



Historic England

Amrith Sehmi  
Planning Administration  
Environment Department  
City of London Corporation

Your Ref: 24/00534/SCOP  
Our Ref: 221572

Contact: Helen Hawkins



07 June 2024

Dear Amrith,

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

**70 Gracechurch Street London EC3V 0HR**

*Request for an EIA Scoping Opinion under regulation 15 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the redevelopment of the site known as 70 Gracechurch Street. The proposed development comprises development of a new tower (154.7m AOD, 32 storeys excl. basement) for office (Class E) and cultural use (Class F2), retail and food and beverage uses (Class E) (circa 70,000sqm GIA); 4 basement levels, servicing access, landscaping, and other associated works*

**Advise Archaeology Scoped in to EIA**

Thank you for your consultation received on 24 May 2024.

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

Archaeology should be scoped into the ES. The site is located over the first and second Roman fora and much of the site has been archaeologically excavated previously for the current development. Some areas of the site were not excavated however, and



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

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archaeological remains were preserved in situ.

The ES/and appendix will need to consider both the potential Roman archaeology and the remains of St Dionis Backchurch. Previous and current impacts will be key and results and locations of previous excavations will need to be included. Areas where archaeology was preserved in situ should also be illustrated.

Continuing preservation of any surviving remains would be a priority for the new development and arrangements for the preservation of these remains should be outlined in the ES.

This response relates solely to archaeological issues.

Yours sincerely

**Helen Hawkins**

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



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**From:** [PlanningGatewayOne](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Planning Application Consultation: 24/00825/FULEIA  
**Date:** 29 August 2024 14:17:05  
**Attachments:** [image001.png](#)

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

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

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

Relevant building is defined as:

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

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

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

Further information is available on the HSE website here.

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the planning gateway one team quoting our reference number (pgo-5789) in all future correspondence.

***[Ethan Fakir](#)***

**Operational Support Planning Gateway One | Building Safety Division**

Health And Safety Executive, Redgrave Court, Merton Road, Bootle, Merseyside, Liverpool, L20 7HS

☎: ✉: [PlanningGatewayOne@hse.gov.uk](mailto:PlanningGatewayOne@hse.gov.uk)



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

From: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

<[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: Thursday, August 29, 2024 10:17 AM

To: [PlanningGatewayOne](#) <[PlanningGatewayOne@hse.gov.uk](mailto:PlanningGatewayOne@hse.gov.uk)>

Subject: Planning Application Consultation: 24/00825/FULEIA

Dear Sir/Madam

Please see attached consultation for XL House 70 Gracechurch Street London EC3V 0HR .

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

Kind Regards

Planning Administration

On behalf of

Amrith Sehmi  
Environment Department  
City of London

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<https://eur03.safelinks.protection.outlook.com/?>

[url=http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7CPlanningGatewayOne%40hse.gov.uk%7C4cb77653225c4172664e08dcc80b64d9%7C6b5953be6b1d4980b26b56ed8b0bf3dc%7C0%7C0%7C638605199498666604%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQljoicV2luMzliLCJBTiI6lk1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=4DJV7GKRafG5nZh65lmnESY%2BhnAqiWsSmdVxdbTCho0%3D&reserved=0](http%3A%2F%2Fwww.cityoflondon.gov.uk%2F&data=05%7C02%7CPlanningGatewayOne%40hse.gov.uk%7C4cb77653225c4172664e08dcc80b64d9%7C6b5953be6b1d4980b26b56ed8b0bf3dc%7C0%7C0%7C638605199498666604%7CUnknown%7CTWFpbGZsb3d8eyJWljoic4wLjAwMDAiLCJQljoicV2luMzliLCJBTiI6lk1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=4DJV7GKRafG5nZh65lmnESY%2BhnAqiWsSmdVxdbTCho0%3D&reserved=0)

From: [DL\\_AirportSafeguarding@bba.co.uk](mailto:DL_AirportSafeguarding@bba.co.uk)  
To: [DL\\_AirportSafeguarding@bba.co.uk](mailto:DL_AirportSafeguarding@bba.co.uk)  
Sent: 28 August 2024 04:45  
Subject: [REDACTED]

This is an external email.

Classification: Internal

Dear Sir/Madam,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would like to draw your attention to the following:

**CAA Building Notification**

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

**CAA Crane Notification**

Where a crane is 100m or higher, crane operators are advised to notify the CAA ([prop@caa.co.uk](mailto:prop@caa.co.uk)) and Defence Geographic Centre ([dgcc@mod.gov.uk](mailto:dgcc@mod.gov.uk)) via Crane notification (Civil Aviation Authority (caa.co.uk) <https://www.caa.co.uk/Commercial/Industry/Notices/Events-and-objects/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

Kind regards,

Simon Vines Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Airport Safeguarding Limited | Advice Building (ESG), Terminal  
Construction Airport, Trafalgar, TW2 3JF  
London England

[REDACTED]

Visit our website: <https://www.airportsafeguarding.com> or contact  
on LinkedIn: <https://www.linkedin.com/company/airport-safeguarding-ltd>



From: [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: 29 August 2024 02:05

To: 'DL\_AirportSafeguarding@bba.co.uk' <[DL\\_AirportSafeguarding@bba.co.uk](mailto:DL_AirportSafeguarding@bba.co.uk)>

Subject: Planning Application Consultation - PA1902473111A

Caution: external email. Unless you recognise the sender and know the content is safe, do not click links or open attachments.

Dear Sir/Madam,

Please see attached consultation for XI, Besse 70 Glascock Street London EC1V 6ER.

Kind regards,

Planning Administration

On behalf of

Amesh Selani

Environment Department

City of London

City of London

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# Memo



To Department of Planning & Transportation

From Paul Jones

Contract and Drainage Service

Department of the Built Environment

Telephone [REDACTED]

Email [REDACTED]

Date 30 August 2024

**Subject** GREASE TRAP REQUIREMENT

**For action**

Application PT\_AS/24/00825/FULEIA

Address: **XL House 70 Gracechurch Street London EC3V 0HR**

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

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

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

Paul Jones



[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

30 August 2024  
Crossrail Ref: CRL-IP-3250

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

Dear Amrith Sehmi,

**24/00825/FULEIA: XL House 70 Gracechurch Street London EC3V 0HR**

*Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the 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 29 August 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](mailto:CRL_Safeguarding@tfl.gov.uk)

Yours sincerely,

**Will Orlik**  
Safeguarding Officer (Elizabeth line)  
[CRL\\_Safeguarding@tfl.gov.uk](mailto: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](mailto: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).

LPA Ref: 24/00825/FULEIA

London City Airport Ref: 2024/LCY/198

Date: 04/09/2024

Dear Amrith Sehmi,

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

<b>LPA Reference</b>	24/00825/FULEIA
<b>Proposal</b>	Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement
<b>Location</b>	XL House 70 Gracechurch Street London EC3V 0HR
<b>Borough</b>	City of London
<b>Case Officer</b>	Amrith Sehmi

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



### **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 Instrument Flight Procedures, therefore they must be assessed before construction.

### **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 make you aware of the following:

### **CAA Building Notification**

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

### **CAA Crane Notification:**

Where a building or crane is 100m or higher, developers and crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk). The following details should be provided before the crane is erected:

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

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

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

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

Kind regards,

Lucy Dale

On behalf of London City Airport

Memo

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

From District Surveyors Office  
Environment Department

Tele phone [REDACTED]

Email [REDACTED]



Date 6 September 2024

Our Ref DS/FS24/0034

Your Ref PT\_A S/24/00825/FULEIA

Subject XL House 70 Gracechurch Street London EC3V 0HR

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

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

Amrith Sehmi  
Corporation Of London  
Development Plan  
PO Box 270  
London  
EC2P 2EJ

**Our ref:** NE/2024/137437/01  
**Your ref:** 24/00825/FULEIA  
**Date:** 13 September 2024

Dear Amrith,

**70 Gracechurch Street London EC3V 0HR**

**Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.**

Thank you for reconsulting us on the above planning application.

There are no environmental constraints within our remit and therefore we have **no comments on** the proposal and have the following advice.

### **Water Resources**

Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures in all developments, particularly in those that are new. 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 all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the [BREEAM 'excellent'](#)

standard for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

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

### **Pre Application Advice**

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

Should you have any queries regarding this response, please do not hesitate to contact me on [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk), quoting the reference at the beginning of this letter.

Yours sincerely,

**Harry Scott**  
**Planning Advisor**

E-mail: [HNL.SustainablePlaces@environment-agency.gov.uk](mailto:HNL.SustainablePlaces@environment-agency.gov.uk)

Telephone: 02030251774



**Memo**

To Assistant Director (Development Management)  
Environment Department

From Lead Local Flood Authority  
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 12 September 2024

Our Ref DS/SUDS24/0050

Your Ref PT\_AS/24/00825/FULEIA

Subject XL House 70 Gracechurch Street London EC3V 0HR

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

The Lead Local Flood Authority has reviewed the submitted information 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 3 l/s from one outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 287.08 m<sup>3</sup>;
- (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
- (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

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

- (a) A Lifetime Maintenance Plan for the SuDS system to include:
  - A full description of how the system would work, its 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.**



Mr Amrith Sehmi  
City of London Corporation  
Guildhall  
PO Box 270  
London  
London  
EC2P 2EJ

Direct Dial: 020 7973 3091

Our ref: P01582065

18 September 2024

Dear Mr Sehmi

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

**XL HOUSE 70 GRACECHURCH STREET LONDON EC3V 0HR  
Application No. 24/00825/FULEIA**

Thank you for your letter of 29 August 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

The current proposal would broadly conform to the same design parameters as the recently consented scheme on this site. We previously raised concerns about the proposed tall building's harmful impacts on the significance of London's historic environment, including to the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site (WHS), St Paul's Cathedral and Leadenhall Market. These impacts remain similar in the new application proposals. We recognise that a slight reduction in height and a calmer design compared to the consented scheme would help to slightly reduce its visual impact in some views.

