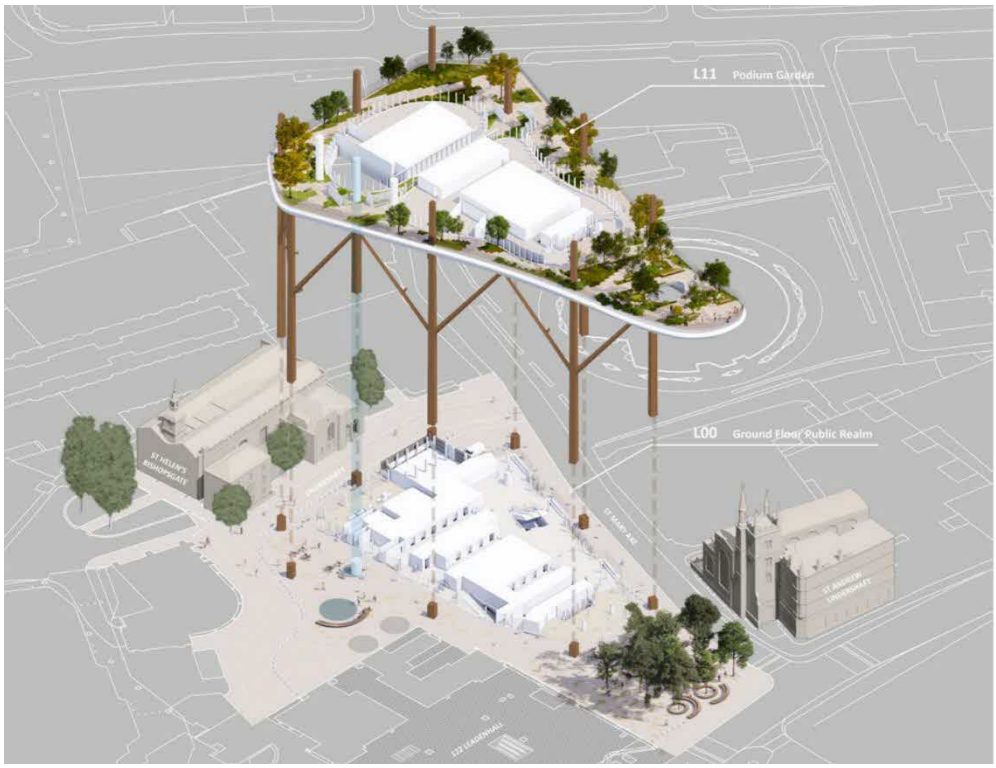

Figure 5: Proposed landscaping at ground and podium level

34. The proposed public realm around the development at ground floor level is all within the red line boundary. In accordance with the GLA's Public London Charter LPG principles, the physical parameters of the publicly accessible space at ground floor level should be clearly defined and subject to a management plan, with a commitment to implementation of the Charter principles and access and maintenance arrangements suitably secured in the S106 agreement.

Functional and environmental impacts

35. It is considered that the functional and environmental impacts of this development as per London Plan Policy D9 will be primarily local. The City of London Corporation should carry out an assessment of these effects, and the results of the assessment will be reported at the Mayor's decision-making stage after consideration by GLA Officers. Functional impacts on the strategic transport network must also be considered in line with the comments in the Transport section below.

36. Regarding fire safety, the application is supported by a fire statement by suitably qualified professionals, which includes all of the information required by London Plan Policy D12.

Heritage

37. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be.

Significance of heritage assets

38. There are a number of Grade I Listed buildings in the immediate vicinity, and the development by virtue of its height, has the potential to have far-reaching impacts on the setting of heritage assets. The designated heritage assets in the immediate vicinity of the site are:

    Church of St Helen, Bishopsgate (Grade I)

    Church of St Andrew Undershaft (Grade I)

    Church of St Ethelburga, Bishopsgate (Grade I) • Church of St Peter upon Cornhill (Grade I)

    Church of St Katharine Cree (Grade I)

    Lloyds Building (Grade I)

    Leadenhall Market Conservation Area and Leadenhall Market (Grade II*) and the other Grade II listed buildings within the conservation area

    St Helen's Place Conservation Area and the Grade II listed buildings within it

    Bank Conservation Area and the listed buildings within it

Assessment of impacts

39. The table below sets out GLA Officers' assessment of the level of harm caused to heritage assets (where harm has been identified) in the vicinity of the site.

Table of indirect (setting) impacts			
Heritage asset	**Category of harm**	**Extent of harm**	**View reference**
Tower of London WHS, Scheduled Monument, listed buildings and conservation area	Less than substantial	Low	Views 19, 20, 21, 22, 22A, 23, 24, 25, 26, A11
St James's Park, Registered Park and Garden, Grade I and associated listed buildings in the view	Less than substantial	Low	Views 7, 8, 8N
Church of St Helen, Bishopsgate, listed Grade I	Less than substantial	Middle	Views 57, 58, 59, 60, 61, 62, 63
Church of St Andrew Undershaft, listed Grade I	Less than substantial	Low to middle	Views 50, 51, 52, 53, 55, 56, 64
Church of St Katharine Cree, listed Grade I	Less than substantial	Low	View 49
Lloyds Building, listed Grade I	Less than substantial	Very low	View 52, 53, 55, 61
Museum of the Home, listed Grade I	Less than substantial	Very low	View 31
Bishopsgate Conservation Area and the listed buildings within it, including Liverpool Street Station, listed Grade II	Less than substantial	Very low	Views 41, 42, 43, B23, B24
Bunhill Fields and Finsbury Square Conservation Area including Bunhill Fields Registered Park and Garden, Grade I	Less than substantial	Very low	Views 33, 34, 35
Finsbury Circus Conservation Area and the listed buildings within it	Less than substantial	Low	Views 36, 37, A17
St Helen's Place Conservation Area and the listed buildings within it	Less than substantial	Low to middle	Views 46, 57, 58, 59, 60, 61, 62, 63

Discussion of impacts

Heritage-related public benefits

40. In terms of heritage benefits, the development proposes public access to the upper two floors, with the potential to provide a viewing gallery and educational spaces. It has been indicated that the Museum of London is a potential partner, and the spaces may have an emphasis on the history of London. This could be a heritage related public benefit if robustly secured in the S106.

Impacts on the setting of heritage assets

41. Generally, in longer-distance views, the proposed building has little impact on setting since it sits within and forms part of the Eastern Cluster, although it rises above the existing tall buildings in most views. It is considered that the proposed development has a low level of less than substantial harm to the setting of the Tower of London World Heritage Site in View 22, where there is backdropping of the Church of St Peter ad Vincula, detracting somewhat from the prominence of its cupola in the view.

42. The proposed development has an extended footprint over part of St Helen's Square and also features a podium level garden which extends south across the remainder. Whilst the structure, at 11 storeys up, is out of the top of the AVR in Views 51, 53 and 56, it is liable to be highly prominent in reality and cause a low/medium level of less than substantial harm the setting of St Andrew Undershaft.

43. 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. There is a similar impact upon the setting of St Andrew Undershaft in View 64.

44. In views from St James's Park Blue Bridge, the setting of the Grade I Registered Park and Garden and Grade I listed Whitehall Court and Ministry of Defence experience some harm as the proposed tall building would appear in the backdrop of the listed buildings as a singular form.

Heritage conclusion

45. National Planning Policy Framework para 208 states that "where a development 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 proposals". The proposed development is assessed to cause harm to the heritage assets. 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 in accordance with the comments in paragraph 23 above.

Transport

Trip generation

46. The application presents trip generation for the proposed development and the extant scheme. The office floor area indicates c. 16,000 people working on site, based on the employee density referenced in the TA. The trip assessment refers to a 'worst case scenario' of 11,469 employees on site each day. It states there will be 5,390 employees arriving during the AM peak, and 4,932

departures in the PM peak hour. The TA should set out the full person trip generation rather than just the peak hours.

47. As future occupiers may rent less space per employee (taking account of hybrid and other types of flexible workspace use), occupancy levels are likely to vary from relatively low to high, the worst-case assessment should be based on maximum likely occupancy rather than average occupancy, so a busy Tuesday, Wednesday or Thursday, rather than five day average.

48. The assessment should also be based on actual impact of the proposed development, rather than net impact. Trips associated with the 2019 permission are notional and therefore should not be deducted from the assessment. Where previously approved trips are within the strategic models' future base, the applicant will need to discuss with officers how to amend the models as appropriate.

49. As with any development of this scale, the TA should include directional analysis for buses, National Rail and London Overground/Underground trips (including line loading generated by the proposals). In addition, the applicant should provide gate line assessments and assess Step Free Access requirements as part of their assessments. Depending on the outcome, mitigation may be necessary.

Mode share

50. The mode share assumptions in the TA should be discussed and agreed with officers before strategic modelling is progressed further (the TA is based on 2011 Census data, which is not advised). It can be assumed for the purposes of assessing impact within the active travel zone that 100% of trips will be pedestrian or cyclists, both as main modes and modes that link to bus stops, underground and rail stations.

51. It is noted that the cycle mode share in 2019 consented scheme was 12%, whilst the current proposals assume only 6%. The appropriate mode share for assessment needs to be discussed further, given the considerable investment in cycle provision in the City of London and City Fringe boroughs and evident cycle growth across London.

Modelling approach

52. The TA proposes an approach to strategic modelling which needs to be agreed via the preparation of a modelling expectation report, including pedestrian modelling, cycling modelling, gate line and line loadings assessments, based on development assumptions and sensitivity. The purpose of the expectation report is to provide transparency on what is being agreed and the assumptions behind it.

53. November 2022 data is included in the pedestrian movement study and further discussion on pedestrian comfort levels is required, given the constrained footway widths around the building, particularly on St Mary Axe. The study

should be revised to reflect the changing context of the Elizabeth Line and return to work. More recent traffic surveys were undertaken at end of July 2023. Whilst more recent, they are from the very end of the summer term and may not represent typical traffic levels. It is recommended that updated traffic surveys, pedestrian and cycle counts are undertaken with survey methodology agreed in advance. This modelling should be carried out prior to determination.

Pedestrian impact

54. The pedestrian movement study is using a 2030 future base, which is different future year from the strategic modelling referenced in the TA, which is 2041. Future assessment years and pedestrian assessment methodology should be updated based on the strategic modelling assessment and the trip assessment. The transport consultant advised that Legion pedestrian modelling was necessary at pre-application stage however this has not been included in the TA. The quantitative aspect of pedestrian assessment is an important part of the assessment, there are various techniques referenced in the TA and pedestrian movement study, and this work needs to be brought together. Concerns are also raised over the doubling in the building footprint and the impact on the pedestrian network.

Access

55. Proposed vehicular access is from St Mary Axe for servicing and Blue Badge parking. Cyclist access would be from the west, whilst pedestrian access would be via multiple locations at ground floor level. Given that at least 340 cycle trips are forecast in the morning peak hour, there should be an accessible, visible, legible cycle route into the site and to the cycle parking.

56. The proposed service access point may result in conflicts with pedestrian, cyclists and road users and should be supported by a Stage 1 Road Safety Audit, as well as Healthy Streets Designers' Check. The applicant should also clarify the extent of hostile vehicle mitigation (HVM) for the public realm and the extent to which will affect footway capacity and usability.

Servicing

57. Information regarding delivery, servicing and waste management has been set out in the TA and provided in a Framework Delivery and Servicing Plan which is welcomed. There are some outstanding concerns over the number of expected trips and the management of the loading bay if the lift were to breakdown. Also, further detail on the consolidation and use of cargo bikes should be provided.

58. Given the scale of the development and the constrained location, Officers request confirmation that (as with other recently consented developments) overnight servicing only would be secured. It is also requested that the closure of St Mary Axe at peak times is considered. The final Delivery and Servicing Plan should be secured via condition.

Active Travel Zone (ATZ) Assessment

59. The applicant has provided an ATZ assessment as part of the submission which is welcome. Clarification on the outcome of the night-time assessment is required for mitigation to be discussed, as the ATZ should include photographic commentary in accordance with TfL guidance.

60. The applicant should work with the highway authorities to deliver the suggested walking and cycling improvements in line with the Healthy Streets agenda. Site-specific mitigation for the wider network may also be sought. This should be addressed prior to determination.

Highways works and s278 agreement

61. Clarity is sought over any proposed highway works surrounding the site and how they are addressing safety in the vicinity of Leadenhall Street and St Mary Axe where there have been several collisions. This should also be informed as a result of amended pedestrian impact assessment. In addition to this, there is a large amount of on street motorcycle parking on St Mary Axe which appears to cause problems for pedestrians and vehicles that will only be exacerbated as a result of the proposal. Officers recommend that possibilities to remove or reduce this are discussed with the City of London transport officers.

