

<b>Committee:</b>	<b>Date:</b>
Planning Applications Sub-Committee	11 February 2025
<b>Subject:</b> 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.	<b>Public</b>
<b>Ward:</b> Langbourn	<b>For Decision</b>
<b>Registered No:</b> 24/00825/FULEIA	<b>Registered on:</b> 01 August 2024
<b>Conservation Area:</b> N/A	<b>Listed Building:</b> No

## Summary

Planning permission is sought 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.

An Environmental Statement accompanies the scheme.

The scheme would be of high-quality design, delivering best-in-class Grade A office floorspace, meeting one of the primary objectives of the City's Local Plan 2015, emerging City Plan 2040, and London Plan policies, as well as providing new publicly accessible cultural spaces at lower ground and level 32, alongside a new public passageway into Leadenhall Market and extensive public realm improvement works. It results in some loss of retail within a Principal Shopping Centre, but this is considered acceptable when taking into account the nature of the development and the other benefits of the scheme, such as the provision of new active frontages at ground level for retail and cultural uses, a publicly accessible elevated external

terrace, a publicly accessible elevated internal public viewing gallery and new pedestrian routes linking Fenchurch Street to Leadenhall Market.

The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The scheme would deliver over 78,711sq.m of lettable Class E commercial floorspace with associated ancillary space, and would deliver 4.22% of the entire City Plan target of the required commercial space to meet projected economic and employment growth demand. This quantity of floorspace would be a strategic contribution to maintaining the City's position as the world's leading international financial and business centre. The floorspace has been designed to be flexible and adaptable for a range of occupier needs and future demand. This floorspace would help deliver an estimated net increase of 3345 FTE jobs.

The scheme would deliver an increased and significant enhancement of public realm through the opening up of the ground floor, creating a new north-south public route through the site from the corner of Gracechurch Street and Fenchurch Street into Ship Tavern Passage, connecting into Leadenhall Market, and would open to the public 24 hours a day. An area of flexible public realm would be created within the footprint of the development, to the east fronting Lime Street and Fenchurch Street. This space would host a street market during the day and would function as the servicing bay after hours.

The scheme would provide a new retail/food and beverage unit at ground floor fronting both Gracechurch Street and the new public passage, which would drive footfall and spend, as well as significantly animating the ground plane. This would transform the site into a key gateway into Leadenhall Market and the Cluster from the south, significantly improving the arrival experience. Furthermore, the scheme provides a varied range of retail/event/cultural spaces at ground floor and lower ground mezzanine, including a retail pop up area within the new permeable accessible space on the southwest of the development.

The scheme would provide an elevated public space at Level 32, totalling around 1,251sq.m of floorspace consisting of an internal area of 851sqm with a 400sqm external terrace. The public viewing gallery would offer views across London to the north, south and west. The space would be managed by the Applicant and would be made available for the benefit of City workers, residents and visitors.

1,106 long term bicycle spaces would be provided at basement levels 1 and 2 with associated shower and locker facilities. 65 short stay spaces would further be provided; 19 of these spaces would be located at ground level within the new public realm area in the east area of the development, and an additional 46 spaces would be provided within the cycle store at Basement Level B1 for visitors of the development. Servicing to the site would take place between the hours of 22:00 to 06:00 at ground level within the new dual-use public realm open space to the south-

east corner of the site, where consolidation of a minimum of 50% would equal a total maximum of 48 delivery and servicing trips per day. One accessible car parking space would also be located in this area. Significant improvements to Fenchurch Street, Gracechurch Street, Lime Street and Ship Tavern Passage through a S278 agreement weigh in favour of the scheme and would help link to the wider transformational public realm improvements.

The scheme would be acceptable in environmental terms. The daylight, sunlight, wind microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight or sunlight to nearby dwellings or religious buildings to unacceptable levels such that it would warrant a refusal of permission.

The building would be designed to high sustainability standards, propose an increase in local greening and ecological value, energy efficient, targeting BREEAM 'Excellent' and adopting Circular Economy Principles by retaining 60% of the existing structure and integrated urban greening.

The proposals would bring a quiet architectural charisma to the western edge of the Cluster, being a sensitive and sustainable exemplar of tower design. It would optimise the use of land, delivering strategic uplift in high quality office space, and publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, DM10.3, DM10.4, DM10.8, emerging City Plan 2040 policies S8, DE1, DE2, DE3, DE4, London Plan D3, D4, D5 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

The proposal would deliver a tall building on a suitable site in the Eastern Cluster/emerging City Cluster in accordance with Local Plan Policy CS14 and CS7, emerging City Plan 2040 Policies S12 and S21, London Plan Policy D9.

The proposal would not harm and would preserve all relevant pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13, emerging City Plan 2040 Policy S13 and London Plan Policy HC2, HC3 and HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. In

consolidating the composition of the City Cluster the proposal would result in a minor enhancement to the characteristics and compositions of LVMF views 4A.1 (Primrose Hill), 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 1A.1 (Alexandra Palace). Following rigorous assessment, it is concluded that the proposal would preserve the Outstanding Universal Value and significance, authenticity and integrity of the Tower of London World Heritage Site, according with the aforementioned policies and associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.

The proposal would preserve the settings and significance of all designated heritage assets assessed, in accordance with Local Plan policies CS12, DM12.1, emerging City Plan policies S13 and HE1 and London Plan policy HC1, and would, subject to conditions, preserve archaeology in accordance with DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

A consultation response to the proposals have been received from Historic England, providing advice but not formally objecting, stating harm could be found to the significance arising as result of the impact on views from within the Inner Ward because of the increase in the amount of modern development visible. Further concerns relate to: The impact of the proposals when viewed upstream at Waterloo Bridge and the effect of daylighting of Leadenhall Market and any loss of light as a result of this scheme could harm the special interest of the listed building. Historic England have however stated that the current design of the tall building is calmer than the previous consent, helping to reduce its visual impact in some views. A consultation response has also been received from the Surveyor to the Fabric of St Paul's Cathedral, seeking assurances that the proposed development would not be visible in views from the Processional Route (Fleet Street), which the scheme would not be, in addition, the Surveyor to the Fabric highlighted the potential impact of the proposed tall building and the expansion of the cluster as a whole, officers have considered this aspect of the scheme in detail and consider that the proposals would not harm St Paul's Cathedral or any protected views.

Objections have been received from nearby residents of 2-4 Bulls Head Passage and Jamaica Buildings, which relate to: loss of daylight and sunlight to these residential properties, Leadenhall Market and the Leadenhall Market Conservation Area, noise and dust from construction, the need to strip back and rebuild the existing site, new access pedestrian routes into Leadenhall Market and lack of engagement and consultation of the previously consented scheme. Officers have considered these objections and clear reasoning had been provided in this report as to how the proposals would address these objections, including any requisite mitigation which would be secured by conditions and in the Section 106 Agreement.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the

proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

The scheme would provide benefits through CIL (of approximately £3,908,100.00 million) for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

Taking all material matters into consideration, Officers are of the view that the material considerations which weigh in favour of the grant of planning permission outweigh the identified conflict with the development plan and other material considerations which weigh against the grant of planning permission.

In this case, the proposals are considered to comply with the majority of development policies in particular those which encourage office development in the City the heritage, design, tall buildings and public realm policies, but not complaint with the retail policies as outlined above and in the ensuing report. It is the view of officers that, as a matter of planning judgement, that as, in particular, the proposals make would make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, heritage, tall buildings and public realm policies, they accord with the development plan when considered as a whole.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up to date development plan without delay.

Paragraph 135 of the NPPF sets out that planning decisions should add to the quality of the area, follow best practice architecture and urban design, be sympathetic to local character, establish a strong sense of place, optimise the potential of the site and create places which are safe, inclusive and accessible. The proposals comply with this objective of the NPPF.

As set out in paragraph 212 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the conservation of a designated heritage asset (and the more important the asset, the greater the weight should be). Officers have concluded that the proposed development would not harm any designated heritage assets.

Taking all material matters into consideration, it is recommended that planning permission be granted subject to all the relevant conditions being applied and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

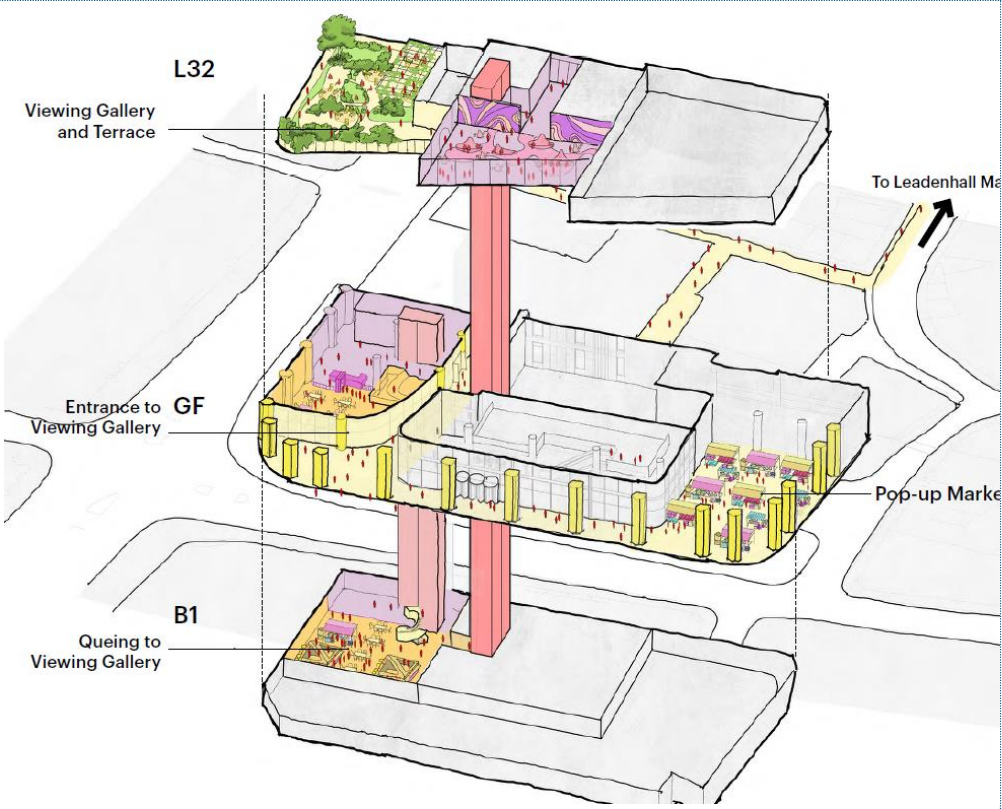

## **Recommendation**

- (1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:
  - (a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);
- (2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed; and
- (3) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

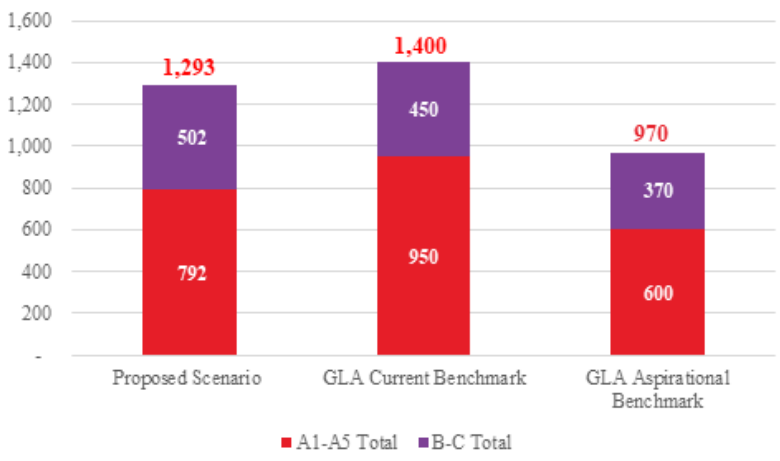
# APPLICATION COVER SHEET

70 GRACECHURCH STREET (24/00825/FULEIA)

TOPIC	INFORMATION			
<b>1. HEIGHT</b>	EXISTING		PROPOSED	
	58.25m AOD (41.05 m above ground level building height) Ground plus 7 storey building, four basement levels		149.67m AOD (132.470 m above ground level building height) Ground plus 32 storey building	
<b>2. FLOORSPACE GIA (SQM)</b>	USES	EXISTING	PROPOSED GIA (WITH PLANT APPORTIONED)	
	Office (Class E(g))	20,314	Office (Class E(g))	78,711 sqm
	Retail/Food and Beverage (Class E(a)-(b))	7,757	Retail/Food and Beverage (Class E(a)-(b))	195sqm
	Cultural space/Public Viewing Gallery (Sui Generis)	0	Culture/Public Viewing Gallery (Sui Generis)	1,273sqm
	TOTAL	28,071 sqm	TOTAL	80,179sqm
			TOTAL UPLIFT:	+ 52,108 sqm
<b>3. OFFICE PROVISION IN THE CAZ</b>	78,711 sqm GIA			
<b>4. EMPLOYMENT NUMBERS</b>	EXISTING		PROPOSED	
	Approximately 1,340 FTE		3,194 FTE	
<b>5. VEHICLE/CYCLE PARKING</b>	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0 1 blue badge space
	Cycle long stay	0	Cycle long stay	1,106
	Cycle short stay	0	Cycle short stay	65
	Lockers	0	Lockers	739
	Showers	0	Showers	56

	Changing facilities	0	Changing facilities	2
<b>6. HIGHWAY LOSS / GAIN</b>	Stopping up within City of London: 17.30sqm. Area gained within City of London: 20.81sqm. Net highway gained for City of London: 1.68sqm Area gained for Transport for London: 1.68sqm			
<b>7. PUBLIC REALM</b>	Proposed 910.34sqm of on site public realm area, including new through-site link and market area			
<b>8. PUBLIC VIEWING GALLERY/CULTURAL SPACES</b>	 			
<b>9. STREET TREES</b>	<b>EXISTING</b>		<b>PROPOSED</b>	
	0		0	
	<b>EXISTING</b>		<b>PROPOSED</b>	

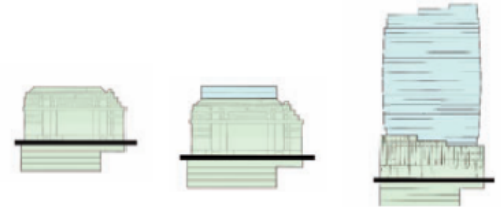


<b>10. SERVICING VEHICLE TRIPS</b>	113 daily (17 in peak hour)	48 daily (7 in peak hour)															
<b>11. SERVICING HOURS</b>	22:00 – 06:00																
<b>12. RETAINED FABRIC</b>	60% of the existing superstructure and substructure (by mass)																
<b>13. OPERATIONAL CARBON EMISSION SAVINGS</b>	Improvements against Part L 2021: 13% GLA policy target: 35%																
<b>14. OPERATIONAL CARBON EMISSIONS</b>	93,857 tonnes CO2 over 60 years 1,171 kg CO2 per square meter over 60 years (includes life-cycle modules B6+B7)																
<b>15. EMBODIED CARBON EMISSIONS</b>	<b>PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS (RICS V1)</b>																
	<p style="text-align: center;">RICS Ed.1 Embodied Carbon Results - kgCO<sub>2</sub>e/m<sup>2</sup> GIA</p>  <table border="1" style="margin-left: auto; margin-right: auto;"> <caption>Embodied Carbon Results (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</caption> <thead> <tr> <th>Scenario/Benchmark</th> <th>A1-A5 Total</th> <th>B-C Total</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Proposed Scenario</td> <td>792</td> <td>502</td> <td>1,293</td> </tr> <tr> <td>GLA Current Benchmark</td> <td>950</td> <td>450</td> <td>1,400</td> </tr> <tr> <td>GLA Aspirational Benchmark</td> <td>600</td> <td>370</td> <td>970</td> </tr> </tbody> </table> <p>Embodied carbon comparison to GLA benchmarks (kg CO<sub>2</sub>e/m<sup>2</sup>)</p> <p>Upfront embodied carbon: 63,522 tonnes CO<sub>2</sub> / 792 kg CO<sub>2</sub> per square meter</p> <p>Embodied carbon: 103,705 tonnes CO<sub>2</sub> / 1,293 kg CO<sub>2</sub> per square meter</p>		Scenario/Benchmark	A1-A5 Total	B-C Total	Total	Proposed Scenario	792	502	1,293	GLA Current Benchmark	950	450	1,400	GLA Aspirational Benchmark	600	370
Scenario/Benchmark	A1-A5 Total	B-C Total	Total														
Proposed Scenario	792	502	1,293														
GLA Current Benchmark	950	450	1,400														
GLA Aspirational Benchmark	600	370	970														

**16. WHOLE LIFE - CYCLE CARBON EMISSIONS**

Total embodied and operational carbon: 197,562 tonnes CO2  
 Embodied and operational carbon per square meter: 2,464 kg CO2 per square meter

**17. WHOLE LIFE-CYCLE CARBON OPTIONS**



Option Reference	Option 1	Option 2	Option 3
	<b>Retrofit</b>	<b>Retrofit plus 2 additional storeys</b>	<b>Retrofit/partial demolition plus additional lower structure</b>
	Existing building to be retrofitted to modern day standards without any structural strengthening work, alongside change of use from department store to office. Public route through ground floor not provided.	Existing building to be retrofitted to modern day standards with a 2-storey extension and minor strengthening works, alongside change of use from department store to office. Total of 10 storeys.	Retention of as much of the existing building with a 25-storey extension and major strengthening works. Total of 33 storeys. Public route through ground floor provided.
Project reference period	60	60	60
Gross Internal area (GIA) m <sup>2</sup>	28,056	31,676	77,633
Net Internal area (NIA) m <sup>2</sup>	11,481	14,419	50,643
Change in NIA (compared to existing) m <sup>2</sup>	0	2,938	39,162
Substructure % retained by mass	100%	100%	55%
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100%	95%	40%
<b>Total WLCA (incl. B6 &amp; pre-demolition) (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b>	<b>936</b>	<b>993</b>	<b>1,406</b>
<i>Module B7 is not considered</i>			
Upfront Embodied Carbon (A1-A5) excl. sequestration (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	357	411	821
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	450	450	450
Estimated Whole Building Operational Carbon for building life time (B6) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	129	129	129
<b>Total WLCA (incl. B6 and pre-demolition) (tCO<sub>2</sub>e)</b>	<b>26,256</b>	<b>31,452</b>	<b>109,186</b>
<i>Module B7 is not considered</i>			
Total existing building demolition (tCO <sub>2</sub> e)	0	98	469
Upfront Embodied carbon (A1-A5) (tCO <sub>2</sub> e)	10,005	13,006	63,751
In-use embodied carbon (B-C) (tCO <sub>2</sub> e)	12,626	14,255	34,935
Operational Carbon for building life time (B6) (tCO <sub>2</sub> e)	3,625	4,093	10,031

**18. TARGET BREEAM RATING**

Score of office use: 87%

Good    Very Good    **Excellent**    Outstanding

Policy target: Excellent

0.33

**19. URBAN GREENING FACTOR**

# Site Location Plan

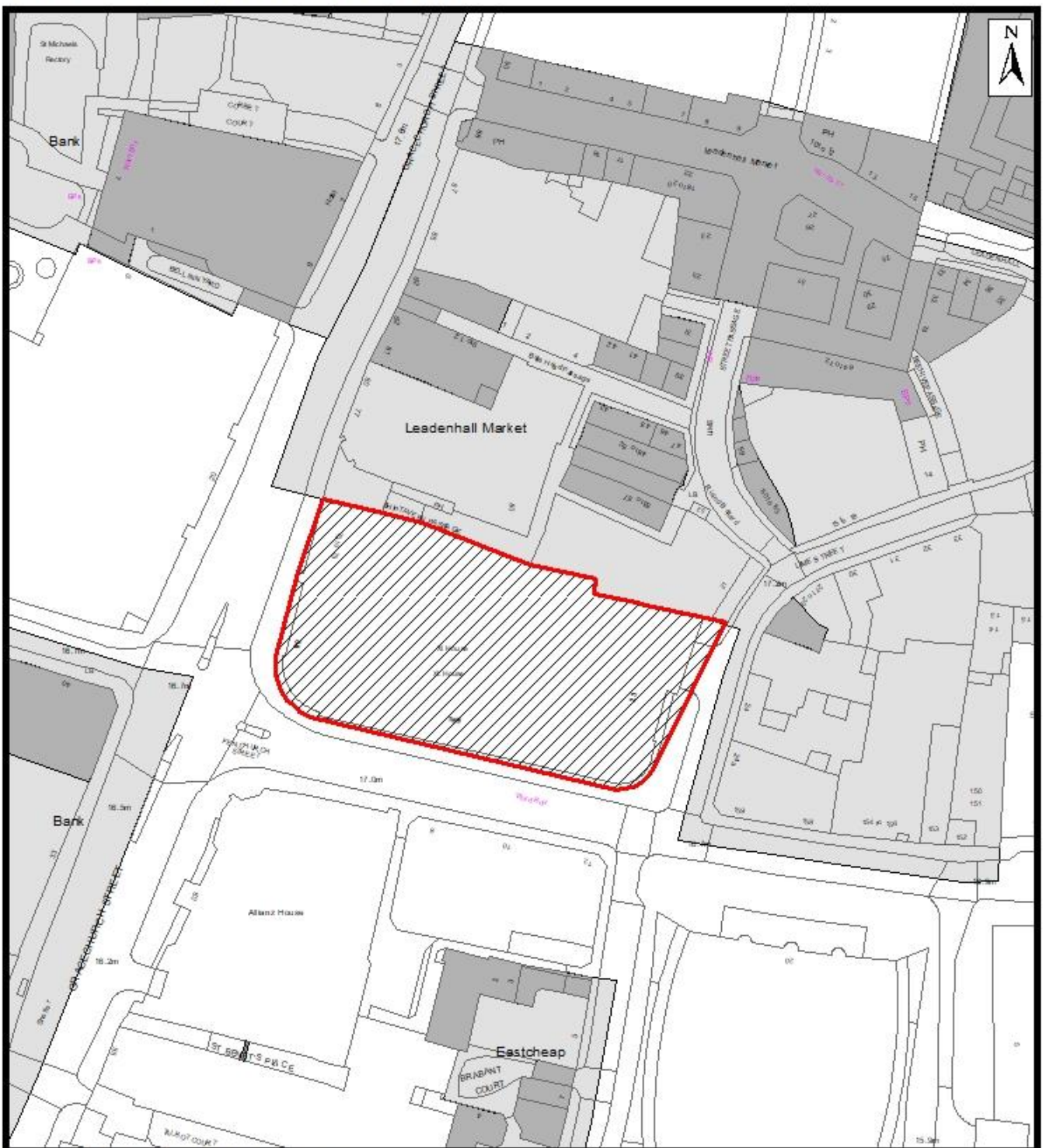
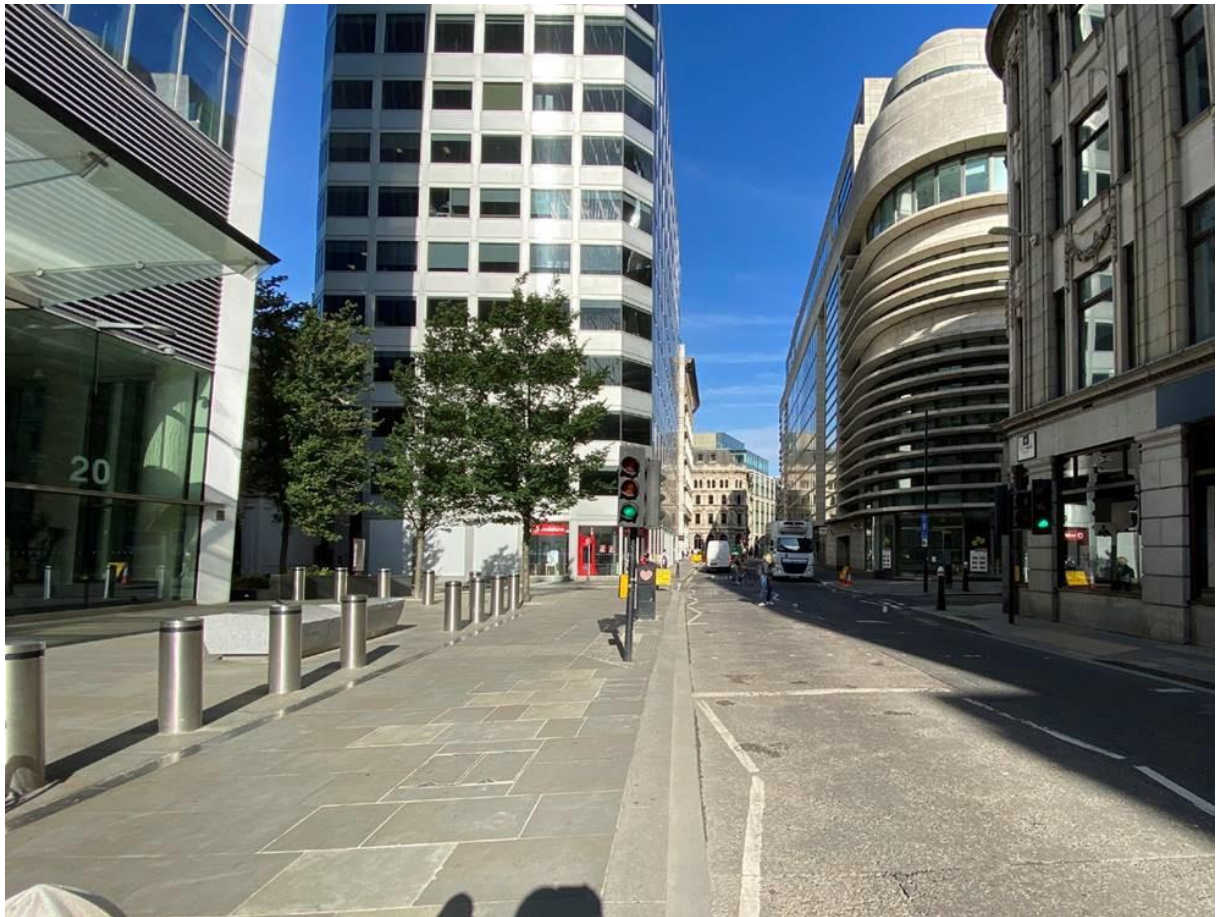




Image 1: View of existing building looking east at the junction of Gracechurch Street, Lombard Street and Fenchurch Street



Image 2: View of existing building, looking east from Fenchurch Street



View 3: View of existing building, looking west from Fenchurch Street



Image 4: View of existing building at Ship Taverns Passage

# **Main Report**

## **Introduction**

### **Environmental Statement**

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
  - To examine the environmental information
  - To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
  - To integrate that conclusion into the decision as to whether planning permission is to be granted; and
  - If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. A local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any

other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.

6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in December 2024. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information. The additional information builds upon the assessments presented in the August 2024 Environmental Statement, to assess the changes to the cumulative assessment only, alongside some minor design changes and their impact on Townscape and Heritage as originally presented in Volume 2 of the ES. All elements of the August 2024 ES not covered in the ES Addendum are considered to remain valid. Any new likely significant effects are assessed and discussed in the relevant sections of this report.
8. The effect interactions of each of the likely significant effects has been considered in the assessment. Mitigation and monitoring measures as proposed in the ES would be secured through planning conditions and/or planning obligations within the S106 agreement as appropriate.

### **Site and surroundings**

9. The site occupies the corner plot between Fenchurch Street to the south and Gracechurch Street to the West. It is bounded by Ship Tavern Passage to the North and Lime Street to the east.
10. The existing building, completed in 2001, is 8 storeys high with four basement levels and comprises a gross internal area of 28,071 sq.m. The Commercial, Business and Service (Use Class E) building includes retail use from lower ground to first floors and office use above. The existing building encompasses the majority of the Site with the remaining area comprising public highway and permissive path. Party walls lie to the north of the Site, at the Swan Tavern Public House and 21 Lime Street.
11. The site is immediately abutted to the north and east by the Leadenhall Market Conservation Area. Land to the east side of Lime Street is in the Leadenhall Market Conservation Area and land to the west side of Philpot Lane lies within in the Eastcheap Conservation Area.



12. The site is located in a prominent location on the western edge of the City Cluster. There are a number of nearby tall buildings benefitting from planning permission, the most prominent being the 74 storey 1 Undershaft. Other nearby consented schemes include 60 Gracechurch Street (36 storeys), 50 Fenchurch Street (36 storeys), 85 Gracechurch Street (32 storeys), 100 Leadenhall (57 storeys) and 55 Bishopsgate (63 storeys).
13. Residential properties at 4 Bulls Head Passage lie to the north and at 14 Lime Street to the north east of the site.
14. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the highway authority.
15. There are a number of listed buildings within the immediate vicinity of the site. These include:
  - Leadenhall Market (Grade II\*)
  - 81-82 Gracechurch Street (Grade II)
  - The Ship Tavern, 27 Lime Street (Grade II)
  - 39-40 Lombard Street (Grade II)
  - 38 Lombard Street (Grade II)
  - 7-9 Gracechurch Street (Grade II)
  - Custom House (Grade I)
  - Billingsgate Market (Grade II)
  - Adelaide House (Grade II)
  - Cannon Street Station Towers (Grade II)
16. Other listed buildings in close proximity include:
  - The Tower of London (World Heritage Site, Scheduled Monument and listed buildings),
  - Tower Bridge (Grade I),
  - The Monument (Scheduled Monument and Grade I),
  - Lloyd's Building (Grade I), 24-28 Lombard Street (Grade II),
  - 60 Lombard Street (Grade II),
  - St Edmund's Church (Grade I),
  - 27-28 Clement's Lane (Grade II) and St Clement's Church (Grade I) all in the Bank Conservation Area;
  - 37-39 Lime Street (Grade II) in the Leadenhall Market Conservation Area and 2-3 (Grade II) & 7-8 (Grade II\*) Philpot Lane and 4 Brabant Court (Grade II) in the Eastcheap Conservation Area.

## **Planning History**

17. The existing building, XL House, was granted planning permission on 21 October 1998.
18. The most recent planning permission was granted on 29 September 2021, under planning permission reference 20/00816/FULEIA for:  
  
*“Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.”*
19. Since the 2021 permission there have been no new relevant applications, though temporary art installations have been permitted in relation to the Sculpture in the City programme.
20. The 2021 permission would expire in 2026 and has not been implemented.

## **Proposals**

21. Planning permission is sought for:
22. 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 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.
23. The scheme would provide 80,179 sq.m GIA floorspace comprising:
  - 78,711 sq.m of office floorspace;
  - 195 sq.m of flexible retail; and
  - 1,273 sq.m of public access space including cultural use
24. The maximum height of the proposed development would be 149.67m AOD. The proposed development includes a base podium building and tower split into three vertical forms. The base would be stepped in height, the eastern part would be ground plus five storeys, stepping up to eight storeys on the corner of Gracechurch and Fenchurch Streets. The podium would be solid form,

expressed in masonry with curved facades and punctuated with glazing topped with terraces and planting. The base includes a new public route through connecting the corner of Gracechurch Street and Fenchurch Street to Ship Tavern Passage. The tower that sits above the podium presents itself as three massing volumes which step upwards from west to east at the crown. The western massing reaches a height of 144.61m AOD, the central massing reaches a height of 147.48m AOD and the eastern massing reaches a height of 149.64m AOD. The vertical components of the massing at the edges would be tapered with the widest points being located in the middle of the tower volume, before tapering back inwards to appear more slender. The upper three floors of each massing volume would be angled more sharply inwards than the floors below to articulate the crown of the building.

25. The scheme provides a significant increase in office floorspace and a reduction in retail floorspace on the site, with the aim of creating an open and permeable publicly accessible ground floor with a variety of retail uses and access to a cultural use, with flexible Grade A office floorspace above.
26. The main office entrance would be from Fenchurch Street, with access to the culture and retail spaces being provided on Gracechurch Street. The southeast corner of the proposed building would be open-sided, providing a large area of outdoor publicly accessible space in daytime hours, with the area in use as a servicing area after hours. This enables pop-up retail uses in this area, fronting Lime Street and providing further activation of this space. The vehicle lifts proposed in the consented scheme are no longer proposed, and servicing would take place at ground floor level.
27. Access to the public viewing gallery at level 32 would be provided from lower ground floor level, with dedicated lifts and supported by a security check area. Access to the lower ground area would be provided by the dedicated lifts and a staircase to a ground level entry lobby, with entrances placed on Gracechurch Street and the new passageway. The viewing gallery is located to offer views across London to the north, south and west. The public viewing gallery would be managed by the applicant and made available to City workers, residents and visitors. It would feature 709sqm of internal space with seating and a small bar/café. This space would be programmable for events which would be ancillary use to the public viewing gallery. There would also be an external terrace of 445sqm with a pergola and a café/bar space, alongside extensive landscaping and seating.
28. When exiting the lifts from the public viewing gallery you would exit via Ship Tavern Passage. The north to south passageway would connect to the network of passageways providing access to Leadenhall Market.
29. The scheme would provide a retail space at ground floor, accessed from entrances on Gracechurch Street and the new public passageway.

30. The proposed scheme would incorporate intensive and extensive urban greening, including large, planted terraces at podium and roof levels, and planters at ground level along the Gracechurch Street elevation.
31. Tenant terraces are proposed at levels 5-7 (podium level) and levels 28 to 31 at the rooftop on two of the three tower roofs. The space would be landscaped and be demised to the office occupiers as amenity space. The space would offer amenity to users, supporting healthy, varied and engaging workplaces. The perimeter of the terrace would have 1.7m high upstand balustrades and landscaped areas.
32. Off street servicing would take place from an open area of dual-use public realm accessed via Lime Street. When not in use as the servicing area, this space would be publicly accessible and would be host to an outdoor street market.
33. The development would have three basement levels, with the existing basement reused as far as possible – the existing basement level would be demolished and rebuilt to give a higher plant floor to the level below. The proposed basement level 1 would accommodate part of the publicly accessible cultural use, as well as end-of-trip cycle facilities, including cycle parking. Basement level 2 would accommodate further cycle parking and plant, with basement level 3 exclusively used for plant. The existing basement level 4 would be partially infilled.

## **Consultations**

### **Statement of Community Involvement**

34. The applicants have submitted a Statement of Community Involvement prepared by London Communications Agency, dated July 2024, outlining their engagement with stakeholders, including four public exhibition events held between 23 April 2024 and 27 June 2024.
35. The applicant's consultation period was split in two, with phase 1 (April and May 2024) collecting feedback on the early proposals, and phase 2 (June and July 2024) seeking feedback on more detailed design proposals.
36. Engagement activities included:
  - A consultation website was launched in April 2024 with comprehensive information on the proposals and a comment section to collect feedback. The website was viewed by 2,947 people 3,409 times over both phases of engagement.

- A two-page A5 flyer with information on the consultation events was sent to 2,046 residents and businesses in an area surrounding the site that was agreed with officers. Flyers were sent for both phases of engagement.
- 15 key political and community stakeholders were invited to public exhibitions via letter to discuss the proposals and to share information on the consultation programme. These included the Chairman of Planning and Transportation, ward members for both Langbourn and Bridge, as well as St Edmund the King, St Clements Eastcheap, St Margaret Pattens and St Peter-upon-Cornhill churches.
- Alongside the exhibitions, two meetings were arranged with key stakeholders, including the Chairman of Planning & Transportation, the Planning and Development Director and EC BID.
- An advert was placed in the City Matters publication and a social media campaign was run ahead of the exhibitions which reached 418,778 people. An email inbox and freephone line were set up for the consultation period, with 6 emails received.
- The first phase 1 public exhibition was held in Leadenhall Market EC3V 1LT between the hours of 11am to 2pm on 23 April, and in total 17 people attended. The second phase 1 exhibition took place in the Vestry at St Edmund the King church, 60 Lombard Street, London, EC3V 9EA between the hours of 4pm to 7pm on 25 April. Twelve attendees were reported. In total, 10 people completed the phase 1 consultation survey, either digitally or in written form.
- Both phase 2 exhibitions were held in the foyer of 70 Gracechurch Street, between the hours of 4pm to 7pm on the 25 and 27 June 2024. The first exhibition reported 13 attendees, and the second reported 6. In total, 4 people completed the phase 2 consultation survey, either digitally or in written form.

#### Statutory Consultation

37. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon twice under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

#### Consultation – August 2024

38. Nearby residential occupiers were notified directly of the application by letter on 09 September 2024.
39. The application was advertised in the press on 10 September 2024.

40. Site notices advertising the planning application were posted in 13 locations around the site on 03 September 2024.
41. At the time of publication of this report, two objection letters have been received. A summary of the representations received, and the consultation responses is set out in the table below.
42. All representations made in relation to the application are available in the public case file and have been read in full and considered in making this report and recommendation. Copies of all received letters and e-mails making representations are attached in full and appended to this report.

<b>Consultation Responses</b>	
Health and Safety Executive	No comments.
Historic England	<p>“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.</p> <p><u>Impact of the proposals</u></p> <p>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:</p> <p style="padding-left: 40px;">a) Tower of London World Heritage Site</p> <p>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 keys 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.</p>

#### b) St Paul's Cathedral

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.

#### 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

	<p>would cause to heritage assets of the highest possible designations.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><b>Officer response:</b> This is addressed in the Design and Heritage sections of this report.</p>
GLAAS, Historic England Archaeology	Conditions and informatives are recommended.
Environment Agency	No comments.
Natural England	No objection.
Transport for London, Spatial Planning	<p>Thank you for consulting TfL. In regard to the above application, TfL have the following comments:</p> <p>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.</p> <p><u>Trip Generation</u> 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.</p>



### 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

	<ul style="list-style-type: none"> <li>• 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.</li> <li>• CLP to provide detailed construction trip generation forecast for pit lanes proposed and minimise A10 impact</li> <li>• Provide end of trip facilities and temporary cycle parking for construction workers.</li> </ul> <p><b>Officer response:</b> The comments raised by TfL have been addressed by the Applicants and the issues have been resolved.</p>
Transport for London – Crossrail Safeguarding	No comments.
Transport for London, LU/DLR Infrastructure Protection	No comments.
London City Airport	<p>Conditions recommended relating to Construction Methodology (location, height, operating radius and start/end dates for cranes) and Building Obstacle Lighting.</p> <p><b>Officer response:</b> Construction Methodology Condition is recommended, Building Obstacle Lighting Condition has not following a later representation.</p>
Heathrow Airport	No objection.
Thames Water	<p><u>Waste Comments</u></p> <p>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.</p> <p>“No development shall be occupied until confirmation has been provided that either:-</p> <ol style="list-style-type: none"> <li>1. Foul water Capacity exists off site to serve the development, or</li> <li>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</li> <li>3. All Foul water network upgrades required to</li> </ol>

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](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

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](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

The proposed development is located within 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:-

- 1) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or
- 2) a development and infrastructure phasing plan has been agreed with Thames Water to allow

development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.

Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development”

The developer can request information to support the discharge of this condition by visiting the Thames Water website at [thameswater.co.uk/preplanning](http://thameswater.co.uk/preplanning). Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: [devcon.team@thameswater.co.uk](mailto:devcon.team@thameswater.co.uk)) prior to the planning application approval.

The proposed development is located within 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."

	<p>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.</p> <p><a href="https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes">https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes</a> Should you require further information please contact</p> <p>Thames Water. Email: <a href="mailto:developer.services@thameswater.co.uk">developer.services@thameswater.co.uk</a> Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB</p> <p><u>Supplementary Comments</u></p> <p>The accompanying documents contain a flood risk &amp; drainage strategy, there is nothing to confirm points of discharge and split of discharge (if applicable) for both FW &amp; SW, and this is required to confirm if there is sufficient capacity for the proposed development.</p> <p><b>Officer response:</b> Conditions and informatives are recommended.</p>
<p>Surveyor to the Fabric of St Paul's Cathedral</p>	<p>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 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.</p> <p>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.</p> <p>An additional pre-application meeting held Thursday 9th 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</p>

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).

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.

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 coincidence 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.

**Note:** The full response, including images referred to above, can be found online in the Public Access case file.

**Officer response:** An officer assessment of the points raised and consideration of the impacts identified above

	are contained in the following sections of this report: Design and Heritage
London Borough of Southwark	No comments.
Royal Borough of Kensington and Chelsea	No objection.
London Borough of Lambeth	No objections.
London Borough of Hammersmith and Fulham	No objection.
Royal Borough of Greenwich	No objection.
London Borough of Tower Hamlets	<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>



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.

	<p>The ES concluded that there would be no effects during demolition and construction, and operation on any built heritage receptors within LBTH.</p> <p>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.</p> <p>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.</p> <p><b>Officer response:</b> This is addressed in the Design and Heritage sections of this report.</p>
CoL, Pollution Team	<p>Conditions relating to roof terraces, amplified music on roof terraces, Scheme of Protective Works (Demolition and Construction), sound insulation, fume extract arrangements, plant, structure-borne sound/vibration, site contamination, ground/surface water pollution, de/construction logistics, NRMM compliance and ventilation/extract maintenance.</p> <p><b>Officer response:</b> Conditions are recommended.</p>
CoL, District Surveyor's Office	<p>The DSO reviewed the fire statement and had no comments to make. The proposals are considered to comply with London Plan policies D5 and D12.</p>
CoL, Lead Local Flood Authority	<p>Conditions required on the details of SuDs and their maintenance.</p> <p><b>Officer response:</b> Conditions are recommended.</p>
CoL, Contract and Drainage Service	<p>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;</p> <p>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.</p>

	I would be obliged if you could incorporate this in your response to the planning department, regarding this application
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### Letters of Representation

43. In accordance with the SCI, notification letters were sent on 09 September 2024 to residential properties in the vicinity in addition to the site and press notices as set out above.
44. Two letters of objection were received as a result of this consultation. The issues raised are summarised as follows:

<b>Comment</b>	<b>Officer Response</b>
The development would result in further strain on utilities.	A utilities statement has been provided with the application. Details of utility connections are required through S106 obligation.
The development would generate pollution.	The City's Environmental Health Team have recommended conditions.
There would be increased late-night disturbance.	Conditions are recommended relating to Noise and vibration from plant, Odour, Servicing hours, Roof terrace - hours and management, Noise insulation.
There is an oversaturation of offices on the market.	The need for further office space within the City is addressed within the Land Use section of this report.
The development would overshadow Leadenhall Market and residential properties.	Addressed in the Daylight and Sunlight section of the report.
Detrimental impacts from construction, including noise and pollution.	Conditions are recommended relating to the submission of a Demolition Management Plan and Construction Management Plan.
Redevelopment of a relatively new building.	This is discussed in the Sustainability section of the report.
The consultation process of the previous scheme was poorly managed.	This is not relevant to the current proposals.