**Historic England Advice**

Significance of the heritage assets

a) The Tower of London World Heritage Site

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



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

Telephone 020 7973 3700  
HistoricEngland.org.uk



World Heritage Site, scheduled monument, collection of listed buildings, and conservation area.

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

#### b) St Paul's Cathedral

The cathedral sits on the highest point in the City and is a world-famous landmark. It was founded in 604; the rebuilding of the previous medieval cathedral on the site was undertaken by Sir Christopher Wren from 1675-1710. His Baroque design, incorporating a great dome, is instantly recognisable and has long presided over London's skyline. It is seen amongst the spires of Wren's City churches and represents the crowning achievement of one of the most highly regarded figures of western architecture. It's symbolism of London as a City and Diocese is unrivalled; it is grade I listed.

#### c) Leadenhall Market

The market is one of the oldest in London; it was first recorded in the grounds of the Leaden Hall in 1321 and gradually became formalised following the gift of the manor to the City Corporation in 1411. The present market buildings designed by Sir Horace Jones were constructed in 1881. The arcades are top lit and the natural variations in light levels contribute to its internal character and vitality. The characterful, atmospheric building is a highly valued part of the historic City and is grade II\* listed.

### Impact of the proposals

The current proposals are broadly similar to the recently consented scheme at this site (20/00816/FULEIA). Various aspects of the design have been revisited, including the partial retention of the existing building on the site. The scale and massing remain similar, as do the harmful impacts on the settings of the heritage assets, which we note here:

#### a) Tower of London World Heritage Site

We previously found that the proposed development would cause some harm to the Tower of London because of the increase of modern development appearing in key views from the Inner Ward and these impacts remain broadly the same. Though the harm would be modest, it would contribute to the erosion of attributes of its OUV, and consequently the integrity of the WHS.

#### b) St Paul's Cathedral



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

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HistoricEngland.org.uk



A visual relationship between the Cathedral and the tall buildings of the City Cluster as two distinct forms with space between them was established as the cluster took shape in the early 2000s, and is best understood from the LVMF views from centre (15B.2) and Westminster bank (15B.1) of Waterloo Bridge. The Cathedral is set apart in the foreground and middle ground of the view, with the City Cluster forming the background to the right.

St. Paul's is the Strategically Important Landmark in the view, and the LVMF management guidance advises that new development should not dominate the cathedral or compromise its relationship with the clear sky around it. New development in the City Cluster should be of an appropriate height and of high architectural design quality.

The pinnacle of the cluster is closer to the Cathedral than the tall building at No. 20 Fenchurch Street which appears as an 'outlier' further to the right. The visual tension created by the cluster in this view of St Paul's Cathedral and on the wider character of the City is likely to increase as the mass of the cluster grows larger and it takes on greater prominence on the skyline relative to the Cathedral.

#### c) Leadenhall Market

The market is dominated on all sides by existing and consented tall buildings, and the proposal at No. 70 Gracechurch Street would not fundamentally change the visual appearance of the setting of the listed building in its townscape. We are, however, concerned that appropriate natural light needs to continue to be provided to the historic market, as the loss of natural light could harm the special interest of the listed building and have consequent effects on its future sustainability.

We recognise the opportunity here to provide public benefits, which include the creation of a permeable connection to the market and improved public realm in general. We acknowledge that better accessibility to the adjacent grade II\* listed Leadenhall Market also has the potential to improve its setting.

#### Relevant policy and guidance

##### a) The City of London Plan 2015 - 2026

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

Policy CS13: Protected Views, aims "to protect and enhance significant City and



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London views of important buildings, townscape and skylines...by...securing an appropriate setting of and backdrop to the Tower of London World Heritage Site, so ensuring its OUV.”

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

#### b) The London Plan 2021

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

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

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

#### c) The National Planning Policy Framework (NPPF)

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

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





irreplaceable resource, and should be conserved in a manner appropriate to their significance.

A robust and proportionate understanding of the significance of any affected heritage assets is required and this should be taken into account in order to avoid or minimise any conflict between the conservation of heritage assets and any aspect of a development proposal (Paragraphs 200-201).

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

### Historic England's position

We reiterate the concerns that we have previously raised about similar development proposals on this site, and the expansion of the Cluster in general, given the harm it would cause to heritage assets of the highest possible designations.

The status of the Tower of London as a World Heritage Site means that preserving that part of its significance, from which it derives its attributes of OUV, as well as its integrity and authenticity, must be given the greatest possible weight as required by the NPPF. The City's adopted policies alongside those of the London Plan provide for a robust protection of the City's historic environment and its skyline, including the Tower and Cathedral.

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

We acknowledge that the consented scheme is now a material consideration and recognise that a slight reduction in height and a calmer design compared to the consented scheme would help to slightly reduce its visual impact in some views, which we welcome. Nevertheless, the harm we have identified will need to be taken into account.

### **Recommendation**

Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage



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Historic England

Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received.

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

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

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

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

Yours sincerely

**Alexander Bowring**

Inspector of Historic Buildings and Areas

E-mail: [REDACTED]



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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.*

**Planning and Place**

Kensington Town Hall, Hornton Street, LONDON, W8 7NX

**Director of Planning and Place**

Amanda Reid



THE ROYAL BOROUGH OF  
KENSINGTON  
AND CHELSEA

Amrith Sehmi  
City of London  
Environment Department  
PO Box 270 Guildhall  
LONDON  
EC2P 2EJ

**Date:** 18/09/2024  
**My Ref:** OB/24/05734  
Your Ref:  
24/00825/FULEIA

Dear Sir/Madam,

**TOWN AND COUNTRY PLANNING ACT 1990**

**70 Gracechurch Street, LONDON, EC3V 0HR**

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

**SCHEDULE**

**Development:**

This Council is asked for its observations on an application submitted to the City of London for partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

**Site Address:**

**70 Gracechurch Street, LONDON, EC3V 0HR**

**RBKC Drawing Nos:**

OB/24/05734

**Applicant's Drawing Nos:**

**Application Dated:**

29/08/2024

**Application Completed:**

29/08/2024

**FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S)  
ATTACHED OVERLEAF**

## **CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION**

### **INFORMATIVE(S)**

1. You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see [Advice for Builders](#) on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at <http://www.rbkc.gov.uk/OB/24/05734> . If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours faithfully,

Amanda Reid  
**Director of Planning and Place**

The full report is available for public inspection on the Council's website at [www.rbkc.gov.uk/292705](http://www.rbkc.gov.uk/292705) . If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.



**From:** [Location Enquiries](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Planning Application Consultation: 24/00825/FULEIA  
**Date:** 19 September 2024 12:58:24

THIS IS AN EXTERNAL EMAIL

FAO Amrith Sehmi,

24/00825/FULEIA

Location: XL House 70 Gracechurch Street London EC3V 0HR

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

Thank you for your consultation.

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

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

Kind regards,

**Mehmet Kani | Safeguarding Engineer**

LU/DLR | Infrastructure Protection | Engineering  
Transport for London  
7<sup>th</sup> Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



Please consider the environment before printing this e-mail.

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

**From:** [PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk) <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
**Sent:** Thursday, August 29, 2024 10:07 AM  
**To:** [Location Enquiries](mailto:SMBLocationEnquiries@tfl.gov.uk) <[SMBLocationEnquiries@tfl.gov.uk](mailto:SMBLocationEnquiries@tfl.gov.uk)>  
**Subject:** Planning Application Consultation: 24/00825/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for XL House 70 Gracechurch Street London EC3V 0HR .

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

Kind Regards

Planning Administration

On behalf of

Amrith Sehmi

Environment Department

City of London

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Date: 19 September 2024  
Our ref: 487074  
Your ref: 24/00825/FULEIA



FAO Amrith Sehmi  
City of London Planning

**BY EMAIL ONLY**

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

T 0300 060 3900

Dear Sir/Madam

**Planning consultation:** Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

**Location:** XL House 70 Gracechurch Street London EC3V 0HR

Thank you for your consultation on the above dated 29 August 2024 which was received by Natural England on 29 August 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](https://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](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Richard Gibson  
Consultations Team

From: [info@thameswater.co.uk](mailto:info@thameswater.co.uk)  
To: [info@thameswater.co.uk](mailto:info@thameswater.co.uk)  
Subject: 3D Fly Planning Application - 240605/FL16A  
Date: 20 September 2024 10:40:47

THIS IS AN EXTERNAL EMAIL.

Corporation of London  
Department of Planning & Transportation  
City Hall  
London  
EC2Y 2EJ  
20 September 2024  
Dear Sir/Madam,  
Re: '8, GLACIERS WICH STREET, LONDON, EC2M 3HS

Our DfS Ref: 43849  
Your Ref: 240605/FL16A

**Water Comments**

With the information provided, Thames Water has been unable to determine the Flood water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FLOOD WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following conditions be added to any planning permission: "No development shall be accepted until confirmation has been provided that either: 1. Flood water Capacity system will be provided to serve the development, or 2. A development and infrastructure planning plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure planning plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure planning plan, or 3. All flood water network upgrades required to accommodate the additional flows from the development have been completed. Reason: 'Normal' infrastructure works may be required to accommodate the proposed development. Any infrastructure works identified will be necessary to avoid sewer flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/planning](http://thameswater.co.uk/planning). Should the Local Planning Authority consider the above recommendations inappropriate or not suitable to include in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk)) prior to the planning application approval.