Healthy Streets Works / A10 Corridor Improvements.

62. The TA also identifies wider clusters of pedestrian, cyclist and vehicular collisions on the A10 corridor. TfL is currently designing safety improvements to address this in line with the Mayor's Vision Zero strategy. The considerable increase in pedestrian, cyclist and public transport trips from this development will add pressure on this corridor. Further discussion will be needed about contributions from this development towards the improvements on the A10 corridor.

63. The applicant should also develop a wayfinding strategy for the wider site and surrounding areas to and from public transport hubs as new cycle and pedestrian links emerge. Any highways improvements or works should be secured via section 278 agreement or planning obligations as appropriate.

Car parking

64. The development will be car free except for two Blue Badge spaces, which is in accordance with London Plan policy. The spaces would be located within the basement service yard area and would be accessed via a vehicular lift. It is noted that there is a hatched walkway to lifts in the basement. It should therefore be confirmed that the walkways are accessible for potential blue badge users. In operational terms, there are concerns over the operation of the access via the lift given the proposed servicing restrictions and this should be addressed. All spaces should be provided with active Electric Vehicle Charging Points (EVCP's).

65. In addition to this, the applicant has provided a Car and Cycle Parking Design and Management Plan which should be secured by condition. All future occupiers should be exempt from being able to apply for parking permits.

Cycle parking

66. The applicant is committed to providing cycle parking provision in accordance with London Plan long and short stay requirements. However, the applicant is requested to clarify how they calculated the cycle parking figure. The applicant should be aware that this should include all GEA floorspace, including areas such as plant. Currently the cycle parking provision appears to be below London Plan minimums.

67. Only 20 short stay cycle parking spaces (less than 10%) are proposed in the public realm. The need for more cycle parking should be balanced with the need to ensure a high-quality and uncluttered public realm. If more cycle parking cannot reasonably be accommodated on site, then provision of off-site cycle parking may need to be secured.

68. With regard to folding bicycles, based on current figures, the applicant is proposing below the 10% provision which is deemed acceptable on current figures but may need to be revisited once final figures are confirmed.

Design and access

69. The design and access of the proposed cycle parking should comply with the London Cycle Design Standards (LCDS). The applicant has provided a detailed layout but failed to provide information regarding access and how the cycle parking would be managed. In addition to this, the applicant should provide a greater proportion of larger and adaptable spaces to comply with LCDS requirements. The applicant is also requested to provide cycle lift analysis which demonstrates that the proposed number of lifts is sufficient to manage lift demand during the peak hours and in a scenario in which the cycle parking is at full occupancy.

Road Safety Audit

70. The scope of the and brief for the Road Safety Audit should be agreed with the local highway authority. Where it relates to works to TfL highway, assets or operations then TfL should also be consulted. The drawings in the safety audit are difficult to read in places, and it is also unclear if the information on pedestrian and cycle routes to site were provided to the road safety auditor. The swept path analysis is welcome however, they show vehicle conflict points, which may lead to collisions with pedestrians and cyclists using the same roads or crossing the vehicle paths. Officers would recommend delivery vehicle routing to site from a road safety perspective, particularly where there are conflicts with lorry routing to site, cycle and pedestrian routes, beyond the area covered by Stage 1 RSA.

Cycle Hire

71. The nearest docking station is located on St Mary Axe, less than 50m to the east of the site. The other surrounding docking stations are under considerable

pressure whilst they play a fundamental role in providing short trips for commuters and visitors to the City of London. This development will add significant pressure to the network and therefore a financial contribution of £220k and land for a new docking station to be provided is requested. If space cannot be identified on site, further assessment will be needed to find an alternative location within the vicinity.

Travel Plan / Cycle Promotion Plan

72. It is noted that the applicant has submitted a Framework Travel Plan with several measures to encourage sustainable travel targets. The document should be revised in line with further detailed comments to be provided to the Corporation and the applicant. It should also be noted that the City Corporation typically request a Cycle Promotion Plan, and this should be provided if required.

Construction

73. This is a constrained and densely developed location therefore a detailed Construction Logistics Plan (CLP) must be secured pre commencement by condition. As the proposed construction access arrangements are proposed to be in situ for a minimum of 5 years, it is recommended that the access proposal is supported by a Road Safety Audit and a detailed assessment in accordance with Construction Logistics and Community Safety standards and appropriate pedestrian comfort levels. It is also noted that there are potential significant changes to Leadenhall Street signal and crossing facilities.

Energy and sustainable development

Energy strategy

74. The London Plan requires all major developments to meet a net-zero carbon target. Reductions in carbon emissions beyond Part L of the 2021 Building Regulations should be met on-site. Only where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on site should a contribution to a carbon offset fund or reductions provided offsite be considered.

75. An Energy Statement has been submitted with the application, which does not yet fully comply with London Plan Policies SI2, SI3 or SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the applicant and the Council in a technical memo. Outstanding policy requirements include:

    Be Lean – further clarifications on specification and further measures required;

    Be Clean – Further exploration of DHN potential with City2 and energy strategy to be futureproofed for connection to a future DHN;

Be Green – Demonstration that renewable energy has been maximised, including details of the proposed air source heat pumps and investigation to improve SCOPs through use of ground or waste heat sources;

Be Seen – Confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;

Energy infrastructure – further details on the design of the heat network and the future district heating network connection is required, and the future connection to the DHN must be secured by condition or obligation.

76. The development is estimated to achieve an 11% reduction in CO2 emissions compared to 2021 Building Regulations. The development therefore falls short of the net zero carbon in Policy SI 2, although it meets the minimum 35% reduction on site required by policy. As such a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or where a local price has been set, borough's carbon offset price. The draft S106 should be made available to evidence the agreement with the borough.

Whole Life-cycle Carbon

77. In accordance with London Plan Policy SI2 the applicant is required to calculate and reduce whole life-cycle carbon (WLC) emissions to fully capture the development's carbon footprint.

78. The applicant has submitted a whole life-cycle carbon assessment. The WLC assessment complies with London Plan Policy SI 2 and no further information is required at this stage. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions. The template and suggested condition wording are available on the GLA website[1].

Circular Economy

79. London Plan Policy D3 requires development proposals to integrate circular economy principles as part of the design process. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, following the Circular Economy Statements LPG.

80. The applicant has submitted a Circular Economy Statement in accordance with the GLA guidance. The Circular Economy Statement does not yet fully comply with London Plan Policy SI7. There are several areas where the applicant should provide additional information or clarification to demonstrate compliance with London Plan Policy SI 7.

[1] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance

81. A condition should be secured requiring the applicant to submit a post-construction report. The template and suggested condition wording are available on the GLA website[2].

Environmental issues

Urban Greening Factor

82. The applicant has calculated the Urban Greening Factor score of the proposed development as 0.5, which exceeds the target set by London Plan Policy G5. A plan showing UGF surface cover types to evidence the calculation should be provided prior to the Mayor's decision making stage, and thereafter should be secured by condition.

Biodiversity Net Gain

83. The applicant has provided quantitative evidence that the proposed development secures a Biodiversity Net Gain of 960% in accordance with London Plan Policy G6. Trading rules are also satisfied, and no further information is required. Delivery of the proposed biodiversity measures should be robustly secured by condition.

Air quality

84. The application is supported by an Air Quality Assessment. The assessment shows that the proposals would be at least air quality neutral, but there are several areas where further information is required to demonstrate full compliance with London Plan Policy SI 1. Further details have been provided to the applicant and the Corporation in the form of a technical memo.

Local planning authority's position

85. City of London Corporation planning officers are currently assessing the application. In due course the Corporation will formally consider the application at a planning committee meeting.

Legal considerations

86. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Corporation under

[2] https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance

Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

87. There are no financial considerations at this stage.

Conclusion

88. London Plan policies on land use, tall buildings, heritage, transport and sustainable development are relevant to this application. The application does not fully comply with the London Plan as summarised below:

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. 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.

For further information, contact GLA Planning Unit (Development Management Team):
Grace Jack, Principal Strategic Planner (case officer)
email: [redacted]
Connaire O'Sullivan, Team Leader – Development Management
email: [redacted]
Allison Flight, Deputy Head of Development Management
email: [redacted]
John Finlayson, Head of Development Management
email: [redacted]
Lucinda Turner, Assistant Director of Planning
email: [redacted]

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

Application ref: 2024/0373/P
Contact: Jennifer Walsh
Tel: 020 7974 3500
Email: Jennifer.Walsh@camden.gov.uk
Date: 20 March 2024

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

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

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
1 Undershaft
London
EC3A 8EE

Proposal:
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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

Drawing Nos:
City of London Cover Letter dated 24th January 2024: 23/01423/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Conditions and Reasons:

Informative(s):

1 Reasons for raising no objections:

The proposal includes the 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

The application site is a significant distance from the London Borough of Camden boundary. The development would have no material impacts on the significance of any protected views, on the amenity of any Camden occupiers or visitors, or on transport, environmental, or ecological conditions. The London Borough of Camden therefore raises no objections to the application.

Yours faithfully

Daniel Pope
Chief Planning Officer

CAROE ARCHITECTURE

Surveyor to the
Fabric
The Chapter House
St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

Tel: 020-7246-8372
07919 300443
Web: www.caroe.com

2 April 2024

Gemma Delves
City of London
Sent via email only

Dear Gemma

Planning Application Response: 1 Undershaft (Revised Proposals)

Introduction

Further to a review of the submission documents and following pre-application discussion with the design team, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding revised proposals for 1 Undershaft as formally submitted.

We understand that the scheme has not developed or changed in any substantive way since we saw the proposals in pre-application discussion. This formal response is therefore based upon our pre-application comments raised during consultation.

Chapter offers 'no objection' as our formal response, based on the following understandings and considerations.

Consultation to Date

We thank the project team for engaging with St Paul's in pre-application consultation process in a helpful and constructive way, including a meeting in July 2023. Recognising the breadth and depth of development occurring in the City in recent years, now more than ever we welcome meaningful dialogue with the developers and respective consultants and technical specialists.

The conversation leading up to the meeting and presentation of 25 July, and the meeting itself, was very useful in helping us to understand the emerging proposals, and moreover how and why they had been derived. Given the prominence of 1 Undershaft and the proposed significant increase in. massing, meaningful discussion was useful and purposeful.

We would also like to extend thanks to Officers at the City of London for their assistance in our response to this application.

Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269

Comment on the Proposals

While we now understand 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.

In passing, we recalled the issues with 20 Bishopsgate, where the applicant had a 'wobble' during construction and belatedly applied 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 had been addressed for the new Undershaft scheme: would it not be valuable to committee to have firm reassurance on this point, as the 1 Undershaft site has, for many years, been accepted as the high centre' of the urban form of the cluster?

If we had a 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 we would not depart from our comments previously offered in relation to the consented scheme. Chapter does not wish to comment on other aspects of the scheme.

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Conclusion

We hope that this is a consultation response which strengthens the relationships and common aims of City and the developers.

Chapter offers 'no objection' as our formal response.

Yours sincerely,

[redacted]

cc Joanna Parker: Principal Planning Officer (Design)
Kevin Rogers/Georgina Graham: London Diocese.

Director:
Oliver Caroe RIBA AABC
Mark Hammond RIBA SCA AABC

Associates and Designers:
Touseer Ahmad
Andrew Senior

Caroe Architecture Ltd. is a company limited by guarantee, registered in England & Wales: registered number 06927269

Tel: 020 8921 5222

Gemma Delves
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
24/0220/K

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

23 April 2024

DECISION NOTICE – RAISE NO OBJECTION

Dear Sir/Madam,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site:	**1 Undershaft, London, EC3A 8EE**
Applicant:	
Proposal:	**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, 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.**
Drawings	Consultation Letter.

I refer to your letter dated 24 January 2024 enclosing details in respect of the above.

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

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

Thank you for consulting me on this matter.

Yours faithfully

Assistant Director

Memo

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

From Paul Bentley
Air Quality Officer
Telephone 07547 106 074
Email paul.bentley@cityoflondon.gov.uk

Date: 08/05/24
Your Ref: 23/01423/FULEIA

Subject: 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

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 NO_2 concentrations predicted during the construction phase, but not during the operational phase.