45. Not all the representations above are material planning considerations. Those that are, have been dealt with in this report.

### Consultation – January 2025

46. A second round of consultation was initiated on 19 December after the receipt of an addendum to the Environmental Statement.

47. Nearby residential occupiers were notified directly of the addendum by letter on 23 December 2024, with a closing date for comments on 06 February 2025.
48. The application was advertised in the press on 07 January 2025.
49. Site notices advertising the planning application were posted in 6 locations around the site on 09 January 2025.
50. The following representations have been made pursuant to the second round of consultation:

<b>Consultation Responses</b>	
GLAAS, Historic England Archaeology	No further comments.
TfL – Crossrail Safeguarding	No comments.
TfL – LUL/DLR Safeguarding	No comments.
Heathrow Airport	No objection.
London City Airport	No objection subject to a Construction Methodology condition being attached. LCA rescinded their previous request to attach a Building Obstacle Lighting condition as, upon further investigation, the proposed development would no longer be considered an obstacle.  <b>Officer Response:</b> Condition recommended.
Environment Agency	No comments.
Health and Safety Executive	No comments.
NATS Safeguarding	No objection.
Thames Water	No further comments.
Port of London Authority	No comments.
London Borough of Lambeth	No objection.

51. A second round of notification letters were sent to residents on 23 December 2024, alongside a site notice posted on 09 January 2025 and a press notice published on 17 January. As of the print deadline, no further representations have been received after this consultation.

## **Policy Context**

52. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
53. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29 August 2024, awaiting Examination in Public. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
54. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of very limited weight and will not be referred to in this report.
55. Government guidance is contained in the National Planning Policy Framework (NPPF) 2024 and the Planning Practice Guidance (PPG), which is amended from time to time.
56. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”. Other relevant sections of the NPPF are set out in the following paragraphs.
57. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
58. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development.” That presumption is set out at paragraph 11. For decision-taking this means:
  - a) approving development proposals that accord with an up-to-date development plan without delay; or
  - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
    - i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

- ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.

59. Paragraph 49 states that “local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

60. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.

61. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

62. Paragraph 91 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.

63. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lives, through promoting good health and preventing ill-health.

64. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

65. Paragraph 104 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting



from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.

66. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 110 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
67. Paragraph 117 states that “applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and it should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
68. Paragraph 118 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
69. Paragraph 125 (c) of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
70. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
71. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and

distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.

72. Paragraph 136 of the NPPF states that 'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...'
73. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
74. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
75. Paragraph 164 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems.
76. Paragraph 166 states that, in determining planning applications, Local Planning Authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
77. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 208 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development

affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

78. Paragraph 210 of the NPPF advises, "In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness."

79. Paragraph 212 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance".

80. Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

81. Paragraph 215 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use".

82. Paragraph 216 of the NPPF states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required

having regard to the scale of any harm or loss and the significance of the heritage asset”.

83. Paragraph 219 of the NPPF states “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

### **Statutory Duties**

84. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
85. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

### **Considerations**

86. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses.
87. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
88. The principal issues in considering this application are:
- The economic benefits of the proposal;
  - The appropriateness of the proposed uses, including the new cultural offer;

- The appropriateness of a tall building on site;
- The appropriateness of the architecture, urban design, and the new public realm;
- The impact on strategic views in the London Views Management Framework and on other strategic local views;
- The impact of the proposal on the Tower of London World Heritage Site;
- The impacts of the proposal on the setting and significance of heritage assets;
- The potential impacts of the development on buried archaeology;
- The acceptability of the proposal in accessibility terms;
- The acceptability of the proposed highway and transportation arrangements including servicing, cycle parking provision and impact on highways;
- The acceptability of the scheme in terms of its environmental effects including wind microclimate, thermal comfort, flood risk, air quality, contaminated land, building resource efficiency, energy consumption and sustainability;
- The impact of the proposed development on the amenity of nearby residential and other occupiers, including noise and vibration, overlooking, daylight and sunlight, solar glare, and light pollution;
- The outcome of the Health Impact Assessment;
- Acceptability of the sustainability credentials of the scheme including appropriateness of the demolition of the existing buildings on the site;
- Acceptability of the proposed security, suicide prevention and fire safety arrangements;
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan, including the paragraph 215 balancing exercise;
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act; and
- The requirement for financial contributions and other planning obligations.

### **Economic Issues and the Principle of Development**

89. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity, and significant weight on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Significant weight is given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to economic benefits will depend on the nature and extent of those benefits in light of other planning considerations.

90. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
91. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
92. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
93. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
94. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace is therefore required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

95. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
96. London Plan Policy GG2 sets out the mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well-connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
97. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.
98. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
99. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
100. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, at policy DM1.2, further

encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

101. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy and enhancing the City's evening and weekend economies; creating new and enhanced culture, leisure and visitor attractions; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces; delivering new, inclusive open spaces and enhancing the City's public realm for everyone; delivering urban greening and greater biodiversity; and creating an inclusive, healthier and safer City for everyone.
102. The emerging City Plan (2040) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1,200,000sqm during the period 2021-2040. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
103. The application site is situated within the Eastern Cluster as defined in the Local Plan 2015 and the City Cluster as defined in the emerging City Plan 2040. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The emerging City Plan in Strategic Policy S21: City Cluster, identifies the Cluster as a key area of change. In the Local Plan 2015 the site is within the Eastern Cluster Key City Place as set out within policy CS7.
104. The Cluster Policy area is defined by an illustrative diagram and on the Policies Map in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the



construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements.

105. The Strategic Objective in relation to supporting a thriving economy within the emerging City Plan 2040 states that to support a thriving economy, maintaining the City's position as a global hub for innovation in financial and professional services, commerce and culture.
106. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are further reflected in the Corporation's 'Destination City' vision for the square mile.
107. The proposed scheme would deliver on the City's strategic objectives and support the City's economic role by providing a substantial and strategic contribution of 78,711 sqm (GIA) of flexible Class E (office) floor space alongside a complementary retail and cultural offer and new public realm.

### **Land Uses**

108. This section of the report provides an overview in respect of the proposed site composition and mix of uses before appraising the acceptability of the proposed uses and the loss of existing uses where relevant.
109. The proposed building has been designed to provide a flexible workplace-led mix of uses. The 32 storeys above ground predominantly provide office use (Class E) with flexible retail use (Class E plus Sui Generis drinking establishment and hot food takeaway) at lower ground mezzanine and ground floor levels. A public viewing gallery (Sui Generis) is located at level 32, accessed from the Basement Level 01 which provides amenity for City workers, residents and visitors. At the south east corner of the ground floor, permeability is enhanced to Fenchurch Street and Lime Street and there is increased permeability through the site from north to south with the introduction of a new publicly accessible route through the proposed development.

110.A breakdown of the existing and proposed land use split (GIA) is set out below:

<b>Land Use</b>	<b>Existing GIA (sqm)</b>	<b>Proposed GIA (sqm)</b>	<b>Net change GIA (sqm)</b>
<b>Office (Class E(g))</b>	<b>20,314</b>	<b>78,711</b>	<b>+58,397</b>
<b>Retail/Food and Beverage (Class E(a)-(b))</b>	<b>7,757</b>	<b>195</b>	<b>-7,562</b>
<b>Cultural space/Public Viewing Gallery (Sui Generis)</b>	<b>0</b>	<b>1,273</b>	<b>+1,273</b>
<b>Total</b>	<b>28,071</b>	<b>80,179</b>	<b>+52,108</b>

111.The following sections of the report provide an assessment of the proposed uses.

### **Provision of Office Accommodation**

112.Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

113.The predominant use of the proposed development is office space, comprising of 78,711 sq.m (GIA) of Commercial/Office Floorspace Class E(g) (a net gain of 58,397 sq.m of office floorspace on this site). The office space is classified as best-in-class, Grade A office space.

114.Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. This policy sought to deliver 1,150,000sqm of additional office floorspace between 2011 and 2026. The emerging City Plan 2040, in Policy S4, seeks to deliver 1.2 million sqm net of new office floorspace in the period between 2021 and 2040. This is based on evidence derived from a study conducted by ARUP/Knight Frank on behalf of the City Corporation, which identified the demand or 1.2 million sqm based on a 'hybrid peak' model of

workplace attendance, and demand for 1.9 million sqm where there was a 'return to in-person'. The apparent significant reduction in the 2040 City Plan compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.

115. At 31st March 2022, 835,000 sq.m net increase in office floorspace had been delivered since 2016 and a further 576,000 sqm net was under construction or was permitted in the City. 370,000sq.m of flexible office floorspace was approved in 2022.

116. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'City Cluster' category, which is modelled at being able to achieve an office floorspace uplift of 630,000-770,000sq.m. The proposed development would deliver a significant amount of this floorspace target for the City Cluster, providing a net uplift of Grade A office floorspace of 58,397 sq.m, equalling approximately 4.86% of the entire City Plan target.

117. The proposed office spaces are designed with a range of floorplate sizes to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with options which offer a range of exterior environment amenity, floor area, and choice of outlook. The proposed development seeks to provide roof terrace spaces for the use of office occupiers at podium and roof levels, these spaces would provide high quality amenity space to City workers and would contribute to the urban greening of the building. This would accord with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.

118. A range of office floorspace is required to meet the future needs of the City's office occupiers, including provision for incubator, start-ups and co-working space. An Affordable Workspace Management Plan would be secured by condition, which shall include details of specification, layout, facilities, operation and management.

119. The central part of the ground floor hosts the double-heighted office entrance lobby and reception, from which escalators and lifts provide access to the main lobby at the first floor. The lobby has frontages and access to both the proposed passageway and Fenchurch Street. Levels 2-31 provide office floorspace with associated facilities.

120. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in

delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a substantial uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

### **Proposed Retail**

121. The site is located within a Principal Shopping Centre (PSC). Policy DM20.1 of the Local Plan 2015 states that within Principal Shopping Centres the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Policy DM20.4 of the Local Plan 2015 states that proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated and policy CS20 states that new retail development should be focused on Principal Shopping Centres so that they become attractive shopping destinations. Policy S5 of the emerging City Plan 2040 supports proposals that contribute towards the delivery of additional retail floorspace across the City to meet future demand and supports provision of retail uses that provide active and publicly accessible frontage across the City where they would not detract from the viability and vitality of the PSCs.
122. The existing retail floorspace on the site is 7,757sq.m (GIA), it is occupied for retail use at lower ground, ground and first floors.
123. The proposed retail floorspace comprises 195sq.m (GIA) of flexible retail space for a flexible mix of shops, cafes and restaurants (Class E(a)-(b) to ensure the building can respond to market demand.
124. There is a significant loss of retail floorspace, 7,562sq.m, contrary to policy. Under policy DM20.1 and emerging policy RE1, the amount of active retail frontage remains largely the same due to the new pedestrian route through the building. There is existing 75m of active ground floor retail frontage and it is proposed that there would be 78m of active retail frontage at ground floor level. The policy is to resist the loss of retail frontage and floorspace.
125. The application proposes that the ground floor and part of the lower ground floor would prioritise a mixture of publicly accessible space and retail space as well as entrances for the areas on upper floors. At the western part of the ground floor, a large retail space is provided to the south-west section of the ground floor, fronting Gracechurch Street, Fenchurch Street and the proposed passageway. This space has frontages to the west, south and east facing frontages. The eastern part of the ground floor would be multifunctional. The space is proposed to be entirely open to Fenchurch Street and Lime Street at

ground floor to the east which accommodates a large piece of public realm in the daytime, suitable in part for retail pop up uses to provide further dynamic enhancement and activation to this space. The lower ground floor provides publicly accessible toilets.

126. The site is located in the Leadenhall Market Principal Shopping Centre (PSC) as identified in the Local Plan. Policy DM20.1 states that within Principal Shopping Centres the loss of retail frontage and floorspace will be resisted and that development should maintain a clear predominance of shopping frontage within Principal Shopping Centres.

127. In weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre. The scheme would provide significant additional office floorspace, close to the Eastern Cluster contributing to meeting the City's targets for increasing office floorspace. Other Local Plan objectives met include provision of a new publicly accessible viewing platform providing higher level views and public areas, in line with emerging City Plan policy.

128. Although there is a loss of retail floor space, the amount of active retail frontage at ground floor level increases slightly. The proposed retail component of the scheme and creation of active frontages would enhance the public interest and vitality of the street frontages on Gracechurch Street and Fenchurch Street, and increase the permeability into the building through the creation of two pedestrian routes. One of these spaces could be used to provide pop up retail, contributing a further 580sq.m of retail space. The proposed development would provide flexible retail floorspace at ground floor across key frontages and at lower ground mezzanine level. The proposed retail would be fit for purpose in the context of a changing retail market, being flexible and adaptable in layout, in support of long-term vitality and viability of the Principal Shopping Centre. It is considered that the proposed use would complement retail uses at the neighbouring Leadenhall Market, particularly with the introduction of the proposed passageway providing increased access. During the day, there is potential for a pop-up retail space within the new permeable, accessible open space. This offer would provide a flexible and adaptable space which has the potential to address rapidly changing retail patterns and demand from the largely office-based employment in the Cluster. This space is flexible and would utilise the same space as the service entrance and so is considered on a flexible basis and is not permanent retail. On balance it is considered that the loss of retail floorspace is acceptable, the mix of uses would provide a complementary use to the offices on the upper floors in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with Emerging City Plan Policy OF1. However, the development

proposed, would be contrary to adopted Local Plan Policy CS10, DM20.1 and Emerging City Plan policy RE1. A condition is recommended to secure retail uses falling within Class E as proposed, and to prevent the change to any other use within Class E.

### **Proposed Cultural Offer**

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

- Providing, supporting and further developing a wide range of cultural facilities including the cultural quarter focused on the Barbican complex, the Guildhall School of Music and Drama, the Guildhall Art Gallery and City Libraries.
- Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
- Protecting existing cultural facilities where they are needed.
- Providing visitor information and raising awareness of the City's cultural and heritage assets.
- Allowing hotel development where it supports the primary business or cultural role of the City.

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

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

132. A cultural plan has been submitted for the proposed site in accordance with Policy CV2 of the emerging City Plan 2040. The plan analyses the City's existing cultural infrastructure and sets out the applicant's vision to provide a

multifunctional environment over three cultural spaces in the City for a variety of cultural uses, such as art exhibitions, community events, market spaces, and interactive displays where visitors could engage with local history and the work of young and emerging artists from across London. The Cultural Plan for the site was prepared by Hatch and informed by research into the City's cultural provision, to identify gaps in provision as well as to help inform the development of a cultural offer that would complement as opposed to compete with the existing cultural offers available within the vicinity of the site, including Leadenhall Market and other nearby consented schemes.

133. The submitted Cultural Plan seeks to balance consideration of cultural infrastructure need, wider societal benefits of culture and the essential role that hospitality and tourism sector businesses play in supporting thriving cultural destinations, and this approach has informed the development of the cultural offer for the scheme and the identification of prospective occupiers and delivery partners. This was in addition to undertaking engagement with cultural sector stakeholders and key industry specialists in Art Exhibitions, Creative Workspace and Social Enterprise Food Business. The engagement with these cultural stakeholders identified a strong interest in the site and highlighted an unmet demand for well-equipped and functional cultural space in the City for both consumption and production.

134. The Cultural Vision outlines its strategy for the development based on utilizing different levels of the proposed development in line with the following initiatives at each level.

#### Lower Ground Level

135. The lower ground level would provide a multifunctional space for various art installations, from immersive digital projections, to interactive displays exploring local history to traditional art exhibitions. This would be a flexible 'black box' design to allow for diverse artistic displays to be programmed and iterated overtime, and would enable showcasing local creative works, enhancing the visitor experience and supporting local emerging artists, and could be further adapted for community events, functions and public activities including seminars and panel discussion, skills training and community workshops. This level would share space for retail and F&B uses to compliment the exhibition space.

#### Ground Floor Level

136. The ground floor level would feature a new pedestrian passage through the site, from Fenchurch Street to Ship Tavern Passage, improving access and footfall to Leadenhall Market, and generally contributing to the network of exciting and engaging pedestrianised routes in the City. A digital media wall would be displayed within the new passage, helping to further draw in visitors and would display visual content including interpretations of local heritage,

such as images of the site's early history and its ancient links to the Roman Forum, as well as contemporary digital art curated from local artists.

137. There would be a new covered public realm space at the corner of Lime Street and Gracechurch Street which would be used for a range of pop up uses such as exhibitions, performances, experiential retail events and markets. The ground floor space at the intersection of Gracechurch and Fenchurch would feature a flexible retail/food and beverage space and would be designed to complement the overall cultural offer.

#### Level 32

138. A public viewing gallery would be provided at the top of the building, contributing to the network of free to access elevated public spaces across the City for the use of the City residents, workers and visitors. The viewing gallery would provide opportunities for enrichment within the public viewing gallery, including supporting art exhibitions, public events and wellness activities. A food/beverage offer would further animate Level 32, encouraging repeat visitation and creating further opportunities for social impact businesses.

139. Given the duration of the construction programme and project completion date for the scheme it is considered premature to 'lock in' a cultural operator for the site at this time, and therefore delivery partners would be scheduled closer to the construction phase of the development. Notwithstanding this, preliminary consultations with local stakeholders have been conducted to understand the current needs and requirements of the sector. These consultations have provided insights that have shaped the development of the cultural plan, and it is expected that the following delivery partners would be expected to ensure efficient and effective operation of the cultural offer:

- a) **Retail/Food & Beverage Occupier:** One or more partners would manage the Ground Floor space under lease agreement and hospitality offering at Level 32. Opportunities for partnership with a social enterprise would be explored to support community-oriented operations and potential rate relief benefits, supporting the ongoing viability of this space.
- b) **Art Exhibition Curator:** One or more partners would oversee the selection, procurement, management and marketing of periodic art exhibitions across all designated cultural areas. This includes curating available spaces at Ground Level, Lower Ground, and the Level 32 gallery, as well as programming for the digital media wall. It is anticipated that this operator would be one of the following groups:
  - An Arts Charity focused on exhibiting works by emerging London artists
  - A creative higher education institution which exhibits student work



- An arts museum or cultural institution which exhibits items from its collection

c) **Market Operators:** One or more partners would be appointed to co-ordinate the scheduling of events in the outdoor market area, bringing expertise in managing successful market environments focused on food and arts and craft sale.

140. These partners would collaborate with building management, who would take carriage of other aspects of the cultural offer including Level 32 security and management of external public areas. To maximise local employment and community benefits, all prospective delivery partners would be evaluated based on social impact selection criteria. Given the timescales involved, the spaces are designed with flexibility and are indicative at this stage, and whilst specific cultural users and delivery partners have been identified, this may change subject to the evolving needs of cultural occupiers.

141. A Cultural Implementation Strategy would be secured in the S106 agreement to secure a year-round Cultural Programme which would establish monitorable deliverables in curation of the spaces for education outreach, sharing of knowledge, cultural activities and events which would respond to the needs of the local area and be informed by a continuing dialogue with stakeholders, the local community and building users. Final details of the design, operation and management of the digital wall would be required by condition and within the S106 agreement.

142. It is considered that the proposal would provide a robust cultural offer for the site that would act as a new destination for the City in line with the Destination City Agenda, CS11 of the Local Plan 2015 and policy CV2 of the draft Local Plan 2040. The proposed Cultural Plan and its intended actions are welcomed and would be secured by condition and through the S106 agreement to ensure that the benefits are delivered in accordance with policy CS11 of the Local Plan.

### **Proposed Elevated Public Space**

143. Local Plan 2015 policy DM10.3 and draft City Plan 2040 policies S8, S12 and DE4 seeks the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City.

144. Policy D9 (D) of the London Plan states that 'free to enter publicly accessible area should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London'.

145. A new public viewing gallery is proposed at level 32 and would be comparable in size and intent to the previous consent for the site. The elevated public space and associated public amenity would be accessed from the ground floor via an entrance on Gracechurch Street and a second entrance in the new public passageway. Upon arrival, visitors would be required to travel down to basement level using the grand stair or lifts in the northern area of the entrance to take lifts to the viewing gallery at level 32. The journey from ground level, to basement level to level 32 is intended as an integrated experience with activities available at all three levels; a flexible space alongside the entrance at ground level, an immersive gallery and community room at basement level all supporting the flexible space at level 32 and the outdoor terrace.
146. The combination of the public viewing gallery, enclosed supporting amenity area for exhibitions and events, seating and landscaping and a food and beverage offer would result in an elevated public space of the highest quality, providing dynamic views across the western part of the City of London, providing a valuable space for culture as well as expansive views over London for all to enjoy.
147. The elevated public space would be free to access and would involve successful management of the space. The public viewing gallery and winter garden would be open all year round (except Christmas Day, Boxing Day, New Year's Day if required) and during the hours of 10am to 7pm or nautical dusk whichever is the later. The number of people the space could accommodate at any one time would be carefully managed (and secured via a management plan) to ensure evacuation and safety of all those visiting, with tickets bookable including 35% walk-ups. The Cultural Implementation Strategy would cover potential use for events outside the public hours which would be secured via a Section 106 agreement. It would be accessed from the lower ground floor with dedicated lifts and security checks.
148. A Public Viewing Gallery Access, Operation, Lift Specification and Maintenance and Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.
149. A Public Viewing Gallery Access, Operation, Lift Specification and Maintenance and Visitor Management Plan and the use of the public viewing gallery and winter garden would be discussed and secured under the Section 106 negotiations and agreement.
150. The proposals for the elevated public space are in accordance with Local Plan policy DM10.3, draft City Plan 2040 policies S8, S14 and DE4, which seek the delivery of high-quality, publicly accessible elevated viewing spaces.

## **Land Use conclusion**

151. Strategic Policy S21 of the City Plan 2040 supports the development of new tall buildings together with complementary land uses, transport, public realm and security enhancements to accommodate a significant growth in office floorspace and employment, through increasing the provision of attractive world class buildings that offer a range of office accommodation to cater for the needs of varied office occupiers and encouraging complementary leisure, culture and retail uses to support the primary office function.
152. The proposed development for a significant increase in Class E office floorspace accords with the primary strategic aim of the Local Plan 2015 and the emerging City Plan 2040, being to deliver new, Grade-A office floorspace to maintain the City's position as the world leading international finance and business centre.
153. The London Plan policy D3(a), encourages a design-led approach to optimise the best capacity of land by ensuring that development is of the most appropriate form and land use for the site, and in policy E1(a) encourages the improvement to the quality, flexibility and adaptability of office floorspace through new provision of office floorspace, refurbishment and mixed-use development. The London Plan policy SD5 reinforces the importance of office floorspace within the Central Activities Zone (CAZ) (which the site sits wholly within) and encourages intensification of office floorspace within the CAZ through redevelopment and refurbishment.
154. Local Plan 2015 policy CS1 seeks to ensure the long-term provision of office floorspace of the highest quality.
155. The provision of an additional 78,711sq.m (GIA) of Class E office floorspace is therefore welcomed in the spirit of the aims of the adopted Local Plan 2015 and emerging City Plan 2040, and Officers consider that the site has been optimised in line with the aims of the London Plan policy D3.
156. The provision of the cultural floorspace is also welcomed in the context of emerging policy S6 (Culture and Visitors) and the Destination City initiative. The provision of retail/F&B floorspace to complement the other proposed uses on site as well as neighbouring commercial and residential uses is also welcomed.
157. Overall, it is considered the proposed development is in accordance with policies CS1, DM1.2, DM1.3, DM1.5, DM10.3 CS11, CS20 and DM20.4 of the Local Plan 2015, policies S4, OF1, S5, RE4, S6, DE4, CV2, CV3, CV5, S8, S12, and S21 of the emerging City Plan 2040, as well as the aims of the London Plan, in delivering growth in office floorspace and employment.

## Design and Heritage

158. The relevant Local Plan 2015 policies for consideration in this section are CS10, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.8, CS12, DM12.1, DM12.4, CS13, CS14, CS16, DM16.1, DM16.2, emerging City Plan 2040 Policies HL1, S8, DE1, DE2, DE3, DE4, DE5, DE8, S9, AT1, S11, HE1, HE3, S12, S13, OS2, and London Plan (2021) Policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4 and GG1-3, GG5, GG6.

### Principle of a Tall Building

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

160. The application site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant economic activity, in line with London Plan Policy SD4. It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.

161. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan 2015 seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).

162. The application site is within the 'Eastern Cluster' policy area in the adopted Local Plan (2015) (CS7, fig G), located in the south-west corner of the policy area. The application site is not in one of the areas identified as inappropriate for a tall buildings, as shown on Figure N of the 2015 Plan. The proposal therefore draws in-principle support from policies CS7 and CS14 (1) which encourages the delivery of tall buildings on suitable sites within the Cluster.

163. In the emerging City Plan 2040, the proposal is within the City Cluster Tall Buildings Area (fig. 14) and the City Cluster Key Area of Change (fig. 27) and would comply with the relevant contour lines of the proposed City Cluster; it would, in the language of policy S12 (3), mediate successfully between the adjacent 140m and 160m contour lines, with the massing of the proposal stepping up towards the east side of the site and reaching 149.67m+AOD at its highest point. The proposal would be in the City Cluster Key Area of Change and would draw in-principle support from emerging policy S21, the proposal would accord with all relevant provisions of this policy. However, the emerging

City Plan 2040 has not yet gone through Examination in Public and is therefore a material consideration to which is afforded limited weight.

164. For the aforementioned reasons the proposal site is identified as suitable in principle for tall building development and the proposal would therefore comply with D9 B (3). Further to this, an assessment against London Plan policy D9 (C) and (D) is made below, with reference to other sections of this report for more detail. The proposals would comply with these parts of the policy, leading to compliance with D9 overall.

165. As such, officers consider the principle of a tall building to be suitable on this site and for the proposal to draw support from and comply with London Plan policy D9, Local Plan policies CS7 and CS14 and emerging City Plan 2040 policies S12 and S21.

### **Tall Building – Impacts**

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

167. The proposal would be read as part of the consolidating City Cluster, positively contributing to the definition of its south-western edge. The height and form of the proposal has been amended following the submission and approval of the previous consent for the site, and pre-application meetings to ensure a sensitive relationship with the Cluster, the wider London skyline, historic skyline features, local views and the significance of heritage assets.

168. The proposal has been designed with the future evolution and consolidation of the Cluster in mind. In strategic London-wide and riparian views, the proposal would help to mitigate the somewhat assertive presence of 20 Fenchurch Street as an outlier from the Cluster.

169. The siting and height of the proposal, to the northwest of 20 Fenchurch Street, would help to fill the gap between the taller cluster to the north and 20 Fenchurch Street to the southeast, it would sit lower than its proposed neighbours, consolidating the cluster with due consideration for its overall tall building composition. The proposals would, in most views, particularly those riparian views, allow 20 Fenchurch Street still to read as a subsidiary 'peak' in height at this point in the Cluster. The proposed tower with its refined and elegant facades would help to counterbalance the singular presence of 20 Fenchurch Street, subduing its currently outlying presence on the skyline, and would help to articulate the overall skyline of this part of the Cluster in the baseline and cumulative scenarios.

170. The height of the proposal would mean that it would be visible in north westerly views available from the Sky Garden at 20 Fenchurch Street, the proposal would sit lower than the sky garden in the foreground of views towards other tall buildings in the eastern cluster. Its impact would be largely similar to that of 6-8 Bishopsgate. The proposal would add to the visual interest of this view and it would not detract from the viewing experience or the visibility of key landmarks such as St Paul's Cathedral. The proposed elevated public space in the scheme provide northwesterly views through the provision of another high quality viewing gallery.

171. The proposal would relate appropriately to the emerging and consolidating Cluster, with its height of a scale commensurate with the stepping down from the apex of the Cluster at 22 Bishopsgate. The height has been specifically modelled to create a gentle undulation among the rooftop heights of the existing and consented neighbouring towers along Gracechurch Street and Bishopsgate, that step down towards the river before a final, subsidiary peak at 20 Fenchurch Street. Officers consider it to strike the right balance in transitioning scale down from the apex towards the river. Such an approach to the future form of the Cluster has been informed by extensive 3D modelling and architectural refinement to ensure that the Cluster can develop and consolidate while minimising the possibility of harm to the City's strategic heritage assets.

172. The proposal is, comparatively, of a more modest height than some of the other existing and consented Cluster towers, listed here in descending AOD order:

- Undershaft: 309.6 AOD (2024 resolution to grant)
- Undershaft: 304.9m (2016 consent)
- 22 Bishopsgate: 294.94m
- 55 Bishopsgate 284.68m
- 100 Leadenhall 263m
- 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
- Heron Tower: 217.80m
- 52-54 Lime Street: 206.50m
- Tower 42: 199.60m
- 30 St Mary Axe (the 'Gherkin'): 195m
- Leadenhall Court: 182.7m
- 20 Fenchurch Street: 177m
- 50 Fenchurch Street: 165m
- 60 Gracechurch Street: 162m (resolution to grant)
- 85 Gracechurch Street: 155.70m
- **70 Gracechurch Street: 149.67m (the proposal)**

Visual impacts:

a) *the views of buildings from different distances:*

173. Of the long range views D9 C (1; a; i), these have been tested in the THVIA July 2024 views Nos. 1-6, 11, 17, 30-43 and A1-5, A10-19 and the addendum in December 2024, and their respective Appendices. Following representations made to the EIA scoping and initial consultation by Tower Hamlets and a review by CoL officers of the THVIA pack, it was decided that the information provided by the applicants that there was sufficient information in the application documents to understand and analyse the impact of the proposals. Some of the comments received from statutory consultees, including Historic England, St Paul's Cathedral and Tower Hamlets, relate to the views provided in the THVIA, the impacts of which are discussed throughout the report and in detail in the Strategic View and Heritage sections.
174. In all relevant LVMF views, the proposal would preserve the setting of St Paul's Cathedral and the Tower of London as the Important Landmarks, as well as the composition, features and characteristics of the LVMF views. The proposals height, overall shape and architectural approach have been carefully considered so the proposed design responds to its location and visibility against designated heritage assets whilst consolidating an overall coherent shape to the City's skyline. In LVMF views, where visible, the proposals would be read against 20 Fenchurch Street, sitting as a smaller neighbour to its north, helping to consolidate the skygap between the existing cluster and 20 Fenchurch Street. In views of the Cathedral and the Tower of London, the proposal would make a positive contribution to the existing and emerging skyline. In relation to long range views, the development would comply with Policy D9 C (1 a; i).
175. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), the impacts are largely demonstrated in THVIA Views no. 7-10, 12-16, 18-21, 24 and 25. Some of the comments from statutory consultees, including LB Tower Hamlets, relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.
176. In both baseline and cumulative scenarios, in mid-range views from all directions, the proposed development would comfortably integrate into the Cluster and would help to reinforce and define its overall silhouette and form. From the southwest, including from Millenium Bridge and London Bridge, the development would appear as a striking new part of the southwestern periphery of the Cluster, lower than 20 Fenchurch Street.
177. From the north and west, the observer would begin to experience the tower's elegant and refined form. From the southwest, south and east, the south elevation would be visible, and in views from the east the eastern elevation would be seen. Particularly from the west and southwest, viewers would perceive the stepped form of the southern elevation and its vertical seams, this detail would add richness and depth. The proposed tower would provide visual

interest in each of these views adding positively to the Cluster's skyline presence. Therefore, in relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).

178. In relation to immediate views, (London Plan D9 C (1; a; iii)), THVIA views 15, 21-23, 26-28 and 31 illustrate the closer range views of the building and how the building is experienced at street level from Gracechurch Street (north and south), Lime Street, Fenchurch Street, Eastcheap, Botolph Lane, Lombard Street, Bank Junction, among others.

179. Within this immediate environment, the proposed building would be seen in the context of other modern and contemporary tall buildings with a landmark status, including 20 Fenchurch Street. While these immediate views would change, the proposed building, both its base and the tower, would be high quality and form a positive relationship with the street, creating a comfortable pedestrian scale which coherently adjoins its surroundings and historic context. In addition, the proposed building would add vitality to the street through clear glazed active facades. The proposed pedestrian route, would add visual interest, activity and vibrancy in the most immediate views. In relation to immediate views the proposals would comply with D9 C (1; a; iii).

180. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would reinforce the Cluster's skyline form, which would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).

181. In relation to D9 C (1; c), the architectural quality of the facades is exemplary and would be maintained throughout its life span. The tower would be visually split into two parts: the ground floor podium, with a tower above. An initial palette of materials has been specified on the application drawings, with conditions to secure their final details and finishes. These indicative materials are considered to be high quality, appropriate exemplary detailing would be required of a building in of such prominence. Overall, the architecture is well-considered, it would be an attractive addition to the skyline, and is considered to comply with D9 C (1; c).

182. In relation to D9 C (1; d), a full assessment of impact on heritage assets is set out in the Heritage and Views sections of the report. Officers have identified no harm to any designated heritage assets.



183. For the reasons set out in this report, it is considered that there is clear and convincing justification for the proposed development. It would optimise the capacity of this site and deliver an essential contribution to the provision of required office space as set out in the land use section of the report.
184. To optimise the site, while avoiding harm, alternatives were explored throughout an iterative process, starting from the massing of the previous tower permission on the site. This included different massing profiles, silhouettes and shapes, with the massing of the tower particularly sculpted to make it invisible in the Fleet Street views and achieve a quiet charisma within the Cluster. The elevational treatments had several iterations and went through a process of refinement, seeking to create interesting and engaging street level views. While the proposal would have intervisibility with a number of heritage assets, its quiet architectural charisma and careful massing would give it a comfortable presence in all relevant viewing experiences of them. The proposal is considered to comply with D9 C (1; d).
185. In respect of D9 C (1; e) the proposal would be visible in relation to the Tower of London WHS as demonstrated by views in the THVIA. The proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the ability to appreciate it. This is by reason of its strategic siting within the long-established and consolidating Cluster backdrop, the intervening distance and height when viewed from in and around the Tower of London. The development would comply with D9 C (1; e).
186. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. Rising to a total height lower than 20 Fenchurch street, which sits closer to the river than the application site. Due to its location towards the south west edge of the cluster, its distance from the river, as well as its strategically driven height, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).
187. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered at its worse to be moderate-major adverse with a potential significant effect to receptors on Fenchurch Street, but negligible-minor adverse for all other receptors (with no significant effects), as discussed in the relevant section in this report. Details of materiality and other design details would assist in mitigating these impacts. Further details would be requested as a S.106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary), in addition to an agreed set of additional testing locations as part of the façade materiality to be secured through the S.106

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

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

### Functional Impact

189. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants, and are considered to be in accordance with London Plan Policy D9 C (2; a).

190. The proposed servicing strategy would be similar to the consented scheme, with some minor differences. This area would function as a dual-purpose area, making an efficient use of the available ground floor space. During the daytime hours (06:00 to 22:00), the area will be used as a public realm space, whereas during overnight hours (22:00 to 06:00), it will be facilitating delivery, servicing, refuse and recycling activities. There are servicing bays in this area to accommodate movements associated with the type of vehicle needed to complete such activities. Swept path analysis were undertaken, showing that vehicles can access and egress the loading bays. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). Further details in respect of the servicing approach are set out in the Transportation section of this report.

191. The proposed development creates several pedestrian access points, for each use; the main access for office workers would be Fenchurch Street and the proposed pedestrian link through the centre of the base, with accesses to the cultural use and retail use on Gracechurch Street and the proposed pedestrian link. The rooftop viewing gallery, both the internal and external space, would be accessed by an arrival space at ground floor level, with circulation space and additional cultural/amenity space at lower ground floor level with lifts up to the rooftop. This area would be the main point of arrival for visitors of the elevated public spaces. The arrival space for the rooftop viewing gallery would be able to accommodate a space for a security check if required, which connects to a passageway leading visitors to the lift for the public spaces. The

public rooftop spaces have been designed to accommodate up to 333 members of the public based on fire capacity, with lifting, access and supporting functions designed around this expected occupancy. The split level foyer space has been generously sized to accommodate visitors to the public areas. This would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. This is in accordance with D9 C (2; c). For cyclists, an access on the east side of the building facing Lime Street would be provided, leading into a lift lobby and stairs with three lifts that take cyclists to the basement cycle store area.

192. As discussed in the transport section of the report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as a result of the development. The impact will require some interventions to the public highway which will be developed in detail as part of the S278 agreement. This would include widening footways, junction improvements and resurfacing public highways to enhance walking and cycling on Gracechurch and Fenchurch Street. The S.106 agreement will require the developer to enter into a S278 agreement with the City of London and the TfL to undertake any works to mitigate the impact of the development in accordance with D9 C (2;d).

193. In particular, the provision of office floor space, the cultural space and the elevated viewing gallery will promote the creation of jobs, services, facilities and economic activity and will act as a catalyst for future growth and change in the locale in accordance with D9 C (2; e).

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

### Environmental Impact

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

### Public Access

196. The proposal would provide a striking new elevated public space at the crown of the building. This would provide striking views over central London to the west, south-west and south in the form large external viewing platform incorporating a separate but linked internal space. The proposal would accord with D9 (D).

### Tall Building, Principle, Conclusion

197. Overall, officers consider the site to be appropriate for a tall building and a strategic delivery site which supports the consolidation of the City Cluster and, as such, the proposal would comply with London Plan policy D9, Local Plan policies CS7 and CS14 and emerging City Plan 2040 policies S12 and S21.

## **Architecture**

### Existing Context and Building

198. The existing building at 70 Gracechurch Street was completed in 2001 and is formed of 8 above ground stories with 4 basement levels. It occupies the entire footprint of a prominent corner plot towards the centre of Gracechurch Street, to its eastern side where the street meets Fenchurch Street. The building was designed by Building Design Partnership (BDP) as a department store with office space above. The ground floor retail unit features primary entrances from Gracechurch Street and Lime Street, with a secondary entrance from Ship Tavern Passage. The office entrance is from Gracechurch Street. The façade is a mix of Jura limestone curtain walling with glazed panel cladding. The corners are articulated with horizontal limestone fins which follow the curved profile.

199. Other than the Swan Tavern, which is set back from the street, the buildings in this terrace have consistent front building line datums, with relatively uniform base proportions, which work together to form a consistent and complete street. Similarly, there is a conformity of building materiality through the use of stone and masonry detailing, proportion and hierarchy, despite these buildings being of different ages and architectural styles. In urban design terms, the scale and proportion of the existing building, and its neighbouring buildings fronting Gracechurch Street, are well-proportioned and exhibit good quality architectural detailing.

200. The curved nature of the building on this prominent corner also helps to lead the eye, and pedestrian movement, around on to Fenchurch street. The curved form is also reflected in the design of the existing 60 Gracechurch Street, which sits on the opposite side of the junction. Working positively together, the curves of these two buildings mark a legible gateway to Fenchurch Street, softening its edges, and enhancing the pedestrian experience of these streets.

201. The ground floor of the application site also offers legible entrances, and an active and human scaled ground floor, which is predominantly clear glazed allowing views into the building, which also provides an active frontage onto Fenchurch Street.

*Summary of changes since previous permission (20/00816/FULEIA)*

202. In 2020, planning permission was granted for a scheme on this site comprising three articulated glazed volumes on top of a mid-height podium block, with a pedestrian route through the site at ground level, lined with active uses and entry to a rooftop elevated public space. These essential elements are carried forward in the current proposals, but significant revisions have been made to improve the sustainability credentials of the building. The changes can be summarized as follows:

Retention of the existing structure

203. Perhaps the most significant change is that a large portion of the existing building's structure would now be retained, with additional structure for the tower added in various places, and this retention would be reflected in the architectural approach of the base of the building, where existing materials would be re-used as far as possible. The structural retention would amount to approximately 60% of the existing structure and sub-structure (by volume), this is considered positive from a carbon saving and circular economy perspective. The level of structural retention is discussed in more detail in the sustainability section of the report. The lower floors, or the 'base' of the building, have a high level of solidity with horizontal and vertical emphases, a more traditional order than the existing building, and in a similar fashion of the previously consented scheme, though under the current proposals the floor to ceiling heights and the width of fenestration have been dictated by the retained structure behind.

204. The tower design has been updated to account for latest best practice in building design, it would be more sustainable, and its calm design has been welcomed by Historic England in their consultation response. A simplified version of the previously consented scheme, 3 distinct curved volumes appear on the southern and northern facades. These curved volumes have been refined and consolidated when compared to the previously consented scheme. The proposed tower has 3 distinct elements, but these 3 sections have been separated by a squarer corner, with straight vertical emphasis. The proposed tower reads as a simplified and refined version of the previous tower, the buildings form and envelope has been streamlined to reduce the embodied carbon impact of the proposals.

205. The base of the building is slightly taller than the previous consent, and would have an additional floor. The top of the building still incrementally increases in

height towards its eastern edge in 3 'steps', however, the differences in height between each tower element, or step, are smaller between each volume. The uppermost floors in the previous consent were Level 30, Level 32 and Level 34, in the proposed scheme they are Level 31, Level 32 and Level 33 respectively (regarding internal, occupiable space).

### Appearance

206. The previous application proposed unspecified masonry facade materials for the base, the current proposals would re-use the jura-limestone on the existing building for the proposed solid elements of the existing building, with new facade panels. The ground level route through would be finished in dark metal, with shopfronts that follow traditional proportions.

207. Both the previous consent and the current proposals would be predominantly glazed, the previous proposal would have had metal fins and terracotta spandrels with an offset fenestration order. The proposed tower would have a simplified design, with horizontal white metal spandrel panels instead of white terracotta, and a more ordered, rectilinear fenestration pattern which would not be offset.