With the information provided, Thames Water has been unable to determine the sewer water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SEWERAGE WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following conditions be added to any planning permission: "No development shall be accepted until confirmation has been provided that either: 1. Sewerage water capacity system will be provided to serve the development, or 2. A development and infrastructure planning plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure planning plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure planning plan, or 3. All sewer water network upgrades required to accommodate the additional flows from the development have been completed. Reason: 'Normal' infrastructure works may be required to accommodate the proposed development. Any infrastructure works identified will be necessary to avoid sewer flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/planning](http://thameswater.co.uk/planning). Should the Local Planning Authority consider the above recommendations inappropriate or not suitable to include in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk)) prior to the planning application approval.

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following conditions to be added to any planning permission: "No piling shall take place until a PILE LOG METHO 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 meter manholes, the local topography and distance between the face of the pile to the face of a pipe (see below) and approval 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 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://info.thameswater.co.uk/working-near-our-structures>. Please also visit <https://www.thameswater.co.uk/working-near-our-structures> for further information please contact Thames Water. Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk) Phone: 0800 809 3921 (Monday to Friday, 9am to 5pm) Hours: Thames Water Developer Services, Clarendon Court, Vauxton Road, Reading, Berkshire RG1 1RH

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimise the risk of damage. We'd 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://info.thameswater.co.uk/working-near-our-structures>.  
<https://info.thameswater.co.uk/working-near-our-structures> or <https://www.thameswater.co.uk/working-near-our-structures> for further information please contact Thames Water. Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk) Phone: 0800 809 3921 (Monday to Friday, 9am to 5pm) Hours: Thames Water Developer Services, Clarendon Court, Vauxton Road, Reading, Berkshire RG1 1RH

As required by Building regulations Part F paragraph 3.6, Thames Water requests that the Applicant should incorporate within their proposed protection to the property to prevent sewer flooding, by installing a passive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surge to ground level during storm conditions. If as part of the basement development a proposal to discharge ground water to the public, surface, or the natural ground (a groundwater Risk Management System) from Thames Water. Any discharge must be treated, stored in a tank and may need to be treated in a tank. Reason: The proposed works will be in close proximity to underground sewerage infrastructure. Any discharge must be treated, stored in a tank and may need to be treated in a tank. Reason: The proposed works will be in close proximity to underground sewerage infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your 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://info.thameswater.co.uk/working-near-our-structures>. Please also visit <https://www.thameswater.co.uk/working-near-our-structures> for further information please contact Thames Water. Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk) Phone: 0800 809 3921 (Monday to Friday, 9am to 5pm) Hours: Thames Water Developer Services, Clarendon Court, Vauxton Road, Reading, Berkshire RG1 1RH

Please refer to the Wholesole, Business comments, Greenwater drainage sections.

**Water Comments**

Following initial consultation, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water has contacted the developer in an attempt to agree a position on water network but have been unable to do so in the time available and as such, Thames Water request that the following conditions be added to any planning permission: No development shall be accepted until confirmation has been provided that either: all water network upgrades required to accommodate the additional demand to serve the development have been completed, or: a development and infrastructure planning plan has been agreed with Thames Water to allow development to be accepted. When a development and infrastructure planning plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure planning plan. Reason: 'The development may lead to a low water pressure and network infrastructure 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/planning](http://thameswater.co.uk/planning). Should the Local Planning Authority consider the above recommendations inappropriate or not suitable to include in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk)) prior to the planning application approval.

The proposed development is located within 15m of a strategic water main. Thames Water do NOT permit the building over or construction within 15m of strategic water mains. Thames Water requests that the following conditions be added to any planning permission: No construction shall take place within 15m of the water main. Information detailing how the developer intends to divert the water / align the development, as to prevent the potential for damage to subsurface water infrastructure, must be approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unexcused access must be available at all times to the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water mains, utility infrastructure. The works have 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://info.thameswater.co.uk/working-near-our-structures>. Please also visit <https://www.thameswater.co.uk/working-near-our-structures> for further information please contact Thames Water. Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk) Phone: 0800 809 3921 (Monday to Friday, 9am to 5pm) Hours: Thames Water Developer Services, Clarendon Court, Vauxton Road, Reading, Berkshire RG1 1RH

There are public sewers crossing or close to your development. Thames Water do NOT permit the building over or construction within 15m of water mains. If you're planning significant works near our water mains (including, but not limited to, 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://info.thameswater.co.uk/working-near-our-structures>.  
<https://info.thameswater.co.uk/working-near-our-structures> or <https://www.thameswater.co.uk/working-near-our-structures> for further information please contact Thames Water. Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk) Phone: 0800 809 3921 (Monday to Friday, 9am to 5pm) Hours: Thames Water Developer Services, Clarendon Court, Vauxton Road, Reading, Berkshire RG1 1RH

Thames Water recommends the following information be attached to this planning permission. Thames Water will aim to give customers with a minimum provision of 15m head (approx. 1 bar) and a flow rate of 10 litres per second at the point where it leaves Thames Water pipes. The developer should detail account of this minimum provision in the design of the proposed development.

The proposed development is located within 15m of a strategic water main. Thames Water requests that the following conditions be added to any planning permission: No piling shall take place until a PILING LOG METHO 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 meter manholes, the local topography and distance between the face of the pile to the face of a pipe has been submitted 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://info.thameswater.co.uk/working-near-our-structures>. Please also visit <https://www.thameswater.co.uk/working-near-our-structures> for further information please contact Thames Water. Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk) Phone: 0800 809 3921 (Monday to Friday, 9am to 5pm) Hours: Thames Water Developer Services, Clarendon Court, Vauxton Road, Reading, Berkshire RG1 1RH

**Supplementary Comments**

The accompanying documents contain a flood risk & drainage strategy, there is nothing to confirm plans of discharge and split of discharge (if applicable) for both FW & SW, and this is required to confirm if there is sufficient capacity for the proposed development.

**Water Utility**

Development Planning Department

Thames Water

Maple Lodge 37th,  
Datchet W5,  
Buckinghamshire,  
W5 9JY

Tel: 01295 2677998  
Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk)

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<https://info.thameswater.co.uk/working-near-our-structures> or <https://www.thameswater.co.uk/working-near-our-structures> for further information please contact Thames Water. Email: [devplan@thameswater.co.uk](mailto:devplan@thameswater.co.uk) Phone: 0800 809 3921 (Monday to Friday, 9am to 5pm) Hours: Thames Water Developer Services, Clarendon Court, Vauxton Road, Reading, Berkshire RG1 1RH

We're happy to help by 24/7

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Corporation of London Department of Planning & Transportation Our DTS Ref: 63849 Your Ref:  
PO Box 270 Guildhall London EC2P 2EJ 24/00825/FULEIA  
20 September 2024

Dear Sir/Madam

**Re: 70, GRACECHURCH STREET, LONDON, EC3M 7HB**

### **Waste Comments**

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

With the information provided Thames Water has been unable to determine the waste water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for SURFACE WATER drainage, but have been unable to do so in the time available and as such Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Surface water capacity exists off site to serve the development or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Or 3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](https://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important

that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

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

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

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

## **Water Comments**

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

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

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>

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1



bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

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

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

### **Supplementary Comments**

The accompanying documents contain a flood risk & drainage strategy, there is nothing to confirm points of discharge and split of discharge (if applicable) for both FW & SW, and this is required to confirm if there is sufficient capacity for 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](mailto:devcon.team@thameswater.co.uk)



Your Ref:  
Our Ref: 24/02748/OBS



**Amrith Sehmi**

City Of London  
PO Box 270  
Guildhall

23rd September 2024

**RE: REQUEST FOR OBSERVATIONS**

Dear Amrith Sehmi

**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: 24/02748/OBS Date of Application: 29.08.2024 Date of Decision 23.09.2024

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: 'Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.', at: XL House 70 Gracechurch Street, London, EC3V 0HR (24/00825/FULEIA).
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**Approved Plans**

Cover letter dated 29/08/2024

**Conditions**

- 1 London Borough of Lambeth raises no objections.

**Lambeth Planning**  
PO Box 80771  
London  
SW2 9QQ

Telephone 020 7926 1180  
[www.lambeth.gov.uk](http://www.lambeth.gov.uk)  
[planning@lambeth.gov.uk](mailto:planning@lambeth.gov.uk)

Notes to Applicant:

Yours sincerely



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

Date printed: 23rd September 2024

Amrith Sehmi  
Development Division  
Corporation of the City of London  
Sent via email only

23 September 2024

Dear Amrith,

Letter Responding to Planning Application: 70 Gracechurch Street (ref:  
24/00825/FULEIA)

### Introduction

Further to review of the application documents and with reference to pre-application discussions, I write on behalf of the Chapter of the Cathedral Church of St Paul in London, referred to hereinafter as the Cathedral, regarding the proposals for the development at 70 Gracechurch Street.

### Background

We thank the project team for reaching out regarding pre-application discussion on the scheme and for their time and thoughtful presentation. We are in receipt of additional information they have shared.

The proposals include the construction of a new tall building to 70 Gracechurch Street, presenting a change from the building previously consented on this site, including a new design approach which proposes to retain the ground floor podium.

Given the fact the submission scheme has not fundamentally changed form that seen at pre-application, our comments below echo those previously issued.

### Planning Policy Context

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

Surveyor to the Fabric



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

City of London Local Plan 2015:

- Core Strategic Policy CS10: Design

- Policy DM 10.1 New Development

- Policy DM 10.4 Environmental Enhancement

- Core Strategic Policy CS12: Historic Environment

- Policy DM 12.1 Managing change affecting all heritage assets and spaces

- Core Strategic Policy CS13 Protected Views

- Core Strategic Policy CS14 Tall Buildings

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

The London Plan 2021:

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

- Policy D4: Delivering Good Design

- Policy D9: Tall Buildings

- Policy HC1: Heritage Conservation and Growth

- Policy HC3: Strategic and Local Views

- Policy HC4: London View Management Framework

National Planning Policy Framework:

- Chapter 12: Achieving well designed places

- Chapter 16: Conserving and enhancing the historic environment

Comment

Given the location of the scheme, potential visual and heritage impacts to the Cathedral from the Processional Way are of the greatest concern. As previously raised with regards to the design development of the extant consent for 70 Gracechurch Street, it is widely understood that Chapter

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would be strongly opposed to any development proposals that impinges on kinetic views of the Processional Way, which - if there were any visibility – would have the potential to cause a high level of visual impact and subsequent heritage harm to this Grade I listed building of exceptional significance.