Should the development be approved please attach the following conditions:

Condition M28C amended

Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest 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.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly

nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Condition M29

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

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM

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

Reason

To reduce the emissions of construction and demolition in accordance with 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.

NO_2 Impact Quantification

As part of the Construction Environmental Management Plan a local NO_2 monitoring strategy shall be submitted. This should define a baseline and quantify the impact of the construction phase of the proposed development. Both long-term and short-term NO_2 objectives should be taken into account when designing the monitoring strategy, with due attention provided to nearby receptors and the diurnal nature of construction vehicle emissions.

Reason

In accordance with the following policy of the Local Plan: DM15.6 to maintain local air quality and ensure that NO_2 concentrations remain within relevant UK objectives during

the construction phase in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Informatives

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

Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

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

From:	ROSSI, Sacha
To:	PLN - Comments
Cc:	NATS Safeguarding; Delves, Gemma; McBirney, Georgia
Subject:	RE: Re-Consultation - 23/01423/FULEIA - 1 Undershaft [SG22212]
Date:	14 May 2024 13:27:18
Attachments:	image001.png image002.png image003.png image004.png image005.png image007.png image006.png

THIS IS AN EXTERNAL EMAIL

Dear Sirs,

NATS acknowledges the submission of additional documentation. Its position remains unchanged and its previous representation on file, dated 21 February 2024 remains valid and unaffected.

Regards
S. Rossi
NATS Safeguarding Office

Sacha Rossi
ATC Systems Safeguarding Engineer

[redacted]

[redacted]

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

NATS Internal

From: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Sent: Tuesday, May 14, 2024 11:50 AM
Cc: Delves, Gemma [redacted]
Subject: Re-Consultation - 23/01423/FULEIA - 1 Undershaft

Dear Sir or Madam,

Please see attached consultation for 1 Undershaft London EC3A 8EE.

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

Kind regards,

Planning Administration

On behalf of

Gemma Delves
Environment Department
City of London

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

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LPA Ref: 23/01423/FULEIA

London City Airport Ref: 2024/LCY/116

Date: 15/05/24

Dear Gemma Delves,

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

LPA Reference	23/01423/FULEIA
Proposal	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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.
Location	1 Undershaft London EC3A 8EE
Borough	City of London
Case Officer	Gemma Delves

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

Radar Mitigation Condition

No Development can take place until:

> -mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 Radar located at Heathrow Airport but utilised by London City Airport.

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.

Construction Methodology Condition

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.

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.

Instrument Flight Procedures (IFPs) Impact Condition

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 cranage.

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.

Building Obstacle Lighting Condition

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.

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

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

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

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com

Kind regards,

Simon Vince
On behalf of London City Airport

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

Gemma Delves
City of London
By email

15/05/24

Dear Gemma,

Planning Reference: 23/01423/FULEIA

Notice is given that Aroland Holdings Limited is applying to the City of London Corporation for the following application and the application is being re-advertised and re-consulted on under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information in relation to the environmental statement provided and under the Town and Country Planning Act 1990 to include further information on planning matters:

Re: 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

Location: 1 Undershaft London EC3A 8EE

Our Ref: LHR5917

We refer to your email dated 15 May 2024, received in this office on the same day.

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria. Heathrow Airport request for the following conditions to be applied to any subsequent planning permission.

H10 Radar Mitigation Condition
No Development can take place until:

- 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.

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.

Instrument Flight Procedures (IFPs) Impact Condition
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 cranage.

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.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

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

Crane Obstacle Lighting
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.

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

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited

From: Active Travel England Planning
To: PLN - Comments
Subject: LPA Reference: 23/01423/FULEIA Standing Advice Response
Date: 16 May 2024 11:53:34

THIS IS AN EXTERNAL EMAIL

LPA Reference: 23/01423/FULEIA

ATE Reference: ATE/24/00127/FULL

Site Address: 1 UNDERSHAFT, LONDON, EC3A 8EE

Proposal: 23/01423/FULEIA | 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, 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. | 1 Undershaft London EC3A 8EE

Standing Advice

Dear Sir/Madam,

Thank you for your email.

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. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter **@activetraveleng**

Instagram **@activetravelengland** and on **LinkedIn**
]]>

[ref:a0zTw0000002sKTIAY;ae35ec604ed890e1f329601eb77c7ba2:ref]

Transport for London

Transport for London
Crossrail
Safeguarding
5 Endeavour Square

[redacted]

17 May 2024
Crossrail Ref: CRL-IP-3181

Dear Gemma Delves,

RE:
Notice is given that Aroland Holdings Limited is applying to the City of London Corporation for the following application and the application is being re-advertised and re-consulted on under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information in relation to the environmental statement provided and under the Town and Country Planning Act 1990 to include further information on planning matters:

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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

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

Thank you for your letter dated 14 March 2024, requesting the views of CRL_Safeguarding on the above application. I confirm that the application relates to land outside the limits of land subject to consultation by the Crossrail Safeguarding Direction.

I have no further comment on the application.

If you require any further information, please contact:
[redacted]

Yours sincerely,

Will Orlik
Safeguarding Officer (Elizabeth line)
[redacted]

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

Please send, by email, all planning application consultations that are captured by the SoS Crossrail Safeguarding Direction to [redacted]
……

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

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

creating a better place

Environment Agency

Gemma Delves
City of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136666/02
Your ref: 23/01423/FULEIA

Date: 21 May 2024

Dear Gemma,

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, 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.

Thank you for reconsulting us on the amended plans for the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application; however, we reiterate the following advice.

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

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

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

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

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

Cont/d..

INVESTOR IN PEOPLE

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

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

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

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Tel: 02030251774

End

From: [redacted]
To:
Subject: RE: Re-Consultation - 23/01423/FULEIA - 1 Undershaft
Date: 21 May 2024 14:29:01
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Good afternoon,

23/01423/FULEIA
Location: 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

Thank you for your consultation.

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

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

Kind regards,

Mehmet Kani | Safeguarding Engineer
LU/DLR | Infrastructure Protection | Engineering
Transport for London
7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN

TRANSPORT FOR LONDON
EVERY JOURNEY MATTERS

From: Watson, Davis <[redacted]
Sent: 15 May 2024 09:34
Cc: Delves, Gemma <[redacted]>; McBirney, Georgia
[redacted]
Subject: Re-Consultation - 23/01423/FULEIA - 1 Undershaft

Dear Sir or Madam,

Further to the 1 Undershaft consultation letter sent yesterday, please find a revised version

attached with the correct reference stated.

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

Kind regards,

Planning Administration

On behalf of

Gemma Delves
Environment Department
City of London

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Westminster City Council

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

westminster.gov.uk

City of Westminster

Your ref:
My ref: 24/03202/OBS

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

Gemma Delves
City of London
PO Box 270, Guildhall, London EC2P 2EJ

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

22 May 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

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

SCHEDULE

Application No.: 24/03202/OBS **Application Date:**

Date Received: 14.05.2024 **Date Amended:** 14.05.2024

Plan Nos: Letter from City of London dated 14 May 2024.

Address: 1 Undershaft, City Of London, London, EC3A 8EE

Proposal: 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

Yours faithfully

Deirdra Armsby.

Deirdra Armsby
Director of Town Planning & Building Control

Note:

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

Crystal Mark
Clarity approved by Plain English Campaign

From:
To:
Cc:
Subject: FW: Re-Consultation - 23/01423/FULEIA - 1 Undershaft
Date: 24 May 2024 16:55:15
Attachments: Re-Consultation Letter - 23-01423-FULEIA - 1 Undershaft.docx
Re-Consultation - 2301423FULEIA - 1 Undershaft.msg
1 Undershaft rec cond 219000.pdf

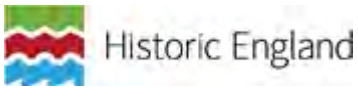
THIS IS AN EXTERNAL EMAIL

Hi Gemma

Thank you for reconsulting me on 1 Undershaft. The revised information that has been submitted does not affect my previous advice, which I have reattached for information

Regards

Helen



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

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From: PLN - Comments
Sent: 14 May 2024 11:50
Cc: Delves, Gemma; McBirney, Georgia
Subject: Re-Consultation - 23/01423/FULEIA - 1 Undershaft

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

Dear Sir or Madam,

Please see attached consultation for 1 Undershaft London EC3A 8EE.

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

Kind regards,

Planning Administration

On behalf of

Gemma Delves

Environment Department
City of London
THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

LONDON GATWICK

POWERED BY VINCI AIRPORTS | GLOBAL INFRASTRUCTURE PARTNERS

03 June 2024

Gemma Delves
Development Division
City of London

Dear Gemma

Re: Planning Application No: 23/01423/FULEIA – Construction of a 73-storey building with associated works at 1, Undershaft, London, EC3A 8EE

Our Ref: LGW5516

Thank you for your letter/email dated 14 May 2024, regarding the above-mentioned consultation.

The proposed development has been examined from an aerodrome safeguarding perspective and it does not conflict with safeguarding criteria. We therefore have no objection to this proposal.

If you have any queries, please do not hesitate to contact me. Please accept my apologies for the delay in replying.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer
For and on behalf of London Gatwick
Email: gal.safeguarding@gatwickairport.com

From: [redacted]
To:
Cc:
Subject: 23/01423/FULEIA - 1 Undershaft
Date: 03 June 2024 12:14:47

Hi Gemma,

We cannot approve the waste storage and collection facilities for this application. The architects are aware of our requirements and need to revise their strategy for approval.

Thanks

Vimal

From: Watson, Davis <[redacted]
Sent: Wednesday, May 15, 2024 9:34 AM
Cc: Delves, Gemma [redacted]; McBirney, Georgia [redacted]
Subject: Re-Consultation - 23/01423/FULEIA - 1 Undershaft

Dear Sir or Madam,

Further to the 1 Undershaft consultation letter sent yesterday, please find a revised version attached with the correct reference stated.

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

Kind regards,

Planning Administration

On behalf of

Gemma Delves
Environment Department
City of London

Your Ref:
Our Ref: 24/01540/OBS

Lambeth

Gemma Delves

City Of London
PO Box 270
Guildhall

7th June 2024

RE: REQUEST FOR OBSERVATIONS

Dear Gemma Delves

DECISION NOTICE

TOWN AND COUNTRY PLANNING ACT 1990.

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

Application Number: 24/01540/OBS Date of Application: 14.05.2024 Date of Decision 07.06.2024

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

For:	Observations on a proposed development within the adjoining Borough of City of London with respect to: 'Demolition of the 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.', at: 1 Undershaft, London, EC3A 8EE [23/01423/FULEIA]

Approved Plans

A full set of drawings and supporting documentsis available on the City of London CouncilPlanning website

Conditions

1 The London Borough of Lambeth offers no objection to the proposed development.

Lambeth Planning
PO Box 80771
London
SW2 9QQ

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

Notes to Applicant:

Yours sincerely

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

Date printed: 7th June 2024

Historic England

Ms Gemma Delves
Corporation of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3764

Our ref: P01571750

7 June 2024

Dear Ms Delves

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

1 UNDERSHAFT LONDON EC3A 8EE
Application No. 23/01423/FULEIA

Thank you for your letter of 15 May regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

We have provided detailed comments on the earlier iteration of the scheme in a letter of 22 February 2024. The comments now provided should be read alongside our previous advice.

We consider that the amended scheme would not meaningfully reduce the harm we have previously identified, and we therefore maintain our objection to this proposal. 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, we urge you to take steps 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, we request a meeting with yourselves and the applicants to

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discuss this. We would not support this aspect of the proposals being resolved post determination via conditions.

Historic England Advice

Our 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. We also identified the sensitivities of St James's Park and the Tower of London World Heritage Site.

The impact of the proposals was particularly concerning in relation to the adjacent highly-graded buildings and their immediate setting. We considered the much bulkier, eye-catching, and oversailing nature of the proposed scheme would seriously affect the streetscape and encroach upon very important assets. We identified that the busy design - including materiality - exacerbated some of those effects, but the root of our 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. We consider that the move towards some subtler, more contextual finishes is a positive step, but in the wider context of the scheme, we consider it makes only a marginal difference to the harm caused.

We 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-

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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.

We consider 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.

Relevant policy and guidance

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

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

The Tower of London is identified in the London Plan as one of three Strategically Important Landmarks for London, and the importance of managing its setting is recognised in the strategic views policies HC3 and HC4, and the London View

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Management Framework (LVMF Supplementary Planning Guidance, 2012).

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

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

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

Paragraph 201 requires Local planning authorities to identify and assess the particular significance of a heritage asset that may be affected by a proposals (including by development affecting the setting of a heritage asset) and that this should be taken 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.