### Pedestrian Route

208. The route through the building at ground floor level would remain, although it has been re-aligned to be slightly diagonal across the building footprint. It has been arranged to terminate more visibly on the junction of Fenchurch Street and Gracechurch Street, this is considered an improvement on the previous application. A large entrance to the route on the south elevation would be prominent in views of the building from the south. The design and appearance of the route has changed, as have the activities which line it. The entrance to the curated cultural space would flank the western edge of this pedestrian route. The presence of a digital art screen would tie in with this cultural use, and create a publicly accessible new part of the City on the edge of Leadenhall Market.

### Cultural Offer

209. In the previous consent, a publicly accessible cultural 'forum hall' space would have been provided at ground level on the southwest side of the building. A separate viewing gallery entrance would have been on the northwest corner, this would have provided access to a double height viewing gallery at level 29.

210. In the current proposals, the public amenity space entrance would remain on the northwest corner, retaining its visual prominence on Bishopsgate, but it would be larger than consented, with a supplementary arrival space at lower ground floor level. This space would positively contribute to the overall public

offer and would be curated and programmed with a range of food and beverage, artistic or community focused activities to support the ongoing success of the elevated spaces. In addition, there would be a large retail or food and beverage use on the southwest corner, which would provide additional amenity to visitors and workers, supporting the activity and vibrancy of the surrounding area. The revised proposals are considered to be an improvement on the previous consent.

#### Transport and servicing arrangements

211. The previous proposals would have located the servicing bay on the southeast corner of the building, with vehicle lifts to take servicing vehicles down to lower ground floor level, a blue badge parking space would have been provided in this area. Servicing would have been managed and taken place out of hours to ensure the success of this space.

212. In the revised proposals servicing would take place outside of normal office hours at ground floor level in the same location. The service vehicle lifts have been removed due to the retention of the existing buildings structure, this structure would have left insufficient space for vehicles to turn below ground. Similar to the previous proposals, a blue badge space would remain, and an outdoor market would take place in the shelter of the cantilever.

#### Proposed Design

213. The proposal would bring a quiet architectural charisma to the City Cluster, with the reuse of existing structural components being at the heart of the design; it would rely not on eye-catching architectural devices for its identity, but the judicious handling of volume (informed by structural retention) dressed in a modern architectural language that would have a simplicity which would contrast effectively with other towers in the Cluster. It would be an elegant and architecturally refined building, adding a rich mix of uses to support and enhance the local area and delivering over 70,000 square metres of office floorspace. It would have excellent sustainability credentials, and be attractive and contextual at numerous scales, with an appropriate character for this part of the City.

214. The proposal would create new high-quality public realm both at ground level and on the upper floors of the building, adding to the City's activity and vibrancy, generating footfall on evenings and weekends in the local area driven by the provision of a high quality publicly accessible spaces, a viewing gallery, and a pedestrian route through the building which would form a seamless link with Leadenhall Market.

215. The proposals are considered to be well-designed, and make an effective use of limited land resource and are considered to be in conformity with City of

London Local Plan (2015) policies CS7, CS10, DM10.1, DM10.2 DM10.3, DM10.4, DM10.5, DM10.8, CS12, DM12.1, DM12.4, CS13, CS14, emerging City Plan 2040 Policies HL1, S8, DE1, DE2, DE3, DE4, DE5, DE8, S9, S11, HE1, HE3, S12, S13, and London Plan (2021) policies D3, D4, D5, D8, D9, HC1, HC2, HC3, and HC4 regarding architecture, urban design and heritage.

*Bulk, Scale and Massing*

216. The proposal would retain a large portion of the existing building's structure and re-use its existing materials where possible, whilst introducing a new tower to the Cluster rising to a total height of 149.67m AOD. The proposal's design, with distinctive and different treatments of its podium, tower and crown, respond positively to its immediate and strategic contexts, the overall composition of these elements would create an aesthetically unified whole.
217. The reuse of the existing standing structural components and facade materials would create a base of the building which engages appropriately with its street level context, the structural re-use has dictated some of the parameters of the design for the lower floors, namely the floor to ceiling heights and the width of window bays. The podium element responds to its immediate local context by reflecting a similar scale and proportions to its neighbours, utilising a traditional order with a simple clean architectural language. The elevations on the corner of Gracechurch Street and Fenchurch Street would be expressed with a dynamic curved corner treatment, with the proposed pedestrian route at ground floor level facing directly on to this key pedestrian route, inviting people through the site into Leadenhall Market. Both the podium and tower elements would address this corner and junction effectively.
218. The podium is divided into three parts, the southern facade fronting Fenchurch Street would be broken up with strong vertical emphasis, the podium would step down in height from seven storeys on Gracechurch Street to five storeys on Lime Street, these steps would align with the tripartite elements of the tower above, this again assists an overall coherence between the base and the tower above. The base would respect the established height of the immediate context and the buildings along Gracechurch Street and the smaller scale buildings in the adjacent Leadenhall Conservation Area. The 'lightweight' tower resting above would have a clear visual break between the base and tower, which would alleviate its street level presence.
219. The massing of the tower has been sculpted to minimise its skyline presence, it would be broken down vertically with 3 forms which appear as interconnected elements, the geometry of these forms would create a visually interesting tower, convincingly breaking down the bulk of the building. In addition, tapering the overall shape adds to this massing approach, the building would taper outwards up to around halfway up the tower, and taper inwards from the midpoint up to the top of the building, creating a slender form which reads well



in local ground level views and in longer range strategic views. The 3 vertical forms of the tower take their cues from the podium, corresponding to each point where the podium facade steps down from Gracechurch Street to Lime Street. The massing on the southeast and north east corners is expressed as a double curve, adding visual interest at street level, with the remaining edges being curved. This visually softens the building and distinguishes it from neighbouring towers.

220. The 3 vertical volumes of the tower would be stepped up towards the east, starting at 143m AOD on the western end of the building and to 149m AOD to the eastern end. This stepping is more uniform than the previous scheme, which proposed larger jumps between each volume. The towers form is reinforced by its staggered plan, which creates subtle protrusions on the elevations, this breaks down the bulk of the tower and forms an overall a pleasing sculptural composition.

221. The stepped arrangement of the roofscape creates space for a high-quality landscaped public terrace, with a large, internal cultural space and viewing gallery forming a symbiotic relationship with the external roof terrace. The external terrace would have a range of seating and greening, it would have a pergola overhead which is architecturally well detailed and integrated into the design, which would provide shade and shelter to users, bolstering the potential use and flexibility of the space. The terrace and viewing gallery will provide excellent views across the City, particularly those towards the southwest, which could be programmed with a range of cultural uses and events, curated and agreed through the Cultural Implementation and Management Plans, secured by the s106 agreement. This elevated public space is considered to be a significant improvement on the consented scheme, which secured a smaller internal space only.

222. At roof level the proposal would introduce a note of architectural dynamism which would contrast pleasingly with the soberer elevations below. The proposed crown would be dramatically serrated, creating triangular volumes and sharper edges to visually 'set-off' the cleaner, quieter curves and tapers of the tower elevations below; the proposed crown would give the proposal an individualism on the skyline without undermining the quiet architectural charisma which characterizes the scheme as a whole. Landscaping would soften the top of the tower in a broad selection of views, emphasizing the presence of the public terrace whilst making a positive contribution to the overall aesthetic composition of the Cluster, these terraces would introduce both climbing plants alongside floor-level planting contributing to urban greening and biodiversity.

## **Materiality**

Podium:

223. The existing building's structural frame would be retained, dictating the floor to ceiling heights and width of window bays. This has informed the rhythm of the new facade, especially at street level where the columns are free-standing, this also helps establish the basic window dimensions and spacings to the floors above.
224. The podium is intended to have a distinct identity from the tower. The base would follow a lighter, mostly neutral colour palette, referencing adjacent buildings and the wider neighbourhood where older buildings are generally finished in Portland stone, Warmer stone would frame the lighter re-used Jura limestone. These materials will be used alongside darker window framing that would be coherent with the tower above. The podium of the building relates closely to its surroundings in terms of scale, relationship to the street and materiality. This provides a more human scale while also providing a strong grounding for the tower above.
225. The ground and mezzanine floor levels that contain the retail, public offer and office entrance would be pulled back from the pavement line on the south elevation to create a colonnade. The corner at Gracechurch Street and Fenchurch Street would be expressed with a dynamic curved corner treatment to mark its townscape prominence.
226. The principal podium façade framing is proposed to be clad in a buff-coloured stone material with pinstripe recesses at the nose of every expressed vertical, in this the re-use of existing cladding would be maximised, with the details and the material re-use to be agreed through condition. The plain spandrel panels beneath the windows are proposed to be in a similar colour to the verticals, which would be slightly recessed to create a vertical emphasis. The parapet would be a simple design with the horizontal panels tapering outwards. The flat side panels to the windows will incorporate vertical caps to the outer edges to add greater depth and refinement to the façade.
227. A large portion of the north façade within Ship Tavern Passage would be panelled above the glazed ground floors. The concrete clad façade retains the grid pattern as the rest of the facades but the panels would have a ribbed concrete finish to add texture and a level of detail, to provide a level of visual interest and animation on the building facade for those approaching the passageway from the alleyways to the north and Leadenhall Market. These materials would be agreed by condition to ensure their high quality and appropriateness to context.

228. There would be landscaped terraces on the roof of the podium, which wrap around the perimeter of the plan, providing a private outdoor amenity for office workers, a key component of providing best in class office floorspace. This will provide the podium with a termination that comprises a set-back glass balustrade with planting behind. This will positively contribute to urban greening and help soften and clearly define the transitional lower portions of the tower that are defined by a zone of plain clear vertical glazing.

Tower:

229. The tripartite form of the tower would be reinforced by the treatment of the facade, which introduces a strong horizontal emphasis to the floor levels through the use of dark, visually recessive window framing between light, metallic spandrel bands, the proposed materials and the overall shape of the building would work well together. The silver metallic spandrel panels with moulded horizontal nosing provide some visual animation with contrasting light and shadow. The three tower volumes are separated by strong, vertical recesses that will be reinforced by a vertical fin that terminates the horizontal banding, creating great shadow and depth and further breaking down the mass.

230. The curved faceted corners at the eastern and western ends vary in radius due to the tapering, this would again soften the buildings' form on the skyline. This will also ensure that continuous and unbroken banding of glass and moulded spandrel panels is achieved, again working well with the overall massing concept.

231. The north portion of the tower incorporates plant and machine rooms that will require ventilation. For this reason, zones have been identified on the façade for louvered vents which run vertically down the facades in two long stripes with larger rectangular areas of vents to the top third and fourth floors. The final design of these louvered panels would be secured by condition to ensure a high-quality finish.

232. The transitional zone between the podium and the tower would be glassier, revealing structural interface between these elements as well as creating a visual recess to separate them.

233. The upper office terrace zone occurs at the upper shoulder level, creating five separate terraces where the massing of the building crown is set back. These are also landscaped and offer a variety of usable spaces, protected by tall glass balustrades.

234. The uppermost storey of the building works with the stepped massing, accommodating plant equipment and the BMU housing, successfully screening this layer of functional equipment from view, enclosing these utilitarian features within the overall tower envelope.

235. The detailed design and architecture of the proposed development is of an excellent standard. Both the tower and podium would make a positive contribution to the local area and the emerging City Cluster of tall buildings. The proposed high-quality materials and detailed design provide a richness to the building, appropriate to the character of the City as well as the setting of surrounding buildings and spaces. The elevations would have a depth and quality of modelling, of a high standard of design and architectural detail.

### **Public Realm**

236. Capitalizing on the site's central location, the proposed development offers diverse opportunities for public interaction and engagement through a mix of elevated public spaces, ground-level public realm enhancements, and a significant cultural and retail offering. This dynamic combination appeals to a broad demographic, fostering an inclusive, welcoming, and highly functional environment for both visitors and workers. The carefully designed sequence of public spaces emphasizes safety, accessibility, and user experience, ensuring it caters effectively to the needs of all users.

237. The existing seven-story building at 70 Gracechurch Street occupies the full site footprint, with no public route to Leadenhall Market. The existing public realm lacks active frontages on Fenchurch Street and Lime Street which are characterised by blank facades, loading bays and servicing entrances.

238. The proposal would significantly improve the existing public realm around the site and would significantly increase the amount of public realm and spaces on the site, in the form of a new north-south pedestrian route, a pop-up space to the east of the site, a split-level cultural space at ground and lower-ground floor levels, and a new elevated internal and external public space at level 32. The proposal elevated public space totals 836 sqm, combining 489 sqm of indoor space with a 347 sqm terrace.

239. The proposals represent compliance with Policies D3, D8, T1 and T2 of the London Plan 2021, as well as CS10, CS16, DM10.1, DM10.2, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies S10, AT1, S8, DE2, DE3 of the emerging City Plan 2040, and, the City of London Public Realm SPD and the City Public Realm Toolkit. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm proposals are considered by officers to be a benefit of the scheme, weighing in its favour. The proposals would represent a substantial public realm offer to the City.

### Ground Floor Public Realm and North South Pedestrian Route

240. A new north south pedestrian route is proposed directly through the site from Fenchurch Street to Ship Tavern Passage. The new route has shifted from a perpendicular alignment which ran parallel to Gracechurch Street in the previous permission (20/00816/FULEIA) to a diagonal alignment which reconnects the less visible areas of Leadenhall Market to Fenchurch Street, establishing connections between Gracechurch Street and 'The Swan Tavern'. This is a key benefit of the scheme, improving north-south routes in the City Cluster and linkages to Leadenhall Market and its retail uses and relieving footfall from the existing street network. The proposed ground floor will transform the existing closed perimeter block into an active and permeable route with cultural entrances, a digital screen, and gathering spaces.
241. The proposals significantly enhance the existing public realm, creating a concentration of active frontages and a legible and inviting route that seamlessly integrates with the City's rich tapestry of historic alleys, leading into Leadenhall Market and the Conservation Area.
242. The podium is well-defined, with a harmonious balance of solid and void elements in the street-facing elevations, supported by robust columns that emphasize the building's tripartite structure and give the ground floor a sense of dimension and depth. The facades are thoughtfully designed to complement the townscape, achieving a balance of traditional order and scale with a simple, clean architectural language. The selected material palette of buff and light stone cladding and grey precast concrete, complemented by mid grey panels contributing to a cohesive and visually appealing streetscape.
243. The office lobby features glazed and curved facades with a high proportion of glazing facing Fenchurch Street, enhancing visual connectivity, and adding architectural interest.
244. The north-south connecting route through the buildings is designed with expansive glazing and double-height proportions creating a suitable extension to Ship Tavern Passage. The scale, height and dark grey metal details have a vertical emphasis which help make the space feel more open, brings natural light into the space, enhances visibility, and improves the legibility of access routes, creating a more inviting environment.
245. The inclusion of a digital art wall helps to enliven and activate the new route, dedicated to displaying art and cultural content linked to the gallery, reinforcing the building's cultural offerings.
246. The arrival sequence to the proposed public spaces is well considered. Clearly marked entrances on Gracechurch Street and the north/south route guide visitors to lifts and a grand staircase to the basement. From there, lifts or stairs

provide access to the Level 32 cultural space and outdoor amenity which has the capacity to accommodate 333 members of the public based on fire capacity. The lifts would take people from basement level to the top of the building in less than one minute. The lifting strategy and its management will be secured via S.106 to ensure inclusive access.

247. The proposals address site-level changes with a step-free, inclusive design allowing unrestricted access, secured via legal agreement. Well-detailed ground and first-floor elevations ensure active frontage, with security features integrated into the facades to maintain safety without visual clutter.

248. The active uses lining the ground floor will animate and enliven the public realm, marking a significant improvement over the impermeable and closed nature of the existing building which lacked activate frontage on Fenchurch Street and Lime Street. The proposed ground floor would be attractive, permeable, legible and provide good levels of passive surveillance. The mixed-use nature of the development, will stimulate activity throughout the day and week, appealing to a broad and diverse audience in compliance with policies S8(6) / D3(D;3/6/10) & D8 (F/G) / DM 10.1.

249. Planters are proposed, integrated into the western façade of the building at ground floor level, planters edged with Corten steel and filled with perennial shade tolerant planting, softening, and enhancing the street frontage.

250. The public realm will feature a palette of York Stone and durable flush granite cobblestones for the north-south connection and southeastern market area. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Public Realm Toolkit, with final detail reserved for condition. The proposals would also rationalise and minimise street clutter.

251. The specification of hard landscaping, which must be resilient, easy to clean, of high quality, and inclusive, with full details of tactile paving and the demarcation of the blue badge bay, will also be secured via condition.

252. The materiality of the public realm, proposed planting and all associated furniture is considered to be acceptable, it is in accordance with Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.

### *Eastern Pop-Up Space*

253. The eastern part of the ground floor is multifunctional. The space is entirely open to Fenchurch Street and Lime Street at ground floor to the east which accommodates a large piece of public realm in the daytime, suitable for retail

pop up uses to provide further dynamic enhancement and activation to this part of the City.

254. The southeast corner of the site would be open-sided, providing a significant area of outdoor publicly accessible space in daytime hours. This space is proposed to be cleared when the area is needed for service use between 10pm and 6am. Management of the pop-up market would be secured in the S106 Agreement through the Public Realm and Market Management Plan. A single accessible blue badge parking bay is included and will remain accessible at all times. A Public Realm and Market Management Plan, secured through a Section 106 agreement, would ensure the space aligns with London Plan Policy D8 and the Public London Charter, detailing strategies for safety, accessibility, inclusivity, public access, events, and maintenance to keep the space functional and welcoming to all. This will allow pop-up retail and cultural uses in this area, enhancing the variety of activity on Lime Street.

#### *Elevated Public Space*

255. Visitors access the elevated public space would be through the B1 level which includes a community space via stairs or lift, before travelling to the flexible cultural space and outdoor amenity on level 32 via lifts. The indoor amenity on level 32 leads to a landscaped outdoor terrace with seating, a pergola, and a mix of hard and soft landscaping. Local Plan policy DM10.3 and emerging City Plan policies S8, S14 and DE5 seeks the delivery of high quality, publicly accessible roof gardens and terraces with high levels of urban greening, which the proposals would comply with.

256. The rooftop terraces (levels 32-33) feature pergola structures with vines as the primary greening element. Made from low-maintenance aluminium and steel, the pergolas have a lattice roof and perforated columns for vertical plants and integrated seating. The texture palette includes metal, creeping vines, jasmine, and grapevines, with recycled steel planter edging and fibre concrete benches.

257. The terrace has been carefully designed to create an optimal climate for dwelling, 3m glass balustrades from the parapet and vertical greening from the pergola would create a safe environment comfortable for dwelling. The glass balustrade adds wind protection and security designed to optimize thermal comfort and meet policy requirements for suicide prevention. In terms of current legislation, Building Regulation K2 states the following: K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, and (B) any lightwell, basement area or similar sunken area connected to a building, Shall be provided with barriers where it is necessary to protect people in or about a building from falling.

258. The space is adequately designed for year-round use with a robust and durable material palette, added greenery and dedicated public entrances for safety and

operational efficiency. Additionally, the design and placement of terrace entrance doors will be conditioned to ensure accessibility year-round, taking into account wind conditions.

259. The proposed material palette for the primary amenity terrace includes Yorkstone, covering an area of 213.15m<sup>2</sup>, and recycled pavers, covering 666.98m<sup>2</sup> (pending results of the demolition audit). Overall, the planting and material selections are deemed to be of high quality and are considered to be acceptable, it is in accordance with Local Plan (2015) Policies DM10.1, DM10.2 DM10.4, London Plan (2021) Policies D3, D4 and D8.

260. Full details of the landscape designs, including planting specification, and strategies for furniture, pergola design, lighting and hard surfaces, will be conditioned to ensure the designs are of a high quality and resilient in this context.

#### *Public Realm, Management, Cultural and Programmable Events*

261. The cultural offerings are thoughtfully distributed throughout the building, providing visitors with a diverse and dynamic range of activities. The gallery and sky gardens on Level 32 will feature art exhibitions and community events, offering views of London's historic core. At ground level, a public entrance gallery, a versatile covered market space, and an internal digital screen will create a lively and welcoming environment. The lower ground level will house a flexible subterranean space, dedicated to celebrating local history and showcasing the work of emerging artists, fostering deeper community engagement. The cultural offer aligns with Local Plan policy CS11 to enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences.

262. The culture plan aligns with London Plan Policy D8 and the draft Public London Charter, maximizing public access while minimizing restrictive rules. A Public Viewing Gallery Access, Operation, Lift Specification and Maintenance and Visitor Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.

263. The combination of the enclosed public viewing gallery and roof terraces would result in an elevated public space of the highest quality, providing a valuable space for culture as well as expansive views over London for all to enjoy. The space would contribute to the network of free to enter viewing galleries across the City and internally would incorporate culture in the form of sculpture, art, pop up cultural performance and educational events.

264. The public viewing gallery would be free to access and would involve successful management of the space. The public viewing gallery and winter garden would be open all year round (except Christmas Day, Boxing Day, New



Year's Day if required) and during the hours of 10am to 7pm or nautical dusk, whichever is the later, and there is no need for a booking system for users and would not be closed for private events during those hours. The Cultural Implementation Strategy would cover potential use for events outside the public hours which would be secured via a Section 106 agreement. It would be accessed from the ground floor with dedicated lifts and security checks.

265. The proposal would far surpass the consented scheme by increasing public space to 1,251 sqm, blending indoor and outdoor areas, and enhancing cultural programming, offering greater flexibility, improved engagement, and a generous amount of civic space. The provision of new public space in the Cluster is crucial as it continues to consolidate, and the proposal would make a significant contribution to this.

#### Urban Greening Factor

266. The proposed development would incorporate a variety of urban greening measures, which provides the following benefits: mitigating air and noise pollution, capturing CO<sub>2</sub> while releasing O<sub>2</sub>, combating the heat island effect, improving biodiversity, rainwater run-off management as well as making a place healthier and more attractive, improving the wellbeing of people. Across the entire application site, the development achieves an Urban Greening Factor (UGF) 0.33 which exceeds the draft London Plan policy G5(B) UGF target of 0.3.

267. A substantial increase in greening is integrated into the architectural approach on the building, delivering new planters facing Gracechurch street at ground, integrated planters and benches at podium level 5-7 and upper balconies 28-31 and vertical greening on the pergola, planters, and intensive living green roofs in the sky gardens at levels 32 and 33.

268. The total site area is 3,376.7 m<sup>2</sup>, comprising 2,933.51 m<sup>2</sup> of base area and overlapping pergola surfaces of 154.26 m<sup>2</sup> (L32) and 288.92 m<sup>2</sup> (L33). Pergolas, integrated into the "Green wall" system, feature native and resilient vines with elevated planters for long-term sustainability. Vegetation coverage is 78% (120.21 m<sup>2</sup>) for L32 and 88% (253.39 m<sup>2</sup>) for L33, contributing to the green wall factor while being fully included in the total site area.

269. The proposed planting pallet references the 'market produce' of historic Leadenhall market and features harvestable plants including fruit trees and vines. The planting pallet would ensure trans-seasonal diversity and richness whilst optimising the holistic benefits of greater biodiversity, cooling, noise attenuation, SuDs and general amenity, with well documented health and wellbeing benefits. The details would be secured by condition and would include maintenance and irrigation details.

270. DM10.2 of the Local Plan and S8(7) of the emerging City Plan and London Plan Policy G5 requires major development proposals to contribute to the greening of the city by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls, and nature-based sustainable drainage. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed buildings, and public realm and is considered to be compliant with London Plan policies D3, D8, G1, G5 and SI13, and City of London Local Plan (2015) Policies DM10.2, DM10.4, CS15, DM15.5, DM19.2

### Lighting

271. At ground level a media wall on the eastern flank of the passageway is envisaged as displaying a history of the site, while projected lighting onto the vaulted passageway soffit enhances visual signalling towards Leadenhall Market. A lighting strategy will be secured through condition covering the detailed design of the digital screen, its management and any necessary restrictions. It would not be allowed to show advertisements.

272. At the roof terrace on level 32 it is indicated that lighting could be incorporated into the structure of the pergola.

273. Lighting, in accordance with the adopted City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the City Cluster in the adopted Strategy. The full details would be ensured via condition.

### Transport Related Urban Design Considerations

274. Hostile Vehicle Mitigation (HVM) is integrated into the building's facade where possible with an additional line of bollards surrounding the public market space facing Lime Street, and at the ends of the pedestrian through route. The HVM will not be placed on public highway and a requirement to provide further details of this for approval would be secured by condition.

275. People would be able to walk north/south through the building from Fenchurch Street, providing relief to the footways surrounding the development and offering a new route; the new pedestrian through route would be open to the public 24 hours per day with step free access.

276. There may be stalls or public furniture placed in the servicing area in the undercroft of the building to the southeast of the site when it is not in use for servicing, to allow people to dwell between the development's opening hours between 6am and 10pm. The blue badge parking space will be available during the

development's operating hours and will convert to a loading bay from 10pm to 6am for deliveries and servicing, enabling dual use of the space.

277. Further public realm enhancements are proposed to the public highway to ensure planning acceptability, including widening footways and resurfacing public highways to enhance walking and cycling on Gracechurch and Fenchurch Streets. Additional works include signaling the Lime Street/Fenchurch Street/Philpot Lane junction, subject to a feasibility study. Temporary measures introduced during Covid-19, such as bollards and surfacing, are to be made permanent, with TfL seeking s106/s278 contributions from this development. Highway improvements must align with Healthy Streets principles, with works secured through Section 278 Agreements, fully funded by the applicant. The City of London is the Highway Authority for Fenchurch Street, while TfL oversees Gracechurch Street, requiring Section 278 Agreements for design and delivery of improvements within their jurisdictions.

### **Delivering Good Design and Design Scrutiny**

278. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design.

279. In respect of D4B, the pre-application process including formal meetings, workshops using visual tools and site visits and as applied a holistic lens to the design analysis to optimise the potential of the site. Officers with expertise in sustainability, microclimate, daylighting, policy and land use, accessibility, heritage, archaeology, urban design, public realm, transport and urban greening have been engaged and shaped the final application proposals.

280. A development carbon optioneering process has been followed which has had external scrutiny and is set out elsewhere in the report. At an early stage, transport and pedestrian data informed options for the service route layout, cycle routes and public realm development officers. Environmental microclimate, daylight and sunlight analysis informed the massing and design treatment as well as the public realm and landscaping, with the use of 3D tools to scrutinise the proposals. Wider engagement by the applicant is set out elsewhere in the report, and has included consultation with wider stakeholders on the height and massing of the proposals and heritage impacts.

281. Part D4 C has been met and a detailed design and access statement has been submitted.

282. In respect of D4 D, the proposals have not been referred to an independent design review but have undergone a rigorous local "borough" process of design scrutiny as required by the policy. In addition, the applicants undertook pre-application engagement with external stakeholders including St Paul's Cathedral and Historic England.

283. In relation to D4 E, parts 1-6, there has been a “City” level of scrutiny comprising extensive officer topic-based reviews over multiple pre-application meetings; external input has been provided by other experts as set out above; feedback has been recorded and provided to the applicants; the evolution of the proposals is summarised in the DAS; and within the Committee report.

284. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on submitted drawings to minimise ambiguity. The recommendation is also supported by a condition to ensure the detailed design would include materials of the highest standard.

285. Overall, the application process has adhered to the intentions of London Plan D4 Delivering Good Design and officers consider that the relevant parts of the policy have been complied with.

### **Conclusion on Architecture, Public Realm and Urban Design**

286. The proposal would have a quiet architectural charisma that stems in part from its extensive reuse of existing structural components and materials; compared with other towers in the Cluster and the previous proposal on the site it would have a simpler, calmer form, helping to diversify the architectural character of the evolving Cluster and providing a moment of quiet architectural gravitas. Nevertheless, with its raffish, serrated crown, it would also contribute to that architectural dynamism which is at the heart of the Cluster’s character.

287. Officers consider that the proposal would result in a unique piece of architecture which would make a strong contribution to the identity of the City, with a visually permeable ground floor frontage, and increase in ground level public realm through the inclusion of the proposed cultural and publicly accessible uses, and a new route through the development to Leadenhall Market which would become an integral part of the arrival experience to the roof garden. Officers consider that the architectural design of the building would be compatible with the existing context, being read as a well-layered piece of design, which expands ground level public realm. The proposals would enhance the overall quality and character of this section of Gracechurch Street.

288. The proposed development will significantly enhance the public realm, offering a greater variety of vibrant, inclusive, and accessible spaces that surpass the scale of the previously approved scheme. Key improvements include to the existing site include a highly permeable pedestrian route, improving access to Leadenhall market, improved active frontages through cultural and retail uses and the introduction of new civic spaces including a large viewing gallery, a rooftop terrace gardens and a pop-up market. The combination of an increased

civic offering, improved connectivity, and additional green space will provide a more functional inclusive and attractive public realm that would benefit the city's growth.

289. The architecture and urban design proposals comply with Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, paragraphs 130 and 132 of the NPPF and the City Public Realm SPD all require high-quality public realm and increased urban greening.

290. It is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate employment growth and would increase the amount of high-quality office space. The proposals would balance this need with the ambitions of Destination City, and would help to create an active and vibrant City core through providing a rich tapestry of uses and activities. The proposals align with the function of the City to accommodate substantial growth in accordance with Local Plan Policies CS1: Offices and London Plan Policies SD4, SD5 and E1.

### **Strategic Views and Heritage**

291. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13, emerging City Plan 2040 policies S12 and S13, and the City's Protected Views SPD, all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG, which provides guidance on the protection and enhancement of views of historic City Landmarks and Skyline Features, including securing an appropriate setting and backdrop to the Tower of London (WHS).

292. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. A THVIA Addendum dated December 2024 was submitted to provide additional information. In addition, an Environmental Assessment (ES) Addendum was provided in December 2024 to amend the views for the developments' future cumulative scenario.

293. The views selection was informed by extensive testing. The split of view visualisation types (render, wireline, and computer-modelled representation) is based on the proximity and sensitivity of the views, to represent the impact of the proposed development. Officers consider the selection of views and the type of imagery provided is extensive and thoroughly visualises the visual impacts of the development. For some views, wireline images were considered to provide an acceptable level of detail given the amount of detail shown in rendered images in similar views.

294. For clarity, the previously consented tower scheme at 55 Gracechurch Street (ref: 20/00671/FULEIA), to the south of the site, has been removed from the cumulative views imagery as this scheme has not been implemented, and its planning permission has expired. Similarly, Fountain House, 130 Fenchurch Street (ref: 16/00809/FULMAJ & 19/00713/FULMAJ), located to the east of the site, has expired and has been removed from the cumulative scenario. 99 Bishopsgate (ref: 24/00836/FULEIA), validated on the 9<sup>th</sup> of September 2024 and has been added to the cumulative scenario. 99 Bishopsgate is located approximately 150m to the northwest of the site.

295. Consultee responses have been received from Historic England, St Paul's Cathedral, and London Borough of Tower Hamlets, which relate to the impacts of the proposed tower on strategic views, St Paul's and the outstanding universal value of the Tower of London World heritage site, and best practice in terms of impact assessment in accordance with policy guidance for Impact Assessments in a World Heritage Context (2022). These are referenced and discussed in detail below.

### **Tower of London World Heritage Site**

#### **OUV and Relationship to Setting:**

296. The seven overarching attributes of Outstanding Universal Value which are contained in the Statement of Outstanding Universal Value, itself contained in the World Heritage Site (WHS) Management Plan, have underpinned this assessment, alongside the components contributing to each attribute. It is considered that three attributes are of particular relevance to assessing the impact of the proposal: i.) an internationally famous monument; ii.) landmark siting; and iii.) physical dominance of the White Tower.

297. Whilst the Tower of London comprises a scheduled ancient monument, and various listed buildings and is in a conservation area, it is considered proportionate and robust, in the circumstances of this case, to consider the impact on OUV in order to draw a conclusion on these assets as a whole.

298. The WHS Management Plan establishes a 'local setting area', an 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Figure 4 of the WHS Management Plan) but is in the wider setting. The Local Setting Study (section 7) identifies the main views and/or viewpoints to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints include a number of LVMF viewing locations, all of which have been used to assess the impact of this proposed tall building.

299. The Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the commercial centre of the City of London (at

paragraph 2.4.25) and that the relationship between the ToL and the Cluster is long-established, forming a backdrop in views, including over buildings in the Inner Ward. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. The Management Plan, at paragraph 7.3.27, states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS will continue to need to consider i.) their effect on the established Cluster ii.) the space between it and the ToL and iii.) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.

300. The assessment uses the assessment framework in the Mayor's 'London's World Heritage Sites: Guidance on setting' SPG, which is based on the relevant UNESCO's guidance, including the impact tables at Appendix 3 and 4, in conclusion.

301. Consultee responses have been received from Historic England and London Borough Tower Hamlets. Historic England provided advice but have not objected to the proposals, identifying harm 'modest' harm to the WHS and ToL, although this consultation response acknowledges that the design of the proposed scheme when compared to the consented is calmer, it is welcomed by Historic England as a change in design. In the conclusion of the consultation response, Historic England suggest that the proposal 'would cause some harm' to the Tower of London WHS.

302. In addition, London Borough Tower Hamlets (LBTH) have provided observations and state that the proposals would exacerbate the existing harm to the setting of the ToL caused by the City Cluster, Tower Hamlets have commented that the visual impacts on the WHS would be negligible-minor neutral, in accordance with the Mayor of London World Heritage Sites Guidance on Setting. Neither of these consultees have formally objected to the proposals.

303. Whilst officers give the views of these stakeholders significant weight, officers reach a different conclusion to Historic England and the LB Tower Hamlets on the proposal and conclude that there would be no harm to OUV as captured in views 7, 8, 9, 10A, 10B, 10C, 10D, 12, 13, 14 and 15 of the THVIA. Tower Hamlets have also raised whether views 9, 10b and 13 of the THVIA should be rendered views, however, officers regard the information set out in the THVIA and the ES to be sufficient to assess the impact on the WHS and in relation to townscape, visual and heritage impacts.

304. The proposal would be visible within, and would therefore result in a change to the wider setting of the WHS. However, change is not necessarily harmful. Views, including those identified within the LVMF view management framework, and ToL Local setting study, where the proposal will be experienced in conjunction with WHS, are identified and assessed below.

*LVMF View 10A.1, River Prospect, Tower Bridge (Upstream, North Bastion)*

305. This is also identified as a Representative View in the Local Setting Study (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge).
306. The LVMF SPG identifies that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background, include the Canon Street Station towers, BT Tower, Centre Point and the Tate Modern (paragraph 182).
307. The visual management guidance anticipates the consolidation of the Cluster which it is deemed will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (paragraph 187). The guidance also states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground; that guidance applies, in particular, to the Monument (paragraph 185). The visual management guidance also states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (paragraph 186).
308. In this view, the proposal would appear to the west of the ToL, with a thin portion of the proposed building visible to the north of 20 Fenchurch Street, on the western periphery of the Cluster. 70 Gracechurch Street would appear a considerable distance away from the ToL. The east elevation of the proposal would be visible, viewers would see the simple and elegant horizontal spandrel panels articulating the predominantly glazed facade, set back from 20 Fenchurch Street, these facades would add richness and depth to the composition of the City Cluster.
309. Officers consider that the characteristics and composition of this viewing experience would not significantly change as a result of the proposals, given the intervening distance between the proposal and the ToL, the existing presence of 20 Fenchurch Street within this view and the way it would almost wholly occlude the proposal. In this location, the proposals form, scale and massing would complement and consolidate the Cluster as a distinct skyline.



310. Appearing at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not compromise those relevant attributes of OUV. It would leave unaffected those relevant components which also form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship to the River Thames and City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paragraphs 183-186).
311. Furthermore, the minimal yet additional mass to the north of 20 Fenchurch Street, in conjunction with 1 Leadenhall, would contribute to the consolidation of the Cluster into a more coherent, clear and discreet form. It would appear visually separated with the preeminent tower in the foreground setting of the river, the proposals would reinforce and make more legible the juxtaposed relationship between two related skyline identities, the historic ToL and the modern City Cluster, which is an important aspect of the understanding and appreciation of its OUV. The tower, and its concentric defences, would still read as a powerful defensive structure strategically sited to preside over the river, distinct from the City Cluster Skyline and its surrounds.
312. Equally, from this vantage point, the proposed building would preserve the observer's ability to recognise and appreciate the relevant Strategically Important Landmarks, the ToL and St Paul's Cathedral and would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.

*LVMF View 25A.1-3, Townscape View, Queen's Walk*

313. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower. The focus of the view is the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflects over 900 years of London's development (para 410). The juxtaposition of the WHS with the modern city and of built elements from a variety of eras is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.

314. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the proposal, only slivers of which would appear behind 20 Fenchurch Street on the western periphery of the Cluster, it is not considered that the proposal would undermine the composition and characteristics of the view or those landmark elements. The southwest corner of the proposed tower would appear as a sliver behind 20 Fenchurch Street, where its well-designed, sleek and elegant facades would appear. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City.

315. The siting, height, and scale, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 57, 418-422) and guidance contained in the Local Setting Study.

*LVMF View 11B.1-2, River Prospect, London Bridge (Downstream)*

316. This view is also identified as important in the WHS Management Plan and the Local Setting Study (Representative Viewpoint 11). The ToL WHS is identified as the sole Strategically Important Landmark, whilst Tower Bridge and HMS Belfast are identified amongst other landmarks.

317. Given the pre-eminence of the River Thames in the foreground and the significant intervening distance between the Tower of London and the proposal, which would be on the western periphery of the cluster, only just within the LVMF viewing frame to the west, it would not undermine the composition and characteristics of the view or those landmark elements. It would allow the observer a recognition and appreciation of the ToL as the Strategically Important Landmark.

318. The proposal would be located distantly from and so not affect the White Tower and would not impose itself on it, given the intervening distance and separation in the field of view, having a neutral impact on and thus preserving all those relevant attributes of OUV and those associated components – preserving the relationship with the River, the City, and the iconic form, ‘dominance’ and silhouette of the White Tower.

### Inner Ward, Tower Green and the Scaffold Site

319. The LSS states there is a range of views from within the Inner Ward and the identified Representative View 1 is the Scaffold Site. These views are deemed by the Local Setting Study to illustrate the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place apart from the modern city outside the walls, where the relationship between the scale of the individual buildings can be appreciated. Under 'key issues' it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings – qualified in the associated 'Objectives and Guidance' development should i.) respect that sense of place and ii.) ensure the buildings surrounding the Inner Ward remain the focus of the view.
320. These viewing experiences have been assessed in a three-dimensional model and have been shown in views 10B, 10C and 10D of the THVIA. The proposal would have no negative visual impact. From views nearer the White Tower looking towards the Chapel of St Peter ad Vincula, the proposal would be seen rising behind 20 Fenchurch Street, in the distant backdrop of the Chapel Royal of St Peter ad Vincula. It would be a considerably lower height than 20 Fenchurch Street, and set behind it, the majority of the proposed building would be masked with 20 Fenchurch Street sat closer to the observer. Only in very minor fleeting glimpses would a part of the eastern elevation appear behind the Chapel. Moving toward the Chapel, in its immediate setting from the green, the proposal, followed by the rest of the Cluster, would move out of view, the Chapel and the ToL would remain unchallenged by the proposals and pre-eminent in the view of the observer.
321. In accordance with the guidance in the Local Setting Study the proposal would i.) respect the distinct sense of place and the pre-eminent stage in which those rich traditions would continue to take place and ii.) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is considered the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in terms of the overarching attributes of OUV while the relationship between the ToL set away from the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct long-established backdrop entity.

### Inner Curtain Wall (South)

322. Local Setting Study view 4 recognises that this view is a 360 degree experience, the aim of which is to maintain an appreciation of the ToL as a riverside gateway, the historic relationship between the ToL and the River. The associated guidance seeks to maintain the White Tower as the key focus to the

north, appearing more dominant than buildings in the Inner Ward or those beyond.

323. A sliver of the proposal may appear to the north of 20 Fenchurch Street, which is positioned to the west of the White Tower, it would however be largely obscured by the existing trees within the ToL. Where visible, if at all, it would assist in consolidating the Cluster's distinct urban form and separate long-established identity. The White Tower, accentuated by its fortified massive masonry crenelated walls, would remain the focus of the view from the Inner Curtain Wall. It would continue to dominate the scene while that relationship with the River and an appreciation of it as a historic gateway would be undiluted. It is considered that those identified relevant attributes and components of OUV would be preserved and the visual management guidance in the Local Setting Study would be complied with.

#### *Inner Curtain Wall (North)*

324. The Local Setting Study, in assessing views from the north Curtain Wall acknowledges a clear contrast between the historic Tower and the modern city outside its walls. The identified aim is to i.) maintain views that reveal the relationship between the Tower and the City and ii.) maintain an appreciation of the defenses as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the Tower of London and the City to the north and that clear views of the concentric curtain walls should be preserved.

325. The proposal, sited a considerable distance to the west of these views, would appear next to 20 Fenchurch Street where the upper third of the proposed tower would be visible, it would add to the southern edge of the established Cluster, making a small stride to consolidate its distinct form and overall shape, whilst preserving the Eastern Clusters relationship with the Tower of London. The concentric defenses would remain pre-eminent and an appreciation undiluted in these views under the baseline and cumulative scenarios, also in accordance with the guidance.

#### *Chapel Royal of St Peter ad Vincula, Tower of London (Grade I)*

326. Dating from the early 16th century, the grade I listed stone chapel in the grounds of the Tower of London is of very high architectural and historic significance and forms part of the World Heritage Site. The City Cluster rises above the Chapel Royal of St. Peter ad Vincula whilst 20 Fenchurch Street appears in the background to the left of the Chapel bell tower. The tall buildings are part of the setting of the Chapel.

327. The proposed development would appear in the small sky gap between 20 Fenchurch Street and the Chapel bell tower, while its height is at the same level as the solid base of the bell tower and would not extend to the distinctive lantern.
328. The change to this view is considered to be minor due to the marginal visibility of the proposed development. The distance away and high quality architecture of the visible part would avoid any harm to the setting and its contribution to the significance of the listed building. The lantern bell-cote of the Chapel would be unaffected and remain seen against the sky backdrop. As such the proposal would not result in harm to the setting of the Chapel Royal of St Peter ad Vincula. The contribution the setting makes to the significance of the listed Chapel within the inner ward of the Tower of London would not be adversely affected.
329. The cumulative effect of the proposed development is a very small addition in relation to the other cumulative tall buildings in the Cluster. Its marginal visibility behind the bell tower makes a minor and balanced contribution to the cumulative effect and is not considered harmful to the setting of the Chapel or its contribution to the setting and significance of the other listed buildings within the Tower of London World Heritage Site.