We therefore welcome the assurances within the application pack that the proposals now brought forward will not be visible in these views – including confirmation that there is absolutely no ‘technical visibility’ so often discussed in relation to similar schemes. We are assured by the documentation that the scheme will be invisible.

An additional pre-application meeting held Thursday 9<sup>th</sup> May was of great assistance with regards to understanding how views and impacts on the Processional Way are today assessed and measured with the technology now available. We understand that a more accurate ‘worst case scenario’ is now taken for testing, with viewpoints taken 30cm from the building line in an approximation of how the public interact with this space. We understand that the design changes to the upper levels of the scheme have ensured this ‘cloak of invisibility’ in the new design.

We welcome that the proposed scheme appears to improve on that previously consented in this regard, in-part using the much-improved assessment and visualisation techniques.

We would still stress the importance of total invisibility within any views along the Processional Way, which if achieved avoids all adverse visual impact and heritage harm. We request that this is absolutely confirmed by Officers in relation to the proposals, beyond the scenario presented.

The proposals will also be appreciable in views from the southeast where the Cathedral is visible. These include LVMF view 15B.2, where the cluster appears to the right-hand side of the Cathedral.

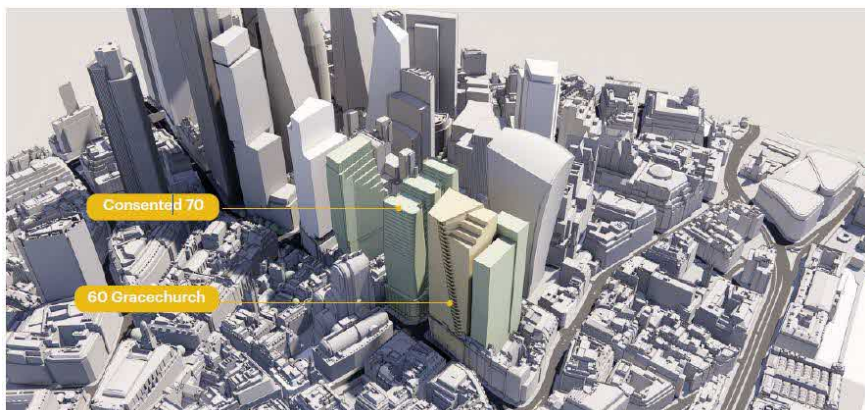
LVMF guidance for this view states that ‘New tall buildings should seek to complement the City’s eastern cluster of tall buildings with buildings of a height appropriate to their site and of high architectural design quality.’ and that ultimately proposals would maintain the visual prominence of the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

In terms of built heritage, ill-judged development at the site as appreciable in views such as 15B.2 has the potential to cause heritage harm through unacceptably increasing the visual presence of the cluster as a whole, thus challenging the pre-eminence of the Cathedral on the London skyline and the historic and architectural special interest of St Paul's as a Grade I listed building.

From recent experience we understand the rate of change occurring within the cluster and those buildings that have been consented between the central core of the cluster and the 'Walkie-Talkie' – 20 Fenchurch Street.

We note from the additional pre-application information that the emerging proposals are marginally lower in height than the consented scheme (though would seek this to be confirmed by the project team for the submission scheme). We welcome the decrease in height, even if minor, as this appears to start to deliver a recognition that shaping the overall form of the cluster is a valid concern in terms of urban design. We have concerns regarding the height and massing of tall buildings in this area, especially with regard to the nearby emerging scheme for 60 Gracechurch Street.

The cumulative baseline, including the recently submitted 60 Gracechurch Street, is somewhat depicted in the application documents. However, given the proximity of the two schemes and the fact that detailed information is now available for both 60 and 70, we would welcome rendered AVRs of both to illustrate the cumulative impact of the proposals – for both schemes. (We would draw Officers attention to our response to 60 Gracechurch Street recently issued, as we suggest that both schemes have an inter-relationship that should be acknowledged).



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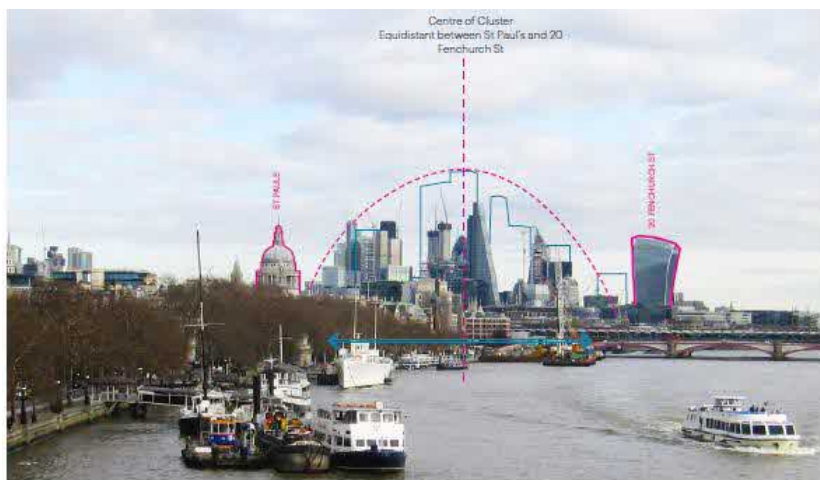


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We would hope to see rendered views of both 60 and 70 Gracechurch Street together in context given their proximity.

We consider that new proposals in this area should not attempt to use the bulk and mass of 20 Fenchurch Street as a 'datum', thus creating a high 'wall' of built form. Instead we would recommend that the built-form should diminish in height between the centre of the cluster and its edge (as outlined within the application material below). Any decrease and downward gradation in height and massing as part of a considered urban whole should therefore be encouraged.



The current and adopted policy and design principles on which the cluster has been managed, which this development and others on Gracechurch Street markedly changes

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This is a broader urban design and compositional point that we have iterated as part of our response to 60 Gracechurch Street and directly with the City planning team. However, it is concerned with the context that this project and others must establish, given the rate and co-incidence of several major co-related development proposals.

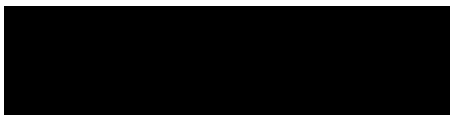
### Conclusion

We welcome the removal of this development from any visible impact on the Processional route and would seek this is absolutely confirmed in all such views.

Our view is that decision-makers should examine closely the overall built-form of this emerging expansion of the cluster and consider how to judge regulate the relationship of this development in relation to proposed neighbours.

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

Yours sincerely,



Surveyor to the Fabric

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

Directors:  
Oliver Caroe RIBA AABC  
Mark Hammond RIAS RIBA AABC

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

Surveyor to the Fabric



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**London Borough of Hammersmith & Fulham**

Development Management, Place Department  
Hammersmith Town Hall, King Street, London W6 9JU

Tel: 020 8753 1081  
Email: [planning@lbhf.gov.uk](mailto:planning@lbhf.gov.uk)  
Web: [www.lbhf.gov.uk](http://www.lbhf.gov.uk)



Amrith Sehmi  
City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

**25th September 2024**

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Applicant:  
Amrith Sehmi  
City Of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ

Application Reference: **2024/02157/OBS**

Registered on: **30th August 2024**

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**Town and Country Planning Act 1990**

**NO OBJECTION RAISED**

**Location and Description:**

**XL House 70 Gracechurch Street London EC3V 0HR**

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b))

development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

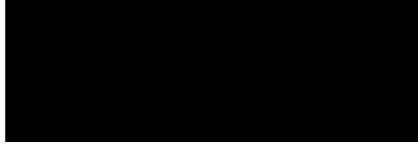
This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact [hello@triumenv.co.uk](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118.

Drawing Nos:

**Particulars of Decision:**

**This Council raises no objection to the proposed development.**

Chief Planning Officer of Place  
Department: Joanne Woodward



**Joanne Woodward Chief Planning Officer of Place Department**  
Duly authorised by the Council to sign this notice.



[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

30 September 2024  
Crossrail Ref: CRL-IP-3276

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

Dear Amrith Sehmi,

**24/00825/FULEIA : XL House 70 Gracechurch Street London EC3V 0HR**

*Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.*

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 29 August 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](mailto:CRL_Safeguarding@tfl.gov.uk)

Yours sincerely,

**Will Orlik**  
Safeguarding Officer (Elizabeth line)  
[CRL\\_Safeguarding@tfl.gov.uk](mailto: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](mailto: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).

Amrith Sehmi  
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](http://www.towerhamlets.gov.uk)

**Application Number:** PA/24/01511  
**Your ref:** 24/00825/FULEIA

**Enquiries to:** Eleanor Downton  
**Tel:** [REDACTED]  
**Email:** [REDACTED]

1 October, 2024

Dear Amrith Sehmi,

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

**OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY**

**Location  
Proposal**

XL House 70 Gracechurch Street London EC3V 0HR  
Observation requested by City of London for partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact [hello@triumenv.co.uk](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118

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

1. **CITY OF LONDON REFS: 24/00825/FULEIA**

**TOWER HAMLETS REF: PA/24/01511** .



The best of London in one borough

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

**ADDRESS: XL House 70 Gracechurch Street London EC3V 0HR**

**PROPOSAL:**

Observation requested by City of London for partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

**COMMENTS:**

These proposals are for a new mixed use tall building development comprising ground plus 32 storeys (on the intersection of Gracechurch Street and Fenchurch Street. The site is within the Easter (City) Cluster and within London's Central Activities Zone (CAZ).