Paragraph 205 states 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. World Heritage Sites are of the highest significance and therefore should afford the greatest weight of conservation.

The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (GPA3) recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided,

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including:

- § Form and appearance of development
- § Prominence, dominance, or conspicuousness
- § Competition with or distraction from the asset
- § Materials (texture, colour, reflectiveness, etc)
- § Architectural and landscape style and/or design
- § Diurnal or seasonal change

Historic England's position

The amendments have not sought to address our concerns about this application, so our 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.

We acknowledge 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, we urge you to take urgent steps to minimise harm to the WHS by ensuring the proposed design is as visually recessive as possible.

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

With that in mind, we would like to meet with the applicants and yourselves 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. We would not support the detailed design of this aspect of the proposals being resolved post determination via conditions.

If the proposed design of the crown remains unaltered, we consider the current scheme would result in greater harm to the WHS than the approved scheme, and Historic England's objection would therefore likely encompass this impact. Our advice will form part of the State Party's notification to the UNESCO's World Heritage Committee.

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, we recommend 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.

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.

Please contact me if we can be of further assistance.

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

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

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

Yours sincerely

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

Historic England
London and South East Region

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

Telephone 020 7973 3700
HistoricEngland.org.uk

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

Date: 19 February 2024
Our ref: 465689
Your ref: 23/01423/FULEIA

PLNComments@cityoflondon.gov.uk.

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir/Madam,

Planning consultation: 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, 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.
Location: 1 Undershaft London EC3A 8EE

Thank you for your consultation on the above dated 24 January 2024 which was received by Natural England on 24 January 2024.

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

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

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

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

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

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

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

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

Yours faithfully,

Danny Whitehead
Consultations Team

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

Housing and Regeneration Directorate
Planning and Building Control

Development Management
Tower Hamlets Town Hall
160 Whitechapel Road
London
E1 1BJ

CITY OF LONDON REFS: 23/01423/FULEIA

TOWER HAMLETS REF: PA/24/00823

ADDRESS: 1 Undershaft, London, EC3A 8EE

PROPOSAL:

23/01423/FULEIA - *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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.*

Dear Gemma,

Thank you for your correspondence dated 14th March 2024, informing the London Borough of Tower Hamlets (LBTH) about the City of London's receipt of the aforementioned Planning application, and the notification that the proposal is considered to affect the Setting of a Building of Special Architectural or Historic Interest and the character and appearance of a conservation area within the boundary of LBTH.

LBTH previously responded to a similar application, 16/00075/FULEIA:

Demolition of the existing buildings 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] | 1 Undershaft London EC3P 3DQ

The response from LBTH was as follows:

"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."

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).

The differences between the 2016 proposal 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. 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.

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 from the 72 storeys proposed in 2016, this could be avoided in View 22.

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.

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.

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.

Yours sincerely,

Ronan Murray
Senior Planning Officer (West) – Planning and Building Control
On behalf of and for the Director of Housing and Regeneration

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

Transport for London

Your ref: 23/01423/FULEIA
Our ref: CITY/24/5

Georgia McBirney & Gemma Delves

Development Management, City of London Corporation

By email only to: [redacted] &
[redacted]

Transport for London
Spatial Planning

5 Endeavour Square
Westfield Avenue
Stratford
London E20 1JN

www.tfl.gov.uk

11 April 2024

Dear Georgia & Gemma,

RE: 23/01423/FULEIA – 1 Undershaft – City of London Corporation– TfL detailed comments

Thank you for consulting TfL with regards to this referable planning application. It is understood that the proposal comprises of the demolition of the existing building and provision of a 73 storey predominately office building with associated commercial, public garden and public realm.

I write to provide detailed strategic transport comments on this application reference 23/01423/FULEIA. These reflect the matters raised in the GLA Stage 1 planning report dated 4 March 2024. Please note that these comments are additional to any response that you may have received from colleagues within different parts of Transport for London (TfL) responsible for infrastructure protection or property matters.

Summary

- As one of the most significant scale office led development in the CAZ, this will result in a considerable uplift in trips across public transport and active travel modes. Further information and clarification is therefore required for a robust assessment and to ensure compliance with the London Plan.
- Contributions to walking and cycling improvements including the A10 corridor as well as to cycle docking stations are required.

Site location and context

The site is bounded to the east by St Mary Axe and to the south by Leadenhall Street, which forms part of the Strategic Road Network (SRN). The nearest part of the Transport for London Road Network (TLRN) is the A10 Bishopsgate, less than 100m to the west of the site. Undershaft is part of the City Corporation network providing local pedestrian and servicing links.

The nearest stations within reasonable walking distance are Liverpool Street (400m), Fenchurch Street (575m), Monument (600m), Bank (650m), Tower Gateway (850m), Tower Hill (850m), Canon Street (930m) and Moorgate (950m). Liverpool Street and Moorgate stations are served by the Elizabeth Line. Bank station has recently been upgraded to provide additional capacity and improve passenger access. Liverpool

Street, Fenchurch Street, Canon Street and Moorgate have LU and NR services. Tower Gateway is a DLR station.

Nearby bus stops on A10 Bishopsgate, Eastcheap, Houndsditch, Old Broad Street and Leadenhall provide access to 23 routes. The site therefore has an excellent Public Transport Accessibility Level (PTAL) of 6b the highest possible.

The Bishopsgate corridor, from Shoreditch to London Bridge has been subject to temporary vehicle restrictions to make it easier for people to walk, cycle and use buses. It has been confirmed that these restrictions will now become permanent, and TfL is currently designing permament scheme.

Cycleway 2 (C2) is approx. 540m to the east and Cycleway 3 (C3) is approximately 540m to the south and the A10 Bishopsgate from part of a Quietway. Improved cycle links are also planned along the London Wall corridor.

The nearest Cycle Hire docking station is also located within 50m of the site, on the eastern side of St Mary Axe, adjacent to the Gherkin.

Apart from an initial screening, the applicant has failed to engage with TfL through the formal pre-application route, which is disappointing given the size and scale of the development. TfL had advised that a pre-application meeting is required. This means the TA lacks detail and technical underpinning required by Policy T4 in the London Plan as set out below, and therefore does not provide TfL will a fit for purpose TA.

Trip generation

The application presents trip generation for the proposed development and previously approved scheme. The office floor area indicates circa 16,000 people working on site, based on employee density referenced in the TA. Yet, the trip assessment refers to a worst case of only 11,469 employees on site each day. It states there will be 5,390 employees arriving during the AM peak, and 4,932 departures in the PM peak. The TA should set out a robust person trip generation using the stated employee density, over the entire day and explain the derivation of the worst-case numbers.

The first principle-approach is based on employee density; that is an acceptable starting point. As future occupiers may rent less space per employee to be based at the development taking account of hybrid and other types of flexible work space use., As occupancy levels are likely to vary from relatively low to high occupancy, the worst-case assessment should be based on maximum likely occupancy rather than average occupancy, so a busy Tuesday, Wednesday or Thursday, rather than five day average.

As the site is currently vacant, the assessment should be based on gross impact of the proposed development, rather than net impact. Trips associated with the 2016 permission, are not relevant, as they have not occurred on the transport network, are not within TfL base data and in any case the permission may have expired. Where previously approved trips are within strategic models future base, we need to discuss with you and the applicant to agree how to amend those models.

As with any development of this scale, the transport assessment should include directional analysis focuses, National Rail, Docklands Light Railway. London Overground and London Underground and including line loading expected to be generated by the development in each direction and on each mode and station. In addition to this, the applicant should provide gateline assessments and assess step

free requirements as part of their assessments. Depending on the outcome, mitigation may be necessary.

Mode share
The mode share assumptions in the TA should be discussed and agreed with TfL, before strategic modelling, discussed below, is completed. The TA is based on 2011 Census data, which by virtue of the time elapsed, TfL advises against using. We can assume for assessing impact within the active travel zone that there will be no private vehicle trips with virtually everyone cycling or walking as main modes and access modes to bus stops and train stations.

The cycle mode share in 2016 application, was 12%, whereas this application proposes 6%. The appropriate target for assessment should be discussed and agreed with the City and TfL, given the considerable investment in cycle provision in the City and City Fringe boroughs and evident cycle growth across London. We consider that even the higher 2016 share of 12% to be low.

Modelling Approach
The TA proposes an approach to strategic modelling; the approach should be agreed with TfL via the preparation of a modelling expectation report. This should include pedestrian modelling, cycling modelling, gate line and line loadings assessments, based on development assumptions and sensitivity. The purpose of the expectation report is to provide transparency on what is being agreed and ensure technical agreement based agreed planning assumptions.

November 2022 data is included in the pedestrian movement study, and so is close to being two years old and covering a period of change as the country came out of COVID restrictions and adapted to new ways of working. More recent surveys were undertaken at end of July 2023 by the applicant. The latter surveys though more recent are at very end of the school summer term, so may not represent typical conditions and movement. TfL recommend updated traffic, pedestrian and cycle surveys are undertaken during a neutral month, with survey methodology agreed with the City Corporation and TfL in advance. It is crucial that this modelling is carried out prior to determination so that decision makers can be fully appraised as to the expected impacts of the development and appropriate mitigation.

Pedestrian, cyclist, and vehicular access
Pedestrian/cyclist
The proposed pedestrian access would be provided to the site from the surrounding public realm and highway on Undershaft and St Mary Axe. There would be entrances/exits for pedestrians on all sides of the development. Cyclist access would also be gained via the public realm and highway but with entry/exit only on the west side of the site at Undershaft. This point is into a cyclist lobby area from which there are lifts and a ramp for wheeled bikes down to the basement long stay cycle parking. The applicant should demonstrate that the entrance and route to the long stay cycle parking can accommodate the expected number of users during peak periods.

Vehicular
On site servicing vehicular access and blue badge access would be gained via St Mary Axe via lifts. TfL have concerns that the proposed service access point may result in conflict with pedestrians, cyclists and other road users. The safety of this arrangement should be demonstrated by the submission of the Stage 1 Road Safety Audit and

Designers response as well as a Healthy Streets Designers Check. Further details are given in the delivery and servicing section below.

With regard to access for all modes, the applicant has failed to take into consideration the surrounding context and the opportunities that this development could offer to provide an enhanced experience and environment for users, including those with less mobility.

The proposal identifies several public realm opportunities; further clarification should be given to demonstrate how the public realm would integrate to the area, especially the landscaping and functions of space and which if any of these identified opportunities are to be taken up and how. The creation of public realm should therefore be provided in accordance with the Public London Charter, in accordance with policy D8 of the London Plan and this should be secured via S106.

The applicant should also clarify the extent of hostile vehicle mitigation (HVM) for the public realm and the extent to which this will affect footway capacity and useability.

Given that at least 340 cycle trips are forecast in the morning peak hour, there should be an accessible, visible, legible cycle route into the site and to the cycle parking access. This should be addressed and agreed. TfL would also expect it to be demonstrated that the lobby area and lift(s) and ramps have sufficient capacity including providing for larger bikes such as used by many disabled people or parents/carers.

Delivery and Servicing

TfL welcomes the provision of a Framework Delivery and Servicing Plan which forms part of the submission. However, there are several key concerns which you should address. TfL has concerns over the expected number of delivery and servicing vehicles and proposed management of the servicing lifts and access.

The DSP states that that all vehicles will be booked in outside of traditional City peak times and when vehicles approach the access point, the delivery vehicles will be inspected. The design does not appear to have considered implications of vehicles being refused entry for whatever reason in that they would be required to reverse onto St Mary Axe, which is dangerous for pedestrians, cyclists and other vehicle users. A similar situation would presumably apply if a vehicle arrived outside the time when servicing was to be allowed, crucially impacting the peak times which all parties agree should be avoided. Further details are also required as to what happens if a driver arrives outside their booked time but still within servicing hours. Another consideration on this element is that St Mary Axe is a key route for other servicing vehicles to adjacent buildings t and such movements may therefore create additional congestion problems in an area that is already very busy during peak periods.

TfL welcomes the commitment to freight consolidation but request further information on the evidence behind the proposed figures and confirmation as to the availability of a specific off-site consolidation facility(s).

The applicant also needs to consider a robust management plan in eventuality of lift failure or required maintenance. This should be incorporated into the DSP and the City Corporation should consider the impact of this on the surrounding highway, upon cyclists, pedestrians and bus operations nearby.