#### Other Views

330. Other views have been assessed which demonstrate the relationship between the proposals and the ToL. The view from the riverside walkway of Tower Wharf, looking west, demonstrates the relationship between the emerging City Cluster in the background and the ToL which, towers over the immediate foreground. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster and the ToL ensemble, which would dominate in the immediate foreground, causing no harm. There are other views which demonstrate the relationship between the ToL and the siting of the proposed tower, where the proposal may be visible, but this would occur in areas which would not undermine attributes of OUV or harm the ToL.

#### Conclusion – Impact on Tower of London World Heritage Site:

331. The proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance with Local Plan Policy CS12, CS13 (3), emerging City Plan Policies S11 and SE13 (3), HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and the CoL Protected Views SPD. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV.

332. Historic England and LB Tower Hamlets have provided advice regarding the way they perceive the proposal would add to the bulk of the Cluster, which they say could cause harm to the WHS, although neither stakeholder have formally objected to the proposals. Officers disagree with the conclusions regarding heritage harm, whilst attaching great weight to the views of these stakeholders; put simply, the proposal's location on the far side of the Cluster, and largely concealed behind 20 Fenchurch Street, would make it an extremely recessive presence in views of and from the WHS, with the intervening main form of the Cluster far more obvious. The proposal would appear on the extreme periphery of the viewer's eyeline when observing the WHS, or would simply not be noticed by them. The proposal would amount to comparatively modest consolidation, in most views it would only be partially visible as a small expansion of the Cluster's overall existing form, it would not fundamentally alter the Cluster's visual relationship with the WHS.

333. As such, it is considered in all instances that the overall impact would not harm the attributes of the OUV or any of the components, authenticity or integrity of the WHS, preserving its significance. In line with Section 6 of the SPG, the height, form and detailed design of the proposal has been amended to mitigate the impact, ensuring the proposal would read as part of the emerging coherent Cluster form, which it is established is intensifying and forms a long-term backdrop to the ToL ensemble. It is the view of officers that the proposed development would not harm the significance of the Tower of London whether in relation to the WHS, the individual listed buildings, the Scheduled Monument or the conservation area of which it is part.

### **London View Management Framework (LVMF) Impacts**

334. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.

335. The site is located on the south-western periphery of the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital (paras 57, 87, 129, 130, 144, 146, 187).

336. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul's and the Tower of London (ToL). However, it would be visible from several assessment points, these are discussed below.

### **London Panoramas and Townscape Views**

337. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's character and identity at a strategic level.
338. Being located within the City Cluster (which is strategically sited as such), the site is located outside all of the geometrically defined viewing corridors in the LVMF London Panoramas and Linear and Townscape Views. It would however be visible from several of these Assessment Points as part of the City Cluster. In particular it would be seen from the North London hills at London Panoramas at LVMF 4A.1 (Primrose Hill: the summit), LVMF 2A.1 (Parliament Hill: the summit), LVMF 3A.1 (Kenwood: the viewing gazebo), LVMF 1A.1 (Alexandra Palace: the viewing terrace). From these places, the scheme would appear as a proportionate, high-quality and well-integrated new addition to the overall Cluster composition and would reinforce its skyline composition. It would result in a minor enhancement to these views overall.
339. From LVMF 6A.1 (Blackheath Point) and LVMF 5A.2 (Greenwich Park: the General Wolfe statue), the proposal would be nearly or entirely screened by the existing form of 20 Fenchurch Street and the impact on these viewing experiences would be negligible.
340. In all such long-range views, the proposal's magnitude of change in these broad panoramas is considered negligible, and in all it would accord with the visual management guidance by consolidating the City Cluster, which is identified as a landmark in these compositions, preserving the composition and the viewers ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral. From the designated Townscape View LVMF 26A (St James Park) the proposal would not be visible and would not have an impact.
341. The proposal would not harm and would make some positive contributions to the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS 13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2040 Policy S13.

### **River Prospects**

342. In these viewing experiences, the magnitude of change and potential impact would be greater, given the building would be located on the south-western edge of the City Cluster, in close proximity to the river Thames. River Prospect views 10A.1 and 25A.1 have been assessed above, the remaining relevant views are identified and assessed below.

*LVMF View 15 (15B.1 and 15B.2), River Prospect, Waterloo Bridge (downstream) THVIA View 42 & 43*

343. This is an iconic London view. St Paul's Cathedral is identified as the Strategically Important Landmark. It is considered that the proposal would complement the development of the emerging City Cluster as a coherent entity in the skyline composition, assisting in subduing and taking the tension out of the isolated 'eye-catching' visual influence of 20 Fenchurch Street. The height is appropriate to the site and would create a gentle undulation in the roofline of the Cluster, stepping down from the apex around 22 Bishopsgate, towards the scale of the River and would be of a high-quality design. This is in accordance with paragraph 263 of the SPG visual management guidance. With its quiet architectural charisma and comparatively modest height, the proposal would appear embedded in the Cluster and clearly disassociated from the Cathedral.
344. The proposal's west and south elevations would be most prominent in these views and the understated horizontal articulation of the white spandrel panels would add a calm elegance to the Cluster. The west elevation would be obliquely visible, with the curved southwest softening the corner of the proposed building. The south elevation would be partially visible, its breadth broken up and articulated by the vertical 'seams' which align with the dynamic serration of the crown. In the future cumulative scenario, this southern elevation would be partially blocked by the form of 60 Gracechurch Street.
345. The proposal would not draw tall buildings closer to St Paul's, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paragraphs 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified.
346. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 262-264, 265 and 57 of the SPG.

*LVMF View 16 (16B.1 and 16B.2), River Prospect, The South Bank: Gabriel's Wharf Viewing Platform. THVIA View 41.*

347. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street to the far east and south of this view into the cluster. Due to the angle of the view, the proposal's refined form and massing envelope would be more legible here, adding an interesting silhouette to its part of the skyline.
348. Despite its prominent location towards the southern edge of the Cluster of the cluster, the proposed tower's location, height and massing, is considered to embed successfully within the composition of the Cluster, and preserve and



enhance the townscape setting of St Paul's whilst not detracting from wider landmarks in the view in accordance with the visual management guidance at paragraphs 280-283 of the LVMF SPG.

349. The proposal would preserve the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 280-281, 283 and 57 of the SPG.

*LVMF View 17 (17B.1 and 17B.2), River Prospect, Golden Jubilee / Hungerford Footbridges (Downstream) THVIA View A2.*

350. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposal's appearance in these views would be similar to the visibility from Waterloo Bridge described above. Here, the proposal would consolidate the form of the Cluster, stepping down in height from the apex of the Cluster toward the River. With its quiet architectural charisma and comparatively modest height, the proposal would appear embedded in the Cluster and clearly disassociated from the Cathedral. Accordingly, it would preserve a recognition and appreciation of St Paul's, strengthening the composition and coherent urban form of an existing tall building cluster and would not obscure or detract from a landmark feature, according with the visual management guidance in paragraphs 301-305 of the LVMF SPG.

*Summary of LVMF Impacts*

351. The proposal would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks (St Paul's and ToL), in accordance London Plan Policy HC4, Local Plan Policy CS13 (1), emerging City Plan Policy 2040 S13, and guidance contained in the LVMF SPG.

352. The proposal would preserve St Paul's Cathedral and the Tower of London as the Strategically Important Landmarks and the composition and characteristics of all LVMF views. Lighting will be detailed by condition and managed to ensure the development would not command the focus within these views or distract unduly from other elements of their composition, but be visually compatible with them after dark.

*City of London Strategic Views*

353. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development. The proposed development site is located within the eastern half of the City of London, and as such falls outside of the St Paul's Heights policy area.

354. Kinetic views from the Southbank and the river bridges are identified in the SPD. The heritage significance of relevant historic City landmarks is considered below within the section on indirect impacts to heritage assets.

### *The Monument to the Great Fire*

#### *Monument Views*

355. In support of Local Plan policy CS13, the Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposals have been designed, in terms of siting, height and appearance, to preserve views of and from the Monument.

#### *Views from the Monument*

356. The proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.

357. Paragraph 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument. The principal axial views are identified as being provided by King William Street and Gracechurch Street/Bishopsgate as leading the eye into the Bank Conservation Area and the fringe of the City Cluster.

358. The building would read as part of the emerging City Cluster, still allowing for an appreciation of the contrast between the Bank Conservation Area and the Cluster. It is considered that the proposal would not adversely affect the view. In the cumulative scenario, the proposed building would be obscured by the proposed 60 Gracechurch Street development.

359. No other identified view from the Monument would be affected.

#### *Views of and Approaches to the Monument*

360. The proposal would not be in the 'Immediate Setting' of the Monument as defined in the Protected Views SPD, but it would be located relatively nearby. It would be prominent in views from Tower Bridge (paragraph 4.22 of the SPD) and the Queen's Walk (western end) (paragraph 4.26).

361. From Tower Bridge the proposal would not obscure or dominate the Monument and would read as part of the Cluster, adjacent to 20 Fenchurch Street. As part

of this dynamic, diverse viewing experience, the proposal would cause no harm.

362. Those views from the Queen's Walk (western end) of the Monument, are identified as the most complete and intimate views of the Monument from the South Bank (4.26). The view from directly opposite on the South Bank is approximately on the line of the Old London Bridge and remains one of the oldest and best views of the Monument. At present, the Monument is backdropped by the emerging Cluster with some limited sky-etched silhouette afforded to the crowning flaming urn finial. The proposal would leave this unaffected. The siting, height and form of the proposal would allow it to read as part of the emerging coherent Cluster form, while the clean and simple design would not detract from or visually overwhelm the Monument. It is considered that the proposal would accord with the guidance in the Protected Views SPD.

363. The SPD identified approach to the Monument view from the Gracechurch Street/Lombard Street junction, would be unaffected as the site does not fall within this view.

364. Further assessment of the impact of the proposed development on the significance of Monument is found below within the section on indirect impacts to heritage assets.

#### Conclusion on Monument views

365. The proposal would preserve all views of and from the Monument identified within the Protected Views SPD and would thereby accord with Local Plan policy CS13 and emerging City Plan S13 and associated guidance in the Protected Views SPD.

#### **St. Paul's Cathedral**

##### St Paul's Viewing Points:

366. The proposal would not be visible and would be out of scope of many of the Viewing Points of St Paul's identified in the Protected Views SPD. Owing to its scale and close proximity to the river, it would be visible along the full kinetic riparian sequences from Waterloo Bridge through to London Bridge and from the Golden Gallery.

367. The Surveyor of the Fabric of St Paul's Cathedral have not objected to the application, but in their consultation response has made reference to two potential impacts, views from the Processional Way and views of the Cluster in LVMF views.

368. The proposed development would lie approximately 1km to the east of the Cathedral, within the centre of the existing City Cluster of tall buildings.

369. The proposed buildings form has been slightly reduced in height, and its form subtly altered from the previous consent. Its overall shape works in a manner which would be the least impactful on strategic heritage assets, including St Paul's.
370. The Surveyor to the Fabric of St Paul's Cathedral stated, "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."
371. In terms of those strategic City-wide riparian views from the banks of the Thames and its bridges, they would be preserved with the Cathedral remaining as the pre-eminent landmark in the view and this represents an important element of significance, both as a symbol of the Diocese of London and as an internationally famous symbol of London itself with Wren's great classical dome dominating the townscape around.
372. In medium and long-range views from the west along the River Thames, including from LVMF River Prospects, the proposed development would appear on the southwest edge of the City Cluster, well separated from St Paul's Cathedral. It would help to consolidate the cluster's cascading arced form, the proposals would appear in the distance, very detached from St Paul's Cathedral in views from the west (LVMF Views 15 and 16). The proposed development would not interact or compete with the silhouette of the Cathedral. It would appear firmly embedded within the Cluster and visually disassociated from the Cathedral. The proposals are not considered to challenge the pre-eminence of the Cathedral or detract from the historic and architectural special interest of St Paul's.
373. Furthermore, the Surveyor to the Fabric of St Paul's Cathedral stated, "the Chapter, 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".
374. The proposal would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street or Ludgate Hill (Fleet Street Sequence Views 32A, 32B, 32C, 32D and 32E). The envelope of the building has been designed to avoid any erosion of sky silhouette and space around the Cathedral, thus ensuring pre-eminence in this viewing experience of state and royal significance. The proposal would leave this important kinetic townscape experience unaffected, in accordance with Local Plan Policy CS 13 and

emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

375. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. In these views, the tower would sit directly to the north of 20 Fenchurch Street, consolidating the Cluster. It would not obscure or detract from a City skyline landmark and would be an attractive addition to the skyline. It is considered, in both the baseline and cumulative scenarios, it would preserve the composition and character of these views.

376. As such, the proposal would preserve the setting and significance of St Paul's Cathedral in all relevant viewing experiences.

Views from other publicly accessible elevated viewing areas, in particular the 'The Sky Garden' at 20 and 22 Bishopsgate, New Change, Tate Gallery, 120 Fenchurch Street Tate Modern:

377. The Sky Garden is a popular public viewing gallery and visitor attraction offering 360-degree views of London. This public benefit was integral to the planning balance in the Secretary of State's decision on the 20 Fenchurch Street planning application. The impact on it as a public attraction and sensitive receptor is a material consideration. The viewing experience offers a unique, 360-degree experience over different levels along a perimeter walk. Due to the siting and height of the proposal directly to the northwest of the 20 Fenchurch Street it would not block views of St. Paul's but would be seen in the views to the northwest as a new tower within the cluster.

378. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated to the left of 20 Fenchurch Street. The proposal would not affect an appreciation of other key aspects of the skyline from here, including St Paul's. The visual amenity of the viewing gallery is therefore considered to be preserved.

Other Borough Strategic Views:

379. The proposal's appearance in views from other neighbouring boroughs has been considered. In many instances the proposal's appearance would be very similar to the strategic views assessed above, and the impact would not change.

380. The London Borough of Tower Hamlets did not object, but responded to some views for consideration to the proposal's impact on the view of the World Heritage Site from Tower Bridge, and this impact is assessed in detailed above; officers conclude that no harm would be caused by the proposal in this view.

### *London Borough of Tower Hamlets:*

381. Adopted Tower Hamlets Plan 2031 Policy D.DH4 (c) and Figure 6 identifies designated local views of which model View A10 from the Wapping Wall bridge at the entrance to the Shadwell Basin is relevant. The Shadwell Basin provides a clear space over which the historic church spires of St Paul's Shadwell and St George in the East can be viewed. The City Cluster is visible to the west on the left-hand side of the view detached from the local context. In baseline and cumulative scenarios, the proposed development would be visible to the behind 50 Fenchurch Street, at considerable distance to the south west of the churches identified in this view, preserving the prominence of local designated landmarks and designated view 2, in accordance with LBTH Policy D.DH4.

### **City Landmarks and Skyline Features**

382. The Protected Views SPD 2012 sets out a number of Historic City Landmarks and Skyline Features, that are underpinned by policy CS13 of the Local Plan. The majority of the landmarks are also designated heritage assets which may be discussed elsewhere in this report.

383. The proposal would not affect views of City landmarks and skyline features in accordance with CS13 (2). Those potentially affected by the proposals, are identified and assessed below:

#### **St Paul's Cathedral (grade I)**

384. The proposal's impact on pan-City views in which St Pauls Cathedral features is discussed in the LVMF sections above. The proposal is sited at some considerable distance from St Paul's (around 1km away) and would be firmly embedded in the Cluster of which it would form a new part.

385. St Paul's Cathedral has metropolitan presence in London along the riparian views from the Thames, its embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. In these viewing experiences the proposal would clearly read as a separated and disassociated part of the Cluster and would not challenge, backdrop or erode its silhouette.

386. The unblemished visibility of the Cathedral along the Processional Route of Fleet Street and Ludgate Hill would be maintained. (THVIA Views 32A-32E).

387. In wider pan London views and approaches, the Dome offers a skyline presence in the broad London Panoramas discussed above, for example those from strategic views identified in the LVMF, including Parliament Hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others.

Where visible in these views, the proposal would be seen at some considerable remove from the Cathedral, and would not backdrop or affect the clarity of the Cathedral's silhouette.

388. Officers consider that while visible, the siting of the proposals adjacent to 20 Fenchurch Street and in the context of the developing Eastern Cluster, and taking into consideration the scale, design, materiality, and colouration, the proposal would not diminish an appreciation of St Paul's Cathedral as a skyline landmark and there would be no encroachment on or erosion of the ability to appreciate its defining silhouette. Thus, the skyline presence of this City Cathedral is considered preserved.

*Tower Bridge (Grade I)*

389. Tower Bridge is an iconic and internationally recognised landmark of London, highly visible in riparian views. The proposals would be seen in views 11, 12 and 37 of the THVIA, including from Millenium Bridge, Butlers Wharf, and Kings Stairs Gardens. In these views, the proposals would be largely screened by 20 Fenchurch Street, and would nonetheless be read as part of the existing and established backdrop of tall buildings. The proposals would largely leave the visual experience of Tower Bridge unaffected, thus, the skyline presence of this City landmark is considered preserved.

*Tower of London World Heritage Site (Grade I)*

390. The Proposals would be seen in the context of the Tower of London World Heritage Site in views 7, 8, 9, 10A, 10B, 10C, 10D, 12, 13, 14 and 15 of the THVIA. As discussed elsewhere in this report, the proposals would be visible within, and would therefore result in a change to the wider setting of the WHS. However, the skyline presence of the WHS would be preserved by reason of the proposal's strategic siting within the long-established and consolidated Cluster backdrop, and, the intervening distance and height when viewed from in and around the Tower of London. The skyline presence of this City Landmark is considered preserved

*Cannon Street Towers (Grade II):*

391. The proposals would be seen as part of the wider backdrop behind the Station Towers in views from the South Bank. In such views, the development would form a group with the existing tall building at 20 Fenchurch Street. The proposal, taking into consideration its scale, design, materiality, and colouration, would not detract from the presence or contribution of the Station Towers within such views, allowing the Station Towers to remain distinct.

392. In some of these views, including in views from Southwark Bridge (THVIA View 36), the proposal would appear between the towers. Due to the existing background of tall buildings in such views, including 20 Fenchurch Street, as

well as the contrasting materiality and colour palette to the historic brick and lead of the Station Towers, their prominence and distinctiveness would be retained. Indeed, the proposal would appear in front of and occlude 52 Lime Street, visible in between the towers in this view, and would have a calm presence. Therefore, the skyline presence of this City Landmark is considered preserved.

*All Hallows by the Tower, Byward Street (Grade I)*

393. The proposals would be seen as part of the wider backdrop behind and to the right of All Hallows-by-the-Tower, in views from the east (THVIA View 10D). In such views, the development would join an existing and established backdrop of tall buildings, including 20 Fenchurch Street, which characterise long and mid-range views of the church from the east and southeast. The proposal, taking into consideration its scale and design, and partial occlusion by 20 Fenchurch Street in this view, would not detract from the presence or contribution of the Church within such views, allowing the steeple to remain legible and distinct. Thus, the skyline presence of this City Landmark is considered preserved.

*Lloyds of London, 1 Lime Street (Grade I)*

394. The proposals would be seen in front of the Lloyd's Building in views from the Monument Viewing Gallery (THVIA view 45). In the proposed (non-cumulative) scenario, the eastern part of Lloyd's Building would remain visible. One reads the Lloyd's Building in the context of the surrounding cluster, with tall buildings on all sides, particularly with 30 St Mary Axe in the background and 20 Fenchurch Street in the foreground of this view. Considering the surrounding context, the skyline presence of this City Landmark is considered preserved.

*Former Port of London Authority Building, 10 Trinity Square (Grade II\*)*

395. In Views 7, 10D and 13 of the THVIA, the proposed development would be seen in views with the Former Port of London Authority, it would appear above Minster Court which currently forms a backdrop to the listed building on the left side. The proposed development would not impinge on the skyline of the tower of this listed building. Its robust architectural form and contrasting materiality when compared to the Cluster buildings would remain a prominent element in these views.

396. Therefore, the former Port of London Authority HQ is considered to retain its prominence and visual strength. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.



*St Dunstan-in-the-East, St Dunstan's Hill (Grade I)*

397. In View C5 of the THVIA the Proposed Development would introduce a new tall building to the northwest of the ruins of the Church of St Dunstan in the East as part of the southern part of the City Cluster. The Proposed Development would be largely occluded by 20 Fenchurch Street with only a small amount of the top of the proposal visible. The foreground church of St Dunstan in the East would remain the focus of the view. In the cumulative scenario the Proposed Development would be almost entirely occluded by 60 Gracechurch Street and would be a very minor background change within its wider setting to the northwest.

398. The proposal, taking into consideration its scale and design would not detract from the presence or contribution of the Church within such views, allowing the steeple to remain legible and distinct. Thus, the skyline presence of this City Landmark is considered preserved.

*St Magnus the Martyr, Lower Thames Street (Grade I)*

399. The proposal would be visible in some views of the church from the south, including views from the western end of the Queen's Walk. In such views, the proposal would read as part of the Cluster, whilst providing significant breathing space between it and the Church, which would remain prominent and with a skyline presence related to the Monument. Thus, the skyline presence of this City Landmark is considered preserved.

*St Vedast alias Foster, Foster Lane (Grade I)*

400. St Vedast alias Foster is identified in the Protected Views SPD as city church with a skyline presence. In THVIA View C13 Additional Views December 2024, the proposals would be visible in the background of the spire of St Vedast Alias Foster which forms a minor element within the view. The architectural design of the proposed development would form a calm backdrop to the church spire, ensuring that it remains legible as a minor skyline element. The visibility of the proposed development in the background of the church spire would reduce as one moves eastwards in the direction of the Site, as shown in View C2. The tower of St Sepulchre Church would remain legible as the focal point in the foreground of the view, commanding the viewer's attention.

401. The impact would be a fleeting moment, and one taken together with the established views of the city cluster, the latter presently appreciated as a dynamic backdrop feature which frequently results in arresting contrasts of this nature. Given the fleeting moment and taking into consideration the significant distances between the proposed development, church and the viewing point on Newgate Street the skyline presence of this City Landmark is considered preserved.

Conclusion on City Landmarks and Skyline Features:

402. The proposal would preserve views of all relevant City and Non-City Landmarks and Skyline Features and comply with of CS 13 (2) and emerging City Plan 2040 S13 and associated guidance in the Protected Views SPD and LVMF SPG.

**Conclusion on Strategic Views**

403. The proposal would be sited at the western edge of the City Cluster, seeking to consolidate strategic growth in areas with the least impact on pan-London and strategic views. In doing so, the proposal would preserve strategic views of and from the Tower of London World Heritage Site and the Monument, and of St Paul's Cathedral and its setting and backdrop.

404. The proposal would preserve the characteristics and compositions of all relevant LVMF and other strategic pan-London views. In consolidating the composition of the City Cluster the proposal would result in a minor enhancement to the characteristics and compositions of LVMF views 4A.1 (Primrose Hill), 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 1A.1 (Alexandra Palace).

405. It would preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral and the Tower of London, it would preserve relevant neighbouring borough views and would preserve views of relevant City Landmarks and Skyline Features.

406. Following rigorous assessment, the proposal would preserve all relevant strategic views in accordance with Local Plan policy CS13, emerging City Plan Policy S13, London Plan Policies HC2, HC3 and HC4, GLA LVMF SPG, City of London Protected Views SPD and neighbouring local view policies and guidance.

**Designated Heritage Assets – Impacts on the setting and significance of listed buildings and conservation areas**

407. The building is not listed or located within a Conservation Area. The proposed building would not, therefore, result in a direct impact on any heritage asset.

The Monument (Grade I and Scheduled Ancient Monument) THVIA 21

Significance

408. The Monument to the Great Fire ("the Monument"), by seminal architect Sir Christopher Wren and Robert Hooke, built 1671-77, symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted

Roman Doric column of Portland Stone with a crowning gilded flaming urn sat atop a large pedestal containing inscriptions and base relief representative of the sociopolitical context in which it was built. The monument is also an early example of a purpose built public viewing gallery and visitor attraction, the scale and design of which was intended to be dominant over its surroundings and command a London-wide presence.

409. It is of exceptional architectural, artistic, historic and archaeological significance as a City and London-wide landmark, it also holds notable group value with other Wren designs across the City.

#### Setting

410. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the rebuilt City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

#### Impact

411. The proposal would appear in views of the Monument up Fish Street Hill, THVIA view 21 shows the development to the left of the Monument in this view. The proposed development would introduce a new tall building towards the centre of this view, although much of it would be obscured by the intermediary mid-rise buildings on Fish Street Hill and as such only part of the upper half would be visible. It would appear lower in scale than both the foreground buildings and 22 Bishopsgate, which remains the tallest landmark in its backdrop, and as such would not considerably alter the existing skyline, conforming to the established scale and form of the Cluster which steps down in height to the south. It would not alter the ability to appreciate The Monument. The Monument would remain the view's focus with clear sky around it. The visible elements of the proposed development would be seen as an articulated and elegant addition to the skyline, with a clearly articulated crown and a soft tapering silhouette. It would contribute positively to the character of the Cluster and the townscape in this view (albeit in a way unrelated to heritage significance).

412. The proposal would also appear to the northwest of the Monument on approach from London Bridge and the South Bank. On approach from Lower Thames Street and Fish Street Hill the proposal would appear some distance away from the Monument, the proposed development would not impinge unduly on the silhouette of the Monument. The proposal would also be present in the viewing experiences of the Monument when looking south down Gracechurch Street, but would be sited a significant distance away, almost at a right angle, as a peripheral presence in the view.
413. In the cumulative scenario, 60 Gracechurch Street (committee resolution to grant approval) and 85 Gracechurch Street (approved) would stand between the Monument and the proposal and interrupt the intervisibility between the two, particularly in the viewing experiences along Fish Street Hill and Gracechurch Street.
414. Officers consider that while visible, the high-quality replacement building will not diminish the appreciation of the heritage asset and that there would be no harm the setting or significance of the Monument as a grade I listed building and Scheduled Ancient Monument.

#### Tower Bridge (Grade I) THVIA Views 11, 12 and 37

##### Significance

415. Tower Bridge, completed in 1894, was designed by famous engineer Sir John Wolfe Barry and architect Sir Horace Jones for the City of London Corporation. It represents a triumph of Victorian engineering as a low hybrid suspension and bascule bridge with a steel frame - the fantastical revivalist French medieval gothic exterior of towers, turrets and pinnacles comprising a High Victorian monument in the romantic medieval tradition, disguising the more modern structural innovation beneath. The dramatic symmetrical composition acts as a 'portal' to central London from its River. It has become an iconic and internationally recognised landmark of London
416. The building possesses very high architectural and artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings, and marriage of modern functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London.

##### Setting

417. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

## Impact

418. The proposal largely leave the visual experience of Tower Bridge unaffected, including in views from the north, south and west. From Butler's Wharf and other views to the east, 20 Fenchurch Street would almost entirely screen the proposal from view.
419. The THVIA includes views from the River Thames on Millennium Bridge (View 37) and views from further east from Butlers Wharf (View 12) and Kings Stairs Gardens (View 11). Furthermore, 3D digital modelling techniques have been used in the assessment of the scheme and ensure a thorough analysis of the impacts on the setting and significance of Tower Bridge. Officers consider that the impact on views and setting of Tower Bridge has been fully assessed and the proposal would not result in harm to the setting and the significance of the grade I listed Tower Bridge.

### St Paul's Cathedral (Grade I)

## Significance

420. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.

## Setting

421. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular

the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance.

- a. Those wider strategic plan-London riparian views from the Thames, its embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
- b. The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it.
- c. Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament Hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations. These make a substantial contribution to significance and an appreciation of it.
- d. Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

#### Impact

422. The proposal is located over 1km away from the Cathedral at the western edge of the Cluster. Its long-range, strategic views presence and impact in relation to the Cathedral has been assessed in detail in the sections above, which conclude that the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

#### Leadenhall Market (Grade II\*) THVIA Views 27 and 28

#### Significance

423. Market complex of 1881 to designs renowned architect Sir Horace Jones, the City Surveyor. The Market comprises a series of roofed arcades disposed about a loosely cruciform plan (a layout preserving the medieval street alignment), with detached portions to the south, all lined with two storey units comprising shopfronts at ground level with offices/ancillary areas above. Of red

brick and Portland stone dressings, the architecture is essentially classical, with much flamboyant renaissance-inspired detailing, and plentiful depictions of dragons and other references to the City Corporation.

424. The Market possesses a high level of historic interest for its status as descendant ultimately of the Roman Forum-Basilica, and subsequently the medieval Leaden Hall – as a gathering-place for mercantile activity; and for its associations with Sir Horace Jones, the City Surveyor who designed many accomplished market buildings for the City. Leadenhall was his last market building within the City's boundary.

425. The Market possesses a high level of architectural/artistic and historic interest for its memorable fusion of the medieval, irregular street plan with Jones's formal Market arcades, resulting in oblique, happenstance views and delightful townscape juxtapositions. In this it was unique amongst Jones's City markets, the other two (Smithfield and Billingsgate) being more formally planned. Its high quality of design and construction illustrate the civic pride inherent in the planning and execution of such buildings.

426. Overall, the Market is considered to be of high significance.

#### Setting

427. Overall, the market draws a modest to moderate contribution from elements of setting to significance, in particular an appreciation of it. Most significance is intrinsic and inherent in the physical fabric, plan form and underground archaeology, rather than from setting.

428. To the west, south and east, the immediate setting of the Market is the Leadenhall Conservation Area in which it sits; the historic scale, architecture and urban grain of the CA provides a complimentary foil and sympathetic setting to the Market buildings. The same is true of the Bank Conservation Area lying further to the west across Gracechurch Street. These areas of setting support the historic and architectural/artistic significance of the listed building. Given the character of the market is somewhat self-contained, this wider historic environment makes a near moderate contribution to significance and an appreciation of it.

429. Located within the City Cluster of tall buildings, the setting of the Market to the north and east is of modern tall buildings; as set out in the assessment of the CA, these form a dynamic modern backdrop to the listed building, some of which are exceptional examples of commercial architecture of their time, such as the Leadenhall Building ('the Cheesegrater') and in particular the Lloyd's building, the group value with which Historic England's List Description describes as "wonderfully incongruous" with some complementary 'nods'. This makes a modest contribution to significance and an appreciation of it.

## Impact

430. Where visible the proposal will be appreciated alongside 20 Fenchurch Street in the backdrop, such as looking south from Gracechurch Street (View 28) and Leadenhall Street along Whittington Avenue (View 27). This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market with the historic buildings dominating the foreground of the views and is part of the market's setting. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market, Historic England have acknowledged the presence of tall buildings around the market and have suggested that the proposed building would not fundamentally change this context, which officers agree with.
431. Historic England have provided advice in their consultation report regarding the impact on daylight to Leadenhall Market, stating that the loss of daylight could cause harm to the Listed Building. An objection has been received from a neighbour, with wording of a similar effect. The market's covered spaces are currently artificially lit to ensure adequate lighting. The daylight levels are not considered to be a contributor to the significance and special architectural or historic interest of the listed building. A change in daylight levels would not harm the setting and significance of the listed building and the impact on sunlight and daylight is covered in detail in another section of this report.
432. Historic England have recognised the opportunity to provide public benefits, through the creation of a permeable connection to the market and improved public realm in general. The proposals would deliver an accessible and permeable new route through the building, increasing pedestrian permeability into the market. This would be an extension of the alleyways which surround the market. Furthermore, the proposed elevated public viewing gallery would result in better revealing its significance by affording views and appreciation of the historic and characteristic roof structures of the market. The proposals would support Leadenhall Market's current use by delivering complementary uses in the proposed development, which would drive footfall, supporting the economic sustainability of the listed building.
433. These proposals would not harm the setting or significance of the grade II\* listed Leadenhall Market buildings.

### The Ship Tavern Pub, Lime Street (Grade II)

## Significance

434. This classical mid-19th Century former public house is located diagonally opposite the application site in Lime Street and is of architectural and historic



interest, through its characteristic stock brick upper façade and traditionally proportioned and detailed frontage below. On the main significance is drawn from the physical fabric and prominent principal elevation to Lime Street.

#### Setting

435. Setting makes a lesser, moderate contribution to significance, in particular an appreciation of it. This derives from the group value with the adjacent complementary historic buildings to the eastern side of the street, as well as the red brick frontage of the market visible on Lime Street Passage, the latter echoing the proportions and Victorian character of the listed building. The rear elevation of the site as existing is seen from the listed building rising significantly over the market. These views appear incidental and utilitarian, creating a 'back of house' character which detracts from the views towards the market.

436. The setting is also characterised by dramatic change in scale with a backdrop of the tall buildings of the Cluster .

#### Impact

437. The proposed high-quality architecture of the replacement building would sit comfortably within the setting of the Ship Tavern. The carefully designed podium that steps down towards Lime Street would respond to the lower height and smaller scale, whilst providing new, high quality and well detailed elevations which would be an improvement.

438. As such, officers consider that the proposal would not result in harm to the setting and the significance of The Ship Tavern public house.

#### 81-82 Gracechurch Street (Grade II) HTVIA View 28

#### Significance

439. 81-82 Gracechurch Street is a good example of a later 19th century purpose-built office building in the Italianate manner, faced in well-detailed Portland stone. A style then associated with dependable business and finance in a City manner, it reincorporates a much older alley and a ground floor parade of shops. Its principal significance lies in its architectural design including façade details of the Gracechurch Street elevation and potentially its interiors. Its subservient secondary facades to Bull's Head Passage survive well, but are more subtle, of traditional white glazed brick and large tripartite sashed windows to optimise light in a dense setting, are of secondary interest. In the main, significance is drawn from the external architecture and plan form.

#### Setting

440. The building's immediate setting makes a positive contribution of two kinds to the significance of the listed building. Firstly, the building is experienced as a small group of classically detailed Portland stone buildings located on the opposite side of Gracechurch Street. The Lombardy classicism exhibited along Lombard Street in particular is considered to establish the sense of a shared architectural decorative language, which sympathetically contextualises the architectural interest of the listed building.

441. The second contribution, albeit to a lesser extent, is the proximity to the western entrance of Leadenhall Market, with its red brick and Portland stone facades seen together with the listed building from the south and north along Gracechurch Street. The character of the market, with its fine-grained commercial buzz, reinforces the sense of activation of the ground floor commercial units within the listed building. Views of the market and listed building terminate in the tall façade of the Scalpel, which together with the modern building at No 20, break above the established building line. The immediate setting is therefore characterised by a mix of stone fronted buildings of various styles, heights and periods juxtaposed with a backdrop of tall modern buildings seen alongside and behind.

#### Impact

442. THVIA view 28 shows the proposed building in the backdrop of the listed building in views looking south along Gracechurch Street, here the listed building can be seen obliquely. The proposal will change the immediate setting due to the increase in height compared to the existing building, the tower would appear in the background. The masonry podium would relate to the established scale on Gracechurch Street and the tower would continue a typical feature of the existing setting, where there are dramatic change of scale along Gracechurch Street

443. In the cumulative scenario the consented scheme at 85 Gracechurch Street would largely conceal much of the proposed development, while the proposed scheme at 60 Gracechurch Street (planning application submitted, awaiting determination) would appear behind it. The proposed development would appear as a coherent part of a distinct group of tall buildings along Gracechurch Street.

444. The setting would not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed.

#### 7-9 Gracechurch Street (Grade II)

Significance:

445. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland Stone in a French/ Beaux Arts style. It is located on the west side of Gracechurch Street to the north of the application site. Its significance lies in its architecture and historic interest.

Setting:

446. Its immediate setting features a mix of buildings in age, materials, style, and height, retaining a group value with a number of Portland Stone fronted buildings in the immediate surroundings. The building enjoys a green setting to the rear set around Castle Court. Its wider setting features a mix of buildings in age, materials, style and height. The juxtaposition of heights and architecture, including the City Cluster of tall buildings is part of the character of the setting.

Impact:

447. The proposal would be a high-quality addition to the south-eastern wider setting and there would be no adverse impact on the special interest of setting of the listed building. The proposals would appear on the other side of the Gracechurch Street to the listed building.

448. In the baseline scenario, the proposed building would, at the lower levels appear as a continuation of the existing street scene, with a human scale masonry mid height podium block sitting comfortably with its neighbours. The tower above would be visually disassociated from the listed building, and would not significantly change the existing character of Gracechurch Street and the setting of the listed buildings, where many tall buildings are present.

449. In the cumulative scenario, the consented scheme at 85 Gracechurch Street would be seen and experienced opposite the proposed development to the south, while the proposed scheme at 60 Gracechurch Street (planning application submitted, awaiting determination) would appear to the south of it. The proposed development would, in both scenarios, appear as a coherent part of a distinct group of tall buildings along Gracechurch Street.

39-40 Lombard Street (Grade II)

Significance

450. Built 1868, by Frederic John and Horace Francis, this Portland Stone building is completed in an ornate Italianate palazzo manner. Comprising a tall ground floor, thought to be a former banking hall, the main facades are richly carved with classical detailing. It is of architectural, artistic and to a slightly lesser extent historical interest.

## Setting

451. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings which are evidently modern in character. A historic setting is better preserved along Lombard Street, but the overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the City Cluster are seen in close proximity, including 6-8 & 22 Bishopsgate and 20 Fenchurch Street, creating a strikingly modern architectural contrast to the immediate surroundings of the listed building.

## Impact

452. On approach from the west along Lombard Street, the backdrop of the listed building is commanded by the isolated bulk of 20 Fenchurch, which would be subdued by the proposals in both the baseline and cumulative scenarios. In the baseline scenario slivers of 70 Gracechurch Street would appear in front of 20 Fenchurch Street when viewed from the west, the proposals would read as an extension of the City Cluster and would not be harmful to the setting of the listed building.

453. In the cumulative scenario, 60 Gracechurch Street would stand before 20 Fenchurch Street and similarly command the backdrop. The full significance of the building is better appreciated in close view, in particular where the sumptuous detail can be appreciated, where given the scale of 39-40, and the height-to-width ratio of the street, the listed building would continue command the foreground, while the proposal would only be visible at a high level in the oblique. It is considered that the impact would be of low magnitude and no harm would be caused to the special interest, significance or setting of 39-40 Lombard Street.

## 38 Lombard Street

### Significance

454. Dating to the mid or late 19th century, this Portland stone building is designed in a classical style. It stands four stories tall with an added attic and a two-storey mansard roof. The facade features four windows, most with segmental arches. The ground floor is arcaded, adorned with polished pink granite pilasters. It is of architectural, artistic and to a slightly lesser extent historical interest.

### Setting

455. Its wider setting is characterised by a number of contemporary Portland Stone commercial buildings which are evidently modern in character. Its immediate

setting, however, is defined by its location at the eastern end of Lombard Street, seen alongside other classical Portland Stone commercial edifices, including nos. 39-40 Lombard Street, makes a modest contribution to significance overall.

456. The tall buildings within the City Cluster are seen to the north, including 6-8 and 22 Bishopsgate, and 20 Fenchurch Street to the west further cementing a modern architectural character to the surroundings.

#### Impact

457. On approach from the west along Lombard Street, the existing backdrop is commanded by the bulk of 20 Fenchurch. The proposed development would appear closer and more prominent than 20 Fenchurch Street appearing to the north in the view. Located further west into the street, this listed building benefits of more enclosure when approaching it from the west, affording more limited views of the existing tall buildings in its surroundings.

458. In any case, the full significance of the building is better appreciated in close view, where given the scale of 38, and the height-to-width ratio of the street, it would command the foreground, while the proposal would only be partially visible in the oblique. No. 38 would continue to be seen in the context of the neighbouring nos. 39-40 Lombard Street, retaining its relationship with its existing historic context.

459. In the cumulative scenario the proposed development would be seen and experienced adjacent to the proposed scheme at 60 Gracechurch Street (planning application submitted, awaiting determination) and 20 Fenchurch Street in the background in views looking west along Lombard Street. The proposed development would, therefore, appear as a coherent part of a distinct group of tall buildings along Gracechurch Street and the wider City cluster.

460. While the proposal would introduce a change in the setting of this listed building, it would cause no harm to the special interest, significance or setting of 38 Lombard Street and the ability to appreciate it.

#### 2-3 Philpot Lane (Grade II) THVIA View 23

#### Significance

461. 2-3 Philpot Lane is a good example of post-Fire 18th century City ensemble, of a residential townhouse located off-street in an intimate courtyard behind attractive iron gates, which is and would have been fronted by commercial development. A late 17th century, post-fire house was likely re-developed in the 1720s and split into two, altered and split again for multiple occupation in the 19th century while the rear developed as a warehouse and associated office chambers. The building is now 5 storeys with the current main entrance

a narrow (3 bays) front on an attractive courtyard off Philpot Lane, stuccoed with parapet and sash windows and a good door architrave with carved consul brackets, whilst the western elevation is similar but plainer and more altered. The much more hidden northern elevation is of more interest, of red brick with moulded dressings and likely the earliest survivor of what remains, which, on the whole, is, modern fabric. That said some historic interior survives.

462. The asset is of high architectural and historic interest, and to a lesser extent artistic or archaeological, largely due to the off-street courtyard typology evident on the more authentic Philpot Lane side. The building's earlier, non-stuccoed fabric on the northern elevation adds to its historical integrity, while the more extensively altered western and southern elevations still contribute to the overall character.

### Setting

463. The main contribution to setting derives from the close appreciation of the building within its courtyard off Philpot Lane, the non-public northern alley accessed from Philpot Lane, and the northern courtyard. To a lesser extent, Brabant Court also adds to this setting, with group value alongside 4 Brabant Court and 7-8 Philpot Lane (grade II\* listed). The setting of 2-3 is characterised by intimate scale courtyards and alleys, affording mainly enclosed views of the immediate surroundings.

464. The wider setting of the asset has changed considerably over the years and now also includes large-scale modern buildings, particularly to the west (along Gracechurch Street) and to the east (No. 20 Fenchurch Street). These modern elements do not make any contribution to the setting or significance of the asset.