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

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

London Plan Policy HC2 sets out that development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, 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 Outstanding Universal Value, or the authenticity and integrity of their attributes.

The Outstanding Universal Value (OUV) of the WHS is based on, amongst other things, a demonstration and symbol of Norman power, reflecting the last military conquest of England. The strategic location of the site in its

prominence is the townscape is a key component of this value.

In the submitted supporting document for the application, ES Volume II: Townscape Heritage and Visual Impact Assessment July 2024, the impact of the proposed building on different views of and from Tower Bridge and Tower of London, is demonstrated.

Development within the existing tall building cluster of the City of London is clearly visible within the setting of the World Heritage Site as seen in views 7, 9, 10A, 10B, 10C and 10D. The impact on the Tower must be given special attention commensurate to its important designation. The Tower should not be dominated by new development close to it.

The proposed development raises concerns about the degree of visual separation between the eastern cluster and the Tower of London. This was similarly raised in response to a previous development on the site, COL ref 20/00816/FULEIA.

City of London Corporation should consider whether views 9, 10b and 13 should be provided as rendered views, as the proposed development is clearly visible alongside the massing of existing developments in the area.

Based on the views reviewed, it is concluded that the proposed building would exacerbate the existing harm caused to the setting of the Tower of London, and numerous other heritage assets within its context, by the tall buildings which form the city cluster. The proposal would expand the width of the cluster and therefore its perceived mass in the setting of the Scheduled Ancient Monument. As similarly raised in objection to the proposed development at 60 Gracechurch Street (24/00743/FULEIA), LBTH is concerned that the Tower of London WHS has already reached its limit in terms of visual intrusion and expresses concern about the continuing and seemingly iterative process of diminishing the expanse of clear sky in backdrop views of the WHS.

#### **EIA STATEMENT:**

LBTH were previously consulted upon and provided a response to the EIA Scoping Opinion Request for the Proposed Development at the subject application site in June 2024. LBTH consultation responses to the Scoping Opinion Request have been referenced below where not addressed.

With reference to Schedule 4(2) of the EIA Regulations, the ES includes an

assessment of alternatives and design evolution in Chapter 3. Whilst LBTH expected to see more explicit reference to the consideration of alternative scale and massing when it comes to effects on the Tower of London World Heritage Site and Scheduled Monument, associated listed buildings and Tower Bridge Grade I listed building and their settings, it has been noted that consideration to these receptors has been given through LVMF views as noted in paragraph 3.22 of Chapter 3.

The Environmental Statement (ES) concluded that the following aspects and matters that could affect LBTH will result in insignificant residual effects: Climate Change and Greenhouse Gas, Solar Glare and Built Heritage. The following aspects and matters that could affect LBTH will result in significant adverse effects, however, none of the affected receptors are located within LBTH: Noise and Vibration, Daylight, Sunlight, Overshadowing and Light Pollution, and Wind Microclimate. With respect to other aspects and matters that could affect LBTH including Townscape and Visual Impact Assessment, and Built Heritage, the ES concluded a single significant effect on LBTH relating to View 7: Tower Bridge Approach – north, which would be moderate beneficial.

In the consultation response to the Scoping Opinion Request, LBTH listed cumulative schemes within their jurisdiction that should be taken into account in the assessments. It is unfortunate to see that none of those have been considered. City of London Corporation and the Applicant are still advised to refer to these, noting that a planning application has now been submitted relating to 1-10 Bishops Square (One Spitalfields) site under LBTH reference PA/24/01198, a site which sits within the indicated 1km radius identified by the Applicant.

A Townscape, Built Heritage and Visual Impact Assessment (TBHVIA) has been provided within Volume 2 of the ES. Part 1 of the TBHVIA assesses the likely significant effects of the Proposed Development on townscape and visual receptors. No townscape receptors have been identified within LBTH.

The following visual receptors within LBTH have been identified and considered in the assessment, noting that Views 7, 10A, 10C and 10D have been provided as render images while remaining ones are wireline in TBHVIA:

- View 7: Tower Bridge Approach – north
- View 8: Tower Bridge Approach looking over the workshop
- View 9: Tower Wharf – east of Henry VIII's Watergate
- Views 10A, 10B 10C and 10D within the Tower of London



- View 13 LVMF 10A.1 | Tower Bridge: the north bastion

Limited discussion on demolition and construction effects has been provided in paragraphs 6.1-6.5 of Section 6 of Part 1 of the TBHVIA. No details of the effects on individual receptors have been provided.

From the above list of visual receptors, only View 7: Tower Bridge Approach – north will experience a significant effect amounting to moderate beneficial, both during operational and cumulative scenarios.

LBTH welcomes the use of winter photography for the relevant views where necessary so that full impact from the Proposed Development can be understood. However, the TBHVIA concludes different effects conclusions for View 10A within the Tower of London stating that there would be no effect during spring, summer and autumn and negligible-minor neutral effect during winter. It is considered that all effects should be reported on a worst-case basis and as such it is not considered necessary to split the effects. Nonetheless, the stated effect during winter is agreed.

Appendix A provides details on supplementary non-verified views. LBTH Borough Designated View 2 View from Wapping Wall bridge to St Paul's Church (As shown on Figure 6 of Tower Hamlets Local Plan 2031: Managing Growth and Sharing the Benefits (2020) has been included as View A10, which is welcomed. The images produced demonstrate that the Proposed Development would not be visible from this view.

Part 2 of the TBHVIA assesses the likely significant effects of the Proposed Development on above-ground heritage assets. For receptors within LBTH, this includes the Tower of London World Heritage Site (WHS) and listed buildings within it, the Tower Conservation Area and grade I listed Tower Bridge. The Tower of London's designation as Scheduled Monument is only mentioned in the TBHVIA, however, it appears that no assessment on such particular designation has been carried out.

The ES concluded that there would be no effects during demolition and construction, and operation on any built heritage receptors within LBTH.

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

Therefore, in terms of the ES, LBTH has no objections in relation to the

aspects listed, on the basis that the ES is considered to be adequate by City of London Corporation in accordance with the EIA Regulations 2017 (as amended), and the methodology adopted is appropriate and does not under or overstate the assessment of effects. City of London Corporation must consider whether further information is required in accordance with Regulation 25 of the EIA Regulations.

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**

Tel: 020 8921 5222



Amrith Sehmi  
City of London  
PO Box 270  
Guildhall  
London  
EC2P 2EJ  
**24/2331/K**

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

01 October 2024

## DECISION NOTICE –RAISE NO OBJECTION

Dear Sir/Madam,

**Site:** XL House 70 Gracechurch Street London EC3V 0HR  
**Applicant:** Amrith Sehmi City of London  
**Proposal:** Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.  
**Drawings** Consultation Letter from the City of London, dated 29.08.2024

I refer to your letter dated 29 August 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

# SOUTHWARK COUNCIL

LBS Registered Number: 24/OB/0038

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



www.southwark.gov.uk

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LBS Reg. No.: 24/OB/0038

Date of Issue of Decision: 11/11/2024

Your Ref No.:

---

Applicant Amrith Sehmi City Planning  
City of London

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

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking,

At XL House 70 Gracechurch Street London EC3V 0HR

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

Signed: *Stephen Platts*

Director of Planning and Growth



Historic England

Amrith Sehmi  
Planning Administration  
Environment Department  
City of London Corporation

Your Ref: 24/00825/FULEIA  
Our Ref: 223336

Contact: Helen Hawkins



17 September 2024

Dear Amrith,

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

**XL House 70 Gracechurch Street London EC3V 0HR**

*Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.*

**Recommend Archaeology Conditions**

Thank you for your consultation received on 29 August 2024.

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

**Assessment of Significance and Impact**



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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

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

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

The planning application was accompanied by an Environmental Statement which contained an archaeology chapter and archaeological baseline as an appendix. Whilst the archaeology submission is generally robust and informative, it is disappointing that there was no discussion of the public benefits of the scheme in regards to archaeology. There will be some benefit from use of images of the history of the site and the forum in the proposed digital video wall.

The archaeology baseline highlights that the site lies over the first and second Roman fora. Although the site has been extensively excavated previously, the design of the current building allowed for preservation in situ of some of the Roman fora deposits outside the deep basements. The preservation of these remains will be continued within the new development. Potential impacts on archaeological remains will be limited to two new piles in the south-eastern part of the site. If archaeological remains of significance are identified within the new pile locations, there is scope to move them.

The remains currently preserved on the site are located within a 'conservation structure'. As part of the development, this structure should be checked to ensure it remains robust and that the archaeology is not deteriorating. During the construction phase, the areas to be preserved in situ should be demarcated on site and communicated to all sub contractors.

#### 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.



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## Recommendations

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

I therefore recommend attaching three conditions as follows:

- Condition 1** No demolition or development shall take place until a written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and
- A. The programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
  - B. details of the foundation design, demolition and construction method, fencing, signage and other control measures to protect the archaeological remains currently preserved in-situ.
  - C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

**Informative** The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. The land to be included in the WSI should cover all areas of potential archaeological survival but exclude the existing triple basement. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

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

I envisage that the archaeological fieldwork would comprise the following:



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

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

Archaeological excavation should be carried out in the areas of the two new south-eastern piles, pile caps (depending on proposed depth) and any pile probing areas in advance of construction of the piles. Should significant archaeology be encountered then the pile will need to be moved and the new location excavated to inspect for archaeology. For the piles proposed in the previously excavated area, a watching brief should be carried out to confirm that archaeology does not survive in this area.

## Preservation in-situ

The areas of the preserved remains should be suitably fenced and their location incorporated into onsite method statements in order to prevent impact in these areas. If any impact is proposed, consent will need to be obtained from GLAAS for the works before they take place.