Whilst the applicant has provided swept path analysis of delivery and servicing vehicles accessing the site, they fail to provide sufficient detail. For example, they do not show

the size or type of the vehicles shown or provide a scale. Secondly, the drawings fail to show/consider the existing on street motorbike bays, the contraflow cycle lane or consider ad hoc delivery vehicles which stop on street.

Clarification is sought on proposed delivery and servicing time restriction. Similar sized developments within the vicinity have agreed to overnight servicing given the resultant increase in vehicles on the network and impact on the pedestrian and cyclist environment. The addition of this development will add to pedestrian and cyclist flows in this location and TfL would support servicing of this site being similarly restricted to night-time only. Already St Mary Axe has a cluster of serious road injuries, which would indicate that to achieve the Mayor of London's Vision Zero target of zero pedestrians or cyclists killed or seriously injured by 2041, measures provided by and or required of this development are required.

The applicant also needs to consider how cargo bikes and on foot couriers will be accommodated on site.

The DSP should also consider how proposed highway works could prevent ad hoc vehicles from stopping on the public highway surrounding the site. All of the above should be addressed prior to determination in line with London Plan policy T7 and the final DSP should be secured via condition.

Active Travel Zone Assessment

The applicant has provided an Active Travel Zone assessment as part of the submission. However, the quality and detail provided does not adhere with the guidance provided. It is disappointing that that the ATZ has been carried out via a desk-based exercise rather than in person and therefore does not reflect the reality of this location. Furthermore, the ATZ has not covered all relevant matters e.g. barriers to cycling. In addition to this, the applicant has failed to provide a sufficiently detailed night-time ATZ which must be addressed.

TfL will be able to comment on the ATZ in detail once appropriate assessment in accordance with guidance has been carried out. The further work on the ATZ assessment (both day and night) should be addressed prior to determination to enable appropriate consideration and securing of mitigation for CoL highway and/or TLRN.

In the meantime, the applicant should work with the relevant highway authority (CoL or TfL) to identify and prioritise the delivery of suggested walking and cycling improvements in the submitted document, in line with the Healthy Streets agenda.

It is also requested that the applicant should provide information on wind mitigation measures, demonstrating how any proposed mitigation helps improve the healthy streets indicators for the site and does not undermine pedestrian comfort and safety.

Highways works and S278

Clarity is sought over any proposed highway works surrounding the site and how they are addressing safety in the vicinity of Leadenhall Street and St Mary Axe where there have been several collisions. In addition to this, there is a large amount of on street motorcycle parking which appears to cause pedestrian and vehicle problems which will only be exacerbated as a result of the proposal.

The design of the s278 works should provide appropriate priority to walking and cyclists given the context of the surrounding area. Given the size and scale of development the applicant must also consider the entirety of the St Mary Axe given the likely impact. Further discussion between the applicant and CoL as highway authority

is recommended on this element prior to determination. TfL would welcome involvement given the SRN status.

Healthy Streets Works / A10 Corridor Improvements.
The TA also identifies wider clusters of pedestrian, cyclist and vehicular collisions on the A10 corridor. TfL is currently developing safety improvements to address this in line with the Mayor's Vision Zero strategy. The considerable increase in pedestrian, cyclist and public transport trips arising from developments in this area, including this one, will add pressure on this corridor. Consequently, TfL has already secured other developer contributions to ensure timely delivery of these improvements. Further discussion about the scale of any mitigation required from this development is therefore requested.

The applicant should also develop a wayfinding strategy for the wider site and surrounding areas to and from public transport hubs as new cycle and pedestrian links emerge. Any highways improvements or works should be secured via section 278 agreement or planning obligations as appropriate.

Pedestrian Impact
The pedestrian movement study is using a 2030 future base, this is different future year from the strategic modelling referenced in the TA, which is 2041. Future assessment years and pedestrian assessment methodology should be updated based on strategic modelling assessment and TfL advice on trip assessment. The transport consultant, WSP proposed Legion pedestrian modelling at the pre-application stage in the screening documents, however, this is not included in the TA and it is unclear why not. The quantitative aspect of pedestrian assessment is an important part of the assessment; there are various techniques referenced in the TA and pedestrian movement study. This work needs to brought together in a form to be agreed with the City and TfL and subsequently used to inform appropriate s106 obligations, design changes and s278 works.

Further information from a TfL walking and pedestrian accessibility expert is found in the appendices.

Car parking
The development will be car free except for 2 Blue Badge spaces, which is in accordance with London Plan policy. The spaces would be located within the basement service yard area and would be accessed via a vehicular lift. It is noted that there is a hatched walkway to lifts in the basement. It should therefore be confirmed that these would be accessible for blue badge users. In operational terms, TfL has concerns over the access via the lift given the proposed servicing restrictions and this should be addressed. Both spaces should be provided with active Electric Vehicle Charging Points (EVCP's).

In addition to this, the applicant has provided a Car and Cycle Parking Design and Management Plan which should be secured by condition. All future occupiers, other than blue badge holders should be exempt from being able to apply for parking permits.

Cycle parking

Quantum
The applicant is committed to providing cycle parking provision in accordance with London Plan long and short stay requirements. The applicant should nonetheless

clarify how they calculated their cycle parking figure. The applicant should be aware that this should include all GEA floorspace, which would include areas such as plant etc. Currently provision appears to be below London Plan minimums.

Short stay
Only 20 short stay cycle parking spaces (less than 10%) are proposed in the public realm proposed development. This must be increased for a development of this scale. Failure to provide sufficient may result in the need for offsite provision to be secured in the s106 but also will result in cyclists leaving bikes chained to lamp columns, railings etc generally adding to street clutter, reducing the amenity of the public realm and impacting the safety and comfort of pedestrians and other cyclists.

Folding bicycles
With regard to folding bicycles, based on current figures, the applicant is proposing below the accepted 10% of total provision which is deemed acceptable on current figures but may need to be revisited once final figure, referred to above are confirmed.

Design and Access
The design and access of the proposed cycle parking should comply with the London Cycle Design Standards (LCDS). The applicant has provided a detailed layout but failed to provide information regarding access and how the cycle parking would be managed.

In addition to this, the applicant should provide a larger quantum of larger and adaptable spaces to comply with LCDS requirements.

The applicant is also requested to provide cycle lift analysis which demonstrates that the proposed number of lifts is sufficient to manage lift demand during the peak hours and in a scenario in which the cycle parking is at full occupancy.

Road Safety Audit
The scope of the and brief for the Road Safety Audit, should have been agreed with the City Corporation as highway authority, TfL would comment where it relates to works to the TLRN , its assets or operations, or more generally if requested by the highway authority. The drawings in the submitted safety audit are difficult to read in places and it is also unclear if information on pedestrian and cycle routes to site was provided to the road safety auditor.

The swept path analysis is welcome; however, it shows vehicle conflict points, which may lead to collisions with pedestrians and cyclists using the same roads or crossing the vehicle paths. TfL would recommend delivery vehicle routing to/from the site to take into account road safety perspective, particularly where there are conflicts with lorry routing to site, cycle and pedestrian routes, beyond the area covered by Stage 1 RSA. The applicant should confirm how the preferred routing will be managed.

Cycle Hire
The nearest docking station is located on St Mary Axe, less than 50m to the east of the site. TfL notes that both it and the other surrounding docking stations are under considerable pressure whilst they play a fundamental role in providing short trips for commuters and visitors to the City of London. This development will add significant pressure to the network. TfL therefore requests a financial contribution of £220k and land for a new docking station to be provided by this development. If space cannot be identified within the application site, further assessment with TfL and the City Corporation will be needed to find an alternative location within the vicinity. The £220k

for installation must in any case be secured along with any additional costs arising from an offsite location.

Travel Plan / Cycle Promotion Plan
It is noted that the applicant has submitted a Framework Travel Plan. Although the document needs revision, it is noted that City Corporation prefer a Cycle Promotion Plan.

Construction
This is a constrained and densely developed location therefore a detailed Construction Logistics Plan (CLP) must be secured pre commencement of any works by condition. The proposed construction access arrangements are proposed to be in situ for a minimum of 5 years, TfL recommends that the access proposal is supported by a Road Safety Audit, also that for pedestrian and cycle routing during construction, these should subject to detail assessment in accord with Construction Logistics and Community Safety standard and appropriate pedestrian comfort levels. It is also noted that there are potential significant changes to Leadenhall Street signal and crossing facilities, for which TfL should be consulted.

It is understood that the City of London Corporation are considering a construction working group for this area given the number and size of projects. The applicant should engage with relevant stakeholders.

In addition to the above, the summary is as follows.

- Further work on the trip generation and strategic modelling is required.
- Further discussion is required to address matters of safety and capacity of the surrounding network for future occupiers.
- A financial contribution to A10 corridor improvements should be provided.
- A revised ATZ.
- Cycle Hire Contribution should be agreed.
- Further discussion and clarification is sought on wider proposed S278 works.

I trust that this provides you with a clear understanding of TfL's current position regarding the application.

Kind regards,

George Snape
Area Planner – TfL Spatial Planning
Email: [redacted]

Appendix 1

Transport Assessment (Part 1)

Paragraph 3.2.7 – The 'Walking speed' is fast, at 5km per hour (ie. 1.38m per second) compared to the DfT standard of 1.2m per second that we generally apply. Furthermore, we are looking to apply a 1m per second 'Walking speed' in some places. Essentially, to help some protected characteristic groups (PCGs) including pedestrians who are disabled, older or children.

The 'Walking speed' should be considerate, as it is also important for calculating time to cross, especially at signal-controlled facilities.

Paragraph 3.2.8 – A realistic 'Walking speed' would provide a more accurate time and distance for walking to locations for Public Transport. It would be interesting to know if this considers pedestrian numbers, as busy footways can reduce 'Walking speed'.

Paragraph 3.2.10 – Traffic reduction will help to sustain Active Travel choices. Reducing carriageway space will help redefine locations as pedestrian priority in favour of vehicle movement, making private vehicle use less attractive.

Transport Assessment (Part 2)

Road Safety Audit – Problems generally appear to relate to swept paths overrunning footways and opposing vehicle movements. Clearly, this will need mitigating for road safety to maintain easy movement and access for all road users.

Pedestrian Movement Assessment

The PCL analysis has identified a couple of 'hot spots', but 'Location 24' also has high demand (2500+ per hour).

Daily movement patterns are valuable to assess. I noted that 2022 data was used. Later data would provide a more reliable impression, post COVID impacts. The proposed development is likely to create an increase in movement, which will then affect the 'All day average'. Particularly, as some locations become less comfortable as their pedestrian comfort levels (PCLs) fall below our B+ (minimum) requirement for footways.

It is important to consider aggregating cycling movement with pedestrians to understand the outcomes. Especially, if cycle parking will be provided in adjacent locations.

The Public Realm key desire line changes appear to indicate an increase in demand along St. Mary's Axe, Leadenhall Street and Great St. Helen's, resulting in additional crossing movements.

Where there is informal crossing, ideally a reduction in vehicle movement and low vehicle speeds will allow for this pattern of pedestrian behaviour. However, some PCGs (eg. pedestrians who are disabled, older or children) prefer the assurance of formal crossings. Therefore, signal controlled or Zebra facilities should also be considered.

It would be helpful to support the diagonal route through the proposed development, which would relieve pedestrian capacity on the main footways as well as meet natural pedestrian desire lines for their ‘Walking time efficiency’.

Mitigation measures will be important for proposed conditions to improve PCLs indicating uncomfortable movement. It is advisable to design to achieve B+ PCLs, which then allows for growth to future proof the outcomes of the development. Essentially, to prevent congestion as this has implications on road safety and personal safety. Especially for PCG who are disabled, older, children and women.

Appendix 1 refers to a 1.5m footway width, which should reflect DfT’s preferred minimum of 2m width. This is to allow two wheelchairs to pass each other comfortably.

Historic England

Ms Gemma Delves
Corporation of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3764

Our ref: P01571750

19 June 2024

Dear Ms Delves

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

1 UNDERSHAFT LONDON EC3A 8EE
Application No. 23/01423/FULEIA

Thank you for agreeing to our 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 we offer the following advice to assist your authority in 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 our last letter we sought further clarification and 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.

We 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 we do not formally object on World Heritage grounds, we 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 is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

We intend to share our advice with the relevant international bodies. Our 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. We urge you to request these amendments before the application is determined. We 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, we raise serious concerns about the harmful impact on the Tower of London World Heritage Site, which we consider could be greatly reduced with minor changes, and urge you 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.

Please contact me if we can be of further assistance.