### Impact

465. The Proposed Development would introduce a new tall building, seen to the left of the view and Philpot Lane (THVIA View 23). It would appear of a similar scale and proportion to 20 Fenchurch Street and in that manner would tie the separated 20 Fenchurch Street into the City Cluster. The proposed development would partly screen 22 Bishopsgate and would occlude One Leadenhall and 8 Bishopsgate. The podium which comprises the base of the proposed development would relate positively to the scale of the building on the opposite side of Lime Street. The materiality and colouration of the podium further responds to the character of the surrounding mid-rise buildings in the fore and middle ground, resulting in a contextual addition to the streetscape.

466. There would be no cumulative schemes visible in this view and the effect of the proposed development would remain the same as that for the proposed development considered in isolation. The elements of setting that contribute to the significance of the listed building would not be negatively affected by the

proposed development with only the carriage entrance being experienced in some oblique views.

467. Therefore, in both the baseline and cumulative scenarios, the proposal would preserve the setting and significance of the listed building, and the ability to appreciate it.

#### 7-8 Philpot Lane (Grade II\*) HTVIA View 23

##### Significance

468. Much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic and archaeological significance, less so artistic.

##### Setting

469. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards.

##### Impact

470. THVIA View 23 shows that the proposal would be seen and appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane and located close to 20 Fenchurch Street. These dramatic contrasts in scale between the old and new are an established character trait of this setting which otherwise in terms of physical form, layout and appearance would be undiluted – that relationship between the ensemble remaining appreciable. In closer views, the listed building will continue to dominate.

471. There would be no cumulative schemes visible in this view and the effect of the proposed development would remain the same as that for the proposed development considered in isolation. Therefore, in both the baseline and cumulative scenario it is considered that the proposal would preserve the special interest and significance, and the contribution made by setting to the significance of 7-8 Philpot Lane.

## 33-35 Eastcheap (grade II\*) & 23-25 Eastcheap (grade II) THVIA View 23

### Significance

472. Two remarkable commercial buildings on Eastcheap showcasing the opulence and eclectic style of high Victorian architecture. Nos. 23-25, was built in 1861-62 by John Young and Son and features a Lombardic Gothic design with polychromatic brickwork, terracotta detailing on round-headed windows, twisted columns, and carved animals adorning the façade. The building has architectural interest as a mid-19th century commercial building, in an Italianate style as well as historic interest as a representation of the rapid growth in purpose built, larger scale commercial premises in the City during the 19th century.
473. Nos. 33-35, completed in 1868 by R. L. Roumieu, presents a striking composition with emphasised pointed Gothic arches, decorative diapered brickwork, marble accents, and intricate wrought ironwork. It has architectural interest as a distinctive Gothic design by the architect R. L. Roumieu, it also has historic interest as a mid-19th century Victorian commercial building and as a representation of the development of this typology across the latter half of the 19th century.

### Setting

474. The immediate setting of 33 - 35 and 23-25 Eastcheap is informed principally by the neighbouring buildings of contemporaneous 19th century fabric and lie within the Eastcheap Conservation Area alongside similar scale 19th and early 20th century buildings. The wider setting of tall and very tall buildings of the City Cluster contrast with the historic buildings with 20 Fenchurch Street forming the northern setting and is seen prominently within their backdrop from the street.

### Impact

475. THVIA View 23 shows that the proposed development would introduce a new tall building, seen to the left of the view and Philpot Lane. It would appear of a similar scale and proportion in this view to 20 Fenchurch Street. It would tie the separated 20 Fenchurch Street into the City Cluster whilst retaining a sky gap. The proposal would be prominent in the background of the listed buildings in views from the south. It would, along with 20 Fenchurch Street, create the emerging edge of the Cluster which would have a dramatic contrast in scale that is characteristic of this part of the City.
476. In close views, in both the baseline and cumulative scenarios, the listed buildings would continue to dominate the foreground while the proposal would be perceived as modern buildings in the background of the listed buildings. As



such it is considered that the proposal would preserve the significance and setting of nos. 23-25 and 33-35 Eastcheap, and the ability to appreciate them.

#### Adelaide House, King William Street (Grade II) HTVIA Views 18,19 and 20

##### Significance

477. Adelaide House, built by Sir John Burnet and Tail in 1924-5 is a large, steel framed office building of 11 storeys, faced in Portland Stone and granite, with archaic Greek and Egyptian style decorative motifs. Its significance lies in its high architectural quality, historic interest as an art deco office building and its setting on the north east side of London Bridge and the River Thames.

##### Setting

478. Adelaide House is located at the north-eastern bridgehead of London Bridge, and as such has a prominent position in cross river views and from the bridge itself. Its monumental form and striking architectural details are fully appreciable from these vantage points to the south. It is appreciated within the lower scale of the riverfront buildings, with the tall buildings of the City Cluster in its backdrop. It derives group value with the wide number of early 20th century and mid to late 19th century buildings which inform a key layer of the City's history and characterise large parts of the townscape. The tall buildings in proximity to Adelaide House, most locally 20 Fenchurch Street, but also the wider profile of the fuller Cluster in views from the south, do not diminish the setting, or heritage significance; or ability to appreciate that significance as a noteworthy example of 1920s commercial architecture in the City.

##### Impact

479. Views 18, 19 and 20 of the THVIA illustrate the visual impact of the proposal on the listed building. Within these views the eastern cluster provides a backdrop to and above the Grade II listed Adelaide House, with 20 Fenchurch Street dominating the foreground views and The Leadenhall Building, 22 Bishopsgate and Tower 42 appearing prominently behind.

480. In the baseline scenario the proposed development would add a high-quality element to the wider northern setting of the listed building which features a variety of old and new buildings of varying scale. The stepped form of the tripartite tower would be partially visible. The proposal would be an extension of the existing northern setting, where a collection of tall buildings which make up the City Cluster can be seen. The addition of the proposal would maintain the character of the backdrop and would not harm the setting or significance of the listed building.

481. In the cumulative scenario, the proposed development would be almost wholly screened by 60 Gracechurch Street. Only a sliver of the eastern edge of the proposed development would be seen beyond the silhouette of 60 Gracechurch Street from some angles of the listed building.

482. The tall buildings of the Eastern Cluster do not detract from the ability to appreciate its significance. The proposal would not adversely affect the significance or setting of the listed building.

Church of St Mary Woolnoth, Junction of Lombard Street and King William Street (Grade I)

Significance

483. The distinctive English Baroque Church of St Mary Woolnoth, built 1716-1727 by Nicholas Hawksmoor, is the parish church of the Lord Mayor of London. The Portland stone principal west front comprises an original composition of double height rustication with Tuscan columns and a tower of twin turrets, crowned by coupled lanterns. It is of very high architectural, historic, artistic and archaeological significance. The unique work of English Baroque architecture is an arresting landmark at the centre of the City of London.

Setting

484. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. The backdrop of the church is informed by the curved western elevation of Capital House, a 7-storey refurbished and extended 20th century Portland Stone commercial building which is the most prominent element of the church's immediate setting. 20 Gracechurch Street, a 16-storey building, and 20 Fenchurch Street provide a taller context to the east and are prominent on the background skyline. New Court provides a taller context to the south of the church at St Swithin's Lane. However, more widely the setting of the church is also informed by the further tall and very tall buildings of the City Cluster to the north-east.

Impact

485. The proposal will appear in the backdrop of the Church in views from the west, in particular in views along Lombard Street. In the baseline and cumulative view, the foreground of Portland Stone classical buildings would be backdropped by the Cluster, creating a strong contrast in scale and character between the old and new City.

486. The Church in part is already backdropped by 20 Fenchurch Street, the proposal would form a continuation of that experience, it would be seen clearly as part of the City cluster, appearing visually separated from the historic streetscape in the foreground. The cluster and the historic foreground have a kinetic and transient relationship, from the junction of Lombard Street and King William Street, the Church is the pre-eminent foreground building with a skyline presence. The Church would still have a sky-backed skyline presence in important local views and would remain a prominent City landmark and skyline feature.

487. The impact of the development would be minor and no harm to the significance or setting of the church would arise, especially given the significant distance of the proposal to the east.

#### Church of St Edmund the King, Lombard Street (Grade I) THVIA View 31

##### Significance

488. Wren church, although attributed to Hooke by Bradley and Pevsner, dating from 1670-79. The church fronts onto Lombard Street. It is in Portland stone, with a rectangular plan and an attached southern tower, with a three bay quoined southern façade to Lombard Street, a side return with three round-headed arched windows, and an attached modern vestry extension to the rear at George Yard. Later tower, with arched belfry openings, dentilled cornice with a lead covered octagonal lantern and spire.

489. It is of very high architectural, historic, artistic and archaeological significance. Further interest derives from it being a post-Fire, Wren/Hooke, City church with the survival several original internal features.

##### Setting

490. The church fronts onto Lombard Street, with visibility of its western and northern elevations from George Yard to its west. It sits within the northern side of Lombard Street, within the Bank Conservation Area and as such is neighboured by a broadly cohesive and contemporaneous 19th century townscape informed by a similar datum and a commercial typology with an often Classical architectural style.

491. 20 Gracechurch Street, a 16-storey building, provides a taller neighbouring context to the immediate east of George Yard. 20 Fenchurch Street is also in proximity to the east of Lombard Street and is seen beyond the church in oblique west-east views. Also within the local setting of the church are the tall buildings to the east, those within the City Cluster, which provide a dynamic and dramatic contrast in scale to the setting which is characteristic of this part of the City.

## Impact

492. The church is the focus of the view along Lombard Street and is seen with a backdrop of 20 Fenchurch Street (THVIA View 31). As part of the kinetic experience of moving eastwards down Lombard Street, the proposed development would move into its background.
493. In both the baseline and cumulative scenario, the historic buildings appear in the foreground with a contrasting backdrop of the City Cluster, this townscape contrast is typical of the City, and would be reinforced by the proposal. This would not detract from the significance of the Church or its neighbouring listed buildings. The distinction between the historic and contemporary buildings would remain clearly discernible.
494. The solidity of the materiality and softness of the curved corners would form an appropriate backdrop and would clearly be seen as part of the Cluster. The impact of the development would be minor and no harm to the significance or setting of the church would arise.

## St Dunstan in the East (Grade I) THVIA View C5 Additional Views December 2024

## Significance

495. The listed building includes a tower and steeple by Wren, constructed between 1695-1721 and the ruins, following bomb damage, of a later church, built between 1817 to 1821, based on designs by David Lang. In 1967–71, the ruins of the church were transformed into a garden, incorporating the restored Wren tower.
496. The surrounding environment of the church has changed over time, with the churchyard now playing a significant role in the appreciation and understanding of the church, making a very positive contribution to its significance.
497. The church's steeple is a material record of work in reconstructing city churches following the Great Fire. Views of the steeple of St Dunstan in the East, including from the riverside, as well as views shared with other Wren churches— St Margaret Pattens, and St Mary-at-Hill, including from the Monument Gallery—also contribute to the church's understanding and significance.
498. The building has high historic and architectural interest as a ruinous early 19th century church, featuring a post-Fire steeple and tower designed by Wren.

## Setting

499. The ruins of the Church of St Dunstan in the East lie within their associated garden but otherwise within a more modern setting informed by commercial buildings mostly dating from the 20th century onwards. There are clear views along aligned routes towards the rebuilt tower from the south at Lower Thames Street, from the east along Cross Lane, and from the north along Idol Lane.
500. This modern setting of larger floorplate commercial buildings, particularly to the south and west do not contribute to the ability to appreciate and understand the heritage significance of the Church ruins. The prominent form of 20 Fenchurch Street is visible in the background of views of the church tower from St Dunstan's Hill, forming part of its backdrop. These modern elements of setting do not contribute to significance.

## Impact

501. In View C5 of the THVIA addendum the proposed development would introduce a new tall building to the northwest of the ruins of the Church of St Dunstan in the East as part of the southern part of the City Cluster. In the baseline scenario, the proposed development would be largely occluded by 20 Fenchurch Street with only a small amount of the top of the proposal visible. The foreground church of St Dunstan in the East would remain the focus of the view. This part of the proposed building would read as a continuation of the existing City Cluster, set in the distant background, visually separated from the church.
502. In the cumulative scenario the proposed development would be almost entirely occluded by 60 Gracechurch Street and would be a very minor background change within its wider setting to the northwest.
503. The proposed development would not harm the setting or impact upon the heritage significance of this listed building.

## **Conservation Areas**

### **Leadenhall Market Conservation Area**

504. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance of the Conservation Area as derived from the vibrancy of the historic market, the characterful Medieval street pattern, small scale of buildings, streets and spaces in dramatic contrast to the immediate setting.
505. The site is on the boundary of the Leadenhall Market Conservation Area on Ship Tavern Passage and Lime Street. The proposals include public realm

enhancements to this public highway, largely resurfacing upgrading the existing surface materials. This would be a minor benefit to the Leadenhall Conservation Area, and views into and out of the conservation area along Lime Street and from Fenchurch Street.

506. The proposed tall building would be sited outside of but immediately adjacent to the Leadenhall Market Conservation Area and so would be a prominent new presence in some views into and out of it. Given the enclosed nature of the Conservation Area, the proposals would have limited intervisibility with the market itself. The streets and spaces of the Conservation Area, which are characterised by a dramatic context in scale beyond its extents, would have a similar character and experience to the existing condition. The proposal would appear most notably in views southwest, looking down Lime Street, as demonstrated by view 26 of the THVIA, in this view, the proposals would clearly read as sitting beyond the extents of the medieval street pattern, in the immediate foreground of this view, the more historic character and appearance of the conservation would retain its primacy. This experience is not unusual for the conservation area, in views north, the conservation area is backdropped by 22 Bishopsgate to the north, and in views south, further along Lime Street, 20 Fenchurch Street has a commanding presence appearing beyond the extents of the conservation area.

507. Where the proposals would be visible against Leadenhall Market, in views from Bishopsgate, the development will be appreciated alongside 20 Fenchurch Street in the backdrop. This relationship of tall buildings as a backdrop to Leadenhall Market is a characteristic element of the setting of Leadenhall Market, with the historic buildings dominating the foreground of the views.

508. An objection has been received from a neighbour, regarding the loss of light to Leadenhall Market as a result of the development and how this will lead to a loss of character. The market's covered spaces are currently artificially lit to ensure adequate lighting. The daylight levels are not considered to be a contributor to the significance and special architectural or historic interest of the listed building, or the character and appearance of the conservation area. A change in daylight levels would not harm the setting and significance of the listed building or the character and appearance of the conservation area. The impact on sunlight and daylight is covered in detail in another section of this report.

509. The proposed tall building would reinforce that characteristic of the setting and would not result in harm to the setting, significance or views of the Leadenhall Market Conservation Area.

510. The proposed podium relates to the general scale of building frontages in the Leadenhall Conservation Area and steps down in height from Gracechurch Street to Lime Street to respect the predominant scale and height of frontages

within the Conservation Area. The solidity of the proposed podium is characteristic of the materiality of the area.

511. The proposals include free public viewing gallery at levels 29 and 30, which would enable the public to enjoy elevated views from which observers could appreciate the conservation area and the distinctive roof structures of the listed II \* Leadenhall Market.

512. At ground level, a new publicly accessible route would be provided through the building from Fenchurch Street linking the site to the Conservation Area at Ship Tavern Passage. This new route builds on the traditions of courts, alleys and quieter routes which characterise the Conservation Area. It would enhance the pedestrian experience and provide a new route into the Conservation Area, in addition it would provide active frontages to Leadenhall Market to the north of the site.

513. The new podium and tower building would not result in harm to the character, appearance, setting or significance the Leadenhall Market Conservation Area.

#### Eastcheap Conservation Area

514. The Eastcheap Conservation Area Character Summary and Management Strategy SPD (the SPD) describes the significance as an area with strong historical associations with the Thames, with post-Fire landmarks and good commercial architecture occupying an ancient street pattern and urban grain. The setting is defined by an established relationship with modern tall buildings in the backdrop, such as 20 Fenchurch Street. The majority of Conservation Area views would be unchanged, given the particular dimensions and character of a unique historic urban grain.

515. The proposed tall building is not located in the conservation area, and it is situated on the north side of Fenchurch Street some way from the boundary but would impact on the setting of the Eastcheap Conservation Area in views looking north along Philpot Lane. The height, massing and architecture of the proposed building is typical of what characterises the existing wider setting and would not harm the character, appearance, setting or significance of the Eastcheap Conservation Area or views into or out of the Conservation Area along Philpot Lane.

#### Bank Conservation Area

516. The boundary of the Bank Conservation Area lies on the west side of Gracechurch Street, diagonally to the south west of the application site. The proposal will be visible from a number of vantage points within the Bank Conservation Area including along Lombard Street.

## Significance

517. The Bank Conservation Area was first designated in 1971. The area comprises the commercial heart of the City of London around Bank junction. The character and appearance of the area comprises:

- Presence of some of London's iconic public buildings and many important churches
- Dominance of monumental, solid masonry buildings in classic style, often built for international corporations
- Highest concentration of grade I, II\* and II listed buildings in the City
- Associations with nationally significant events and people

518. The majority of the Conservation Area interior comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. The contrast of medieval street plan, 18th and 19th century buildings and modern office developments is the quintessential character of the City of London which has evolved as a leading international commercial centre since Roman Antiquity.

519. Its character and appearance stems from notable surviving buildings from the 18<sup>th</sup> and 19<sup>th</sup> centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic nexus of financial power. This is expressed through the sense of dramatic arrival at Bank Junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction.

520. The Bank Conservation Area has been the financial and commercial heart of the London and the British Empire since the 18th century. Many significant buildings, for example the Bank of England, the Royal Exchange, and the headquarter buildings of large international companies, closely associated with important dates in British history, stand in close proximity.

## Setting

521. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new. The character of Bank junction as a historical centre is therefore presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive. The historic buildings and scale of the Leadenhall Market Conservation Area form a modest positive contributor.



522. The development site at present makes a neutral contribution to the setting of the conservation area being seen in limited easterly views along Gracechurch Street and the junction with Lombard Street.

### Impact

523. It is only in a few more open vistas would the proposal be visible. The proposal will be visible in some views as part of the distant backdrop as a fleeting, transient element alongside 20 Fenchurch Street. The impact is not considered harmful and is not an unusual relationship in the Conservation Area, with fleeting views of the City Cluster with the dynamic contrast of the historical City in the foreground and new City exemplified as the cluster of towers as a distant backdrop.

524. In those views north and south along Bishopsgate and Gracechurch Street, the proposal would read part of the cumulative Cluster of tall buildings. By reason of its complementary materials, and solid, robust and modelled masonry base there would be a positive dialogue with the scale and proportions of the Conservation Area opposite. The tower would form part of that prevailing contrast in scale on the eastern border of the Conservation Area.

525. View no 79 identified in the Bank Conservation Area Character Summary and Management Strategy SPD looks north along the boundary of the Bank Conservation Area on Gracechurch Street (View 22 in THVIA). The existing view features tall buildings in the backdrop setting to the north on Bishopsgate, both in the baseline and cumulative scenario. The proposed development would appear on the right in this view, against a backdrop of other modern tall buildings in the City Cluster. It would be entirely characteristic of the established, and thrilling, contrast between the old and new financial City.

526. Overall, the proposal would result in some minor change to the setting of the Conservation Area, but not in a manner which would be harmful to its character, appearance, setting or significance.

### Other Heritage Assets

527. The setting of a heritage asset is defined in the NPPF as “The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.” Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise, utilising 3D modelling, site visits and consideration of the submitted application

material, was conducted so as to identify heritage assets the setting of which may be affected. As well as those assessed in preceding paragraphs, the designated heritage assets considered included but not limited to:

- St Paul's Cathedral (Grade I)
- Lloyd's Building (Grade I)
- 7 & 9 Bishopsgate & The Royal Bank of Scotland (Grade II):
- Church of St Edmund the King, Lombard Street (Grade I)
- 1, 13-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill (Grade II) and 15-22 Cornhill (Grade II\*)
- Church of St Michael Cornhill (Grade I)
- Church of St. Peter Cornhill
- Church of St Magnus the Martyr (Grade I)
- Church of St Clement, (Grade I)
- St Margaret Pattens (Grade I)
- St Peter Upon Cornhill (Grade I)
- Chapel Royal of St Peter ad Vincula (Grade I):
- Royal Exchange (Grade I)
- Merchant Taylors Hall (Grade II\*)
- 66 and 67 Cornhill (Grade II)
- 2a; and 23 and 25 Eastcheap (Grade II)
- 48 Bishopsgate (Grade II)
- 40 Threadneedle Street (Grade II)
- Iron Gates in St Benet's Place (Grade II)
- 4 Brabant Court (Grade II)
- Custom House (grade I)
- Old Billingsgate Market (grade II)
- Barbican (Grade II, Grade II\* RHPG)
- Finsbury Circus CA and RPG (grade II)
- Creechurch CA
- Various listed buildings not referenced in the assessments above within the Eastcheap, Guildhall, Finsbury Circus, St Helen's Place and Tower Conservation Area (London Borough of Tower Hamlets).

528. As a result of the scoping exercise, these assets were scoped out of the assessment above because officers judged that the proposal would not have the potential to impact upon their settings and the contribution made to significance. This is for a variety of factors, chiefly the relative distance of or minimal prominence of the proposal, or its limited to nil intervisibility, in the viewing experiences of these heritage assets. As such, the settings and the contribution they make to the significance of these heritage assets would not be adversely affected by the proposals.

### Conclusion on Heritage

529. The proposal would preserve the special architectural and historic interest and significance and setting of strategic, landmark designated heritage assets, including St Paul's Cathedral, Tower of London, Tower Bridge and the Monument.

530. The proposal would not result in any harm to the Outstanding Universal Value of the Tower of London World Heritage Site, or the significance or setting of the listed buildings, Scheduled Monument and conservation area. The significance of the Tower of London and the ability to appreciate its OUV would be unharmed by the slight change to its setting and the cumulative impact of the scheme.

531. The proposals would not harm the setting or significance of other listed buildings in the vicinity identified in the THVIA, nor the settings or significance of the Leadenhall Market, Eastcheap and Bank Conservation Areas.

532. The proposal would not harm the setting of any designated and non-designated heritage assets and would not detract from LVMF, townscape, riverscape, skyline, protected views and views into and out of the surrounding conservation areas and would therefore comply with Local Plan policies CS12, CS13 and DM12.1, emerging City Plan 2040 policies S11, S13, HE1, and London Plan policies HC1, HC2, HC3 and HC4

### **Archaeology**

533. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.

534. The site 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.

535. The planning application is accompanied by an Environmental Statement which contains an archaeology chapter and archaeological baseline as an appendix. Whilst there was no discussion of the public benefits of the scheme in regards to archaeology, there would be some benefit from use of images of the history of the site and the forum in the proposed digital video wall.

536. The 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 would be continued within the new development. Potential impacts on archaeological remains would 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 would be scope to move them.

537. 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.

538. Historic England GLAAS have advised that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation and has therefore recommended conditions to manage the potential harm. However, subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

### **Access and Inclusivity**

539. The proposals have been assessed to ensure that they meet the highest standards of accessibility and inclusive design as required by London Plan Policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1 and S8. These policies seek to ensure that the City is inclusive and welcome for all, with no disabling barriers and that it is responsive to the requirements of all users. Policy HL1 of the draft City Plan 2040 further seeks to ensure that the City is a place that promotes equity, diversity, and social inclusion in the design and use of buildings and public spaces, including through the provision of spaces that are free to access. Policy CV2 of the draft City Plan 2040 relates to the provision of Arts, Culture and Leisure Facilities and states that the provision of arts, culture and leisure facilities should be encouraged where they would contribute to the enjoyment, appreciation and understanding of the City's heritage in a way that is inclusive, welcoming, and accessible for all. Policy CS19 of the Local Plan 2015 encourages additional publicly accessible open space.

540. The principles of inclusive design have been incorporated into the proposals and the scheme is designed to be highly accessible, with accessibility being considered for all levels of the building for both visitors and office workers.

541. The ground floor of the development is proposed to be highly permeable, with a number of entrances and a new route through the site. As part of the proposed Section 278 works the stepped entrance to Leadenhall Market from Ship Tavern Passage would be made an accessible route, and therefore enhancing this route and the entrance to Leadenhall Market.

542. Passenger lifts would provide access to the lower ground level and all upper areas of the main building, including the Level 32 Public Viewing Gallery. All lifts within the development would be designed to meet Part M requirements.

543. The submitted Fire Statement explains in detail the evacuation procedures, and the strategy has adopted best practice procedures for the evacuation of disabled people from all parts of the buildings.

544. Toilet facilities would include universal WC's and Accessible WC's on each floor with a choice of either right or left-handed transfer layouts. A Changing Places facility is proposed within the lower ground floor and Level 32 area. Details of the Changing Places facilities would be secured as a planning condition.

545. A 'Blue Badge' parking bay would be provided at ground floor level within the new public realm in the eastern area of the site, within the servicing area. Details of the car parking management of this space would form part of both the Delivery and Servicing Management Plan (secured by S106) and an Accessibility Management Plan (secured by condition).

546. For cyclists, 5% of cycle spaces should be suitable for larger cycles to meet London Plan policy T5B and London Cycling Design Standards 8.2.1. The dimensions of wider cycle storage locations are indicated on the plans and the size of the cycle lifts should meet London Cycling Design Standards. 5% of the short and long stay cycle provision is proposed within the basement level of the development. Access to the cycle storage would be steps and also a cycle lift from ground floor level. The cycle parking would be subject to further design development with details contained within an Accessibility Management Plan which would be secured by condition.

547. Step free access would be provided from the surrounding streets into all parts of the development. There are clear benefits for inclusive access from new step-free routes connecting the site in all directions. At detailed design stage, further information would be provided on gradients, planting, seating, surface materials, boundary edges, lighting and hazard protection.

548. In addition to the measures outlined above the following key design principles have been followed:

- All floorspace has level access, and lift access is provided to all floors;
- Level changes are mediated across the ground floor to allow level access throughout at acceptable gradients;
- Surface treatments, lighting, and design features would all be developed with access in mind;

- A compliant provision of accessible cycle parking spaces is incorporated into the scheme.

549. Overall, the proposal accords with the aims of the relevant policies. Further details of access and inclusive design would be secured via condition. The step-free access into the site at all the entrances and internally is a great benefit towards an inclusive City for all and is welcomed as part of the proposals. Subject to conditions it is considered that the proposal would meet the highest standards of accessibility and inclusive design as required by London Plan Policy D5, Local Plan 2015 policy DM10.8 and draft City Plan 2040 policy HL1.

## **Highways and Transportation**

### **Surrounding Highway Network and Site Accessibility**

550. There is an established network of footways in the area immediately surrounding the Site, with footways provided along each of the adjacent roads.

551. The site is bounded by Gracechurch Street to the west, Fenchurch Street to the south, Lime Street to the East and Ship Tavern Passage to the North, and located on the corner of the signalised junction at Gracechurch Street, Fenchurch Street and Lombard Street.

552. Gracechurch Street is a Transport for London Road Network (TLRN), whereas the City of London is the Highway Authority for the other surrounding roads.

553. The Site is within close proximity to Liverpool Street, Fenchurch Street, Aldgate, Bank, Monument, Cannon Street, Mansion House and London Bridge Stations. These stations provide access to various services on the London Underground, DLR, and National Rail networks. The Site is therefore considered well located to encourage sustainable trips, in accordance with policy T1 of the London Plan, which seeks to ensure that all development makes the most effective use of land, reflecting its connectivity and accessibility by existing public transport, walking, and cycling routes.

554. With regards step-free access at nearby stations, Liverpool Street features step-free access to the Elizabeth Line (linked with Moorgate station), Circle, Hammersmith & City and Metropolitan Lines. Bank station provides step-free access to the northern line and DLR.

555. The Site therefore benefits from being highly accessible by non-car modes, including excellent levels of access to public transport (PTAL rating of 6b), as well as walking and cycling links in the vicinity of the Site. There are well maintained footways connecting the application site and these offer convenient access to the local area, local amenities as well as public transport opportunities such as the bus and rail services.

## **Trip Generation**

556. A trip generation assessment was undertaken to determine peak hour and daily person trips generated by the scheme, comparing forecast trips associated with the proposed development to the existing land uses.

557. The approach to calculating the trip generation was agreed with TFL and CoL and benchmarked against approved planning applications for office-led developments of similar scale within the City.

558. The average hourly trip rates used were from 08:00 to 09:00 for the AM peak and 17:00 to 18:00 for the PM peak. The proposed development would attract office users, visitors to the proposed retail unit, and the cultural offers at ground level, lower ground level and the Public Viewing Gallery at Level 32 .

559. The trip generation assessment for the existing situation found that there were 328 Arrivals and 23 Departures during the AM peak, 351 two-way trips during the AM peak; and 33 Arrivals and 307 Departures, 340 two-way trips during the PM peak. The full break down of arrivals, departures and modes of transport are captured in the Transport Assessment.

560. A trip generation forecast was carried out for proposed land uses. The assessment anticipates 1,935 two-way trips for the AM peak, and 2,025 two-way trips for the PM peak.

561. Table 5.4 in the Transport Assessment (below) shows the net development trip generation when comparing the existing development to the proposed scheme. This represents the total proposed development trip generation minus the existing development trip generation.

*Table 5.4 Forecast Net Trip Generation – Existing Scheme*

Mode	Daily		AM Peak (08:00-09:00)		Midday Peak (13:00-14:00)		PM Peak (17:00-18:00)	
	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures	Arrivals	Departures
Underground & Crossrail	2799	2730	527	37	423	353	73	528
Train	2943	2871	555	39	445	371	77	555
Bus	390	380	73	5	59	49	10	73
Taxi	32	31	6	0	5	4	1	6
Motorcycle	0	0	0	0	0	0	0	0
Car	0	0	0	0	0	0	0	0
Car Passenger	22	21	4	0	3	3	1	4
Bicycle	980	956	185	13	148	124	26	185
On foot	691	675	130	9	105	87	18	130
<b>Total</b>	<b>7857</b>	<b>7665</b>	<b>1481</b>	<b>103</b>	<b>1188</b>	<b>991</b>	<b>205</b>	<b>1481</b>

562.As a result, 1,584 net total trips are forecast during the 0800-0900 AM peak, and 1,686 net total trips are forecast for the 1700-1800 PM peak.

### **Deliveries and Servicing**

563.Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

564.The existing site is serviced through the two mechanical vehicle lifts, located at the southern end of Lime Street, facilitating the collection vehicles with a 4.25m restriction in height. Larger delivery and servicing vehicles currently turn right and then exit onto Fenchurch Street, whereas smaller vehicles use the route via Lime Street (northbound), and this is subject to complying with restrictions in Lime Street, which are from 8AM to 6PM.

565.For context, it should be noted that the consented scheme was proposed to be serviced via two vehicle lifts which provided access to a basement loading area. This is no longer proposed in order to reduce the embodied carbon of the proposal. A large proportion of the existing basement would be retained with the exception of existing basement level 02, which would be demolished to allow for a higher plant floor on the level below. This would be renamed as basement level 03. Overall, at-grade servicing would mean that the scheme can retain its existing basement as part of the refurbishment, and furthermore would not be reliant on vehicle lifts.

566.The servicing area for the proposed development is accessed from Lime Street, with vehicles entering and exiting the site in forward gear. Four loading bays would be positioned at ground level within the new dual-use public realm open space to the south-east corner of the site.

567.A framework delivery and servicing plan has been produced for the proposed scheme.

568.It is proposed that vehicles up to 8m in length would be permitted to access the service area, Vehicles would be able enter and exit the site in a forward gear, in accordance with DM16.5.

569.The existing site generated 56 trips for servicing and deliveries, with 9 of these occurring within the peak hour. It is anticipated that the proposed development would generate 54 trips per day, with 7 of these occurring within the peak hour.

570.Notwithstanding the above, in line with recent applications approved by the City of London, trips generated for servicing and deliveries are based on the assumption that 0.22 deliveries are required per 100sqm for Class E (office use), whereas for retail use this would be at 1.35 deliveries per 100sqm.



571. With this methodology applied, the proposal with 78,711 sqm (GIA) of office space is estimated to generate 173 trips per day. For the 195sqm (GIA) of retail space, the estimated number trips would be 3 per day, making a total of 176 trips per day.

572. The proposed development would use freight consolidation and would operate with a consolidation management strategy that would be secured as part of the Deliver and Servicing Plan in the Section 106 Agreement, which would reduce the number of vehicles travelling to the site by 50%.

573. If the 50% consolidation is applied to the 176 daily trips, then the number of daily trips would be reduced to 88 trips per day, covering all uses associated with the delivery and servicing of the proposed development, which is higher than the proposed 54 trips per day. Given that two trips are required per trip, (IN/OUT movements), the expected number of deliveries would therefore be 44 trips per day which would be required to facilitate this development. A further 4 extra deliveries would be allowed to account for the pop-up market which is likely to require deliveries, therefore bringing the total to 48 deliveries.

574. The table below demonstrates the modal split of the two-way trips required for the proposed development, with and without consolidation:

<b>Mode</b>	<b>% Modal split (office)</b>	<b>Trips No consolidation</b>	<b>Trips With 50% consolidation</b>	<b>% Modal split (retail)</b>	<b>Trips No consolidation</b>	<b>Trips With consolidation</b>	<b>Deliveries Total development*</b>
Motorcycle /scooter	4	7	4	0	0	0	2
Car	34	59	30	25	0	0	15
LGV	53	92	46	25	1	1	23
Rigid 3 axle (HGV)	9	15	7	50	2	1	4
Rigid 4 axle (HGV)	0	0	0	0	0	0	0
<b>Total</b>	100	<b>173</b>	<b>86</b>	100	<b>3</b>	<b>2</b>	<b>44</b>

*\* adjusted to even numbers to represent the 2 way trips*

575. The proposal is acceptable with the criteria that the delivery and servicing daily trips are reduced by 50%, using the consolidation centres. The number of deliveries/servicing trips would be capped and the proposed mix would not

exceed the numbers as per the table above, and this would be secured in the Section 106 Agreement.

576. In addition, a booking system is required under the Section 106 Agreement that manages and allocates delivery/servicing slots for all land uses of this development. This is to ensure safety on the public highway and that no queuing would take place in and around the area. Also, the system must keep records of all trips generated following the occupation, and data kept thereafter. The trip records must be presented to the City of London upon request to ensure compliance.

577. As part of the delivering and servicing strategy, four loading bays are proposed to accommodate the maximum servicing demand per hour of the proposed scheme. One of these loading bays would operate as a blue badge bay during the daytime use of the public realm area, should a blue badge holder require parking for the workday. This provision fulfils the scheme's requirements for disabled car parking for the proposed development.

578. The blue badge bay adjacent to the loading bay would act as a fourth loading bay during the servicing hours between the hours of 22:00 to 06:00. This flexible arrangement would be fully managed by the on-site facilities management (FM) team.

579. It is anticipated that there would be no conflict between the blue badge bay user and delivery/servicing activity, as deliveries and servicing would take place outside of typical office hours (i.e. 0800-1900).

580. The draft City Plan 2040 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. It is anticipated that delivery and servicing would take place between 22:00 and 06:00 the following day.

581. The proposals for delivery and servicing comply with City Plan policy S9, due to the provision of on-site servicing facilities and encouragement of deliveries by cargo bike.

582. Overall, subject to a S106 obligation to secure a Delivery and Servicing Plan, it is not considered that the proposed servicing arrangements would result in any undue implication on the public highway, nor highway safety in general and are considered acceptable. The proposals comply with Local Plan 2015 policies DM16.1 and DM16.5 securing the provision of blue badge spaces and car-free requirements. The proposals also comply with the emerging City Plan 2040 policies S9, VT2 and VT3.

## **Refuse Management and Waste Strategy**

583. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.
584. A Waste Management Strategy has been produced by the applicant, within the Framework Delivery and Servicing Plan, to outline details of how waste generated from the scheme would be collected/recycled.
585. Waste is currently stored and processed within the loading bay / servicing area.
586. Waste associated from the proposed development an external market space is proposed to be stored in bins at Basement Level 1, along with an in-bin compactor. Prior to collection, the bins would be transported from the waste store at Basement Level 1 to the loading area at ground floor level via the goods lift and collected by a private refuse company. This would ensure that refuse collection would be organised via a managed booking system.
587. To ensure that there are no conflicts with delivery and servicing activities, and to comply with the criteria on the hours of its use, it is recommended that collection of refuse/recycling is part of the same system that manages the delivery and servicing slots. The allocated slots for refuse/recycling would then be reviewed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development.
588. Further detail regarding the refuse/recycling matters, for example, requesting the pick up points while not conflicting with other activities within the building, would be secured as part of the Servicing and Delivery Management Plan in the Section 106 Agreement.
589. The proposals comply with the current Transport Strategy, Local Plan 2015 on Policy DM 16.1, Policy 16.5 and Policy 17.1 ensuring that waste facilities are integrated within the building design.
590. The proposals are also in accordance with the emerging City Plan 2040 and its Strategic Policy S10 complying with Policy VT2 (freight trips).
591. Overall, the proposed refuse collection strategy is considered acceptable and in accordance with policies DM17.1, DM16.1 and DM16.5 of the Local Plan, as well as emerging City Plan 2040 policies S10 and VT2. Full details are to be secured within the Delivery and Servicing Plan under the S106.

## **Pedestrian Comfort**

592. Transport for London (TfL) Guidance states that Pedestrian Comfort Levels (PCL) classify the level of comfort based on the level of crowding a pedestrian experience on the street.

593. Pedestrian crowding is measured in pedestrians per metre of clear footway width per minute. It is noted that these results simply reflect the level of crowding on pedestrian links and do not account for more holistic factors (such as those included within the Healthy Streets Design Check) which influence the on-street experience (i.e. crossing environment, safety, desire lines etc).

594. Pedestrian Comfort Levels are graded A+ (Comfortable) to F (Uncomfortable) and a target of B+ is commonplace across the City. TfL's own guidance suggests that scores of C+ are acceptable for office and retail developments.

595. A PCL assessment has been undertaken on key footways and crossings within the local area based on thresholds set by TfL's 'Pedestrian Comfort Guidance for London' document.

596. A Pedestrian Comfort Level (PCL) assessment and pedestrian movement forecasts were carried out for the following footways and junctions:

- Gracechurch Street – North Point, Middle Point, South Point and South Lamp & Signal;
- Fenchurch Street – West, Middle and East;
- Lime Street – WS (two locations) and ES;
- Ship Tavern Passage – EW and NS.

597. Two scenarios were modelled:

- Scenario 1: 2032 Future Baseline without Development
- Scenario 2: 2032 Future Baseline with Development

598. In Scenario 1, the future baseline 2032 assessment would be consistent to the Baseline 2023 assessment resulting in scores on Gracechurch Street, Fenchurch Street, Ships Tavern Passage and the west side of Lime Street for the all representing comfortable levels. The eastern side of Lime Street again would continue to have a score of F, due to the narrow footway which is below 1.5m and therefore an automatic fail.

599. In Scenario 2, all Pedestrian Comfort Levels would be higher than C+ showing minor differences between future baseline scenario with and without the proposed development. In Scenario 2 the key area of focus is on the east side of Lime Street which would significantly improve with proposed Highways improvement works, secured via a Section 278 Agreement, ensuring a PCL target ranging from C+ to B depending on the time of day. Without any intervention, the PCL score for this part of Lime Street would be an F.

600. In order to secure that an appropriate PCL rating is achieved on Lime Street, it is recommended that works to meet a minimum of the tested scenarios are secured through S278 agreement. The results demonstrate that with this intervention, the net uplift in walking trips expected can, from a pedestrian comfort perspective, be satisfactorily accommodated via the proposed pedestrian network and highways interventions.

601. The scope of the Section 278 works can be found later in this report. The indicative design of the highway would be fully funded by the developer. The proposals comply with the current Local Plan 2015, in particular policy DM16.2, ensuring acceptable pedestrian movements, and with the emerging City Plan 2040 policy S10 (Active Travel and Healthy Streets) and Policy AT1 (Pedestrian Movement, Permeability and Wayfinding).

### **Car parking**

602. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2040 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.

603. Local Plan Policy DM16.5 (2) states that designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements.

604. London Plan (2021) T6.5 (non-residential disabled persons parking) sets out that a disabled persons parking should be provided in accordance with the levels set out in Table 10.6, ensuring that all non-residential elements should provide access to at least one on or off-street disabled persons parking bay. Standards for non-residential disabled persons parking are based on a percentage of the total number of parking bays. All proposals should include an appropriate amount of Blue Badge parking, providing at least one space even if no general parking is provided.'

605. The existing building has no off-street parking facilities and the proposed development would be car free with the exception of one disabled car parking space at ground level within the dual-use public realm space. The disabled parking bay would be accessed from Lime Street and would have an additional 1.2-meter strip on each side to enable drivers to move in and out of the car easily.

606. The dual-use space would function as public realm space during the day and would be the location of the market space. The parking space would be available for use during the time when this development is open and would not be available from 10 pm to 6 am, during which time the area where the car

parking space is situated would function as a loading bay to facilitate deliveries and servicing.

607. The use of the accessible parking space and delivery/servicing bays would not interfere with the functioning of the pop-up market. Deliveries and servicing are proposed to take place when the market is closed between 22:00 and 06:00, and the accessible parking space would be designed to ensure there is sufficient space to enter and exit in a forward gear, as shown via the swept path analysis in the submitted Transport Assessment.

608. Within the vicinity of the site, there are other disabled car parking spaces located nearby on the public highway, with the closest located at George Yard (145m), followed by the Eastcheap (250m) and Mincing Lane (290m). These designated disabled bays can be used for up to four hours on weekdays, and with no limits during the weekends.

609. Although it is accepted that public transport provision at this location is at the highest level possible, in order to bring this proposal fully in line with the approved policies, a Travel Plan is recommended to be secured through the Section 106 Agreement.

610. The Travel Plan would support each disabled staff member in having a tailored travel plan detailing how they would get to and from the site and supported through different initiatives. Similarly, disabled visitors to this development can request support for their travel if public transport does not meet their needs. Not all nearby underground stations have step-free access, which means that some users of this development may require additional support. Measures such as arranging a pick-up from a nearby underground station with step free access, or pre-arranged locations must be considered, and could form part of the travel plan measures to support the disabled people.