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



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Telephone 020 7973 3700 Facsimile 020 7973 3001

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# Memo

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



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

Date 22 November 2024  
Our Ref 24/05092/NPLN  
Your Ref 24/00825/FULEIA

Subject XL House 70 Gracechurch Street London EC3V 0HR

**Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application. Electronic copies of the ES can also be issued by Trium Environmental Consulting LLP; for further details please contact [hello@triumenv.co.uk](mailto:hello@triumenv.co.uk) or Tel: +44 (0) 203 887 7118.**

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

The roof terraces on hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day, other than in the case of emergency or for maintenance.

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

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

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

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

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

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

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

The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The

sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.

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

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

Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the commercial kitchen use takes place.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

(a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation. Emergency plant will be expected to meet this criterion.

(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.

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

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

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

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

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

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

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

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

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

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property

and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's current guidance.

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

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

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

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

approved amendments thereto as may be agreed in writing by the Local Planning Authority.

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

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

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

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

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

Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

M33 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:





From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: 24/00825/FULEIA, 70 Gracechurch Street - TfL comments  
Date: 02 December 2024 09:54:50  
Attachments: [Outlook-xowatbli.png](#)  
[70 Gracechurch Street, City of London, TfL Pre Application Advice.pdf](#)

THIS IS AN EXTERNAL EMAIL

Dear City of London planning,

Please find below TfL Spatial Planning full formal comments on 70 Gracechurch Street. I also attach our Pre Application advice to the Applicant from 16 April 2024.

**Borough Reference:** 24/00825/FULEIA

**Location:** 70 Gracechurch Street

**Proposal:** Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement which is available for inspection with the planning application.

Thank you for consulting TfL. In regard to the above application, TfL have the following comments:

Gracechurch Street (A1213) forms part of the Transport for London Road Network (TLRN). TfL is the highway authority for the TLRN and is therefore concerned about any proposal which may affect the performance and/or safety of the TLRN.

### ***Trip Generation***

The applicant has provided trip rates for lunchtime peak periods between 1pm-2pm – this is supported. The applicant has also clarified that the sites selected within the TRICS database are based on relevant existing office developments within the City of London.

### ***Pedestrian Comfort Levels (PCL)***

As requested in TfL's pre-application comments, the applicant has provided further assessment of PCLs, with most expected PCL results a minimum of B+.

Further assessment of PCLs should be provided prior to determination. The applicant has assessed only one arm of the junction (see TA Figure 5.3). A PCL assessment is

needed for all four arms of the junction, such as Lombard St with Gracechurch St and Fenchurch St. It is welcomed that for the assessed junction arm of Gracechurch St and Fenchurch St, the applicant has proposed mitigation for the worst-case scenario score of C+.

The applicant should also provide a PCL assessment of the pit lane and the footway gantry temporary arrangements proposed for construction. This could be secured by pre-commencement condition. The applicant has confirmed that 10% of the pedestrian trips would be diverted on to the new pedestrian route - This is accepted by TfL.

### *Highway Improvements*

The new pedestrian link proposed to join Leadenhall Market via Ships Tavern Passage to Fenchurch Street and A10 Gracechurch Street must be publicly accessible 24 hours a day and 7 days a week and secured by Section 106 (S106).

For the viewing gallery, access is proposed via Gracechurch Street. TfL has requested and recommended access from Ships Tavern Passage instead of the A10. This comment is reiterated from pre-application discussions and should be addressed.

TfL introduced a Traffic Order on the A10 Gracechurch Street corridor in January 2022 which became permanent in July 2023. The order restricts through traffic on parts of the corridor from 7am and 7pm, Monday to Friday. Along with temporary improvements to the corridor implemented as part of the COVID-19 pandemic Streetspace for London programme, this project has improved conditions for pedestrians, cyclists and bus passengers.

In line with Healthy Streets and the Mayor's Vision Zero target to eliminate all deaths and serious injuries from London's transport system by 2041, a contribution is sought towards TfL's permanent works along the A10 corridor, which will both complete and enhance the recent improvements already delivered.

Data collected during the experimental phase of TfL's A10 improvements showed that it resulted in faster bus journey times and safer cycle journeys. Through traffic, including taxis, is now restricted on parts of the corridor between 7am and 7pm, Monday to Friday.

Wider footways were created at points along the route, and further long-term safety and public realm improvements are now being planned for future delivery by TfL, in partnership with the City Corporation as the highway authority for adjoining roads.

Based on a net uplift in floorspace proposed in this application that we estimate to be 52,108 sq m GIA, a £800,900 s106 contribution to the TfL A10 corridor improvement scheme is sought, index linked to the BCIS General Building Cost

Index, not the Retail Price Index.

The payment of £800,900 to TfL will be required prior to commencement, or alternatively the completion of a s278 Agreement with TfL for certain works prior to commencement would be acceptable instead. This can be reflected in the s106 and s278 agreements.

In the event a s278 Agreement for the s278 works has been entered into prior to commencement, the applicant must complete the s278 works prior to occupation.

The TfL highway improvements requested should include but not be limited to:

- safety improvements to junctions in the vicinity of the Site;
- measures in the vicinity of the Site to improve safety and security at night and reduce fear of crime;
- pedestrian corridor improvements in the vicinity of the Site; and
- any other strategic highway mitigation works reasonably necessary to make the development acceptable

The s278 Works defined should include but not be limited to:

- pit lane on A10 Bishopsgate to support construction of the development (subject to agreement of this requested contribution or alternative equivalent s278 works through further discussion and negotiation with TfL)
- footway improvements to North East corner of the Gracechurch Street / Fenchurch Street / Lombard Street junction
- potential signal retiming at same junction
- supporting highway modelling if necessary
- Road Safety Audits (RSAs)
- following TfL Streetscape Guidance with approval from TfL
- ensuring sufficient space along the A10 for Bus operations and for Cyclists to pass Buses and other traffic safely on the near side both northwards and southwards
- co-ordination with 60 Gracechurch Street development's highway works
- improving the crossings and footways that connect to the North West corner of the Gracechurch Street / Fenchurch Street / Lombard Street junction

To ensure the development complies with London Plan policies T1 (Strategic approach to transport); T2 (Healthy Streets); T4 (Assessing and mitigating transport impacts), T5 (Cycling), D8 (Public realm) and D9 (Tall buildings)

### ***Access***

The applicant has conducted a Road Safety Audit (RSA) on the vehicle access from Lime Street; as this impacts local authority highway it is for the City Corporation to consider. The applicant should confirm if the RSA followed TfL RSA procedure SQA-0170.

Pedestrian access is proposed to be from Ship Tavern Passage to the north and Fenchurch Street/Gracechurch Street to the south.

Further work is required including relocation of the proposed entrance to the viewing platform from A10 Gracechurch Street to Ship's Tavern Passage.

### *Car parking*

TfL welcomes that the proposal would be car free, with 1 blue badge parking space in line with London Plan Policy T6. The bay should be marked as a disabled persons parking bay in line with Policy T6. A pre-booking system should be in place to ensure the space is effectively managed. The electric vehicle charging point (EVCP) for this space is welcomed.

### *Cycle parking*

#### *Access:*

Cycle parking is proposed to be accessed on the eastern side of the site via Lime Street to access the stairs, or the open space to the south-east of the site for access to the lift. Long stay will be located at basement levels 1 and 2 with associated end of trip facilities, and short stay will be located within the site boundary and at basement level B1.

The applicant should clarify signage and management measures proposed for short stay cycles left overnight, as these may conflict with the delivery and servicing vehicles.

TfL has previously requested the size of the cycle lifts and stairwell gradient to ensure compliance with London Cycle Design Standards (LCDS). This should be provided urgently.

#### *Quantum:*

The proposed development would provide 1,106 long-stay cycle parking spaces and 65 short-stay spaces in line with London Plan Policy T5.

The applicant has clarified that 5% of long stay cycle parking spaces are capable of accommodating larger/adapted cycles, and 11% of short-stay spaces are adaptive as per TfL's requests.

3 cargo bike spaces would be provided at grade by the pop-up market and in public space to the south-east of the site. 10 public cycle spaces will be re-provided on Lime Street on City Corporation highway, which is also welcomed.

### *Design*

The applicant has provided further information on the design of the cycle parking spaces - the proposed mix of two tier, Sheffield stands and adaptive spaces is in line with guidance in the London Cycling Design Standards. The applicant should clarify that a minimum aisle width of 2500mm beyond the lowered frame would be provided.

### *Cycle hire*

£100,000 only is now requested to part-fund a new docking station in Rood Street. £100,000 previously also requested should be allocated instead to the A10 corridor improvement project mentioned elsewhere.

The TA has set out that a financial contribution to a new Santander cycle hire docking station is acceptable, as per TfL's pre-application request. In discussion with TfL, Rood Lane has been identified as the best potential location, with City Corporation support.

### *Public realm and healthy streets*

The development is designed to connect well with Leadenhall Market and surrounding pedestrian desire lines, strengthening the site's connectivity and enhancing permeability.

The proposed public realm enhancements and pedestrian access are supported in line with London Plan Policies T2 Healthy Streets and D8 Public realm. The proposal to realign the junction between Philpot Lane and Lime Street and widen footways on both roads is also supported.

### *Deliveries and servicing*

Access for deliveries and servicing vehicles is proposed at grade with four loading bays, and the loading area is proposed to be accessed from Lime Street with vehicles entering and exiting the site in forward gear.

TfL welcomes the proposal to consolidate 50% of all deliveries, in line with London Plan Policy T7. It is proposed to have 54 daily delivery and servicing vehicle trips, with 7 in the peak hour.

TfL has previously requested that night-time deliveries occur only, and restrictions outside the hours of 10pm to 6am are now agreed. The Delivery and Servicing Plan (DSP) should be secured by a pre-occupation condition and discharged in consultation with TfL as an affected highway authority for the TLRN.

### *Construction and demolition*

The applicant has provided an outline Construction Logistics Plan (CLP). Due to the sensitive location, TfL would prefer a full CLP prior to determination.