Yours sincerely

Historic England
London and South East Region

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

THIS IS AN EXTERNAL EMAIL

Dear Georgia and Gemma

I have reviewed the updated and amended documents that are the subject of the Reconsultation. As the committee date is coming up, I have provided an update on our key Stage 1 comments.

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

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)

Architecture and design – we 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.

Crown of the building – We 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.

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

Transport – I understand George is in contact with you directly regarding his response to the Transport comments raised in our Stage 1. GLA Officers support TfL's request for contributions towards the A10 corridor improvements from this scheme.

Energy – There are some outstanding points to be addressed before compliance with London Plan energy policies can be confirmed. I will send these to the agent this afternoon and copy you in.

WLC – Was considered to be acceptable at Stage 1.

CE – I am still waiting for internal colleagues to review the applicant's latest response. I will copy you in once received.

Air quality – Concerns raised at Stage 1 have been addressed.

Please let me know if you'd like anything further from me.

Kind regards
Grace

Grace Jack
Principal Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
Union Street, London SE1 0LL
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From:
To:
Cc:
Subject: RE: Planning Application Consultation: 23/01423/FULEIA [SG22212]
Date: 22 October 2024 12:49:31
Attachments: image001.png
SG22212 1 Undershaft 2024 cond_with.pdf

THIS IS AN EXTERNAL EMAIL

Dear Madam,

We acknowledge receipt of the further consultation and the proposed minor changes to the scheme. NATS's position remains unchanged from that previously communicated. I attach our last representation which remains applicable. For the avoidance of doubt, I understand that Condition 13 relating to cranes was in the process of being discharged in order to facilitate cranes of up to 200m to operate on site. NATS had advised the Applicant that these were acceptable and the LPA can therefore continue on that basis. In respect of cranes above 309m, NATS remains engaged with the airports and Applicant around the process to manage these.

Regards
S. Rossi
NATS Safeguarding Office

NATS

Sacha Rossi
ATC Systems Safeguarding Engineer

D:

E:

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL

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NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: Tuesday, October 22, 2024 11:51 AM
To: NATS Safeguarding
Subject: Planning Application Consultation: 23/01423/FULEIA

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

Dear Sir/Madam

Please see attached consultation for 1 Undershaft London EC3A 8EE .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Gemma Delves
Environment Department
City of London
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From:
To:
Subject: LPA Reference: 23/01423/FULEIA Standing Advice Response
Date: 23 October 2024 09:38:33

THIS IS AN EXTERNAL EMAIL

LPA Reference: 23/01423/FULEIA

ATE Reference: ATE/24/00127/FULL

Site Address: 1 UNDERSHAFT, LONDON, EC3A 8EE

Proposal: 23/01423/FULEIA | 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, 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. | 1 Undershaft London EC3A 8EE

Standing Advice

Dear Sir/Madam,

Thank you for your email.

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. Our standing advice can be found here: https://www.gov.uk/government/publications/active-travel-england-sustainable-development-advice-notes

Regards,

Development Management Team

Active Travel England

West Offices Station Rise, York, YO1 6GA

Follow us on Twitter **@activetraveleng**

Instagram **@activetravelengland** and on **LinkedIn**
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[ref:a0zTw0000002sKTIAY;be1a940d305d95d9e2189577a509009b:ref]

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

Gemma Delves
City of London
By email

23/10/24

Dear Gemma,

Planning Reference: 23/01423/FULEIA

Re: 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. RE-CONSULTATION.

Location: 1 Undershaft London EC3A 8EE

Our Ref: LHR6061

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

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria. Heathrow Airport request for the following conditions to be applied to any subsequent planning permission.

H10 Radar Mitigation Condition
No Development can take place until:

- 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.

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.

Instrument Flight Procedures (IFPs) Impact Condition
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 cranage.

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.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

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

CAA Crane Notification
where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)
https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/

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

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

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

Yours sincerely

Simon Vince
For and on behalf of Heathrow Airport Limited

creating a better place
for people and wildlife

Environment Agency

Gemma Delves
City of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136666/03
Your ref: 23/01423/FULEIA

Date: 23 October 2024

Dear Gemma,

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. 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.

Thank you for reconsulting us on the amended plans for the above application. Based on the information available, the application raises no environmental concerns for us. We therefore have **no comments** on this application; however, we reiterate the following advice.

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

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the

area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

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

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

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

Further information on our charged planning advice service is available at; https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions.

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

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

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: HNLSustainablePlaces@environment-agency.gov.uk
Tel: 02030251774

LPA Ref: 23/01423/FULEIA

London City Airport Ref: 2024/LCY/245

Date: 24/10/2024

Dear Gemma Delves,

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

LPA Reference	23/01423/FULEIA
Proposal	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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development. 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.
Location	1 Undershaft London EC3A 8EE
Borough	City of London
Case Officer	Gemma Delves

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

Radar Mitigation Condition

No Development can take place until:

-mitigation has been agreed and put in place to ensure that the proposed development will have no impact on the H10 Radar located at Heathrow Airport but utilised by London City Airport.

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.

Construction Methodology Condition

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.

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.

Instrument Flight Procedures (IFPs) Impact Condition

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 cranage.

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.

Building Obstacle Lighting Condition

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.

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

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

CAA Building Notification

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

This response represents the view of London City Airport Ltd as of the date of this letter and applies solely to the above stated application. This letter does not provide any indication of the position of any other party, whether they are an airport, airspace user or otherwise. It remains your responsibility to ensure that all the appropriate consultees are properly consulted.

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

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

Kind regards,

Lucy Dale
On behalf of London City Airport

Transport for London

PLNComments@cityoflondon.gov.uk

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

25 October 2024
Crossrail Ref: CRL-IP-3303

Dear Gemma Delves,

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.

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

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

I have no comment on the application.

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

Yours sincerely,

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

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

……

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

……

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

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

Memo

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

From District Surveyors Office
Environment Department
Telephone [redacted]
Email [redacted]

Date 28 October 2024
Our Ref DS/FS24/00050
Your Ref PT_GD/23/01423/FULEIA
Subject 1 Undershaft London EC3A 8EE

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

I have reviewed the revised submitted fire statement and given that the fire safety measures have not changed since the original submission, I consider that policies D5 and D12 have been met.

Lesley Agyekumaa-Sasu

[redacted]

[redacted]

Gemma Delves
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

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

24/3453/K
Your Ref: 23/01423/FULEIA
28 October 2024

Dear Sir/Madam,

Site: 1 Undershaft, London EC3A 8EE
Applicant: C/O Agent
Proposal: 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.

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.

I acknowledge receipt of your communication dated 22 October 2024, which was received as valid on 22 October 2024.

I will endeavour to let you know the Council's view as soon as possible.

Yours Faithfully
Lesley Agyekumaa-Sasu
Development Control

LONDON GATWICK

03 June 2024

Gemma Delves
Development Division
City of London

Dear Gemma

Re: Planning Application No: 23/01423/FULEIA – Amended/Add Plans relating to the construction of a 73-storey building with associated works at 1, Undershaft, London, EC3A 8EE

Our Ref: LGW5516

Thank you for your letter/email dated 22 October 2024, regarding the above-mentioned consultation.

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.

This response only relates to London Gatwick, other airports will have different requirements.

For information, please note that the DfT Circular 'Town & Country Planning (safeguarded aerodromes, technical sites & Military Explosives Storage Areas) Direction 2002, under Annexe 2 'High Structures', requires that Local Planning Authorities notify CAA of any building or works extending 91.4m or more above ground level as soon as permission has been granted. Please notify CAA at arops@caa.co.uk

For details of the information to be submitted please refer to the circular at The town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas) direction 2002 - GOV.UK (www.gov.uk)

If you have any queries, please do not hesitate to contact me.

Yours sincerely

Amanda Purdye, Aerodrome Safeguarding Officer
For and on behalf of London Gatwick

Email: gal.safeguarding@gatwickairport.com

From:
To:
Subject: 3rd Party Planning Application - 23/01423/FULEIA - Amendment
Date: 31 October 2024 10:44:42

THIS IS AN EXTERNAL EMAIL

Corporation of London Our DTS Ref: 75572
Department of Planning & Transportation Your Ref: 23/01423/FULEIA - Amendment
PO Box 270
Guildhall
London
EC2P 2EJ

31 October 2024

Dear Sir/Madam

Re: 1, UNDERSHAFT, -, LONDON, -, EC3A 8EE

Waste Comments
The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "No piling shall take place until a PILING METHOD STATEMENT (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-
developments%2Fplanning-your-development%2Fworking-near-our-
pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818471074%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=%2F%2FWLhGneZJG6mXtGm8RDvCYIsiVa5yGGYcCOQVC7U8E%3D&reserved=0 Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818494771%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=qVcI%2BAG9FRI1tfsELTEVZCkeWYDAZtdp1wQJG90RNnQ%3D&reserved=0. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. https://gbr01.safelinks.protection.outlook.com/?
url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-
pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818509948%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=yIyyhumlfu3YbrSjOR%2FyOZhLjm4pysJ8%2BPKd2d75XVo%3D&reserved=0

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

As per Building regulations part H paragraph 2.21, Drainage serving kitchens in commercial hot food premises should be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825-2:2002 or other effective means of grease removal. Thames Water further recommend, in line with best practice for the disposal of Fats, Oils and Grease, the collection of waste oil by a contractor, particularly to recycle for the production of bio diesel. Failure to implement these recommendations may result in this and other properties suffering blocked drains, sewage flooding and pollution to local watercourses. Please refer to our website for further information : https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.thameswater.co.uk%2Fhelp&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818524713%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=uJ7epq7RMptniz5TkK9Zrk9UrYnAD4BiJToCYJc5zjQ%3D&reserved=0

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

Water Comments
The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-
our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818548131%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=hpKx0ESEjunmDmUbhryncRjJrnlTw5q4H9Be12NpU6k%3D&reserved=0 Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near our mains (within 3m) we'll need to check that your development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.
https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-
pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818570584%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=wRiLHbA1wJL3cSXCa5oT%2FobVfYpXRyZ%2Br912Kq0ttdg%3D&reserved=0

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

Yours faithfully
Development Planning Department

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

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devcon.team@thameswater.co.uk
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url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818592997%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=%2F21PRF8eugAEkXGuXf8NdTB57SxW3tz0k63aTn0zZEw%3D&reserved=0 , follow us
on twitter https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818614893%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=bP7jciLmp%2B1gkmXy7RER%2B8CtHD3VD0ggjA5T%2FLk59Go%3D&reserved=0
or find us on https://gbr01.safelinks.protection.outlook.com/?
url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C435822f7e8314936e3ae08dcf9990312%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638659682818636593%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=GCtrDvyiHD%2Fjb6vkI6aeCJM4B39UVQamglMh0ymc1%2Fw%3D&reserved=0.
We're happy to help you 24/7.

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From:
To:
Subject: Our DTS Ref: 75572 Your Ref: 23/01423/FULEIA - 1, UNDERSHAFT, LONDON, EC3A 8EE
Date: 31 October 2024 10:45:45

THIS IS AN EXTERNAL EMAIL

Corporation of London Department of Planning & Transportation PO Box 270 Guildhall London EC2P 2EJ Our DTS Ref: 75572 Your Ref: 23/01423/FULEIA - Amendment 31 October 2024

Dear Sir/Madam

Re: 1, UNDERSHAFT, -, LONDON, -, EC3A 8EE

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

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

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

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

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

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

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

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

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

Yours faithfully

Development Planning Department

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

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

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From:
To:
Subject: Planning Application Consultation: 23/01423/FULEIA
Date: 05 November 2024 09:36:06
Attachments:

THIS IS AN EXTERNAL EMAIL

Dear Gemma Delves

Our ref: **492105**
Your ref: **23/01423/FULEIA**

Thank you for your consultation.