611. The applicant would be required to keep records and manage the demand for disabled car parking spaces. In addition, details on facilitating alternatives to car parking for disabled users (staff and visitors) for all land uses included in this development, should form part of the Travel Plan. The action plan with initiatives is to be submitted for review to the Local Planning Authority annually.

612. Further details would be secured under the S.106 including management and the criteria for the use of the accessible car parking space. These details would be requested under the Travel Plan and shall include, but not limited to, the following:

- The disabled car parking space is available at all times to users of the building, except from the hours from 10PM to 6AM, when the use of the parking area requires a permission from the management company. Out

of hours parking slots could be available, if that area is not required for delivery and servicing activities.

- Responsibility for allocation of the car parking space, enforcement of parking contraventions.
- Criteria for applying to use the disabled car parking space, details on how the decision is made if more than one user is requiring the space at the same slot.
- Using the disabled car parking space is free of charge, in perpetuity, for employees of the building and other users of this building.
- Passive Electric Vehicle Charging (EVC) point to be included, with the plan to make it active charging point.
- Keep records of the car parking demand and the occupancy levels. Upon request, the applicant would need to submit records to the LPA.

613. The applicant would further be required to submit details of the gradients of this area as part of a planning condition to ensure level access is provided across this whole area.

614. Policy T6 of the London Plan sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. Appropriate disabled persons' parking for Blue Badge holders is to be provided in accordance with Policy T6.5 for non-residential elements of the development. The proposals are also in accordance with the emerging City Plan 2040 Policy VT3 and the Local Plan 2015 Policy DM16.5.

### **Cycle Parking**

615. London Plan Policy T5 (Cycling) requires cycle parking to be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 also requires cycle parking to be designed and laid out in accordance with the guidance contained within the London Cycling Design Standards, and that developments should cater for larger cycles, including adapted cycles for disabled people. The emerging City Plan 2040 Policy AT3 also accords with London Plan Policy T5.

616. The table below shows the cycle parking requirements of the scheme according to the London Plan Policy Standards (2021) with that proposed:

Land Use	London Plan Requirement		Site Requirement	
	Long Stay	Short Stay	Long Stay	Short Stay
Class E(g) – Office	1 space per 75sqm GEA	1 space per 500sqm up to 5000 sqm, then 1 space per 5000sqm GEA	1,101	26
Class E(a/b)	1 space per 175sqm GEA	1 space per 20 sqm GEA	2	11
Sui Generis	1 space per 8 FTE staff	1 space per 100 sqm (GEA)	1	14
<b>Total Required</b>			<b>1,104</b>	<b>51</b>
<b>Total Proposed</b>			<b>1,106</b>	<b>65</b>

617.65 short stay cycle parking spaces are proposed for the development in compliance with the London Plan requirements. 19 spaces would be located at ground level on the eastern side of the public realm area. An additional 46 spaces would be provided within the cycle store at Basement Level B1 and for visitors of the development, alongside the long-stay accessible cycle parking spaces. Appropriate signage and wayfinding would be provided.

618. It is further proposed to re-provide 10 cycle spaces on the Lime Street western footway as part of the realignment proposal, providing a total number of 26 cycle parking spaces available for the public to use at ground level, representing a net increase of 11 spaces within the public realm.

619.3 cargo bike spaces are proposed to be located by the pop-up market and public space to the south-east of the site, facilitating the delivery/servicing by bikes.

620. 1,106 long-stay cycle parking spaces are proposed at basement levels 1 and 2 in compliance with the London Plan requirements. This would be split between the basement level 1 (total of 164) and basement level 2 (total of 942), which can be accessed through a dedicated staircase with cycle channels. In addition, a cycle lift is provided to accommodate larger cycles.

621. The main dedicated cycle access is proposed via Lime Street, which leads to the area to disembark then cycle stairs which have a channel. It is predicted that 70 % of cyclists would use this route.

622. The alternative cycle access is proposed through the open space at the south-east of the site, leading to the area where the lift is positioned. 30% of cyclists are predicted to use this route.



623. Further details would be secured via condition detailing the size of the cycle access entrance from Lime Street, assessment on the numbers arriving/departing at peak periods, details on the cycle rail channels, including the cycle parking journey from on street to the parking space with full dimensions and gradients; and ensuring that the use of the goods lift does not interfere with use of the cycle lift.

624. 5% of the long stay, and 11% of the short stay spaces would accommodate accessible type bikes.

625. The cycle parking mix for long stay spaces is presented in the table below.

Type of Cycle Stand	Proportion	Numbers
Accessible Spaces (Sheffield Stand)	5%	50
Two-Tier Rack	82%	914
Brompton Bike Locker	10%	114
Semi-Vertical	3%	28
Total	100%	1,106

626. In addition to the long-stay cycle parking spaces, the scheme proposes 56 showers, including 10 accessible WC/showers, and 739 lockers.

627. Accessible end-of-trip facilities would also be provided for cyclists using larger or adapted cycles, to be designed and implemented using LCDS guidance. Larger accessible cycle parking spaces would be located at the first basement level in the main cycle store for people using adapted and larger cycles. These spaces represent 5% of the overall long-stay cycle parking provision, the proportion of which is fully compliant with the London Plan.

628. The final design of the end-of-trip facilities and cycle parking facilities would be secured by condition, and this should be designed using LCDS guidance as per London Plan Policy T5. This accords with the emerging City Plan 2040 Policy AT3. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required by Section 106 obligation to produce a Cycling Promotion Plan as part of a Travel Plan, which is required to address both the long stay spaces and also ensuring public access to the short stay spaces. It would need to be submitted to the City for approval in line with the London Plan Policy T4.

### **Travel Plans**

629. The emerging City Plan 2040, sets out “a strategy for the future planning of transport in the City of London which provides a 25-year framework for future investment in and management of the City’s streets, as well as measures to reduce the social, economic and environmental impacts of motor traffic and congestion.”

630. It includes: “a long-term management strategy that includes the promotion of active travel for a development. It shall seek to deliver sustainable transport objectives and will be regularly reviewed in line with planning obligation requirements.”

631. The travel plan would need to be approved by the City of London prior to the occupation of the development. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.

632. It should set out a detailed strategy designed to encourage safe, healthy, and sustainable travel options. This would assist in supporting the trips generated from this proposed development and its impact on the highways network as an effective tool for managing visitors, volunteers, and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

633. In addition to the aforementioned, the travel plan should also be supporting disabled people of this development, through inclusive travel planning measures. Each disabled staff to have a tailored travel plan, on how they get to/from the site, and supported through different initiatives. Similarly, disabled visitors of this development, could request support to get to/from site, if the public transport is lacking to meet their needs. Not all underground stations nearby have step free access, which means until all stations nearby are step-free, some users of this development may require additional support. Measures such as arranging a pick up from nearby underground station, or other pre-arranged locations should be considered, and could form part of the travel plan measures.

634. With an expected uplift of over 1500 trips generated from this proposed development; it is essential that the City seek to mitigate the impact on this development through requiring a Travel Plan. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.

635. If planning permission is granted, a Travel Plan with a Cycling Promotion Plan, would need to be secured as part of the Section 106 planning obligation to meet London Plan policy T4, Local Plan Policy 16.1 and the emerging City Plan 2040 strategy Policy S9 and Policy VT1.

### **Construction Logistics**

636. The London Plan, Policy T7 on deliveries, servicing and construction, the Local Plan 2015 and the emerging City Plan 2040, indicates that the development must address the impacts during the construction phase, and when the site becomes operational.

637. The detailed deconstruction/construction logistic plans shall be developed in accordance with TfL guidance per the latest standards and approved by the City of London and TFL, prior to the start of the construction of this development.

638. A preliminary Construction Logistics Plan (CLP) has been submitted in support of the planning application. This provides useful information to describe the proposed works and how they would be undertaken. It also provides useful information to describe how the impacts associated with the construction period would be mitigated. A more detailed CLP would be prepared once a Principal Contractor has been appointed, which would need to be in line with TfL's Construction Logistics Plan Guidance.

639. The logistics arrangements would be developed in consultation with the City's Highways Licensing and Traffic Management teams and TfL to minimise the disruption to neighbouring occupiers and other highway users. TfL has raised the need for a full Construction Logistics plan to be submitted and approved prior to commencement.

#### **Highway Boundary/Stopping Up and Adoption**

640. An area of land along Gracechurch Street is proposed to be stopped up, for which Transport for London is the Highway Authority, as well as the sections on Ship Tavern Passage and Lime Street, for which the City of London is the Highway Authority.

641. The total area to be stopped up would be 17.30 sqm, and the area proposed for adoption would be 20.81 sqm.

642. If the new link road is offered for adoption, this would be done as part of Section 38 of the Highways Act 1980. The applicant would be required to engage with the Highway Authority to agree details, such as: surface materials, sub-soil/construction, acceptable gradients, method of surface level drainage, position of the bollards, demarcation between the private and public highway, and other associated works.

643. The proposal does not include oversailing or undersailing of the public highway.

#### **Section 278 and Section 38 Highways Works**

644. The future development would attract a substantial number of pedestrians to the area. As part of these proposals, plans to enhance the public areas and the highways within the vicinity of the site are included.

645. It is acknowledged that significant changes are ongoing in the area due to the construction of tall buildings, leading to an increase in pedestrian flows, which can currently be accommodated within the existing highways network but increased future demand from the completion of such developments requires

significant improvement works to local highways infrastructure to accommodate the anticipated pedestrian numbers.

646. The necessary highway works to mitigate the impact of the development and improve the pedestrian experience (including post-construction) would be carried out as part of a Section 278/38 Agreement of the Highways Act 1980, in alignment with the City's requirements and aspirations for the area.

647. The works proposed to the public highway adjacent to the Site are (and are not limited to):

Fenchurch Street:

- Widening of the footways fronting the site
- Carriageway resurfacing
- Improvements to highways drainage within the frontage of the site
- Provision of road markings and associated traffic orders

Gracechurch Street (TFL):

- making permanent of the current buildout on Gracechurch Street, currently in place with temporary materials
- Carriageway resurfacing
- Reconstruction/Reinstatement of footways and associated works

Lime Street:

- Introduction of vehicular access within Lime Street and necessary accommodation works and removal of the existing access
- Realignment of the Lime Street carriageway crossing improvements at the junctions of Fenchurch Street (materials to match the public realm vision for the area), Philpot Lane and Lime Street
  - To consider the signalisation of this junction, as it was the case with the previously agreed Section 106 agreement where it refers to the TA as preferred option
- The study to consider all options to facilitate the pedestrian movements, for example: introducing a zebra crossing, unsignalized crossing with refuge island, informal crossing with raised table, including the option to signalize this junction to allow a pedestrian phase. If signalisation is the option selected due to proximity with the existing junction Gracechurch/Fenchurch Street, linking the two junctions is likely to be required. Crossing improvements at the junctions of Fenchurch Street, Philpot Lane and Lime Street to be implemented by the applicant (in accordance with City of London procedure) following the outcome of the feasibility study.
- removal of the 2no. existing steps on the public highway on Ship Tavern Passage, to create a step free route

Philpot Lane:

- Footway improvement works and associated works

- Carriageway resurfacing
- Highways Drainage
- Provision of road markings and associated traffic orders

648. Gracechurch Street forms part of the TfL Network red route. The applicant would need to enter a Section 278 Agreement with TfL for all highways, walking, cycling, and public realm improvement works.

649. A contribution towards the A10 safety, walking and cycling improvement project would be made. This has been calculated by TfL as £450,000. The applicant would either pay this sum towards the A10 improvement scheme or enter into a Section 278 Agreement with TfL for these works. A further £100,000 contribution is requested to part-fund a new cycle docking station on Rood Lane, however this is subject to agreement.

650. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy, and City of London's Public Realm vision. This would be secured through the Section 106 agreement, and an indicative plan is appended to this report (Appendix E).

### **Highways and Transportation Conclusion**

651. Subject to the recommended conditions and planning obligations, the proposal would accord with relevant transport related policies including London Plan policies Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T6 Car Parking, T7 Deliveries, Servicing and Construction. It accords with the Local Plan 2015 Policy DM16.1, DM16.2, DM16.3, DM16.4, and DM16.5, as well as DM3.2 and London Plan Policy D11 Safety, Security, and Resilience to Safety. It also accords with the emerging City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

### **Environmental Impact**

652. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

## **Wind Microclimate**

653. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation and architectural features.
654. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
655. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
656. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists. The City of London Lawson criteria defines the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK, and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe. The threshold would be breached if wind speeds exceed 15m/s for more than 1.9 hours of the year (0.022% of the time).
657. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
658. There are four criteria for determining the sensitivity of a receptor:

- High: seating areas, entrances, and terraces

- Moderate: thoroughfares
- Low: high pedestrian traffic thoroughfares
- Negligible: roads and areas of no pedestrian access

659. There are also four criteria for determining the magnitude of change/impact to a receptor:

- Large: Safety exceedance
- Medium: two categories above criteria
- Small: one category above criteria
- Negligible: within suitable criteria.

660. Assessments have been carried out for both the windiest season and the summer season.

661. Eight configuration scenarios were tested in the wind tunnel tests. These configurations are a series of cumulative configurations, which separates out all consented developments, and those which have been submitted but not yet granted planning permission (referred to as “non consented cumulative schemes”). These configurations are listed below:

- Configuration 1: Existing site with Existing Surrounding Buildings;
- Configuration 2: Existing site with consented and Non Consented Cumulative Schemes;
- Configuration 3: Proposed Development with Existing Surrounding Buildings;
- Configuration 4: Proposed Development with consented Cumulative Schemes;
- Configuration 5: Proposed Development with Consented and Non Consented Cumulative Schemes;
- Configuration 6: Proposed Development with Existing Surrounding Buildings, Proposed Landscaping and Wind Mitigation Measures;
- Configuration 7: Proposed Development with Consented Cumulative Schemes, Proposed Landscaping and Wind Mitigation Measures;
- Configuration 8: Proposed Development with Consented and Non Consented Cumulative Schemes, Proposed Landscaping and Wind Mitigation Measures.

662. The Tier 1 Assessment (which accounts for the schemes that have planning consent or a resolution to grant within a 400m radius of the site) comprises 10 cumulative schemes in total which have either been granted or received resolution to grant. It is considered that Tier 1 Assessment represents a reasonable worst-case scenario.

663. The Tier 2 Assessment (comprising all consented schemes in Tier 1 with the addition of schemes pending determination) have also been considered in relevant testing configurations in accordance with the City of London's Wind Microclimate Guidelines, and includes schemes that 'may not be consented but are being designed at the time of planning submission.' The 4 schemes considered under the Tier 2 Assessment are:

- 1 Undershaft – planning reference 23/01423/FULEIA
- 60 Gracechurch – planning reference 24/00743/FULEIA
- Bury House – planning reference 24/00021/FULEIA
- 75 London Wall – planning reference 23/01270/FULMAJ.

664. It should be noted that the Tier 2 schemes listed above were included as Tier 2 schemes rather than Tier 1 as they were still pending determination when the application was submitted (1st August 2024). However, at the time of publication of this report, all of the above mentioned Tier 2 schemes have either been granted or given a resolution to grant, or in the case of Bury House, received a resolution to refuse by your Planning Applications Sub Committee. Technically, these schemes should now be moved into the Tier 1 assessment. However, the results of the wind testing have been thoroughly assessed, and it is considered that the subsequent grant or refusal of these schemes following submission of this application and the environmental information contained therein would not materially change the results insofar as to require the tier listings of the schemes to change and the tests be re-run and reported.

665. A ninth configuration was also tested, which incorporated temporary wind mitigation measures at off-Site locations which would not be required once cumulative buildings are completed to illustrate how certain off-site comfort exceedances could be mitigated.

666. It should be noted that Configurations 2, 4, 5, 7 and 8 were retested in the Wind Tunnel and CFD following the removal of the expired consents for 55 Gracechurch Street (planning reference 20/00671/FULEIA) and 130 Fenchurch Street (planning references 16/00809/FULMAJ and 19/00713/FULMAJ), and the inclusion of 99 Bishopsgate (planning reference 24/00836/FULEIA) and an addendum to the wind results were submitted.

667. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.



## Wind conditions at street level

668. In the existing baseline conditions (Configuration 1) the wind tunnel tests and CFD show that conditions around the site are range from suitable for frequent sitting use to uncomfortable for all uses. Further to the east around 20 Fenchurch Street where the conditions are windier, there is one location to the north of 20 Fenchurch Street which is categorised as uncomfortable in the windiest season, however this is in the road with no safety exceedances.
669. The effects of the proposed development with existing surrounding buildings (Configuration 3) wind conditions would range from suitable for frequent sitting use to uncomfortable for all uses during the windiest season. During the summer season, the wind conditions would generally be one category calmer, suitable for frequent sitting use to walking use. The windiest areas would remain Lime Street and the passageway underneath the proposed development.
670. Testing of the effects of the proposed development on wind microclimate has shown some on-site areas which would experience comfort exceedances. These include: The entrance to the viewing gallery use within the new public route; Two areas of the terrace at level 7; and four areas on the upper terraces for both office and public users. All of these areas of on-site exceedances are deemed to have Moderate Adverse impacts.
671. It is proposed to incorporate a number of features into the design of the building and landscaping to mitigate these impacts. These include:
- Updated massing to the south-western corner of the proposed development;
  - Installation of a 3m tall baffle across the northern end of the passageway;
  - Landscaping introduced to all upper level terraces and rooftop terraces, including planters with shrubs up to 1.5m in height, and pergolas with climbing/overhanging plants.
672. It is considered that with the mitigation measures above, these on-site areas would be fit for their intended uses.
673. In considering the completed development with the inclusion of the wind mitigation strategy at and surrounding the Proposed Development in the context of the existing surroundings (Configuration 6), wind conditions would range from suitable for frequent sitting use to uncomfortable for all uses during the windiest season. During the summer season, wind conditions would be generally one category calmer, suitable for frequent sitting use to walking use. In most locations the wind conditions would remain either in the same

categories as existing or become windier but would continue to fall within a category suitable for the intended use.

674. Whilst the general wind conditions in the context of the above would remain either in the same categories as existing, become calmer, or become windier but would continue to fall within a category suitable for the intended use, some off-site comfort exceedances are identified:

- A temporary bus stop located on the western side of Gracechurch Street, which is deemed to be a Major Adverse and significant effect (location 218);
- Entrances to buildings at 159 Fenchurch Street and Alpha House/24A Lime Street (locations 103 and 124) which is considered to be a Major Adverse effect, which is significant;
- A bench outside 20 Fenchurch Street (in itself intended to be a wind mitigation tool for that development – location 101) would experience a Major Adverse and significant effect;

675. Temporary mitigation measures have been identified which could be implemented for all of these off-site comfort exceedances:

- Reinstatement of a dead tree outside 20 Fenchurch Street;
- A 3 metre temporary baffle within the new route through the site;
- A solid temporary screen at the bus stop on Gracechurch Street; and
- Use of movable screens/windbreaks to the outdoor dining area on Lime Street Passage and on Bulls Head Passage.

676. Temporary mitigation measures are proposed because the Wind Tunnel Testing and CFD results show that these areas of comfort exceedances would become suitable for their intended purposes once all of the cumulative schemes (consented and non-consented) are completed.

677. Wind conditions for Configuration 2 (the future baseline scenario) show the wind conditions during the windiest and summer season respectively in relation to the Tier 1 and 2 Cumulative Schemes within the 400m radius of the site.

678. In the future baseline scenario, wind conditions would range from suitable for frequent sitting use to walking use. During the summer season, wind conditions would be one category calmer at ground level compared to the windiest season, suitable for frequent sitting use to standing use.

679. In terms of pedestrian comfort for Configuration 2, wind conditions at and surrounding the site in the context of the cumulative surrounding buildings would be the same or calmer than those in the baseline scenario (Configuration 1). The windy conditions which were uncomfortable for all uses within the road on Fenchurch Street in Configuration 1 would be alleviated with the introduction of cumulative schemes and would be suitable for walking use. The windier than suitable conditions at the bus stop on Fenchurch Street, would persist (suitable

for walking use during the windiest season) with the inclusion of cumulative schemes. Furthermore, walking use wind conditions noted at the entrance represented by measurement location 359 identified in Configuration 1 would persist with the completed cumulative buildings. In the summer season, windier than suitable standing use conditions would persist at the benches around 20 Fenchurch Street.

680. The results of Configuration 2 therefore further conclude that several of the areas outlined previously which would result in wind conditions which would be unsuitable for their intended uses would be resolved when the cumulative buildings are constructed.

### Cumulative Effects Assessment

681. Wind conditions in the context of the Tier 2 cumulative schemes (without any mitigation measures in place) have been wind tunnel tested in Configurations 4 and 5 respectively. Configurations 7 and 8 tested the wind conditions around the proposed development with the proposed wind mitigation strategy in place in the context of the Tier 2 cumulative schemes respectively.

682. Wind conditions for Configuration 7 (Proposed Development with Cumulative Surrounding Buildings and wind mitigation measures) show that the wind conditions would range from suitable for frequent sitting use to walking use during the windiest season, with the windiest areas located along Gracechurch Street and Leadenhall Street to the north of the site. During the summer season, wind conditions would be generally one category calmer, suitable for frequent sitting use to walking use. Generally the wind conditions would largely be materially the same as the condition in Configuration 6. The results show the wind conditions would remain either in the same categories or become calmer.

683. There is only one location in Configuration 7 (terrace on the southern elevation represented by measurement location 417) which would have wind conditions one category windier than desired for general amenity use (standing use conditions during the summer season). This is one category windier than in the context of existing surrounding buildings. As this area would be substantially landscaped, further additional mitigation measures which would be required once cumulative developments are completed would likely detract from other aspects of this terrace (such as daylight), and on balance would result in a less usable space. Furthermore, as the purpose of the area is an outdoor break area for the office space at this level, it is expected that standing use wind conditions would be tolerable for this purpose. Therefore, this wind condition would represent a Negligible (not significant) effect.

684. Configuration 8 tested the wind conditions at and surrounding the proposed development in the context of the cumulative surrounding buildings with the wind mitigation strategy in place and Tier 2 cumulative schemes. Wind conditions in this configuration would range from suitable for frequent sitting use to walking use. During the summer season, wind conditions are expected to be one category calmer at ground level, suitable for frequent sitting use to standing use.

685. In terms of pedestrian comfort, wind conditions in Configuration 8 would be largely consistent with those in Configuration 7. However, the Tier 2 cumulative scheme scenario would result in windier conditions at two on-site terrace locations; measurement location 410 at the south-east corner of the podium terraces and measurement location 415 on the southern elevation terraces. These standing use wind conditions during the summer season would be one category windier than in comparison to Configuration 6 and 7, and one category windier than desired for private amenity spaces.

686. As discussed for measurement location 417 in Configuration 7, these areas are already thoroughly landscaped, and any further wind mitigation measures would severely impact other aspects of the area such as daylight. Since the intended use of these spaces is a break area for those in the offices, the standing use wind conditions would be acceptable as the level of activity would be similar to that of people at a waiting area. Therefore, due to the potential influence on other aspects of the site, and as wind conditions are expected to be tolerable, these wind conditions would represent a Negligible (not significant) effect.

#### Retested Configurations following removal of 55 Gracechurch Street and 130 Fenchurch Street

687. Following the expiration of the planning consents for 55 Gracechurch Street and 130 Fenchurch Street, and with the inclusion of the live 99 Bishopsgate planning application (planning reference number 24/00836/FULEIA) as mentioned above, the following configurations were re-tested in the Wind Tunnel and Computational Fluid Dynamics (CFD) to understand the impact of removing these expired schemes:

- Configuration 2: Existing site with consented and non-consented cumulative buildings;
- Configuration 4: Proposed Development with consented cumulative buildings;
- Configuration 5: Proposed Development with consented and non-consented cumulative buildings;
- Configuration 7: Proposed Development with consented cumulative buildings and mitigation measures;

- and
- Configuration 8: Proposed Development with consented and non-consented cumulative buildings and mitigation measures.

688.99 Bishopsgate is located beyond the established 400m radius for assessment and therefore was not considered further.

689. Overall, the revised Wind Tunnel Testing and CFD has shown that largely the wind conditions for most on-site and off-site locations would not materially change as a result of these changes to the cumulative scenarios.

#### On-site

690. As a result of the changes to the cumulative scenario, due to the lack of shelter previously provided by 55 Gracechurch Street and potentially 130 Fenchurch Street, windier than suitable conditions were shown at two entrance locations within the ground floor passage of the proposed development (locations 345 and 355). In addition, podium level amenity (location 410), would experience calmer wind conditions and would therefore be suitable for intended amenity use.

691. In relation to location 345, conditions would be one category windier (walking use, with the target use of standing use) with only the consented schemes in situ (Configurations 4 and 7). They would, however, be suitable once the non-consented schemes come forward (Configurations 5 and 8). In relation to location 355, conditions would be uncomfortable and unsafe in Configurations 4 and 7. Once non-consented cumulative schemes are completed, wind conditions would improve such that their effects would no longer be significant.

692. The potential wind mitigation outlined in paragraph 195 of this report would need to be re-assessed for their effectiveness. It is acknowledged that the City is ever changing in its cumulative context, and so the assessment and commitment to any mitigation would be secured via condition and the Section 106 Agreement when the likely cumulative context is more certain.

#### Off-site

693. Wind conditions located at two entrance locations, to east of site the along Lime Street (locations 103 and 124), would be too windy (walking use, with the target condition of standing) with only the consented schemes in situ (Configurations 4 and 7). They would, however, be suitable once the non-consented schemes come forward (configurations 5 and 8). Therefore, it is proposed that further wind testing is subject to a planning condition to confirm what additional mitigation measures would be required.

## Wind Microclimate Conclusion

694. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level.
695. Where there have been on-site and off-site exceedances identified (locations 101, 103, 121, 124, 345 and 355) which would have windier than suitable conditions in the context of the existing surrounding buildings which are windier than the baseline scenario, these would be alleviated with the inclusion of the cumulative schemes.
696. In the instance that not all cumulative schemes are built out, potential wind mitigation measures identified earlier in this report would be secured in the S106 Agreement.
697. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the Environmental Statement.
698. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan 2040 policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

## **Daylight, Sunlight and Overshadowing**

699. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.
700. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
701. Draft City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides

acceptable standards taking account of the Building Research Establishment's guidelines.

702.Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states that when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

### **Assessment methodology**

#### **Daylight and Sunlight**

703.The BRE guidelines "Site layout planning for daylight and sunlight – A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:

- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
- **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

#### **Overshadowing**

704.Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG) and transient overshadowing. The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

705.Sun Hours on Ground is undertaken on the equinox (21st March and 21st September), and tracks the sun's path to determine where the sun would reach the ground and where it would not. It is recommended that at least half an

amenity area should receive at least 2 hours of sunlight at the equinox, or that it should not be reduced to less than 0.8 times its former value.

706. Transient overshadowing consists of a series of shadow plans illustrating the location of shadows cast from the proposed buildings at different times of day and year. This includes 21st March (spring equinox), 21st June (summer solstice), and 21st December (winter solstice).

#### Interpreting results

707. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable, or negligible. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

708. With regards the impact of a development on overshadowing, as above it is recommended that at least half the area should receive at least two hours of sunlight on the equinox, OR that it should not be reduced by 20% from the baseline.

709. An assessment of the impact of the development on daylight, sunlight and overshadowing to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE7 of the draft City Plan. Policy D6D of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.

710. Four scenarios have been tested:

- Existing Baseline
- Existing Baseline and Proposed Development
- Proposed Development and Cumulative Schemes (Tier 1)



- Proposed Development and Cumulative Schemes (Tier 2)

711. The two cumulative scenarios considered are:

- Cumulative Tier 1: has quantitatively assessed consented schemes with the potential to generate additional effects in conjunction with the Proposed Development; and
- Cumulative Tier 2: has qualitatively assessed consented schemes + submitted schemes with the potential to generate additional effects in conjunction with the Proposed Development.

712. Cumulative Tier 1 are the Cumulative Schemes deemed close enough in proximity (using professional judgement) based on their scale, relative distance from the proposed development and sensitive receptors and planning status to have the potential to generate cumulative effects. These are considered to be:

- 85 Gracechurch Street (22/01155/FULEIA); and
- Site Bounded by Fenchurch Street, Mark Lane, Dunster Court and Mincing Lane (19/01307/FULEIA).

713. Cumulative Tier 2 considers all approved cumulative schemes listed above in addition to the following future development:

- 60 Gracechurch Street - planning reference 24/00743/FULEIA

714. It should be noted that similarly with the Wind Microclimate, the Tier 2 scheme listed above was included as Tier 2 schemes rather than Tier 1 as it was still pending determination when the application was submitted (1st August 2024). However, at the time of publication of this report, the above mentioned Tier 2 scheme has been given a resolution to grant by your Planning Applications Sub Committee. Technically, this scheme should now be moved into the Tier 1 assessment. However, the results of the Daylight, Sunlight and Overshadowing testing have been thoroughly assessed, and it is considered that the subsequent grant of this scheme following submission of this application and the environmental information contained therein would not materially change the results insofar as to require the tier listings of the schemes to change and the tests be re-run and reported.

715. 55 Gracechurch Street (20/00671/FULEIA) was originally tested in the Tier 1 category, however due to its expiration the tests were rerun without the inclusion of 55 Gracechurch Street. This will be discussed in more detail later on in this section.

## **Assessment of impacts**

716. When referring to the degree of adverse impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the Environmental Statement. In forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE7), it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.

717. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms in adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include places of worship, schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight.

718. In this case, Officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and Officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premises, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

719. The residential buildings and open spaces to be considered include those at 2-4 Bulls Head Passage, 4 Brabant Court, 9B Eastcheap, Jamaica Buildings, ancillary residential at The Ship Public House and The Grapes Public House. Impact on 14 amenity spaces is also to be considered.

720. The impact on four nearby churches were also assessed in the Environmental Statement, all of which experience a Negligible impact.

### Daylight and Sunlight

721. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.

722. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

723. Both the London Plan 2021 and Local Plan 2015 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered when considering any reductions in daylight and sunlight assessed under the BRE methodology.

### Existing Baseline results

724. A total of 17 buildings have been considered as sensitive receptors and assessed in the baseline for daylight. 14 of these buildings are considered to be sensitive to sunlight due to them having site facing windows with an orientation within 90° of due south. Three buildings, 4 Brabant Court, 1-4 Botolph Alley and 9 Eastcheap, are not sensitive due to sunlight impacts due to their location south of the site.

725. In the baseline condition across all properties tested, 22 of the 354 windows tested for VSC would meet the BRE's recommended levels. Only 25 of the 146 rooms tested for NSL would receive the BRE target of 80% NSL.

726. With regard to sunlight, within the 14 buildings assessed, 23 of the 192 windows assessed for would meet the recommendations for sunlight in the baseline condition.

727.As such, it is evident that the locality is significantly affected by the existing context of tall buildings in the baseline, consistent with the dense urban environment of the City.

### Proposed development

728.When comparing the proposed development to the baseline, 307 out of 354 total windows tested would meet the BRE guidelines for VSC, that is a reduction of no greater than 20%. This equates to 86.7% compliance.

729.In this same scenario, of the 146 total rooms tested for NSL, 127 would meet the BRE guidelines being a reduction of no greater than 20%. This equates to 87% compliance.

730.9 of the 17 properties assessed for daylight would meet the BRE criteria for both VSC and NSL and as such would experience a negligible impact where the effect is not significant. These are The Ship Public House, The Bunch of Grapes Public House, Jamaica Buildings, St Michael Cornhill Church. 1-4 Botolph Alley, St Clements Church, St Margaret Patterns Church, 5 Philpot Lane and 2 Philpot Lane.

731.For sunlight, of the 192 relevant windows tested, 175 (91.5%) would meet the BRE guidelines. Overall, 10 out of 14 of the properties assessed would meet the BRE guidelines. The four buildings which would experience a reduction in APSH and WPSH are 4 Bulls Heads Passage, 2-3 Bulls Head Passage, The Bunch of Grapes Public House, and St Michael Cornhill Church.

732.The assessment below will therefore focus on the remaining eight buildings with windows/rooms that see a reduction in VSC and/or NSL as a result of the proposed development, and the four buildings with a reduction in APSH and WSPH.

733.In the cumulative scenarios, the assessment further takes into account the removal of 55 Gracechurch Street, which, overall, lessens the magnitude of cumulative daylight and sunlight effects in relation to the following shared receptors: 4 Brabant Court; The Ship Public House, 4 Bulls Head Passage, Jamaica Buildings, St Edmund the King Church, St Maragaret Pattens Church, 2 Philpot Lane, 5 Philpot Lane, 9 Eastcheap and 11 Eastcheap.

### Daylight

#### 4 Brabant Court

734.4 Brabant Court is in residential use and split over 4 floors.

735. For VSC, all 15 windows assessed see losses greater than recommended by BRE. Of these 15 affected windows, one would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect, whilst the remaining 14 windows would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. Due to the built-up nature of the surrounding context, these windows receive limited levels of VSC in the baseline condition, ranging from 4.2% at ground level and 10.4% VSC on the third storey.

736. The ground-level living spaces would experience absolute reductions in VSC of less than 2%, which is unlikely to be noticeable. The remaining affected windows, which serve a reception room, study, and bedrooms on the first to third storeys, would see similarly minor absolute reductions ranging from 2% to 3.7% VSC. These changes would be minimally perceptible, if at all, and the rooms in question are considered to be of secondary use.

737. For NSL, 7 out of 8 (87.5%) of the rooms would meet the BRE criteria, which is a negligible impact.

738. The affected room, a ground floor living room, would experience a 30.4% alteration in NSL, which would be classified as a Moderate Adverse effect, but this would only be slightly above the threshold. Given the low baseline NSL value of 27.5%, this alteration is unlikely to result in a noticeable change.

739. Overall, the daylight effect to this property is considered Minor Adverse (not significant).

#### 4 Bulls Head Passage

740. 4 Bulls Head Passage is in residential use and split over 3 floors.

741. For VSC, 6 out of the 10 (60%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.

742. For the 4 remaining affected windows, three would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect. The final remaining window one would experience an alteration between 30-39.9% which is considered a Moderate Adverse Effect. Two of these windows serve first and second floor living rooms, and would experience absolute VSC changes of 1.9% and 2.6%, respectively. However, due to mitigating windows, these living rooms would remain BRE compliant when considering the room average VSC values. The remaining two windows serve a third floor Living/Kitchen/Dining Room (LKD), which would experience a 3% absolute change in VSC. This would be considered minimally noticeable.

743. For NSL, 2 out of 3 (66.7%) of the rooms would meet the BRE criteria, which is a negligible impact. The affected LKD at ground floor level, would experience a 27.5% alteration in NSL, which would be classified as a Minor Adverse effect. Given the low baseline NSL value of 15%, this alteration is unlikely to result in a noticeable change.

744. With regard to sunlight, 4 of the 10 windows assessed, would meet the BRE criteria for APSH or WPSH, experiencing a Negligible effect.

745. Overall, the daylight effect to this property is considered Minor Adverse due to the low existing VSC levels and high level of NSL compliance.

### 2-3 Bulls Head Passage

746. 2-3 Bulls Head Passage is in residential use and split over 3 floors.

747. For VSC, three out of the six windows (50%) assessed meet the BRE's criteria and are therefore considered to experience a Negligible effect. The remaining three affected windows serve bedrooms and would experience VSC alterations ranging from 20% to 29.9%, classified as a Minor Adverse effect. The absolute changes to these windows range from 1% to 2.5% VSC, which would be minimally noticeable. It is also worth noting the limited baseline VSC values for these windows, which range from 4.7% to 8.7%.

748. For NSL, five out of the six rooms (83.3%) assessed meet the BRE's criteria and are considered to experience a Negligible effect. The one affected room, a second-storey bedroom, would experience an NSL alteration of 27.1%, which is classified as a Minor Adverse effect. However, bedrooms are generally considered less critical in terms of daylight provision.

749. Overall, the daylight effects on this property are considered Minor Adverse (not significant).

### St Edmund The King Church

750. St Edmund The King Church is a religious building split over 2 floors.

751. For VSC, 33 out of 34 windows (97.1%) assessed meet BRE's criteria and are considered to experience a Negligible effect. The single affected window, which serves the rear extension of the church building, would experience a VSC alteration exceeding 40%, classified as a Major Adverse effect. However, this window has a baseline VSC of just 0.1% in the existing scenario, making the alteration disproportionate. More importantly, the main nave would remain unaffected.

752. For NSL, five of the seven rooms assessed (71.4%) meet BRE's criteria and are considered to experience a Negligible effect. Of the two affected rooms, one would experience an NSL alteration of 20–29.9%, classified as a Minor Adverse effect, while the other would experience an alteration exceeding 40%, classified as a Major Adverse effect.

753. Overall, given the low existing VSC values, high compliance for VSC, and the significant NSL compliance, the overall daylight effect on this property is considered Negligible (not significant).

### The Swan Tavern

754. The Swan Tavern contains residential uses from floors 2 to 4.

755. For VSC, five out of the 17 windows (29.4%) assessed meet BRE's criteria and are considered to experience a Negligible effect. Among the 12 affected windows, three would experience VSC alterations between 20–29.9%, classified as a Minor Adverse effect, while four would experience alterations between 30–39.9%, classified as a Moderate Adverse effect. The remaining five windows would experience alterations exceeding 40%, classified as a Major Adverse effect.

756. For NSL, two out of the eight rooms assessed (25%) meet BRE's criteria and are considered to experience a Negligible effect. Of the six affected rooms, three would experience NSL alterations between 30–39.9%, classified as a Moderate Adverse effect, and three would experience alterations exceeding 40%, classified as a Major Adverse effect.

757. This property is located adjacent to the north of the site, with all windows significantly obstructed by the existing surroundings. Consequently, the existing VSC values for these windows range from 2.4% to 9.2%, which are well below the BRE Guidelines (2022) recommendation of 27%. Similarly, the rooms served by these windows have existing NSL values ranging from 11.4% to 50.8%, far below the recommended 80%. Given these low baseline values, any alterations in VSC and NSL could result in disproportionate percentage changes, though these changes are unlikely to be noticeable to occupants.

758. Overall, considering the level of VSC and NSL compliance, the location of the affected windows and rooms at the rear of the property with very low existing levels, and the minimal impact on the front of the property, the overall daylight effect is considered Minor Adverse (not significant).

### 11 Eastcheap (previously reference as 9b Eastcheap)

759. 11 Eastcheap consists of retail at ground floor, with residential uses on the upper floors from floors 1 to 5.

760. For VSC, seven of the 18 windows (38.9%) assessed meet BRE's criteria and are therefore considered to experience a Negligible effect. Among the 11 affected windows, nine would experience alterations in VSC between 20–29.9%, classified as a Minor Adverse effect, while two would experience alterations between 30–39.9%, classified as a Moderate Adverse effect.

761. For NSL, eight of the 14 rooms assessed (57.1%) meet BRE's criteria and are considered to experience a Negligible effect. Of the six affected rooms, three would experience alterations in NSL between 20–29.9%, classified as a Minor Adverse effect, while the other three would experience alterations between 30–39.9%, classified as a Moderate Adverse effect.

762. Overall, given the low existing VSC levels and the high level of NSL compliance, the daylight effect on this property is considered Minor Adverse (not significant).

### 9 Eastcheap

763. 9 Eastcheap consists of retail at ground floor, with residential uses on the upper floors from floors 1 to 5.

764. For VSC, all windows assessed meet BRE's criteria and are therefore considered to experience a Negligible effect.

765. For NSL, three of the five rooms (60%) assessed meet BRE's criteria and are considered to experience a Negligible effect. Of the two affected rooms, one would experience an alteration in NSL between 20–29.9%, classified as a Minor Adverse effect, while the other would experience an alteration exceeding 40%, classified as a Major Adverse effect.

766. Overall, considering the low existing VSC levels and the high level of NSL compliance, the daylight effect on this property is considered Minor Adverse (not significant).

### St Peter Upon Cornhill Church

767. St Peter Upon Cornhill Church is a religious building split over 3 floors.

768. For VSC, 23 out of 24 windows (95.8%) assessed meet BRE's criteria and are therefore considered to experience a Negligible effect. The single affected window would experience a VSC alteration between 20–29.9%, classified as a Minor Adverse effect.

769. For NSL, all rooms assessed meet BRE's criteria and are considered to experience a Negligible effect. Compared to the Consented Scheme, the variation in VSC is no greater than 0.1, and the NSL value remains unchanged.



770.Overall, given the low existing VSC levels and the high level of NSL compliance, the daylight effect on this property is considered Negligible (not significant).

## **Sunlight**

### **4 Bulls Head Passage**

771.For APSH, the 6 windows experiencing losses, show losses between 20-29.9%, which is considered Minor Adverse. These windows serve first and second storey living rooms, and a third storey LKD, which would retain 16% to 18% APSH. This would be considered to remain reasonably well sunlit given the already dense urban location.

772.For WPSH, all windows assessed would meet BRE's criteria and so are considered to experience a Negligible effect.

773.Overall, the sunlight effects on this property would be considered Minor Adverse due to the percentage reduction and retained values and would not be significant.

### **2-3 Bulls Head Passage**

774.For APSH, five out of the six windows (83.3%) assessed meet BRE's criteria and are considered to experience a Negligible effect. The remaining window, which serves a third-storey bedroom, would experience a loss of 27.3%, classified as a Minor Adverse effect. However, this window would retain 16% APSH, which is deemed reasonable for an urban location. According to BRE guidance, bedrooms are generally considered less critical in relation to sunlight matters.

775.For Winter PSH, all assessed windows meet BRE's criteria and are considered to experience a Negligible effect.

776.Overall, given the high level of compliance, the sunlight effect on this property is considered Negligible (not significant).

### **The Bunch of Grapes Public House**

777.A total of 10 windows were assessed for sunlight within this building, with one window (10%) meeting BRE's criteria for both Annual and Winter PSH and therefore experiencing a Negligible effect.