The applicant has clarified the construction working hours would be 8am-6pm Monday-Friday, 9am-2pm Saturday, and no works on Sunday or bank and public holidays.

We have previously advised that a pit lane along Gracechurch Street is not supported. This should be discussed further with TfL prior to determination.

The current CLP proposes that in later stages after the main Fenchurch Street pit lane is not in use, Lime Street will become the main delivery point. The applicant is required to provide a more detailed construction vehicle trip generation forecast to help us understand any spare capacity available across the construction programme in the pit lane on Lime Street.

Swept path analysis showing construction vehicles accessing the loading bay in forward gear has been provided.

Notwithstanding final agreement of its acceptability, a Stage 1 RSA and Designer's Response for the A10 pit lane prior to determination must be provided.

The proposed DSP commits to engage suppliers who are Fleet Operator Recognition (FORS) members. All construction vehicles should be FORS Silver or Gold accreditation. The applicant has confirmed all construction vehicles will also be compliant with CLOCS.

The applicant should confirm end of trip facilities and temporary cycle parking will be made available to construction workers.

## Summary

- PCL assessment for all four arms of the junction, and PCL assessment for pit lanes to be secured by pre-commencement condition.
- Public access to new pedestrian link to be secured by Section 106 (S106).
- Discussion with TfL regarding the proposed access to the viewing gallery; access from the A10 is not supported.
- £800,900 s106 contribution to the TfL A10 corridor.
- Work with 60 Gracechurch Street development's highway works:
- Footway improvements to North East corner of the junction.
- May include improvements to both crossings connecting with the North West corner
- Confirmation that the Lime Street access RSA followed TfL RSA procedure SQA-0170.
- Provide a Stage 1 RSA and Designer's Response for the A10 pit lane prior to determination.
- Confirm signage and management measures proposed for short stay cycles left overnight
- Confirm size of the cycle lifts and stairwell gradient to ensure compliance with

LCDS.

- Clarify that a minimum aisle width of 2500mm beyond the lowered frame would be provided for cycle stands.
- £100,000 for new TfL Cycle Hire docking station on Rood Lane.
- DSP secured by a pre-occupation condition, discharged in consultation with TfL
- Full CLP secured by pre-commencement condition, discharged in consultation with TfL committing to Fleet Operator Recognition Scheme (FORS) and Construction Logistics and Community Safety (CLOCS) standards.
- CLP to provide detailed construction trip generation forecast for pit lanes proposed and minimise A10 impact
- Provide end of trip facilities and temporary cycle parking for construction workers.

Thanks and kind regards,

**Gavin McLaughlin MSc; MA; MRTPI**

**Spatial Planning | City Planning**

Construction Logistics Planning (CLP) - Advanced, CIHT/TfL-accredited course

[REDACTED]

[REDACTED]

PLEASE CONFIRM ALL MEETINGS BY CALENDAR

TfL Spatial Planning is committed to equity, diversity and inclusion and we strive to ensure that Londoners are fully represented in the planning process.



For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit: <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

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**From:** [Planning Applications](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
**Date:** 08 January 2025 16:52:50

---

THIS IS AN EXTERNAL EMAIL

Official

Good afternoon

XL House 70 Gracechurch Street London EC3V 0HR.

Please be advised that this address is not in the Wandsworth Council borough.  
We are therefore unable to assist.

Best Regards

**Planning Technical Support**  
Planning Department

**Chief Executive Directorate**  
Serving Richmond and Wandsworth Councils  
[www.wandsworth.gov.uk](http://www.wandsworth.gov.uk)

---

**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Sent:** 08 January 2025 15:26  
**Subject:** Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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**From:** [PlanningGatewayOne](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA (Our ref pgo-6466)  
**Date:** 09 January 2025 08:22:45  
**Attachments:** [image001.png](#)

---

THIS IS AN EXTERNAL EMAIL

Dear Sir/Madam,

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

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

Relevant building is defined as:

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

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

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

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

Once again thank you for your email, if you require further advice with regards to this application, please do not hesitate to contact the Planning Gateway One team quoting our reference number (pgo-6466) in all future correspondence.

Kind regards

*Lisa Gaskill*

**Operational Support for Planning Gateway One**  
Health and Safety Executive | Building Safety Division  
[PlanningGatewayOne@hse.gov.uk](mailto:PlanningGatewayOne@hse.gov.uk)



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**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Sent:** Wednesday, January 8, 2025 3:26 PM  
**Subject:** Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

**Planning Administration Team**

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**From:** [Devcon Team](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
**Date:** 09 January 2025 14:12:32  
**Attachments:** [image001.png](#)

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THIS IS AN EXTERNAL EMAIL

Good Afternoon,

Please note that we provided formal response in August 2024.

I can't see any new additional information in regards to the above planning application, therefore our previous comments still stand.

Kind Regards,

**Saira Irshad**

Development Planner  
Asset Management & Engineering

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

Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ



It's everyone's water

---

**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Sent:** 08 January 2025 15:26  
**Subject:** Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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LPA Ref: 24/00825/FULEIA

London City Airport Ref: 2025/LCY/005

Date: 09/01/2025

Dear Amrith Sehmi,

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

<b>LPA Reference</b>	24/00825/FULEIA
<b>Proposal</b>	Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development. This application is accompanied by an Environmental Statement
<b>Location</b>	XL House 70 Gracechurch Street London EC3V 0HR
<b>Borough</b>	City of London
<b>Case Officer</b>	Amrith Sehmi

In our previous response, under reference number 2024/LCY/198, an aviation obstacle lighting condition was applied to this development. However, on further review of the proposed elevation, we now realise that the building will not infringe any safeguarding surfaces associated to London City Airport. Therefore, as the building will no longer be classed as an obstacle, there is no requirement for aviation obstacle lights to be applied and the previous condition can now be removed.

Based on the latest consultation, we have the following comments to make.

London City Airport's response must change to an objection unless the following condition is applied to this planning permission.

### **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 Instrument Flight Procedures, therefore they must be assessed before construction.

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

### **CAA Building Notification**

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

### **CAA Crane Notification:**

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

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

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

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

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

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

Kind regards,

Lucy Dale

On behalf of London City Airport



**From:** [NATS Safeguarding](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: [SG30608] Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA [SG30608]  
**Date:** 09 January 2025 17:02:49  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)

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THIS IS AN EXTERNAL EMAIL

Our Ref: SG30608

Dear Sir/Madam

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

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

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

Yours faithfully

**NATS**

**NATS Safeguarding**

E: [natssafeguarding@nats.co.uk](mailto:natssafeguarding@nats.co.uk)

4000 Parkway, Whiteley,  
Fareham, Hants PO15 7FL  
[www.nats.co.uk](http://www.nats.co.uk)



---

NATS Internal

**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>

**Sent:** Wednesday, January 8, 2025 3:26 PM

**Subject:** [SG30608] Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

**Planning Administration Team**

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

---

**From:** [DD - Airport Safeguarding/BAA](#)  
**To:** [PLN - Comments](#)  
**Subject:** Re: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
**Date:** 10 January 2025 10:15:15  
**Attachments:** [image.png](#)

THIS IS AN EXTERNAL EMAIL

Classification: Internal

FAO Amrith Sehmi,

We have now assessed the above application against safeguarding criteria and can confirm that we have no safeguarding objections to the proposed development.

However, we would 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'.

#### 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 (dvofo@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

Kind regards

**Simon Vince** | Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Airport Safeguarding Limited | Admin Building (EDC), Teesside International Airport, Darlington, DL2 1LU  
United Kingdom

[WEBSITE](#)

Visit our website: [Home - Airport Safeguarding Limited](#) or connect on LinkedIn - Airport Safeguarding Limited.



**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Sent:** 08 January 2025 15:26  
**Subject:** Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)

10 January 2025  
Crossrail Ref: CRL-IP-3356

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

Dear Amrith Sehmi,

**24/00825/FULEIA : XL House 70 Gracechurch Street London EC3V 0HR**

*Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the 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 08 January 2025, 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](mailto:CRL_Safeguarding@tfl.gov.uk)

Yours sincerely,

**Will Orlik**  
Safeguarding Officer (Elizabeth line)  
[CRL\\_Safeguarding@tfl.gov.uk](mailto:CRL_Safeguarding@tfl.gov.uk)

TfL Infrastructure Protection Team  
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](mailto:CRL_Safeguarding@tfl.gov.uk)

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

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

From: [REDACTED]  
To: [REDACTED]  
Subject: FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
Date: 14 January 2025 09:44:26  
Attachments: [24-00825-FULEIA - Re-Consultation Letter.pdf](#)  
[70 Gracechurch Street ad cond 223336.pdf](#)

THIS IS AN EXTERNAL EMAIL

Hi Amrith

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

Regards

Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London  
Greater London Archaeology Advisory Service (GLAAS)  
Phone: [REDACTED] Mobile: [REDACTED]

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

[www.historicengland.org.uk](http://www.historicengland.org.uk)

**Please send all your planning and pre-planning archaeology consultations to:**  
[e-glaas@historicengland.org.uk](mailto:e-glaas@historicengland.org.uk)

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From: E-Glaas <E-Glaas2@historicengland.org.uk>

Sent: 13 January 2025 15:10

To: Hawkins, Helen <[REDACTED]>

Subject: FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Helen

Re-consultation - <https://keystone.historicengland.org.uk/resource/2b443f92-ff76-4bbb-889d-19f4a498b2e5#>

I have reactivated the case

Steve

Steve Hurst

Business Officer | Barnet | Hammersmith & Fulham | Haringey | Havering | Merton |

Richmond Upon Thames

Planning Group | London

Direct Line: [REDACTED]

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

---

From: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: 08 January 2025 15:26

Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

**-- 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 the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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**From:** [Location Enquiries](#)  
**To:** [PLN - Comments](#)  
**Subject:** FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
**Date:** 14 January 2025 11:39:44  
**Attachments:** [image001.png](#)  
[24-00825-FULEIA - Re-Consultation Letter.pdf](#)

THIS IS AN EXTERNAL EMAIL

FAO Amrith Sehmi,

24/00825/FULEIA

Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

Location: XL House 70 Gracechurch Street London EC3V 0HR.