Natural England has previously commented on this proposal and made comments to the authority in our response dated **19 February 2024**, our reference number **465689 (attached).**

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

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

Yours faithfully

David Reid
Officer
Natural England
Consultation Service
Natural England, County Hall, Spetchley Road, Worcester, U.K., WR5 2NP
Email: consultations@naturalengland.org.uk
www.gov.uk/natural-england

Natural England offers two chargeable services - the Discretionary Advice Service, which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service for European Protected Species mitigation licence

applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

For further information on the Discretionary Advice Service see here
For further information on the Pre-submission Screening Service see here

-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 22 October 2024 11:50
To: SM-NE-Consultations (NE)
Subject: Planning Application Consultation: 23/01423/FULEIA

Warning: The sender of this message could not be validated. Please use caution when opening any message content such as attachments or links

Dear Sir/Madam

Please see attached consultation for 1 Undershaft London EC3A 8EE .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Gemma Delves
Environment Department
City of London
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pqVSm8RJAv%2BssRStGHHJZSylegHyg9a7H0Q%3D&reserved=0

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From:
To:
Cc:
Subject: FW: 23/01423/FULEIA - 1 Undershaft London EC3A 8EE
Date: 07 November 2024 09:36:14
Attachments:

THIS IS AN EXTERNAL EMAIL

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

Historic England

Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at historicengland.org.uk/strategy.
Follow us: Facebook | Twitter | Instagram Sign up to our newsletter

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-----Original Message-----
From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>
Sent: 22 October 2024 11:52
To: E-Glaas
Subject: 23/01423/FULEIA - 1 Undershaft London EC3A 8EE

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

Dear Sir/Madam

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

The application and associated documents are available for viewing at http://www.planning2.cityoflondon.gov.uk/online-applications/applicationDetails.do?activeTab=summary&keyVal=S6C4BQFHGT700

Kind Regards

Planning Administration
Environment Department
City of London Corporation

On behalf of

Gemma Delves

020 7332 1704

Details
OUR REF: 23/01423/FULEIA
ADDRESS: 1 Undershaft London EC3A 8EE (Grid Reference: 533216, 181224)
PROPOSAL: 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)) THIS E-MAIL AND ANY ATTACHED FILES ARE CONFIDENTIAL AND MAY BE LEGALLY PRIVILEGED. If you are not the addressee, any disclosure, reproduction, copying, distribution or other dissemination or use of this communication is strictly prohibited. If you have received this transmission in error please notify the sender immediately and then delete this e-mail. Opinions, advice or facts included in this message are given without any warranties or intention to enter into a contractual relationship with the City of London unless specifically indicated otherwise by agreement, letter or facsimile signed by a City of London authorised signatory. Any part of this e-mail which is purely personal in nature is not authorised by the City of London. All e-mail through the City of London's gateway is potentially the subject of monitoring. All liability for errors and viruses is excluded. Please note that in so far as the City of London falls within the scope of the Freedom of Information Act 2000 or the Environmental Information Regulations 2004, it may need to disclose this e-mail. Website: http://www.cityoflondon.gov.uk

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department
Telephone [redacted]
Email [redacted]

Date 12 November 2024
Our Ref DS/SUDS24/0009
Your Ref PT_GD/23/01423/FULEIA
Subject 1 Undershaft London EC3A 8EE

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

Should the application be approved, we continue to recommend the conditions that were included in our previous memo (Ref: PT_GD/23/01423/FULEIA, dated 12 February 2024):

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, 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^3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;

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

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

Historic England

Ms Gemma Delves
Corporation of London
PO Box 270
Guildhall
London
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01571750

12 November 2024

Dear Ms Delves

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

1 UNDERSHAFT LONDON EC3A 8EE
Application No. 23/01423/FULEIA

Thank you for your letter of 22 October 2024 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Our 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.

We are disappointed that the opportunity to address the harmful impact on the Tower of London has not been taken.

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.

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.

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.

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

Historic England

Recommendation

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.

In addition, we raise serious concerns about the harmful impact on the Tower of London World Heritage Site, which we consider could be greatly reduced with minor changes, and urge you 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.

Please contact me if we can be of further assistance.

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

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

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

Yours sincerely

Alexander Bowring
Inspector of Historic Buildings and Areas
E-mail: [redacted]

[redacted]

Hi

Please can this be redacted and indexed against the above application.

Thank you

Gemma

From: Coco Whittaker [redacted]

Subject: C20 Society RE 23/01423/FULEIA

You don't often get email from [redacted]

THIS IS AN EXTERNAL EMAIL

Dear Gemma Delves,

Thank you for re-consulting the Twentieth Century Society on the application 23/01423/FULEIA following the submission of additional information and revised drawings. We maintain our objection to the application as outlined in our letter of the 26 February 2023, remaining strongly opposed to the proposed demolition of the Aviva Tower.

Kind regards,

Coco

Coco Whittaker – Head of Casework
(she/her)
Twentieth Century Society
70 Cowcross Street, London, EC1M 6EJ
[redacted]
www.c20society.org.uk
Twitter | Instagram | Facebook | LinkedIn
Reg. charity no: 1110244

SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0049

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

www.southwark.gov.uk

LBS Reg. No.: 24/OB/0049 **Date of Issue of Decision:** 15/11/2024
Your Ref No.:

Applicant Gemma Delves - City Planning
City of London

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

Re con 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.

At 1 Undershaft London EC3A 8EE

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

Signed: *Stephen Platts* Director of Planning and Growth

Gemma Delves
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

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

Application Number: PA/24/01825
Your ref: 23/01423/FULEIA

Enquiries to: Ronan Murray
Tel:
Email: [redacted]

18 November, 2024

Dear Gemma Delves,

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

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location 1 Undershaft London EC3A 8EE

Proposal Observations requested by the City of London 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.

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.

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.

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

1. 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.

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

Yours sincerely,

Sripriya Sudhakar, Director Planning and Building Control

[redacted]

From: Gregory Barrett [redacted]
Sent: 19 November 2024 07:22
To: Delves, Gemma [redacted]
[redacted]>
Subject: 1 Undershaft London EC3A 8EE (ref: 23/01423/FULEIA)

THIS IS AN EXTERNAL EMAIL

Dear Gemma,

Many thanks for notifying the Cathedral of updated proposals to 1 Undershaft.

We offer no comment on the principle changes brought by the updated proposals. We would, however, be open to understand more regarding the lighting design of the scheme.

Kind regards,

Greg

Gregory Barrett
BA (Hons) MPhil (Cantab) FRSA IHBC
Lead Heritage Consultant and Clerk to the Surveyor
[redacted]
on behalf of Caroe Architecture Ltd

I may send email outside normal working hours from time to time.
Please be assured I do not expect a reply outside normal working hours.
*For our **COVID-19 Business Continuity** arrangements please click here*

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

London Office:
The Surveyor's Office, The Chapter House, St Paul's Churchyard
London EC4M 8AD
Tel: 020 7246 8341
Visit our website: caroe.com

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From: Varma, Vimal <[redacted]
Sent: 19 November 2024 09:45
To: McBirney, Georgia <[redacted]
Cc: Delves, Gemma <[redacted]; Wilson, Peter
<[redacted]; Turner, Lee <[redacted]
Subject: RE: 23/01423/FULEIA - 1 Undershaft - Re-consultation - Please Respond

Hi Georgia,

The proposed waste and storage collection facilities indicated in the Waste Management Strategy, December 2023, comply with our requirements. Therefore, this division will not object to this proposal. This does not set precedence for any other developments in the City. We normally ask for 6m clearance over roll-on-roll-off compactor loading area, please ensure there is no ducting or snagging which can be pulled down whilst loading.

Thanks

Vimal

From: McBirney, Georgia <[redacted]
Sent: 18 November 2024 10:16
To: Varma, Vimal <[redacted]
Cc: Delves, Gemma <[redacted]; Wilson, Peter
<[redacted]
Subject: RE: 23/01423/FULEIA - 1 Undershaft - Re-consultation - Please Respond
Importance: High

Hello,

Hope you had a good weekend.

Could you please advise when your updated comments will be required or confirmation that you are relying on your previous comments.

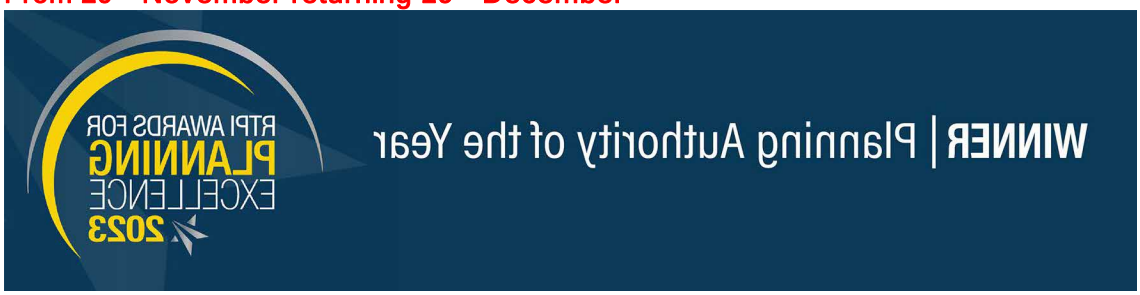
Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation,

Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

Advance leave notice:
From 29th November returning 19th December



From: McBirney, Georgia
Sent: 12 November 2024 10:26
To: Varma, Vimal <[redacted]>
Cc: Delves, Gemma <[redacted]>
Subject: 23/01423/FULEIA - 1 Undershaft - Re-consultation

Hi Vimal,

Hope you are well.

Following the committee deferral in July of 1 Undershaft, revisions were made to scheme (set out in brief below) and a consultation request was sent on the 22nd October. Could you please advise if you will be relying on comments made previously or whether you will be providing updated comments.

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.

The design alterations include alterations at basement level, so this could have implications on the comments that you provided previously in respect of waste collection vehicles.

So, you are aware, the application is going to Committee on the 13th December and the print deadline is the 28th of November. Due to this we will need any updated comments within the next week.

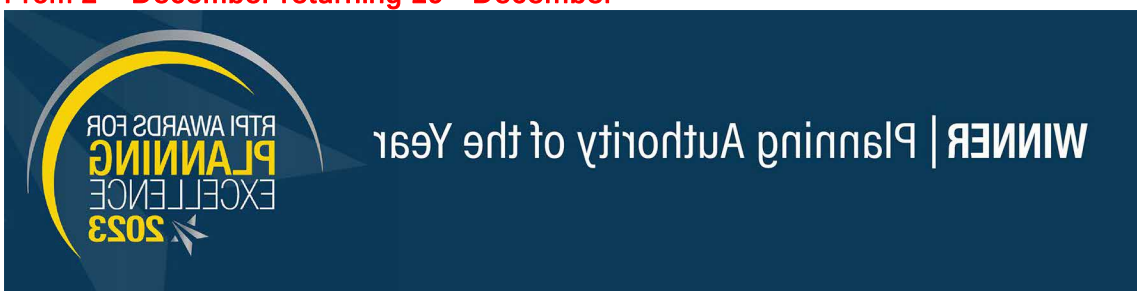
If you need Gemma and I to take you through the amendments, please let us know.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation,
Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

Advance leave notice:
From 2nd December returning 19th December



From: Grace Jack [redacted]
Sent: 19 November 2024 09:56
To: Delves, Gemma <[redacted]>; McBirney, Georgia <[redacted]>
Subject: GLA comments on revisions - 1 Undershaft

THIS IS AN EXTERNAL EMAIL

Dear Gemma and Georgia,

Please see below a set of informal officer observations on the proposed amendments to 1 Undershaft. These are made without prejudice to the Mayor's consideration or decision at Stage 2.

Background:
The GLA issued a Stage 1 report for this application on 11 March 2024.

GLA officers subsequently provided feedback via email dated 20 June 2024, regarding an earlier set of amendments. 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.

The GLA has now been asked to comment on a second set of amendments submitted in October 2024. These amendments do not concern the building's upper levels but relate primarily to St Helen's Square. The key changes are:

- Reduction in the building's footprint to retain more of St Helen's Square and consequential amendments to the building's interior layout; and
- Introduction of a programmable digital screen facing St Helen's Square.

GLA design comments on October 2024 amendments:
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.

Kind regards,
Grace

Grace Jack
Principal Strategic Planner, Development Management
GREATER**LONDON**AUTHORITY
Union Street, London SE1 0LL

london.gov.uk

We are London. Find out about the work of the Mayor, the London Assembly, and the Greater London Authority. **https://www.london.gov.uk/**

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The information in this email may contain confidential or privileged materials. For more information see https://www.london.gov.uk/about-us/email-notice/

From: Donal Rooney <[redacted]
Sent: 20 November 2024 11:10
To: McBirney, Georgia <[redacted] ; Delves, Gemma <[redacted]
Subject: RE: 23/01423/FULEIA - 1 Undershaft - Re-consultation - Please respond

Hi Both,
The only concerns related to noise from the use of the proposed screen could be addressed by the following conditions.
The proposed screen hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
Noise from the screen should not be audible at the façade of the any residential property.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
No other changes to my previous comments are necessary.
Regards
Donal

From: McBirney, Georgia <[redacted]>
Sent: 18 November 2024 09:24
To: Whitehouse, Robin <[redacted] ; Donal Rooney <[redacted]>; Bentley, Paul <[redacted]>; Eleftheriou-Vaus, Kyri <[redacted]>
Cc: Delves, Gemma <[redacted] ; Wilson, Peter <[redacted]>
Subject: RE: 23/01423/FULEIA - 1 Undershaft - Re-consultation - Please respond
Importance: High

Hello,

Hope you all had a good weekend.