778. For APSH, 4 out of the 10 windows (40%) assessed meet BRE's criteria and are considered to experience a Negligible effect. Of the remaining affected windows, five would experience alterations of 20–29.9%, classified as Minor Adverse effects, while one would experience an alteration of 30–39.9%, classified as a Moderate Adverse effect.

779. For WPSH, four out of 10 windows (40%) meet BRE's criteria and are considered to experience a Negligible effect. Of the six affected windows, two would experience alterations between 20–29.9%, classified as Minor Adverse effects, while four would experience alterations exceeding 40%, classified as Major Adverse effects.

780. Despite these changes, the affected rooms retain APSH values of 19% or more, with one room retaining 30% or more, exceeding the BRE Guidelines (2022) recommendation of 25%. The absolute change in WPSH is just 1%, making the percentage alteration disproportionate to any noticeable impact on occupants.

781. Overall, the sunlight effect on this property is considered Minor Adverse (not significant).

#### St Michael Cornhill Church

782. A total of 24 windows were assessed for sunlight within this building, with 23 windows (95.8%) meeting BRE's criteria for both Annual and Winter PSH and therefore experiencing a Negligible effect.

783. For APSH, all windows meet BRE's criteria and are considered to experience a Negligible effect.

784. For WPSH, 23 out of 24 windows (95.8%) meet BRE's criteria, also experiencing a Negligible effect. The remaining one window would experience an alteration in WPSH between 20-29.9%, classified as Minor Adverse

785. All these windows serve a single room, which retains an APSH value of 58% and a WPSH value of 8%.

786. Overall, the sunlight effect on this property is considered Negligible (not significant).

#### Cumulative Impact

787. Daylight and Sunlight has been assessed against the cumulative scenarios shown in Tiers 1 and 2.

788. The assessment below is a comparison of the magnitude of impact on daylight and sunlight in relation to the nearby sensitive receptors between the results shown in the proposed development and when cumulative schemes are in situ. The assessment also takes into account the retested scenarios with the removal of 55 Gracechurch Street.

#### Tier 1 Cumulative Scenario

789. For daylight, in the Tier 1 cumulative scenario 14 properties experienced a change in impact from the proposed development scenario assessment. For sunlight, 7 properties experienced a change in impact. These are listed below with the resulting impact. With the retesting following the removal of 55 Gracechurch Street, the results shown in the Environmental Statement submitted in August 2024 would either be reduced or remain unchanged, resulting in a cumulative scenario with lessened magnitudes of cumulative daylight and sunlight impacts:

790.4 Brabant Court would have a Moderate Adverse (Significant) impact – this is reduced from Moderate to Major Adverse.

791. The Ship Tavern Public House: For daylight, this would have a Negligible (Not Significant) impact – this is reduced from Moderate Adverse (Significant); For sunlight, there would be a Negligible (Not Significant) impact.

792.4 Bulls Head Passage: For daylight, this would have Negligible to Minor Adverse (Not Significant) impact – this is reduced from Moderate Adverse (Significant); For sunlight, there would be Moderate Adverse (Significant) impact compared to Minor Adverse (Not Significant) from the proposed development.

793.2-3 Bulls Head Passage: For sunlight, there would be a Minor Adverse (not significant) impact compared to Negligible (not significant) from the proposed development, with the Minor Adverse impact being caused by the 85 Gracechurch Street consented scheme.

794. The Bunch of Grapes Public House: For daylight, this would have a Negligible to Minor Adverse (Not Significant) impact; For sunlight, there would be a Major Adverse (Significant) impact compared to Minor Adverse (not significant) from the proposed development.

795. Jamaica Buildings: For daylight, this would have a Negligible to Minor Adverse (Not Significant) impact – this is reduced from Minor Adverse; For sunlight, there would be a Moderate to Major Adverse (Significant) compared to Minor Adverse (not significant) from the proposed development.

796. St Michael Cornhill Church: For sunlight, this would remain unchanged as a Negligible (not significant) impact.
797. St Edmund The King Church would have a Negligible to Minor Adverse (Not Significant) impact – this is reduced from Minor Adverse.
798. 1-4 Botolph Alley would have a Negligible (Not Significant) impact in terms of daylight but would overall have improved VSC conditions in the Tier 1 cumulative scenario with the removal of 55 Gracechurch Street.
799. St Margaret Patterns Church would have a Negligible (Not Significant) impact in terms of daylight – this is reduced from Minor Adverse.
800. The Swan Tavern Public House would have a Moderate to Major Adverse impact. The magnitude of impact occurs due to the existing low levels in this constrained location. The additional alterations occurring from the cumulative developments may not be noticeable, however, due to the greater magnitude of impact, the effect on daylight levels within this property is considered Moderate to Major Adverse (Significant), compared to Minor Adverse from the proposed development.
801. 5 Philpot Lane: For daylight, this would have a Negligible (Not Significant) impact. This is reduced from Moderate to Major Adverse (Significant); For sunlight, there would be a Negligible (not significant) impact, reduced from Moderate Adverse with the removal of 55 Gracechurch Street.
802. 2 Philpot Lane: For daylight and sunlight, this would have a Negligible (Not Significant) impact.
803. 11 Eastcheap would have a Minor to Moderate Adverse (Significant) impact. This is reduced from Major Adverse;
804. 9 Eastcheap would have a Minor to Moderate Adverse (Significant) impact. This is reduced from Major Adverse;
805. St Peter Upon Cornhill Church: For daylight, this would have a Moderate Adverse (Significant) impact in the Tier 1 cumulative scenario, compared to Negligible (Not Significant) in the proposed development. For sunlight, there would be a Moderate Adverse (Significant) impact compared to Negligible (not significant) from the proposed development. These adverse impacts would be caused by the 85 Gracechurch Street consented scheme.

### Tier 2 Cumulative Scenario:

806. The Tier 2 Cumulative Scenario assesses the proposed development in conjunction with the surrounding cumulative schemes in Tier 1, as well as the committee approved scheme at 60 Gracechurch Street.
807. For daylight, only two properties experience a change in impact from the proposed development scenario assessment:
- 808.4 Brabant Court would have a Moderate to Major Adverse (Significant) impact, compared to Minor Adverse from the proposed development because of the 60 Gracechurch Street development.
- 809.2 Philpot Lane would have a Major Adverse (Significant) impact, compared to Negligible from the proposed development as a result of the 60 Gracechurch Street development.
810. In terms of sunlight, there would be no changes to the magnitude of impact for the sunlight or overshadowing assessment for the Tier 2 cumulative assessment compared to the Tier 1 cumulative assessment. Therefore, the 60 Gracechurch Street scheme should not result in any additional sunlight or overshadowing cumulative effects.

### Conclusion on Daylight & Sunlight impact

811. The submitted Daylight and Sunlight chapter of the Environmental Statement shows an overall high level of compliance with the BRE Guidelines 2022 on many of the properties tested. Where there are transgressions, it is noted that the dense urban environment of the City, and in particular the Cluster, is such that properties experience low values in the existing baseline scenarios, and any reasonable increase in massing proposed in order to meet the aims of the development plan and priorities for the CAZ on delivery of office floorspace, would appear to disproportionately affect any percentage reduction. .
812. Overall, whilst there are some impacts in excess of BRE guidance, due to the context of the individual properties assessed it is not considered that the proposal would result in unacceptable impacts overall and is therefore in compliance with Local Plan Policy DM10.7, London Plan Policy D6(d), and Draft City Plan 2040 Policy DE7.

### Overshadowing

813. The BRE guidelines advise that sunlight amenity is measured on 21st March (spring equinox) and the result is expressed as a percentage of the amenity area that receives at least two hours of sunlight on 21st March. The sunlight

amenity and transient overshadowing analysis was undertaken in accordance with the guidelines.

814. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.

815. In the baseline, of the 14 amenity areas tested for overshadowing, 7 roof terraces would meet the BRE's criteria of receiving two hours of sun on March 21st on at least 50% of their total area. These are 31-32 Lombard Street roof terrace, 85-87 Gracechurch Street roof terrace 01, 2-4 Bulls Head Passage rooftop amenity, 15-18 Lime Street roof terraces 01, 02 and 04, and 8-13 Lime Street roof terrace. The remaining 7 areas – St Edmund the King Church, George Yard, Church of St Michael Cornhill, St Peter upon Cornhill, 85-87 Gracechurch Street roof terrace 02, 15-18 Lime Street roof terrace 03 and Leadenhall Market - do not meet the criteria.

816. With regards to Sun Hours on Ground (SHOG), of the 14 amenity areas tested with the proposed development in situ, 10 would meet the BRE criteria, experiencing less than a 20% alteration when compared to the baseline scenario. They would therefore experience a Negligible (not significant) impact from the shadow cast from the proposed development.

817. The remaining four areas would see alterations greater than 40% which is considered Major Adverse (Significant). These areas are 85-87 Gracechurch Street roof terrace 01, 2-4 Bulls Head Passage rooftop amenity, and 15-18 Lime Street roof terraces 03 and 04.

818. Roof Terrace 01 at 85-87 Gracechurch Street and the rooftop amenity at 2-4 Bulls Head Passage receive only very marginally above the two hour criteria, and therefore the reduction in sunlight hours would only need to be approximately 1 hour of less to fall below the recommendation. Furthermore, should the consented development at 85 Gracechurch Street be implemented, roof terrace 01 would be demolished and therefore the overshadowing impact to this amenity space would no longer be applicable.

819. With regard to roof terraces 03 and 04 at 15-18 Lime Street, it is noted that the use of these terraces are unclear. Therefore, it is acknowledged that these areas could be used as outdoor amenity areas and so are assessed as a worst-case scenario. Should this area serve an inaccessible roof area which is not used for amenity purposes there would be no effect.

820. Transient overshadowing was also undertaken. At the equinox (21 March/September), shadow would be cast from the proposed development at 8am, moving clockwise. Between 1pm and 4pm, the roof of Leadenhall Market would be partially overshadowed by the shadow cast from the proposed

development. The remaining amenity areas would be unaffected by the shadow cast from the proposed development.

821. At the summer solstice (21 June), shadow is cast from the proposed development from 6am, moving clockwise. Between 2pm and 4pm the roof of Leadenhall Market would be partially overshadowed by the shadow cast from the proposed development. The remaining amenity areas would be unaffected by the shadow cast from the proposed development.

822. At the winter solstice (21 December), shadow is cast from the proposed development from 9am, moving clockwise. No additional shadows cast from the development would reach any of the 11 14 amenity areas on this day.

### Cumulative Impacts

823. In the Tier 1 cumulative scenario, in the transient overshadowing test at the Equinox (21 March/September), there would be an additional impact through additional shadows cast to the roof of Leadenhall Market and St Helen's Bishopsgate Churchyard. Between 1pm and 4pm the roof of Leadenhall Market would again be partially cast in shadow from the proposed development. At 2pm, a shadow from the cumulative schemes would encroach onto Jubilee Gardens, which would clear by 3pm. The remaining amenity areas would be unaffected by the shadows cast from the proposed development. The overshadowing effect to all amenity areas on this day would therefore be considered to be Negligible (not significant).

824. At the summer solstice (21 June) there would be an additional impact between 11am and 12pm, with St Helen's Bishopsgate Church yard cast in shadow from the cumulative schemes, and the roof of Leadenhall Market cast in shadow from the proposed development between 2pm and 4pm. The remaining amenity areas would be unaffected by the shadows cast from the proposed development.

825. At the winter solstice (21 December) there would be no additional impacts as a result of the proposed development and cumulative schemes.

826. Further in the cumulative scenario, in the Sun Hours on Ground test, the same 10 amenity areas would continue to experience a Negligible (not significant) impact. Roof Terrace 01 at 85-87 Gracechurch Street and the rooftop amenity at 2-4 Bulls Head Passage would experience an increased magnitude of impact as a result of the cumulative schemes, but as with the proposed development, these two areas receive only very marginally above the two hour criteria, and therefore the reduction in sunlight hours would only need to be approximately 1 hour of less to fall below the recommendation. Roof terraces 03 and 04 at 15-18 Lime Street would not experience a change in the magnitude of impact.

827. In the Tier 2 cumulative scenario, there are no changes to the magnitude of impact for the overshadowing assessment for the Tier 2 cumulative assessment compared to the Tier 1 cumulative assessment. Therefore, the 60 Gracechurch Street scheme would not result in any additional overshadowing cumulative effects.

828. In conclusion, the results show that there would be no material overshadowing effects caused by the development to any public amenity area or surrounding properties and therefore the proposal complies with, policy D6 of the London Plan, DM10.7 of the Local Plan and DE7 of the emerging City Plan.

### **Solar Glare**

829. Glare is the discomfort or impairment of vision caused by excessive or large contrasts in luminance within the observer's field of view, and can occur when sunlight is reflected from a glazed façade. There are two categories of glare: distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high luminance source within a low luminance scene which impairs vision).

830. For discomfort glare, the key issue is the total duration of time for which the sun can be reflected to the sensitive location. Durations of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.

831. The assessment assumes a day with no cloud cover and so the maximum potential sunlight is assessed. No change in climate will alter the effect of the analysis.

832. No railway line or rail station sensitive receptors are within the relevant study context, so the assessment has focused on road receptors. The following streets have been assessed along their lengths with viewpoints at regular intervals, giving 175 viewpoints, all of which have high sensitivity:

- Gracechurch Street, northbound (extending to London Bridge, King William Street)
- Gracechurch Street, southbound (extending to Bishopsgate)
- Fenchurch Street, westbound
- Lombard Street, eastbound
- Cheapside, eastbound
- Poultry, eastbound
- Philpot Lane (extending to Botolph Lane)



833. In the submitted addendum to the Environmental Statement, Solar Glare was not assessed or considered further as solar glare is not assessed cumulatively. The solar glare assessment therein focuses on the August 2024 Environmental Statement.
834. At Gracechurch Street northbound and southbound, there would be no instances of reflected glare greater than 500cd/m<sup>2</sup>, resulting in a negligible impact where the effect is not significant.
835. At Fenchurch Street westbound, reflected glare instances greater than 500cd/m<sup>2</sup> were found to occur as a result of the Proposed Development for approximately 44 days per year, with duration up to 15 minutes and spatial extent to 30-40 metres. These were primarily found in May, June, July and August, between 16:30-17:30. This disability glare gives a major adverse impact where the effect is significant.
836. At Lombard Street eastbound, reflected glare instances greater than 500cd/m<sup>2</sup> were found to occur as a result of the Proposed Development for 4 days per year, with a duration of 7 minutes at most and a spatial extent of less than 20m. This results in a minor adverse impact where the effect is not significant.
837. At Cheapside eastbound, reflected glare instances greater than 500cd/m<sup>2</sup> were found to occur as a result of the Proposed Development for 8 days per year, with a duration of 9 minutes at most and a spatial extent of less than 20m. This results in a minor adverse impact where the effect is not significant.
838. At Poultry eastbound, reflected glare instances greater than 500cd/m<sup>2</sup> were found to occur as a result of the Proposed Development for 6 days per year, with a duration of 7 minutes at most and a spatial extent of less than 20m. This results in a minor adverse impact where the effect is not significant.
839. At Philpot Lane, no instances of reflected glare greater than 500cd/m<sup>2</sup> were found to occur as a result of the Proposed Development, resulting in a negligible impact where the effect is not significant.
840. As the Environmental Statement has identified potential adverse impacts with significant effects, mitigation options were assessed particularly to the receptors on Fenchurch Street. The ES has recommended mitigation measures including a fritted surface finish with a frit density of 30% coverage by area on the outside surface of the glazing on levels 6 to 10 of the southeastern façade/corner of the Proposed Development.
841. With this proposed mitigation in place, the reflected solar glare occurrence is reduced to 7 days per annum, primarily in May, with a spatial extent of 15m or less and a duration of 7 minutes at most. When considering the probability of sunshine in May, approximately 40%, the potential for harmful glare for 7 days

per annum is reduced to 3 days per year. This would be considered moderate adverse but the effect would not be significant.

842. Overall, the potential impact of solar glare from the proposed development on most nearby road receptors is considered negligible-minor adverse and the effects are not considered significant.

843. For the instances of moderate-major adverse impacts and possible significant effects, it should be noted that the assessment for solar glare assumes the worst-case scenario, that the sun will shine every day during daylight hours. Climate data indicates that this is not the case in the UK generally.

844. The final materials and design would act to reduce both the incidence of solar glare and the light pollution by restricting the passage of light or reflected light from the façade of the proposal to sensitive receptors. The potential glare from the proposed new building could be tempered through the use of fritting as outlined above as a recommended mitigation measure. Further details of the external materials would be provided by condition in order to ensure safe and comfortable levels of solar glare and solar convergence.

845. Overall, subject to the mitigation measures identified it is considered that the effects on solar glare would be acceptable.

846. If planning permission were to be granted, an obligation within the s106 Agreement would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with policy D9 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

### **Light Spill**

847. Light spillage is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from commercial buildings onto residential accommodation, where this would cause nuisance to the occupants. It is measured through light intrusion assessments – this is the spilling light beyond the boundary of a proposed development, and it is assessed through vertical illuminance in lux, measured flat at the centre of the sensitive receptor.

848. Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. Draft policy HS3 (Residential Environment) states that light spill from development that could affect residential areas should be minimised in line with policy DE8 and the Lighting SPD.

849. The Site and its surroundings are defined as a high distinct brightness, which the Institute of Lighting Practitioners (ILP) Guidance Notes classify as Environmental Zone 4 (E4). Within E4, the recommended limit of light spillage is 25-lux pre-curfew (11pm) and 5-lux post-curfew.

850. The potential light spillage impacts arising from the Proposed Development upon the surrounding existing residential and religious receptors has been assessed. The following properties have been identified as light spill receptors of moderate-high sensitivity:

- The Swan Tavern
- 2-3 Bulls Head Passage
- 4 Bulls Head Passage
- The Bunch of Grapes, 14 Lime Street
- St Peter Upon Cornhill Church
- St Michael Cornhill Church
- Jamaica Buildings
- St Edmund the King Church
- St Clements Church
- 9 Eastcheap
- 11 Eastcheap
- The Ship Tavern, 11 Talbot Court
- 4 Brabant Court
- 2 Philpot Lane
- 5 Philpot Lane
- St Margaret Pattens Church.

851. At all receptors identified and assessed for light spill pre-curfew, the levels of light trespass would be limited and would be well below the 25-lux threshold set out within the ILP Guidance and the CoL Lighting SPD.

852. The technical assessment also shows that post-curfew (after 11pm), the levels of light trespass would be below the 5-lux threshold set out within the ILP guidance for all of the buildings assessed and concludes a negligible impact and no significant effects.

853. A condition has been recommended which requires a detailed lighting strategy to be submitted for approval prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

854. Subject to the relevant lighting condition, the development would comply with the Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3, and has been designed as to avoid light spill.

### **Thermal Comfort Assessment**

855. London Plan Policy D8 and D9 and the emerging City Plan 2040 Policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood - must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

856. In accordance with the City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.

857. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort are set out below and are used to define the categorization of a given location.

KEY	USAGE CATEGORY	% OF HOURS WITH ACCEPTABLE UTCI	DESCRIPTION
	All Season	>90% in each season	Appropriate for use year-round (e.g. parks).
	Seasonal	>90% spring-autumn AND >70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
	Short-term	>50% all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.
	Short-term seasonal	>50% spring-autumn AND >25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
	Transient	<25% winter <50% any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

858. Five configurations have been assessed, including;

- Configuration 1: Existing site with existing surrounds
- Configuration 2: Existing site with consented cumulative schemes
- Configuration 3: Proposed Development with existing surrounds
- Configuration 4: Proposed Development with consented cumulative schemes
- Configuration 5: Proposed Development with consented and non-consented cumulative schemes.

#### Baseline and Future Baseline (configurations 1 and 2)

859. In the existing baseline, conditions range between all-season to short-term seasonal, with the poorest comfort conditions experienced to the southeast and east of the Site on Fenchurch Street, Rood Lane and Lime Street. These lower comfort conditions are mostly attributed to wind chill in winter.

860. For entrances and bus stops in the existing baseline, all receptors tested meet the target conditions.

861. For surrounding amenity spaces (ground level seating), most receptors meet the comfort criteria in the existing baseline with the exception of the spill out seating on Lime Street which is one category less comfortable than the target.

862. Other amenity spaces (terraces), all tested receptors meet the target conditions.

863. In the future baseline, conditions are made generally more comfortable than the existing baseline, with the areas of short-term seasonal conditions to Fenchurch Street and Lime Street reduced in size.

864. However, in the future baseline scenario, conditions would be less comfortable to the northeast of the Site along Gracechurch Street.

865. Bus stops and entrances would continue to meet the target conditions in the future baseline. Ground level amenity spaces would all meet the comfort criteria, including the area on Lime Street which was one category less comfortable than the target in the existing baseline. All tested surrounding terraces would meet the target condition in this scenario, consistent with the existing baseline.

#### Proposed Development (existing surrounds)

866. Overall, the range of comfort levels achieved as a result of the Proposed Development with existing surrounds is the same as the existing baseline condition. However, there would be instances of less comfortable conditions in Gracechurch Street to the west of the Site, and to the southeast of the Site between Fenchurch Street and Lime Street.

867. On-site, all entrances would satisfy the target comfort conditions.

868. Most off-site entrances would achieve the target comfort conditions with the Proposed Development in situ with existing surrounds. However, there is one entrance on Lime Street which would experience short-term seasonal conditions, one category less comfortable than the target.

869. The off-site bus stops to Gracechurch Street would be suitable for short-term seasonal use which is one category less than the target. All other off-site bus stops would achieve the target conditions.

870. All off-site ground level amenity spaces would meet the target comfort criteria. There would also be an instance of betterment to the spill out seating area along Lime Street where, with the Proposed Development in situ, the area meets the target conditions where it did not in the baseline.

871. For terraces off-site, all would meet the target comfort conditions with the proposed development in situ. For the on-site terraces, the terraces at levels 6, 28, 29 and 32 are suitable for their intended uses as they would meet the target comfort criteria. The terraces at levels 5 and 7, however, would achieve between one and two categories less comfortable than the target criteria.

#### Proposed Development (consented cumulative surrounds)

872. The range of conditions experienced with the Proposed Development with consented cumulative surrounds would be similar to the future baseline scenario, although the Proposed Development would reduce some conditions'

comfortability, particularly to Gracechurch Street west of the Site and to the southeast corner of the Site at Fenchurch Street/Lime Street junction.

873. On-site and off-site entrances, off-site bus stops, and off-site amenity spaces at ground level would meet the target comfort criteria.

874. On-site terraces at levels 6, 28, 29, and 32 would meet the target comfort criteria. However, on-site terraces at levels 5 and 7 would be one to two categories less comfortable than the criteria.

875. Off-site terraces would all meet the target comfort criteria, with the exception of the 88 Gracechurch Street roof terrace which would achieve between one and two categories less comfortable than the target. However, this is consistent with future baseline conditions so is not attributable to the Proposed Development.

#### Proposed Development (consented and non-consented cumulative surrounds)

876. This scenario includes the not yet consented schemes at 1 Undershaft and 60 Gracechurch Street in the above cumulative scenario, although it should be noted that these two schemes have both been given resolution to grant at the time of publication of this report.

877. The range of conditions experienced at off and on-site receptors would be of the same order as configuration 4 (Proposed Development with consented cumulative surrounds), with the exception of less calm conditions experienced on Fenchurch Street and Gracechurch Street, which is attributable to 60 Gracechurch Street.

878. All on-site entrances would achieve suitable comfort conditions in line with the target criteria.

879. Most off-site entrances would achieve suitable comfort conditions in line with the target criteria, with the exception of one on Lime Street which would be one category less comfortable than the target. This is also experienced in the proposed development versus existing surrounds scenario.

880. Surrounding bus stops off-site would mostly achieve the target condition. However, the bus stops to the western pavement of Gracechurch Street would be one category less comfortable than the target criteria. This is also experienced in the proposed development versus existing surrounds scenario.

881. All off-site ground level amenity spaces would meet the target conditions.

882. On-site terraces would achieve the same comfort conditions as in the Proposed Development versus existing surrounds and Proposed Development versus consented cumulative surrounds scenario, with the terraces at levels 5 and 7 proposed being one comfort category less than the target.

883. Off-site terraces would all meet the target comfort criteria, with the exception of the 88 Gracechurch Street roof terrace which would achieve between one and two categories less comfortable than the target. However, this is consistent with future baseline conditions so is not attributable to the Proposed Development.

884. The newly introduced roof terrace at 60 Gracechurch Street in this scenario would achieve conditions up to two categories less comfortable than the target criteria. These terraces face away from the Proposed Development so it is unlikely that these conditions are attributable to 70 Gracechurch Street.

#### Addendum to the ES

885. The thermal comfort assessment was updated as part of the Environmental Statement addendum (November 2024), given the removal of the expired consents at 55 Gracechurch Street and 130 Fenchurch Street. Configurations 2, 4 and 5 were re-tested with these two schemes removed from the configurations.

886. For configuration 2 (existing site with consented cumulative schemes), the removal of the two consented schemes would generally make conditions more comfortable in the locality.

887. For configuration 4 (Proposed Development with consented cumulative surrounds), the results are consistent with those originally submitted as part of the August 2024 Environmental Statement.

888. For configuration 5 (Proposed Development with consented and non-consented cumulative surrounds), the results are consistent with those originally submitted as part of the August 2024 Environmental Statement.

#### Thermal Comfort Conclusion

889. The application has suitably and sufficiently assessed the thermal comfort impact of the proposed development, in line with the City of London guidance.

890. Overall, the proposed development would make conditions less comfortable on Gracechurch Street to the west and on the junction of Lime street and Fenchurch street to the southeast. Although, overall comfort levels would not be fundamentally different from the baseline and Officers consider this is therefore acceptable. The inclusion of cumulative schemes would generally make conditions more comfortable around the site.

891. The proposed development would have an adverse impact on one entrance on Lime Street and the bus stops on the west of Gracechurch Street, but have a beneficial impact on spill-out seating along Lime Street.



892. Conditions within the Site at the majority of the proposed terraces are suitable for the intended uses, although the comfort levels on the level 5 and level 7 terraces would not satisfy the target conditions. This is due to raised wind speeds in these areas, and the conditions on the terraces could be further improved and mitigated through landscaping, which was not considered in the assessment. These mitigation measures would be secured through condition and S106 obligation.

893. Subject to condition, it is considered that the thermal comfort in and around the site would be acceptable and in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

### **Noise and Vibration**

894. Noise and vibration from the development, particularly during construction and late-night noise from the completed development, is a concern for some neighbouring residents raising objection to the scheme.

895. The development plan sets out a series of noise policies that need to be taken into consideration in the assessment of each case. This includes policy DM15.7 of the Local Plan, which relates to noise and light pollution. A summary of the main noise related points from policy DM15.7 are set out below:

- Developers will be required to consider the impact of their development on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise sensitive land uses such as housing and quiet open spaces;
- Any potential noise conflict between existing activities and new development should be minimised;
- Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development; and
- Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

896. Policy DM21.3 of the Local Plan further seeks to protect the amenity of existing residents by resisting uses that would cause undue noise disturbance and seeks to ensure that noise generating uses are sited away from residential uses where possible.

897. Policy DM3.5 of the Local Plan states that proposals for new night time entertainment related uses will only be permitted where it can be demonstrated

that, either individually or cumulatively, there is no unacceptable impact on the amenity of residents and other noise sensitive uses and environmental amenity, taking account of the potential noise, disturbance and odours arising for the operation of the premises, customers arriving at and leaving and the servicing of the premises. Applicants would be required to submit Management Statements detailing how these issues would be addressed during the operation of the premises.

898. The draft City Plan 2040 has policies relating to the prevention of noise pollution (policy HL3) and preventing noise disturbance from terraces and viewing galleries (policy DE4). Policy SA2 of the Plan sets out a requirement for major commercial development to provide a management plan setting out proposals for the dispersal of patrons and workers from premises to reduce instances of noise nuisance.

899. Policies D13 and D14 of the London Plan 2021 further seek to ensure that harmful noise impacts are mitigated.

900. The City of London Noise Strategy identifies the strategic approach to noise in the City in line with the Noise Policy Statement for England, and the City's Code of Practice for Deconstruction and Construction Sites provides guidance on procedures to be adopted to minimise the noise impacts of development.

901. Chapter 7 of the Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic which could be attributed to the development, and the likely significant environmental effects of these matters.

902. The nearest noise sensitive receptors are as follows:

- The Swan Tavern
- 77-80 Gracechurch Street
- 20, 33, 60 and 81 Gracechurch Street
- 6-12, 20 and 158-159 Fenchurch Street
- 21 Lime Street
- 25 Lime Street
- The Bunch of Grapes, 14 and 15-18 Lime Street
- 2-4 Bulls Head Passage
- 4 Brabant Court.

903. The Proposed Development would feature retail at ground floor in the form of a market, office terraces at levels 5 and 7 and balconies at levels 28-31, and a public terrace at level 32. The public viewing terrace would be open from 10am-7pm.

904. In most City redevelopment schemes, the main noise and vibration issues occur during demolition and early construction phases. The Assessment identifies a Major Adverse (significant) impact to the Swan Tavern in terms of noise and vibration during structural demolition of the central core between level 4 and basement, and a moderate adverse (significant) impact during piling and construction of the superstructure to level 4. Otherwise, this receptor would experience negligible (not significant) impacts during demolition and construction.
905. 14 Lime Street would experience a moderate adverse (significant) impact during structural demolition of the central core between level 4 and basement. Otherwise, this receptor would experience negligible (not significant impacts) during demolition and construction.
906. All other receptors would experience a negligible-minor adverse (not significant) effect throughout demolition and construction.
907. Demolition and construction impacts would be temporary in nature. The ES acknowledges that the presented noise levels are a worst-case scenario, without any mitigation measures being applied. In practice, the development would be required to comply with the City's Code of Practice for Deconstruction and Construction Sites (9th Edition, January 2019), which sets out standards for how construction sites are to be maintained and operated with a view to limiting disturbance and disruption to neighbours and users of the surrounding area. A scheme of protective works for the development would be required by condition prior to any works commencing, setting out how noise, dust, and environmental effects of the works would be minimised.
908. The statement has identified that there would be no significant effects during the operational stage of the development, either from road traffic noise associated with the development itself, plant noise, or operational noise from the development including from entertainment noise emission from the use of internal and external spaces in the proposed development.
909. Information is not yet available regarding the type, number or exact location of the mechanical plant which could be installed in the completed development. Such information would be expected at detailed design stage. As a result, should planning permission be granted details of the type of plant, location of the plant, noise levels from the plant and details of plant mounting would be required by condition. The plant would need to comply with the City's standard of 10dba below background noise level. As such it is not considered that operational plant noise would give rise to any adverse or significant adverse effects.

910. The ES considers the effects of noise from delivery and servicing activities associated with the operation of the proposed development. The service yard is located to the east of the site, in the area of the proposed market, and would be operated overnight. This is located away from the majority of the noise sensitive receptors. Subject to a Delivery and Servicing Plan (DSP) to be secured through S106, it is anticipated that there would be no significant noise from delivering and servicing activities at the sensitive receptors. As such negligible impacts are expected from delivery and servicing noise and no significant effects are anticipated.

911. Technical consideration has been given to potential noise from the proposed market and public viewing terrace and any use of amplified music. The potential impact from these spaces has been assessed, and it is recommended that an Events Noise Management Plan be prepared and submitted by condition/S106 obligation.

912. The following conditions are recommended by the City's Environmental Health team to prevent undue operational noise from the site, noting that the Licensing Act 2003 should not be relied on to control noise:

- Ensure that no live or recorded music is played from the Site that is audible within any residential or other premises in nearby relevant buildings, which includes use of the external terrace areas; and
- That the office roof terraces are not used or accessed between the hours of 11pm on one day until 7am the following day and at no time on Saturdays, Sundays or Bank Holidays other than in the case of an emergency.

913. Policy 3.5 of the Local Plan and policy CV4 of the Draft City Plan 2040 refer to the provision of management plans for evening and nighttime uses. A clause within the S106 agreement would require a management plan is provided for the proposed viewing terrace, cultural uses and market, setting out information such as:

- Hours of operation;
- Noise mitigation plans both internal and external noise, including measures to reduce sound transfer, such as soundproofing, noise controls and double entry lobbies;
- The dispersal of patrons;
- Arrangements for the storage, handling and disposal of waste;
- Information on deliveries and servicing; and
- Measures to deal with odours and the location of ducts and plant.

914. In conclusion, the submitted ES considers the impact of the development on the noise environment and potential impacts of vibration. Subject to conditions

controlling noise levels from entertainment uses and plant equipment, hours of operation, and S106 clauses regarding the management of the premises, it is not considered that operational noise would adversely affect neighbours. Noise and vibration from construction and deconstruction has been identified as potentially having temporary significant effects on sensitive receptors. The developer would be required to mitigate the impact of the works and would need to provide a Scheme of Protective Works to demonstrate compliance with the City of London's Code of Practice for Deconstruction and Construction sites. A condition is recommended to ensure that any new plant would be 10dba below background noise level. Subject to conditions it is considered the proposals would comply with London Plan Policies D13 and D14, Local Plan 2015 Policies DM15.7, DM21.3 and DM3.5 and draft City Plan 2040 policies HL3, SA2 and DE5.

### **Air Quality**

915. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts, and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.
916. The application submission includes an assessment of the likely impact of the proposed development on air quality as a result of the demolition, construction, and operational phases of the development. Air Quality was scoped out of the Environmental Statement. The Air Quality Positive approach as recommended by policy HL2 of the emerging City Plan 2040 has been undertaken throughout the design of the proposed development in line with the GLA Air Quality Positive Guidance 2023, and an Air Quality Positive Statement has been submitted with the application.
917. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.
918. The proposed development would be car free save for the disabled parking bay, and the energy strategy including heating and hot water is all-electric. No combustion plant is proposed for the primary energy strategy, but there is an emergency-power diesel generator proposed, only routinely used for testing and maintenance, and the exhaust would be located 3.25m above roof level in

a good dispersion environment. The BREEAM Pre-assessment demonstrates that the scheme would achieve 'Excellent' in the pollution category. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

919. Measures that were considered during the design phase to have a positive impact on air quality include separating sensitive uses from pollution hotspots and a robust ventilation strategy, use of green infrastructure, minimising traffic generated, and utilising a low or zero emission energy strategy.

920. The City's Air Quality Officer has no objections to the proposals. Conditions are recommended in relation to the requirement for a revised Air Quality Positive Assessment to ensure that the proposed development maximises benefits to air quality, to Non-Road Mobile Machinery Register details, details of ventilation and extraction equipment specifically in relation to the market, and the requirement for a Local NO<sub>2</sub> Monitoring Strategy as part of the Construction Environmental Management Plan.

921. Subject to conditions, the proposed development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040, and policy SI of London Plan which all seek to improve air quality.

### **Contaminated Land**

922. Local Plan policy DM15.8 and draft policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.

923. Policy S1 of the emerging City Plan expects developers to address land contamination. The application is accompanied by a Geotechnical and Geoenvironmental Desk Study prepared by Robert Bird Group, as a standalone technical document outside of the Environmental Statement.

924. There are nine accessible boreholes on and around the Site. During the construction of the existing 4-storey basement, most of the made ground identified was removed. There was a historical electricity sub-station located within the site boundary, which is a potential source of contamination, but this was likely removed when the building was last excavated in 2000. Off-site there were a number of railway uses within 50-250m of the site, with potential contaminants such as hydrocarbons from fuel and trains, historical tanks with potential to be fuel or water tanks that could leach into ground water. However,

the off-site potential contaminants are of low contamination risk given the distances from the Site, and the impermeable nature of the remaining near surface geology.

925. The unexploded bomb risk maps confirmed the Site is located in an area of moderate to high risk of Unexploded Ordnance (UXO), but given the extensive basement excavation in the 2000s, UXOs are considered low probability.

926. The applicant has identified that the site has a long history of occupation, including for commercial purposes since 1873. The current building dates from the early 2000s, and included a significant 4-storey basement excavation. The main potential contaminant has been identified as made ground, although it is thought that the majority of potentially contaminative made ground was removed as part of the 2000 basement excavation with some remaining made ground potential around the perimeter of the Site. The other potential contaminant is existing building plant, which is located at basement level 3. The plant is due to be replaced at second/third basement floor level, and there would be no additional excavation as the basement levels are being retained in situ with the exception of basement level 4 which is being infilled.

927. During the existing building's construction, no asbestos based products were incorporated and all existing building asbestos was removed from site. Therefore, the current existing building is believed to be entirely free of asbestos. There is the potential for asbestos to remain in the made ground that may be present around the perimeter of the Site.

928. The Site is not currently classified as contaminated land under Part 2A of the Environmental Protection Act 1990, nor has it been identified for further review under the CoL's Contaminated Land Strategy. There are no records of current or former landfills on Site. The assessment has considered the effect of made ground across the City.

929. The report confirms that there is low risk to future site users from potential contamination from made ground, noting the majority of the made ground was removed in the 2000's excavation. Given that no further excavation is proposed, the risk is negligible. Any potential contamination from the removal of existing plant can sufficiently mitigated against through safe working practices.

930. Conditions are recommended that requires a detailed site investigation to establish if the site is contaminated, followed by a remediation scheme to be submitted if any contamination is discovered that requires remediation. As part of any future investigation the work should also include groundwater and gas monitoring, and screening of samples for the presence of asbestos.

931. Overall, subject to condition the proposals are in accordance with policy DM15.8 of the Local Plan and policies S1 and HL4 of the emerging City Plan.

### **Health Impact Assessment**

932. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.

933. The applicants have submitted an HIA using evidence and assessments of impact within documents submitted with the planning application. The HIA sets out an overall positive impact on health arising from the proposed development and advises on the benefit of adopting strategies that would ensure health impacts are positive, such as a Construction Environmental Management Plan and Cycling Promotion Plan.

934. There are a number of residential properties surrounding the development site. The HIA addresses potential disturbance from construction noise for the neighbouring sensitive receptors and states that the Construction Environmental Management Plan and Demolition and Construction Logistics Plans would enable mitigation of disturbance.

935. The HIA has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Promoting walking through clear and comfortable pedestrian routes and an enhanced public realm, and suitable inclusively accessible routes;
- Excellent cycle facilities which would encourage and support active transport by building users;
- Focus on pedestrian and cyclist safety through clear signage and wayfinding, active and passive surveillance across the Site, and a robust lighting strategy to allow for an enhanced feeling of security;
- The Site is well located with good links to a wider pedestrian, cycle and public transport network, promoting users to choose active modes of travel coming to and from the Proposed Development;
- The provision of improved public realm at grade which would facilitate easy movement between buildings and places by linking to and revitalising the existing streetscape, with a link to Leadenhall Market, improving the physical environment and contributing to social cohesion, including through integrated seating and green infrastructure that would encourage people to linger and promote an improved sense of wellbeing;



- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
- Provision of significant greened areas and external terraces for future occupiers to promote access to nature and a sense of wellbeing;
- Servicing and logistics strategy has been designed to minimise delivery vehicle trips to the Site;
- A car-free (except the disabled bay) development minimising vehicles travelling to the Site, encouraging active travel, and reducing emissions;
- Building design that has considered the context of the Site and site layout optimised through the co-location of commercial and community uses with enhanced public realm and public viewing gallery;
- The flexible market space, viewing galleries and terraces included in the Proposed Development are purpose-built for community use and are intended to promote social interaction through special events and programming.
- The proposed buildings would employ systems to reduce energy usage, and the Proposed Development targets a BREEAM Excellent rating; and
- Consideration to sustainability and inclusive design.

936. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:

- Preparation and agreement of Construction Environmental Management Plan (CEMP)/Scheme of Protective Works to address any adverse amenity impacts arising from demolition and construction.

937. Potential temporary negative impacts identified would be mitigated so far as possible by the requirements of relevant conditions and obligations contained within the S106 Agreement. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2040 policy S1.

## **Sustainability**

### **Circular Economy**

938. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1 set out the City's support for circular economy principles.

939. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the

avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites.

940. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 strategic policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options.

941. To address these policies, the application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.

942. The existing building, completed in 2001, was directly commissioned by the retailer Marks and Spencer and follows a department store format with office floorspace above. The building occupies the entire site footprint, sharing party walls with the Swan Tavern Public House and 21 Lime Street. The façade is a balance of Jura Limestone curtain walling and glazed panel cladding. The substructure consists of reinforced concrete raft slabs with a secant pile basement perimeter retaining wall. The use of no piles avoids the remaining archaeology and historic piles beneath. The steel framed superstructure is founded on the raft slab. There is no structural concrete core, the building is stabilised through steel-braced frames located at lifts and stairs. The column grid is typically 9m x 7.5m, with a floor-to-floor height of 5m. The superstructure includes metal decking floor slabs with a steel frame.

#### Pre-redevelopment audit optioneering

943. The pre-redevelopment audit includes an options assessment that details how different development options would address circular economy, establish the potential of retention, reuse and carbon impacts of different materials. Whole life-cycle carbon impacts of the options are set out in the whole life-cycle carbon emissions section of this report. The options are also evaluated with regard to their opportunities for wider environmental sustainability benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2024, chapter 2, paragraph 8.

944. The optioneering exercise undertaken for 70 Gracechurch Street includes 3 options:

- Option 1: Retrofit of the existing building, 100% retained substructure and superstructure; 28,056 sqm GIA

- Option 2: Retrofit plus 2 additional storeys, 100% retained substructure, 95% retained superstructure; 31,676 sqm GIA
- Option 3: Retrofit/partial demolition plus additional tower structure, 55% retained substructure, 45% retained superstructure; 77,633 sqm GIA; 33 storeys

945. The optioneering assessment demonstrates that options 1 and 2 maximise retention of the existing building fabric. However, option 3 provides opportunities for significant improvements to the public realm, including a new north-south public route to Leadenhall Market, and deliver a quantum of office space that would contribute to the City Corporation's target for additional office floorspace. Option 3 retains a significant proportion, maximises reuse of the existing basement and foundations, and delivers a 25-storey extension with major strengthening works. It includes full social and economic benefits on the site while significantly reducing impact on embodied carbon and construction waste. It was therefore recommended as the preferred option.