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  
7<sup>th</sup> Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



**From:** PLN - Comments <PLNComments@cityoflondon.gov.uk>  
**Sent:** Wednesday, January 8, 2025 3:26 PM  
**Subject:** Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

**Planning Administration Team**

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From: [REDACTED]  
To: [REDACTED]  
Cc: [REDACTED]  
Subject: Port of London Authority response (DC 831) Plan ref: 24/00825/FULEIA 70 Gracechurch Street  
Date: 16 January 2025 11:13:44

THIS IS AN EXTERNAL EMAIL

FAO: Amrith Sehmi

Dear Amrith

Thank you for consulting the Port of London Authority (PLA) on the above mentioned application, for the proposed mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development at 70 Gracechurch Street, London. I have now had the opportunity to review the submitted documents, and given the location of the proposed development in proximity to the Tidal Thames the PLA has no comments to make.

Regards

Michael

**Michael Atkins**  
Senior Planning Officer

*Port of London Authority*

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# Memo

To Assistant Director (Development Management)  
Environment Department  
Email [plnccomments@cityoflondon.gov.uk](mailto:plnccomments@cityoflondon.gov.uk)



From Paul Bentley  
Air Quality Officer

Telephone [REDACTED]

Email [REDACTED]

Date: 16/01/2025

Your Ref: 24/00825/FULEIA

**Subject:** 70 Gracechurch Street, London, EC3V 0HR

24/00825/FULEIA | Partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development.

The proposed development is a new application for 70 Gracechurch Street. An AQ ES Chapter was submitted for a previous consented scheme, 20/00816/FULEIA, and the revised AQIA submitted draws on modelling results and drawing conclusions from the 2020 assessment. From reviewing the ES the nearest residential receptors stated were 88 Gracechurch Street and 67 Fenchurch Street, the properties at 4 Bulls Head Passage have not been listed as receptors. These should have been included in the AQIA, but their non-inclusion would not materially change the outcomes.

The AQIA follows a standard structure that can be split into four core areas:

Construction Impacts:

The site has correctly been considered as High Risk as per the City of London AQ SPD, and it has been stated the appropriate mitigation measures will be included to mitigate this risk. A condition will be added with relation to the Scheme of Protective Works required, and this will be assessed in terms of meeting the requirements of the City of London Code of Practice for Construction and Deconstruction. The site will have to comply with London NRMM requirements.

The impact from construction traffic has been judged to be negligible or not significant. There has been a reduction in predicted traffic within this submission compared to the previous consented scheme, therefore it has been assumed this

will result in an improvement in terms of impact compared against the consented scheme.

#### Operational Impacts:

The development is to be 'car-free' with only a Blue Badge parking space. Similarly to the impact from construction vehicles, the impact from operational vehicles has been judged to be negligible or not significant. There has been a reduction in predicted traffic within this submission compared to the previous consented scheme, therefore it has been assumed this will result in an improvement in terms of impact compared against the consented scheme. Although not detailed within the AQIA, an outline DSP has been completed and this details measures to reduce the number of delivery and service vehicles by 50% compared to the predicted volume.

Heating and hot water are to be provided via non-combustion methods therefore there are no standard building operational emissions associated with the development. It is stated that there is to be a diesel fuelled backup generator for life-safety emergency usage. There are no details provided for this generator apart from that it will be located 3.25m above roof level. Conditions will be required on the basis that no alternatives to the proposed diesel generator have been explored, it has not been confirmed that the NO<sub>x</sub> emission rate of the generator is below the IAQM/EPUK screening rate, no statement or evidence to show conformity with the City of London AQ SPD.

#### Air Quality Neutral:

Due to being 'car-free', as per GLA guidance and the heating strategy being all-electric the development is deemed air quality neutral, as per GLA guidance. It should be noted that delivery and service vehicles and emergency backup generators for life-safety purposes are excluded from assessment in the GLA assessment.

A condition will be added to ensure that if any tenant generator is proposed for any level of business continuity a revised air quality neutral will need to be completed, taking the emissions from a proposed generator into account.

#### Air Quality Positive:

A generic air quality positive assessment has been submitted, with the measures included already required through associated London Plan and Local Plan policies. Even without the completion of this document, the measures included

within the matrix would be taken forward as part of the development. Additionally, the matrix has not been completed fully, innovation and futureproofing has been missed out.

Due to this, and the potential update to the development in-terms of the backup power solution a condition will be added to revise this assessment so that it can be shown that the proposal maximises benefits to air quality.

Should the development be approved please attach the following conditions:

**Condition M26F**

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

**Reason**

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

**Condition M28C amended**

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

#### **Air Quality Positive Assessment**

A revised air quality positive assessment that maximises the developments benefits to air quality must be submitted. The air quality positive assessment must follow the latest air quality positive guidance.

#### **Reason**

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

#### **Air Quality Neutral Assessment**

Prior to the installation of any generator to be used for any purpose outside of emergency life-safety, a revised Air Quality Neutral Assessment that considers the building emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance.

#### **Reason**

In order to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with the following policies: Local Plan policy DM15.6, Policy HL2 of the draft City Plan, Policies SI1 Improving Air Quality Part B(2)(a) and E of the London Plan

#### **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 \(www.gov.uk\)](https://www.gov.uk/guidance/medium-combustion-plant-and-specified-generators-environmental-permits)

**From:** [HNL Sustainable Places](#)  
**To:** [PLN - Comments](#)  
**Subject:** RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
**Date:** 21 January 2025 17:00:04

---

THIS IS AN EXTERNAL EMAIL

Dear Amrith,

Thank you for consulting us on this planning application. You will find our response attached. Please let me know if you have any questions.

Kind regards,

Demitry Lyons

Planning Advisor, Hertfordshire and North London Sustainable Places

Environment Agency | 2 Marsham Street, 3<sup>rd</sup> floor, London, SW1P 4DF

Email: [HNL Sustainable Places@environment-agency.gov.uk](mailto:HNL Sustainable Places@environment-agency.gov.uk)

Telephone: 020 7714 0578

---

**From:** PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>  
**Sent:** 08 January 2025 15:26  
**Subject:** Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,

Planning Administration Team

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Your Ref:  
Our Ref: 25/00060/OBS



**Amrith Sehmi**

City Of London  
PO Box 270  
Guildhall

22nd January 2025

**RE: REQUEST FOR OBSERVATIONS**

Dear Amrith Sehmi

**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: 25/00060/OBS Date of Application: 09.01.2025 Date of Decision 22.01.2025

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 the partial demolition of the existing building, partial infilling of the existing basements and refurbishment and extension of the building comprising basement levels and ground floor plus 32 storeys (149.67m AOD, 132.47m AGL) to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development, with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm including street market with associated highway works and other works associated with the development at XL House 70 Gracechurch Street London EC3V 0HR
------	---

**Approved Plans**

Letter dated 8 January 2025 (ref: 24/00825/FULEIA)

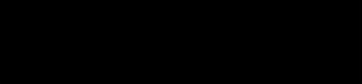
**Conditions**

**Lambeth Planning**  
PO Box 80771  
London  
SW2 9QQ

Telephone 020 7926 1180  
[www.lambeth.gov.uk](http://www.lambeth.gov.uk)  
[planning@lambeth.gov.uk](mailto:planning@lambeth.gov.uk)

Notes to Applicant:

Yours sincerely



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

Date printed: 22nd January 2025

From: [REDACTED]  
To: [REDACTED]  
Subject: FW: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
Date: 23 January 2025 09:54:35  
Attachments: [24-00825-FULEIA - Re-Consultation Letter.pdf](#)  
[70 Gracechurch Street ad cond\\_223336.pdf](#)

THIS IS AN EXTERNAL EMAIL

Dear planning team

Thank you for reconsulting me on this application. The revised information does not affect my previous advice which I have attached for information

Regards

Helen

Helen Hawkins BA MA MCIFA

Archaeology Adviser, City of London  
Greater London Archaeology Advisory Service (GLAAS)  
Phone: [REDACTED] Mobile: [REDACTED]

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

[www.historicengland.org.uk](http://www.historicengland.org.uk)

**Please send all your planning and pre-planning archaeology consultations to:**  
[e-glaas@historicengland.org.uk](mailto:e-glaas@historicengland.org.uk)

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From: PLN - Comments <[PLNComments@cityoflondon.gov.uk](mailto:PLNComments@cityoflondon.gov.uk)>

Sent: 08 January 2025 15:26

Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Kind regards,

Planning Administration Team

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From: [REDACTED]  
To: [REDACTED]  
Subject: RE: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA  
Date: 23 January 2025 15:59:56  
Attachments: [Y\\_HERef\\_P01582065\\_457282\\_2400825FULEIA.pdf](#)

THIS IS AN EXTERNAL EMAIL

Dear Amrith

Thank you for re-consulting Historic England on this planning application.

We refer you to our previous advice letter (dated 18 September 2024 –please find attached).

Kind regards

Alex Bowring  
Inspector of Historic Buildings and Areas  
London and South East Region  
Historic England  
Cannon Bridge House, 25 Dowgate Hill, London, EC4R 2YA

Email: [REDACTED]

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From: PLN - Comments <PLNComments@cityoflondon.gov.uk>  
Sent: 08 January 2025 15:26  
Subject: Re-Consultation - 70 Gracechurch Street - 24/00825/FULEIA

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Dear Sir or Madam,

Please see the attached letter relating to the re-consultation for the 70 Gracechurch Street planning application.

Kind regards,



Planning Administration Team

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