Could you please advise when your updated comments will be required or confirmation that you are relying on your previous comments.

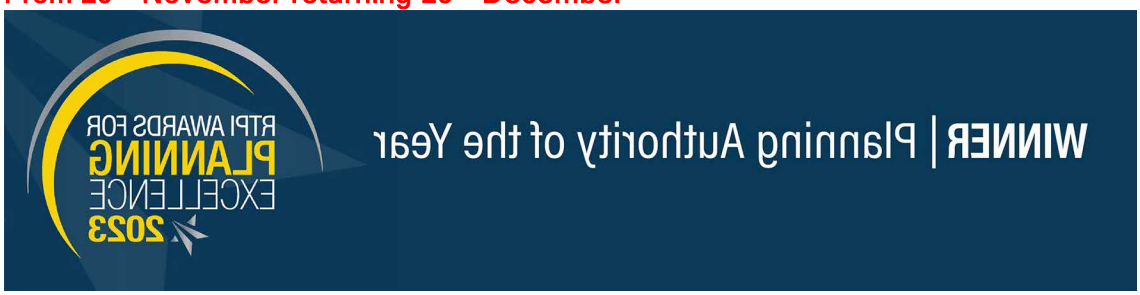
Kind regards

Georgia McBirney (she/her)

Planning Officer
(Development Management)
Environment Department | City of London Corporation,
Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

Advance leave notice:
From 29th November returning 19th December



From: McBirney, Georgia
Sent: 12 November 2024 10:24
To: Whitehouse, Robin <[redacted]>; Donal Rooney <[redacted]>; Bentley, Paul <[redacted]>; Eleftheriou-Vaus, Kyri <[redacted]>
Cc: Delves, Gemma <[redacted]>
Subject: 23/01423/FULEIA - 1 Undershaft - Re-consultation

Hello,

Hope you are well.

Following the committee deferral in July of 1 Undershaft, revisions were made to scheme (set out in brief below) and a consultation request was sent on the 22nd October. Could you please advise if you will be relying on comments made previously or whether you will be providing updated comments.

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.

So, you are aware, the application is going to Committee on the 13th December and the print deadline is the 28th of November. Due to this we will need any updated comments within the next week.

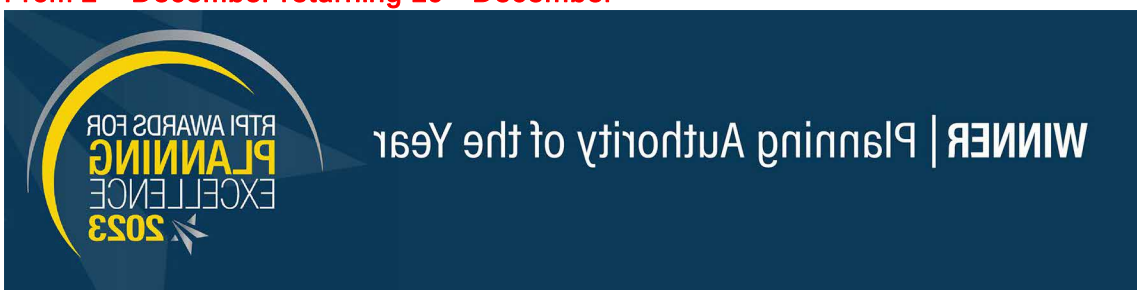
If you need Gemma and I to take you through the amendments, please let us know.

Kind regards

Georgia McBirney (she/her)
Planning Officer
(Development Management)
Environment Department | City of London Corporation,
Guildhall, London EC2V 7HH
[redacted]
Environment
www.cityoflondon.gov.uk

Katie Stewart –Executive Director Environment

Advance leave notice:
From 2nd December returning 19th December



Memo

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

From Paul Bentley
Air Quality Officer
Telephone [redacted]
Email [redacted]

Date: 25/11/24
Your Ref: 23/01423/FULEIA

Subject: 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, public realm improvement works, ancillary basement cycle parking, servicing, plant, highway works and other works associated with the proposed development.

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.

Following submission, and subsequent review, of the Second Addendum:
The generator flues previously located on the 9th floor have now been relocated to the 10th floor, below the public terrace on the 11th floor. It is confirmed by the AQ consultant that the generators would only be tested when there is no access to the terrace.

Should the development be approved please attach the following conditions:

Condition M28C amended

Prior to the installation of any generator. A report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must be the latest 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.

Reason

In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and

particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

Condition M29

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

Reason

In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

Condition M32 NRMM
Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

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

Informatives

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

Compliance with the Clean Air Act 1993
Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height

approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

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

Westminster City Council

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

westminster.gov.uk

City of Westminster

Your ref:
My ref: 24/07341/OBS

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

Gemma Delves
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

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

31 October 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

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

SCHEDULE

Application No.: 24/07341/OBS **Application Date:**

Date Received: 22.10.2024 **Date Amended:** 22.10.2024

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

Address: 1 Undershaft, City Of London, London, EC3A 8EE

Proposal: RE-CONSULTATION

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.

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.

Yours faithfully

[redacted]

Deirdra Armsby
Director of Town Planning & Building Control

Note:

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

Note:

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

4635 Crystal Mark
Clarity approved by Plain English Campaign

APPLICATION COMMENT FORM

From: Ben Bishop, Environmental Resilience Officer

Application No: 23/01423/FULEIA

Development Management Case Officer: Gemma Delves

Site Address: 1 Undershaft London EC3A 8EE

Proposal: 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, 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.

Application Received: 27th December 2023

Request for Comment Received: 24th January 2024

Updates:

- 14th June 2024
- 27th of November 2024

Comment:

Date & Initials

BB

27/11/24

Following receipt of a technical memo an update to the comment form has been provided.

Overview

The applicant has supplied the following documents '1 US Technical Memo_Climate_Change' to respond to the original comment:

'Following my review of the Climate Change Resilience Assessment in the ENVIRONMENTAL STATEMENT VOLUME I CHAPTER 15: CLIMATE CHANGE, I would ask for further information from the applicant. This could either be the full assessment with further detail with information on tools and modelling carried out. Or this could be the Climate Change Adaptation Appraisal referred to in the Sustainability statement which is to be provided at RIBA stage 2. Once one of these has been provided, we will be able to follow up with our comments.' Prior to the receipt of the original *Environmental Resilience Planning memo* submitted 16/02/24.

The technical memo included an update on the following subjects:

- Overall CCR assessment
- Wind Microclimate Study
- Outdoor Thermal Comfort Study
- Flood Risk Assessment
- Drainage Strategy
- Overheating Assessment
- Solar Glare Assessment

In the memo it outlines the methods applied in preparation of the Environmental Statement, by Aecom. The assessment utilised the UKCP18 and have assessed the proposed location for a time period of up to 2099, taking into account relevant climate variables. Baseline climatic conditions used data from closest meteorological station (approx. 7km). Relevant guidance has been followed including IEMA impact assessment guide: Climate Change Resilience and Adaptation and the EU's technical guidance on climate proofing infrastructure.

Overheating and the urban heat island effect

- Use of brise soleil to reduce internal heat gains
- Western façade on second 'stack' has vertical garden which will reduce thermal massing
- Thermal comfort study addresses increases increased to average maximum summer temperatures and study deems development is within suitable range.
- Public realm improvements include 'cluster' of trees in paved area providing shaded canopy cover.
- Podium garden at L11 projects over public walkway on the southern elevation, potentially providing street level shading.
- TM52 modelling for internal thermal comfort has been carried out.

Flooding

No changes

- The Site is located within Flood Zone 1 with a 0.1% (1 in 1000) annual probability of river flooding, outlining very few restrictions in terms of flood risk to the proposed development. The Site is therefore identified as being an area at low risk of fluvial and tidal flooding.
- Drainage rates will be reduced to 4.8% to account for a 1 in 100 year event (Greenfield rate of 4.5 litres per second. Flood Risk assessment carried out by AECOM.
- SuDS feasibility has been carried out by WSP, options include blue roofs and rainwater harvesting, attenuation in green infrastructure features such as raingardens, bio retention, permeable paving and below ground storage.

Water stress

No changes

- Low flow fixtures are identified in the Environmental Statement as measures to reduce operational carbon emissions. Including: low flushes and low flow regulators.
- Water efficiency goals outline use of greywater and rainwater re-use throughout the proposed development. Including collection of grey-water for flushing and rainwater use for irrigation.
- Water leak detection to be implemented
- BREEAM Excellent standard for Wat 01 achieved.

Biodiversity and pests and diseases

See changes to comment below.

- Following the changes made to the proposed development the site expects an increase in biodiversity units on-site of 527.63%, this is lower than the original estimate of 960.95%. Regardless this figure is still considerably high and is provided through a range of accessible areas at ground level and

roof areas.

- UGF scores have been recalculated and include the public realm and all levels including the hanging garden, score increases from 0.43 to 0.59.
- Ground level greening includes trees in standard tree pits.
- L11 is expected to contribute to the largest increase in green infrastructure through provision of semi-natural vegetation, green roofs, standard trees, perennial planting, rain gardens and other lower planting.

A range of acceptable native species proposed, that with correct management could provide high level biodiversity value.

Good practice for planting for future resilience is to utilise the 10:20:30 approach; no more than 10% of all trees planted should be the same species, no more than 20% of all trees planted should be the same genus and no more than 30% of all trees planted should be of the same family.

Within the planting palette there are no species under significant threat from pests and disease proliferation. However there should be considerations on how the development, its green infrastructure and occupants could be at risk from emerging pests and diseases. This could include a biosecurity statement regarding the procurement of planting as well as a risk reduction approach to managing risk to occupants and visitors.

Food, Trade, Infrastructure

No changes

The proposed development makes a net positive contribution to the City of London, with the potential to mitigate some of the wider impacts of climate change.

- The development includes facilities that are directly beneficial i.e. retail/ cultural/ community space.
- Facilities are provided to enable occupiers to use active transport including cycling, reducing the dependence on transport infrastructure.
- Infrastructure is set up to reduce overall energy demand and peaks, using passive design measures, low energy lighting and energy recycling.
- MEP services (Mechanical, Electrical, and Plumbing), the strategies aim to enhance the longevity, adaptability, and flexibility of 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 building infrastructure more adaptable.

Other considerations

Climate Change Resilience Assessment not an extensive risk assessment. The preferred approach which utilises the hazard identification, hazard assessment, risk estimation, risk evaluation and risk management methodology.

Thermal comfort study – winter comfort in certain areas is around 50% hours of acceptable range. There should be more considerations around how to reduce this and increase the hours in acceptable range.

Recommendation:

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

BB 16/02/24

BB Update 14/06/24

From: [redacted]
To:
Cc:
Subject: RE: 23/01423/FULEIA - 1 Undershaft, City of London
Date: 27 November 2024 18:22:14
Attachments: image001.png

THIS IS AN EXTERNAL EMAIL

Dear Gemma and Georgia,

In addition to the previous TfL detailed comments, dated 11 April 2024, please see further comments below on key topic areas.

Modelling and A10 Contribution

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. Following the most recent discussions, TfL have requested approx £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.

The applicant team has offered a contribution of £1million towards the scheme. TfL do not deem this appropriate mitigation for the size and scale of this development but is keen to work with the applicant and will comment on this separately.

Pedestrian, cyclist and vehicular access

TfL note the changes in the access for pedestrians, cyclists and vehicles to the site which is deemed acceptable. However 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.

Active Travel Zone Assessment

The City of London should secured Active Travel Zone improvements, given the size and scale of the development.

Cycle parking

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.

Also, it is disappointing that the applicant does not appear to have added additional short stay cycle parking spaces in the 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 proposed S278 works as concerns over the location of the existing motorcycle parking bay remain.

Cycle hire contribution
The financial contribution of £220k towards the TfL Cycle Hire network within the vicinity of the site remains.

Legible London
As per previous request.

Please do not hesitate to contact me if you have any further queries.

Kind regards,
George

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For more information regarding the TfL Spatial Planning team, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit
https://tfl.gov.uk/info-for/urban-planning-and-construction/our-role-in-planning?intcmp=3484

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