946. The pre-redevelopment audit highlights that any extension greater than two stories would exceed the structural capacity of the existing foundations and a major vertical extension would require extensive structural strengthening. A central area of each floor slab would be removed to enable the construction of a structural core, however a significant part of the structure and floor slabs between basement level three and the fourth floor would be retained. Due to the high floor-to-floor heights (approximately 5m) of the existing building, levels five and above are proposed to be demolished to enable an additional storey to be accommodated in the design. The setbacks from level five mean that a considerable proportion of the floorplate would need to be demolished for the core, and considerable temporary works would be required.

947. The explored options are considered to comply with the GLA's Circular Economy Statement Guidance. The evaluation of the carbon intensity of the options is discussed in the whole life-cycle carbon emissions section of this report.

#### Application Proposal:

948. The submitted Circular Economy Statement describes the strategic approach, including the incorporation of circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Guidance.

949. The proposed development would retain approximately 60% of the existing structure and substructure (by mass).

950. The pre-demolition audit forecasts that the development would generate approximately 18,498 tonnes of material. Of this, more than 99% has been identified as suitable for reuse and recycling:

Material	Estimate (tonnes)	Forecast recycling		Forecast Reuse		Embodied carbon (tCO <sub>2</sub> e)
		Onsite	Offsite	Onsite	Offsite	
Concrete	15,243	15%	85%			1,880
Metals	2,300		43%	5%	52%	4,369
Timber	213		95%			89
Stone	349		75%	25%		31
Gypsum	201		100%			78
Glass	180		100%			274
Ceramic	12		100%			3
<b>Total</b>	<b>18,498</b>	<b>12%</b>	<b>80%</b>	<b>1%</b>	<b>6%</b>	<b>6,724</b>

951. The proposed development commits to meeting all mandatory GLA waste requirements. It has also established circular economy project commitments and further innovation opportunities that align with the GLA Circular Economy principles and Building Layers. The commitments and innovation opportunities will be further developed in detailed design, and will be monitored through each project stage. Commitments include:

- 55-60% reuse of the existing substructure by mass (maximising use of existing basement) and 30-35% reuse of the superstructure (reuse of the steel frame elements where possible)
- Reuse of the existing Jura limestone cladding as part of the new precast cladding (or potential re-use as roof paving or other paving)
- Limited Cat A installation
- Specification of high-quality materials to maximise durability/lifespan
- Scenario building for different floorplate arrangements for smaller tenancies
- Design in access for maintenance, replacement and repair of building components.

952. A total of 120 tonnes of structural steel extracted from the existing building have been assigned for use in the new construction. A condition is recommended to ensure that this material reuse opportunity is carried through design development.

953. Further innovation opportunities include:

- Prefabricated or modular façade elements, including offsite assembly opportunities

- Specifying MEP products if the provider can demonstrate a circular approach
- Development of a comprehensive maintenance and repair programme
- Development of a servicing strategy with projected climate scenarios to meet future occupant needs

954. Prior to commencing the soft strip, the following material reuse and recycling actions will be explored:

- Contacting suppliers regarding take back schemes (for raised access flooring, fines, FFE and building service equipment)
- Material exchange platforms options to list items for offsite reuse
- Research into innovative on-site reuse opportunities, and reuse of materials from other sites

955. A condition is recommended for an update to the Circular Economy Statement prior to the commencement of construction, and post-completion update, to confirm that high aspirations can be achieved.

### **Operational energy strategy and carbon emissions**

956. The Energy Statement outlines the operational energy strategy in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed development has been designed to achieve an overall 13% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building (the 'Part L baseline').

957. A passive design approach is adopted to achieve 6% 'Be Lean' savings beyond the Part L baseline. Glazing area locations and design is optimised to maximise natural daylight and minimise overheating. Automated blinds would help balance solar gains, daylight and occupant comfort. The passive design approach helps adapt the building to cope with anticipated increases to summertime temperatures. A decentralised ventilation system would help control and reduce energy consumption when

958. Further energy efficiency measures, such as the utilisation of smart sensors and controls to match user demand and minimise energy usage will be explored. These measures include Specific Fan Powers (SFPs), lifts, provision of variable flow systems and variable air volume.

959. There are currently no available or proposed district heating networks in the local area, however a future connection to a potential future heat network will be provided and this strategy may be revisited as the design develops and subject to local heat network development.

960. A system of Photovoltaic (PV) panels and heat pumps are proposed as Low and Zero Carbon (LZC) technology solutions. A potential area of 120sqm has been identified as space for 20 PV panels, which would generate a total of 8.24kWh of electricity annually, approximately 0.13% of the landlord electrical energy (based on a NABERS 5\* rating scheme). The proposed heating and cooling plant is comprised of 2-pipe reversible air source heat pumps and air-cooled chilled. The heat pumps have been sized to meet the building space heating and domestic hot water demand for showers.

961. The proposed energy strategy demonstrates that the proposed tower would achieve a 13% reduction in regulated carbon emissions under Part L 2021. It does not meet the GLA's 35% target, and the GLA acknowledges that the 35% carbon reduction target relative to Part L 2021 will be initially challenging for non-domestic buildings. Due to the proposed building's mix of uses, form, arrangement and design being highly unique, the energy efficient design cannot be considered appropriately in the Building Regulations Part L methodology. In addition, limitations of the Part L methodology arise from comparing the building's performance with a notional building performance rather than basing the operational carbon performance on the actual, modelled whole building energy use intensity (EUI). As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations section of this report.

#### Energy Use Intensity (EUI)

962. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m<sup>2</sup>(GIA)/year and a space heating demand of 15 kWh/m<sup>2</sup>(GIA)/year (regulated). The estimated EUI from the offices of the proposed development is 27.1 kWh/m<sup>2</sup>/year and for the space heating demand 0.81 kWh/m<sup>2</sup>/year, the latter being low due to enhanced performance targets.

963. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - of the building is dependent on the level of occupancy and operation of the building.

964. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

## BREEAM

965. The proposed development has been pre-assessed under BREEAM New Construction v6.1 - shell & core (office). The development is targeting an 'excellent' rating with a targeted weighted score of 87%. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Water, Pollution, Materials and Waste. Although the pre-assessment score exceeds the 85% threshold to achieve an 'outstanding' rating, preliminary energy modelling demonstrates that the development would only achieve 4 out of the mandatory 6 credits in the Energy category needed for an 'outstanding' rating. There is still an aspiration to achieve all 6 credits through detailed design adjustments.
966. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. Post construction BREEAM assessments are required by condition.

## NABERS UK

967. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposal targets a minimum target of 5 stars (out of 6 possible) rating and a detailed Design for Performance assessment will be carried out through RIBA stages 3 and 4.

## **Whole life-cycle carbon emissions**

968. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle

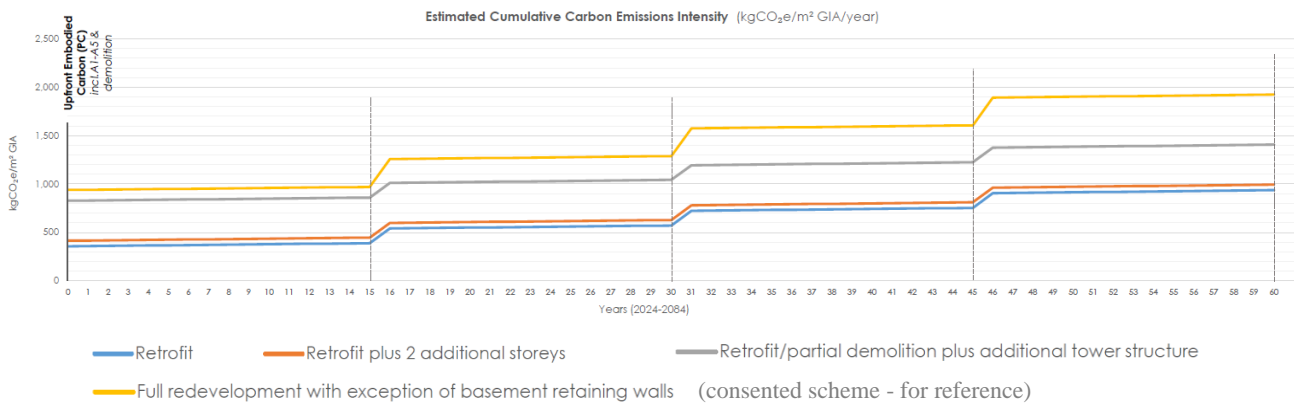
Carbon assessment is therefore an important tool to achieve the Mayor’s net-carbon city target.

Carbon options

969.Four options have been assessed with regard to their carbon impacts, environmental and wider planning benefits and constraints:

- Option 1: Retrofit of the existing building, 100% retained substructure and superstructure; 28,056 sqm GIA
- Option 2: Retrofit plus 2 additional storeys, 100% retained substructure, 95% retained superstructure; 31,676 sqm GIA
- Option 3: Retrofit/partial demolition plus additional tower structure, 55% retained substructure, 45% retained superstructure; 77,633 sqm GIA; 33 storeys
- An option 4, showing the whole life-cycle carbon impacts of the consented scheme, is shown in the graph below for reference only.

970.The following graph and table present the whole life-cycle carbon results from the options.





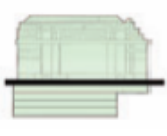


			
Option Reference	Option 1	Option 2	Option 3
	Retrofit	Retrofit plus 2 additional storeys	Retrofit/partial demolition plus additional lower structure
	Existing building to be retrofitted to modern day standards without any structural strengthening work, alongside change of use from department store to office. Public route through ground floor not provided.	Existing building to be retrofitted to modern day standards with a 2-storey extension and minor strengthening works, alongside change of use from department store to office. Total of 10 storeys.	Retention of as much of the existing building with a 25-storey extension and major strengthening works. Total of 33 storeys. Public route through ground floor provided.
Project reference period	60	60	60
Gross Internal area (GIA) m <sup>2</sup>	28,056	31,676	77,633
Net Internal area (NIA) m <sup>2</sup>	11,481	14,419	50,643
Change in NIA (compared to existing) m <sup>2</sup>	0	2,938	39,162
Substructure % retained by mass	100%	100%	55%
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	100%	95%	40%
<b>Total WLCA (incl. B6 &amp; pre-demolition) (kgCO<sub>2</sub>e/m<sup>2</sup> GIA)</b> <i>Module B7 is not considered</i>	<b>936</b>	<b>993</b>	<b>1,406</b>
Upfront Embodied Carbon (A1-A5) excl. sequestration (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	357	411	821
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	450	450	450
Estimated Whole Building Operational Carbon for building life time (B6) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	129	129	129
<b>Total WLCA (incl. B6 and pre-demolition) (tCO<sub>2</sub>e)</b> <i>Module B7 is not considered</i>	<b>26,256</b>	<b>31,452</b>	<b>109,186</b>
Total existing building demolition (tCO <sub>2</sub> e)	0	98	469
Upfront Embodied carbon (A1-A5) (tCO <sub>2</sub> e)	10,005	13,006	63,751
In-use embodied carbon (B-C) (tCO <sub>2</sub> e)	12,626	14,255	34,935
Operational Carbon for building life time (B6) (tCO <sub>2</sub> e)	3,625	4,093	10,031

Table: Whole life-cycle carbon options summary

971. The options can be analysed in terms of their carbon emissions, opportunities and constraints throughout the GLA's reference period of a 60 year life-cycle as follows:

972. Options 1 and 2 two provide modest interventions to the existing building without any major structural works. The retrofit and upgrade of the existing fabric would result in approx. 2/3 of the embodied carbon of option 3 (per square meter). There is a similar proportion of embodied carbon impact of the whole life-cycle carbon results per square meter due to the assumption that the retrofit would result in comparable operational carbon emissions across all options.

973. However, options 1 and 2 would not offer significant improvements for the public realm and connectivity in this busy part of the City, due to commercial constraints as office floorspace would need to be further reduced to achieve this. Similarly, opportunities for the integration of urban greening and biodiversity would be restricted. Given the pivotal location of the site in the Eastern Cluster, the transformation of the existing building to a development of the highest quality provides a vibrant mix of uses and publicly accessible spaces, a variety of external amenity spaces including urban greening and biodiversity would be limited by the constraints of the existing structure.

974. Options 3 and the consented full redevelopment would have similar opportunities to provide a holistic sustainability strategy. However, option 3 would retain and reuse significant percentages of the existing structure and would result in reduced embodied carbon impacts. While a retrofit with limited extension would be a feasible option, and as a lower level of extension in option 3 could deliver the same sustainability benefits with less embodied carbon impacts, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London, as set out elsewhere in the report. Overall, option 3 is considered to provide the best opportunities for a sustainable building design that benefits the vibrancy, connectivity, climate resilience and biodiversity of the local area and that contributes to futureproofing the City as a whole.

975. Option 3 therefore has been selected as to be developed for the application scheme.

976. The optioneering approach set out in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City of London's Carbon Options Guidance to establish and evaluate the carbon impact of development options.

977. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2024 stating in paragraph 161 that the planning system should support the transition to net zero by 2050 and paragraph 164 that new development should be planned for in ways that help reduce greenhouse gas emissions. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

#### Application Proposal:

978. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. The tall building structure and design present particular challenges to the need to reduce whole life-cycle carbon emissions, and the consideration of design options has determined the design to include:

- Retention of existing substructure and elements of the existing superstructure
- Design of a lightweight superstructure frame for the tower to minimise strengthening requirements of the foundations
- Addition of piling and raft within existing basement volume
- Use of 25% cement replacement product in concrete (GGBS – ground granulated blast furnace slag)
- Optimisation of the façade design for embodied carbon and operational energy performance.

979. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development can achieve the GLA's Standard Benchmark. The measures listed below could contribute to achieving embodied carbon emissions that improve on the GLA standard benchmark, despite the challenges of a tall building structure. These will be considered during the detailed design stages and include:

- Steel reuse from existing frame deconstruction
- Low carbon concrete specification
- Low carbon aluminium
- Reuse of site deconstruction material, e.g. piling mat.

980. GLA Guidance requires applicants to use the (original) methodology developed by RICS (Royal Institution of Chartered Surveyors). RICS have published the 2nd edition which has come into full effect on 1 July 2024, requiring to follow this Version 2's requirements when completing a whole life-cycle carbon assessment. The GLA has indicated that it would not update its guidance to reflect these changes for now. The applicants used RICS Version 2 in accordance with RICS requirements, however, the calculations in compliance with Version 1 were provided in the 10 December 2024 addendum, in compliance with the requirements of the GLA guidance.

981. The table below shows baseline whole life-cycle carbon emissions per square meter for the building in relation to the GLA benchmarks for offices at planning application stage. The table reports calculations using RICS Version 1 methodology, as required in the GLA WLC Assessment Guidance. The Version 1 results shown in the table below in bold figures are compared with the GLA benchmarks in order to remain in compliance with the requirements of the GLA's WLC Assessment Guidance. It also reports calculations using RICS Version 2 methodology, for information only. RICS version 2 is an updated methodology that includes a 15% contingency and several new assumptions across specific life-cycle modules.

Scope	<b>Proposed development (RICS V1)</b>	Proposed development (RICS V2)	Benchmark	GLA benchmark
RICS components	<b>kgCO2/m2</b>	kgCO2/m2	kgCO2/m2	
A1-A5	<b>792</b>	851	< 950	GLA standard
			< 600	GLA aspirational
A-C (excluding B6-B7)	<b>1,293</b>	1,362	< 1,400	GLA standard
			<970	GLA aspirational
B6+B7	<b>1,171</b>	1,171		
A-C (including B6-B7)	<b>2,464</b>	2,533		

982. The WLC RICS Version 1 Assessment Spreadsheet, submitted in the December 2024 addendum, calculates that the proposed development would result in 197,562,183 kg CO2e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 93,856,808kg CO2e (48% of the building's whole life-cycle carbon), and the

embodied carbon emissions for 103,705,375kg CO<sub>2</sub>e (52% of the building's whole life-cycle carbon).

983.The WLC RICS Version 2 Assessment Spreadsheet, submitted in the July 2024 planning submission, calculates that the proposed development would result in 203,090,932 kg CO<sub>2</sub>e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 93,856,808 kg CO<sub>2</sub>e (46% of the building's whole life-cycle carbon), and the embodied carbon emissions for 109,234,124 kg CO<sub>2</sub>e (54% of the building's whole life-cycle carbon).

984.A detailed whole life-cycle carbon assessment and a confirmation of the post construction results are required by conditions.

985.The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the independent 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic policy CS15 Sustainable Development and Climate Change and the emerging City Plan 2040 policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to net zero by 2050 in accordance with NPPF (2024) paragraph 161.

### **Climate Resilience**

986.Buildings that are being planned now will be subject to more extreme climate conditions during their lifetime than we current experience. London Plan Policy GG6 requires development to "ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect". Local Plan policy DM15.5 (Climate change resilience and adaptation) supports these outcomes.

987.In section 4.2.4 'Climate Change Resilience and Adaptation' of the submitted Sustainability Statement it is stated that a site-specific review of vulnerability to climate change has been carried out in line with the BREEAM Wst 05 credit. The report states that the analysis suggested that the design parameters already cover the project climate change scenarios that are applicable to the project. The analysis did identify the potential increased risk of overheating due to climate change. The applicant should provide a copy of the BREEAM Wst

05 assessment within their Climate Change Resilience and Sustainability Statement (CCRSS).

### Overheating

988. An overheating assessment followed CIBSE TM52 modelling has been undertaken for the building. The assessment indicated that in configuration 5 (proposed development, consented and non-consented cumulative schemes) some bus stops and amenity spaces were assessed to be in comfort categories which are less than the comfortable target condition.

989. Design measures that are proposed to limit overheating are:

- Passive design measures such as orientation, shading, high albedo materials, fenestration, insulation and green infrastructure provision.
- Manage heat within the building through exposed internal thermal mass and high ceilings.
- Internal heat generated will be minimised through energy efficient design for lights, pipework, fans and pumps.
- Local mechanical ventilation plant provided on each floor to ensure flexible operation and control, reducing fresh-air cooling requirements.
- Façade incorporates low u-values and g-values to limit solar gains.

990. The submission documents relating to overheating do not provide a sufficient level of detail on how the development is addressing the urban heat island effect which is a core element of the CR1 Overheating and Urban Heat Island (UHI) policy. The quantified information for the design measures listed above would be included within the CCRSS via condition.

### Flooding

991. The Flood Risk Assessment assessed the site to be at low to negligible risk of flooding from all sources.

992. The proposed drainage system comprises three blue/green roofs and an attenuation tank, and a rainwater harvesting for green roof irrigation is also included.

993. The proposed drainage system would restrict discharge rates to 3 l/s which would provide a 98% betterment on existing 1 in 100 year rates.

994. Based on the information provided in the submission documents, the proposed development is compliant with Policy CR2 Flood Risk.

### Water stress

995. The proposed development is targeting 4 out of 5 BREEAM Wat 01 credits. Low flow sanitary fittings have been selected, and grey water and rainwater harvesting are included.

996. Further details and quantified values would be submitted via condition in the CCRSS on the fittings that have been selected to reduce the proposed development's impact on water supplies.

### Biodiversity

997. The proposed development would create an uplift of approximately 2.14 biodiversity units per Ha, which does not meet the City of London's draft policy of 3 units per hectare.

998. Greening would be provided through planting, green roofing and green walls. The submitted Landscape Strategy states that a mixed strategy of native and cultivars have been selected. The native species have been selected to tolerate the high wind speeds that are expected for their planting locations.

999. Further details would be provided in the CCRSS via condition on the species of plants that have been selected for their climate resilient qualities. The impact of biodiversity losses could be further reduced within the proposed development by:

- Areas of biodiverse green/brown roof should be allowed to colonise 'naturally', evidence suggests that these plants will be more stress resistant. Whilst some seeding would take place management should not focus on removal or management of plants that colonise. Unless these are deemed to be invasive or have significant structural or ecological implications;
- Varied substrates are highly recommended on green roofs and should be further complimented with a range of substrates including sands, gravels and rocky piles;
- Nest and roost box specifications should consider open face nest boxes for black redstarts and where integrated follow BS 42021 and specify only 'swift bricks';
- Invertebrate measures can also include rocky piles, sandy loam earth mounds and standing water. These would all provide a range of niches for invertebrate lifecycles and reproduction.

### Pests and Diseases

1000. No reference or assessment has been made for the risk that pests and diseases as a result of climate change pose to the proposed development. This

should be considered in the context of the green infrastructure and the potential establishment of invasive non-native species (INNS). Infectious and climate sensitive diseases should also be mitigated within the interior systems of the building, specifically through ventilation measures, thermal regulation and water supply management. These details would be secured in the CCRSS via condition.

### Food, trade and infrastructure

1001. The submitted Sustainability Statement notes that active travel opportunities have been met through the provision of 1,006 cycle parking spaces and end of trip facilities.

1002. When the CCRSS is prepared the following opportunities for food, trade and infrastructure should be considered as potential mitigation measures:

- Onsite facilities
- Are parts of the site publicly accessibly i.e. retail or cultural offerings.
- Facilities that provide food have sufficient storage space to manage demand,
- Opportunities for onsite food production (not bee hives).
- Sustainably supply
- Use of off-site consolidation services.
- Accommodation for cargo bike provision.
- Local Area Energy Plan
- Building connects to Citigen or other district heat network.
- Buildings make provision for future connection to heating and cooling networks.
- Onsite solar generation.
- Onsite emergency back-up electrical generation.

### Conclusion on Sustainability

1003. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.



1004. The proposed development would optimise the quantity of floorspace for offices and a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.
1005. Compared to the assessed retrofit options with very limited extension potential, the proposed scheme retaining 60% of the existing structure and inserting a tall building into the site would ensure that a holistic sustainability strategy can be implemented, with benefits relating to improving the public realm around and across the site, incorporating a diverse mix of uses with public access to the roof top and integrating urban greening and climate resilience measures. A lower tower option might be able to deliver the same sustainability benefits with less absolute carbon impacts - however, the scheme in its proposed form would unlock a number of planning benefits that planning officers consider to be a suitable approach to future proof the City as a sustainable location in London.
1006. The energy strategy has been optimised for the site, targeting a challenging NABERS UK rating of 5 stars and a BREEAM “excellent” rating, aspiring to an “outstanding” rating through detailed design. Circular economy measures have been incorporated, such as by retaining 60% of the existing structure (by mass), as well as designing for longevity, adaptability and low maintenance. The proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA. In addition to this, the proposed building form, design and use are highly unique and cannot be appropriately reflected in the calculations of the Part L methodology. However, offset payments will be made to mitigate the shortfall to reach the net zero carbon target. The proposed development therefore is considered to be in overall compliance with London Plan policy SI 2, SI 7, Local Plan policy CS15 and DM17.2, as well as emerging City Plan 2040 policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

### **Security**

1007. London Plan Policy D11 (‘Safety, security and resilience to emergency’) states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

1008. Local Plan Policy CS3 ('Security and Safety') seeks to ensure that the City is secure from crime, disorder, and terrorism. Local Plan Policy DM3.2 ('Security measures in new developments and around existing buildings') seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 ('Crowded places') requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.
1009. Emerging Strategic Policy S2 of the draft City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, stakeholders to ensure that it is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism by ensuring that that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.
1010. The security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the Architectural Liaison Office and Counter Terrorism Security Advisers within the City of London Police at pre-application stage.
1011. The main office, cultural space and retail entrances would be freely accessible during working and opening hours. Outside of these hours, these access points would be locked and monitored via an access controls system. Entrances and the new public realm would be under video and natural surveillance, both externally and internally, with proposed lighting considered to be adequate to support CCTV. Both the long stay and short cycle stay cycle storage would be under constant video surveillance, and additional security would be situated within the basement cycle facilities to ensure efficient and effective security management of the area.
1012. The site would be protected by integrated upstands within the perimeter of the building as well as two bollards at each end of the new public passage. There would be further bollards surrounding the servicing/market space within the site at ground level, with remotely controlled rising bollards to provide access to servicing vehicles. Further details of these protective measures would be required through condition and the Public Realm and Marketplace Management Plan secured in the S106 agreement.
1013. Security lines would be situated within the building, providing restricted access to all staff, tenants, visitors and contractors of the building. Turnstiles would be located on ground floor level to allow controlled access to occupiers.

Visitors to the public roof areas would need to go through a security screening. Further measures would be in place past the ground floor in the form of destination control lifts, and there would be a video surveillance system in place both internally and externally around the site for added security observation and the use of access control systems. All security measures would be controlled from the security control room located within the building, ensuring complete management of all security measures in place, during the buildings operating hours and outside of these hours.

1014. The building would have the ability to 'lock down' using physical measures in the event of an external threat, ensuring people do not enter dangerous areas and any threats are prevented from entering the building.
1015. Further details of the overall security strategy would be required by condition and through a S106 obligation, which would detail more specifically the measures to protect the building and its different user groups.
1016. The proposal, subject to conditions and S106 obligations is considered to be in accordance with London Plan policy D11, Local Plan Policy DM3.2 and the emerging City Plan strategic policy S2.

### **Suicide Prevention**

1017. The City Corporation has an approved guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades.
1018. Policy DE4 of the emerging City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling.
1019. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrent capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

1020. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building Regulation K2 states the following:

(A) Any stairs, ramps, floors and balconies and any roof to which people have access; and

(B) any lightwell, basement area or similar sunken area connected to a building;

Shall be provided with barriers where it is necessary to protect people in or about a building from falling.

1021. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS 6180: Barriers in and around buildings.

1022. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advises a barrier height of at least 2.5 metres high, no toe or foot holds, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with Building Regulation standards and, where feasible and practical, consider providing a barrier in line with UKHSA guidance.

1023. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to adverse weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.

1024. Regarding the proposals, there would be external terraces at levels 5-7 (podium level) and levels 28 to 31 for office workers, and a publicly accessible terrace at level 32. These terraces could represent a potential risk to individuals attempting suicide from the building. A combination of physical barriers, planting, staff training and surveillance are proposed to maximise the

effectiveness of preventative measures, including measures that increase the potential for human intervention.

1025. Access to the external terraces (levels 5-7, 28-31) would be for building occupants only and not the general public. A 1.7m tall screen would be located at these terraces to prevent any risk of terrace users from climbing over. The screens on the publicly accessible terrace would have a parapet height of 3.0m. Suitable species of planting would help to discourage movement to the perimeter of the building, and further measures would be in place such as suitable lighting and CCTV.

1026. Details of suicide prevention measures alongside an associated risk assessment would be secured by condition.

### **Fire Statement**

1027. London Plan Policy D12 requires that all developments achieve the highest standards of fire safety to ensure the safety of occupants and efficient evacuation in case of an emergency. London Plan Policy D5 further mandates that the building design incorporates provisions for safe and dignified emergency evacuation for all users, including those with reduced mobility.

1028. A Fire Statement, prepared by Arup and dated July 2024, was submitted with this application, in line with London Plan Policy D12 B for major developments. The statement outlines a comprehensive fire safety strategy for the building, which includes a phased evacuation strategy supported by a Category L3 automatic fire detection system and a voice alarm system. The building would be equipped with two independent firefighting shafts, each with a dedicated firefighting stair, evacuation lifts, wet risers, and mechanical smoke extraction systems. Sprinkler protection would be provided throughout the building, and all floors would be provided as compartment floors with 120-minute fire resistance. The building façade has been designed to prevent external fire spread, incorporating non-combustible materials where necessary, particularly near site boundaries.

1029. For persons with reduced mobility, the design includes protected refuges at each level above and below ground, outside of the flow of occupants evacuating the building. Each refuge would be equipped with two-way emergency voice communication systems. Dedicated evacuation lifts would serve all levels except for plant areas, ensuring equitable means of escape. A tailored Personal Emergency Evacuation Plan (PEEP) would be prepared by building management for each person using the building who may not be able to escape in a timely manner unaided. Details of inclusive emergency procedures would be requested under the Inclusive Access Management Plan to ensure escape routes and staff training has been considered for disabled people including where there is not a separate firefighting and evacuation lift.

1030. The fire strategy incorporates provisions for ongoing safety, with measures to ensure that any future modifications to the building would not compromise its fire safety design. A Responsible Person would be appointed under the Regulatory Reform (Fire Safety) Order 2005 who would oversee compliance with fire safety requirements during the operational phase of the development.
1031. The City's District Surveyor has reviewed the Fire Statement and raised no objection, confirming that the proposal complies with London Plan Policies D5 and D12. A condition would ensure the development is undertaken in accordance with the approved Fire Statement. Accordingly, officers consider the proposed development is acceptable in terms of fire safety.

### **The Public Sector Equality Duty (section 149 of the Equality Act 2010)**

1032. The City, as a public authority must, in exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons should do not share it;
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
1033. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would reduce barriers to access for disabled people through the provision of an enhanced and step-free public realm and a blue badge parking space on site. Officers also consider that the provision of accessible floorspace, and publicly accessible garden, learning space would advance equality of opportunity.
1034. The proposed development would not result in an adverse impact on the ability to use the surrounding churches as places of worship and religious observance. As such, there would be no impact on those who share a protected characteristic relating to religious beliefs and practices.

### **Human Rights Act 1998**

1035. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR)).

1036. Insofar as the grant of planning permission would result in interference with right to private and family life (Article 8 of the ECHR), particularly regarding residential amenity of neighbouring properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme, and therefore necessary in the interests of the economic well-being of the country. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policies DM10.7 and DM15.7 and emerging City Plan 2040 Policies DE7, HS3 and HL3.
1037. Insofar as the grant of planning permission would result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

### **CIL and Planning Obligations**

1038. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
1039. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
1040. On the 1<sup>st</sup> of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
1041. CIL contributions and City of London Planning obligations are set out below.

#### MCIL2

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£9,223,227.34	£8,854,298.25	£368,929.09

#### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
City CIL	£3,908,100.00	£3,712,695.00	£195,405.00
<b>City Planning Obligations</b>			
Affordable Housing	£2,605,400.00	£2,579,346.00	£26,054.00
Local, Training, Skills and Job Brokerage	£1,563,240.00	£1,547,607.60	£15,632.40
Carbon Reduction Shortfall (as designed) <i>Not indexed</i>	£600,344.00	£600,334.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£100,000.00	£100,000.00	£0
Security Measures Contribution (Eastern City Cluster)	£521,080.00	£515,869.20	£5,210.80
S106 Monitoring Charge	£5,750.00	£0	£5,750.00
<b>Total liability in accordance with the City of London's policies</b>	<b>£9,303,914.00</b>	<b>£9,055,861.80</b>	<b>£248,052.20</b>

### City's Planning Obligations

1042. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- 'Be Seen' Energy Performance Monitoring
- Accessible Car Parking Space Management Plan
- Carbon Offsetting Document Submissions
- Changing Places Toilet Management Plan
- Construction Monitoring Contribution (£53,820 for First Year and £46,460 for Subsequent Years)
- TfL Cycle Hire and Improvement Contribution (£100,000.00 Indexed)
- Travel Plan (incorporating Cycle Promotion Plan)
- Delivery and Servicing Management Plan (including consolidation)
- Highway Reparation and other Highways Obligations
- Local Procurement Strategy



- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction)
- Provision of Affordable Workspace (First Floor) and associated Affordable Workspace Management Plan
- Provision of the Cultural Space at Basement Level, Cultural Implementation and Management Plan incorporating Digital Wall Management Plan (including curation, maintenance, hours of Digital Wall use and cultural content)
- Provision of the Digital Wall
- Provision of the free Public Viewing Gallery and accompanying Access, Operation, Lift Maintenance & Management Plan
- Provision of the Public Realm, Marketplace and accompanying Public Realm and Marketplace Management Plan
- Provision of the Public Route and accompanying Public Route Management Plan
- Section 278 Agreement and Section 38 Agreement (CoL)
- A10 Transport for London Road Network (TLRN) improvement scheme contribution (£450,000 BCIS index linked) or the completion of an Section 278 Agreement with TfL, which may include but is not limited to:
  - Making permanent of the current buildout on Gracechurch Street, currently in place with temporary materials
  - Carriageway resurfacing
  - Reconstruction/reinstatement of footways and associated works
  - Television Interference Survey
  - Utility Connection
  - Wind Audit
  - Solar Glare Assessment

1043. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement and accompanying feasibility study.

1044. The scope of the s278 agreement may include, but is not limited to:

#### Fenchurch Street

- Widening of the footways fronting the site
- Carriageway resurfacing
- Improvements to highways drainage within the frontage of the site
- Provision of road markings and associated traffic orders

#### Lime Street

- Introduction of vehicular access within Lime Street and necessary accommodation works and removal of the existing access

- Realignment of the Lime Street carriageway crossing improvements at the junctions of Fenchurch Street (materials to match the public realm vision for the area), Philpot Lane and Lime Street
- To consider the signalisation of this junction, as it was the case with the previously agreed Section 106 agreement where it refers to the TA as preferred option
- The study to consider all options to facilitate the pedestrian movements, for example: introducing a zebra crossing, unsignalized crossing with refuge island, informal crossing with raised table, including the option to signalize this junction to allow a pedestrian phase. If signalisation is the option selected due to proximity with the existing junction Gracechurch/Fenchurch Street, linking the two junctions is likely to be required. Crossing improvements at the junctions of Fenchurch Street, Philpot Lane and Lime Street to be implemented by the applicant (in accordance with City of London procedure) following the outcome of the feasibility study.
- removal of the 2no. existing steps on the public highway on Ship Tavern Passage, to create a step free route

#### Philpot Lane

- Footway improvement works and associated works
- Carriageway resurfacing
- Highways Drainage
- Provision of road markings and associated traffic orders

#### Monitoring and Administrative Costs

1045. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
1046. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

#### **Conclusion**

1047. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.
1048. Two objections have been received from nearby residents relating to the impact of the development on nearby designated heritage assets, and the impact on

the environment and amenity of the immediately surrounding area and buildings. This report has considered these impacts, including any requisite mitigation which would be secured by conditions and S106 obligations.

1049. The proposed development comprises the structural retention and facade replacement of an unremarkable and outmoded retail and office development, alongside the delivery of a high quality, office-led tall building in the emerging City Cluster, which would contribute significantly to the office floorspace demand of the City, growing and changing business accommodation needs, whilst supporting and strengthening opportunities for continued collaboration and clustering of businesses, as well as, delivering high quality public realm and a visitor destination to drive footfall, vibrancy and activity on evenings and weekends.
1050. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure, and able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is central to the City's growth modelling and would deliver 4.86% of the entire City Plan target of the required commercial space to meet projected economic and employment growth demand. Over 78,000 sq.m of Class E commercial floorspace, which would be flexible, sustainable and best-in-class Grade A office floorspace, suitable for an additional circa 3345 City workers would be provided as part of the scheme. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers, including SME's.
1051. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. The proposal would result in some daylight and sunlight transgressions to surrounding residential dwellings. However, considering BRE Guidance, the nature of the results and the sites location within a dense urban environment, it is not considered that the proposal would result in an unacceptable impact on the existing properties and would not reduce the daylight to nearby dwellings to unacceptable levels such that it would warrant a refusal of permission. The wind microclimate impact of the development has been thoroughly assessed and the assessment concludes that conditions would be suitable for the intended uses in the proposed and cumulative scenarios, and there would be no unacceptable wind impacts at street level. All on-site receptors would be suitable for their intended uses.
1052. The building would be high sustainable, propose an increase in local greening and ecological value, would be energy efficient, targeting BREEAM 'Excellent' and adopting Circular Economy Principles by retaining 60% of the existing structure and integrated urban greening.

1053. The proposed development makes optimal use of the site and would be an efficient use of land, providing an attractive, elegant and refined City tower set on top of robust podium. The delivery of high-quality office floorspace would be in accordance with the City's objective to support a thriving economy and remain the world's leading international financial and professionals service centre.
1054. The scheme would deliver significant public realm enhancement, including a generously proportioned north-south passageway through the site, connecting Fenchurch Street to the network of passageways and lanes connecting to Leadenhall Market. Further public realm enhancements would be created to the southeast fronting Fenchurch Street and Lime Street, creating a large permeable publicly accessible space within the site and delivering highways and public realm improvements on Fenchurch Street.
1055. In transportation terms the proposal would provide significant betterment of the local public realm and highway through an aspirational scope of works, secured through S278 Agreement, meeting the aspirations set out in the City's Transport Strategy. 1,106 long term cycle parking spaces would be provided with associated shower and locker facilities, and 65 short stay spaces would be provided. The scheme has been designed to encourage active travel to the site. On analysis of the pedestrian environment, it is concluded that the net uplift in walking trips around the site can be satisfactorily accommodated via the proposed pedestrian network. Servicing and delivery trips can be accommodated within an on-site loading bay, with all vehicles being able to access and egress in forward gear, and with sufficient consolidation to be secured through a delivery and servicing management plan. In respect of demolition and construction traffic, deconstruction and construction logistics plans would be required by condition.
1056. The proposals would bring a quiet architectural charisma to the western edge of the Cluster, being a sensitive and sustainable exemplar of tower design. It would optimise the use of land, delivering strategic uplift in high quality office space, and publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, DM10.3, DM10.4, DM10.8, emerging City Plan 2040 policies S8, DE1, DE2, DE3, DE4, London Plan D3, D4, D5 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

1057. The proposal would deliver a tall building on a suitable site in the Eastern Cluster/emerging City Cluster in accordance with Local Plan Policy CS14 and CS7, emerging City Plan 2040 Policies S12 and S21, London Plan Policy D9.
1058. The proposal would not harm and would preserve all relevant pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13, emerging City Plan 2040 Policy S13 and London Plan Policy HC2, HC3 and HC4 and associated guidance in the LVMF SPG and Protected Views SPD. It would preserve the experience from those existing and emerging high-level views identified which are also important to the character of the City of London. In consolidating the composition of the City Cluster the proposal would result in a minor enhancement to the characteristics and compositions of LVMF views 4A.1 (Primrose Hill), 2A.1 (Parliament Hill), 3A.1 (Kenwood) and 1A.1 (Alexandra Palace). Following rigorous assessment, it is concluded that the proposal would preserve the Outstanding Universal Value and significance, authenticity and integrity of the Tower of London World Heritage Site, according with the aforementioned policies and associated guidance in the WHS Management Plan, Local Setting Study and LVMF SPG.
1059. The proposal would preserve the settings and significance of all designated heritage assets assessed, in accordance with Local Plan policies CS12, DM12.1, emerging City Plan policies S13 and HE1 and London Plan policy HC1, and would, subject to conditions, preserve archaeology in accordance with DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.
1060. The proposals comply with strategic objective 1 in the Local Plan and with the policies relating to offices and to economic growth.
1061. The proposals conflict with policies which seek to prevent the loss of retail floorspace in Principal Shopping Centres. It is the view of officers that as a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 complied with, and as the policies relating to tall buildings, heritage, design, and public realm are also complied with, that notwithstanding the conflict with the retail policies, the proposals comply with the development plan when considered as a whole.
1062. The proposed development would provide benefits through CIL (of approximately £3,908,100.00 million) for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

1063. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
1064. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals make would make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, Eastern/City Cluster, and public realm policies.
1065. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.
1066. It is the view of officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

## **Background Papers**

### **Consultation Responses:**

Objection, Mr Will Ryan, 30 August 2024  
Objection, Peter Rose, 29 September 2024

### **Consultee Responses:**

#### **Internal Consultations:**

Memo, Contract and Drainage Service, 30 August 2024  
Memo, District Surveyors Office, 06 September 2024  
Memo, Lead Local Flood Authority, 12 September 2024  
Memo, Environmental Health Officer, 22 November 2024  
Memo, Air Quality Officer, 16 January 2025

#### **External Consultations:**

Letter, Historic England, 07 June 2024  
Email, Health and Safety Executive, 29 August 2024

Email, Heathrow Airport, 29 August 2024  
 Letter, TfL Crossrail Safeguarding, 30 August 2024  
 Letter, London City Airport, 04 September 2024  
 Letter, Environment Agency, 13 September 2024  
 Letter, Historic England, 17 September 2024  
 Letter, Historic England, 18 September 2024  
 Letter, Royal Borough of Kensington and Chelsea, 18 September 2024  
 Email, TfL LU/DLR Infrastructure Protection, 19 September 2024  
 Letter, Natural England, 19 September 2024  
 Email, Thames Water, 20 September 2024  
 Letter, Thames Water, 20 September 2024  
 Letter, LB Lambeth, 23 September 2024  
 Letter, Surveyor to the Fabric of St. Paul's, 23 September 2024  
 Letter, LB Hammersmith and Fulham, 25 September 2024  
 Letter, TfL Crossrail Safeguarding, 30 September 2024  
 Letter, LB Tower Hamlets, 01 October 2024  
 Letter, Royal Borough of Greenwich, 01 October 2024  
 Letter, LB Southwark, 11 November 2024  
 Email, LB Wandsworth, 08 January 2025  
 Email, Health and Safety Executive, 09 January 2025  
 Email, Thames Water, 09 January 2025  
 Letter, London City Airport, 09 January 2025  
 Email, NATS Safeguarding, 09 January 2025  
 Email, Heathrow Airport, 10 January 2025  
 Letter, TfL Crossrail Safeguarding, 10 January 2025  
 Email, Historic England, 14 January 2025  
 Email, TfL LU/DLR Infrastructure Protection, 14 January 2025  
 Email, Port of London Authority, 16 January 2025  
 Email, Environment Agency, 21 January 2025  
 Email, LB Lambeth, 22 January 2025  
 Email, Historic England, 23 January 2025  
 Email, Historic England, 23 January 2025

### **Application Documents:**

- Completed Planning Application Form, prepared by DP9;
- CIL Form, prepared by DP9;
- Covering Letter, prepared by DP9, dated 31 July 2024;
- Site Location Plan, prepared by
- Site Plan, prepared by
- Drawing Schedule, prepared by KPF
- Planning Statement, including Draft Heads of Terms for Legal Agreement, prepared by DP9;
- Design and Access Statement, prepared by KPF; including:
  - Accessibility Statement, prepared by Arup
  - Lighting Statement, prepared by EQ2 Lighting Consultants
  - Security and Hostile Vehicle Mitigation Strategy, prepared by Arup
- Aviation Safeguarding Report, prepared by KL Grant Consulting
- Biodiversity Net Gain Report (and BNG Plan), prepared by TMA
- Circular Economy Statement, prepared by Arup
- Cultural Plan, prepared by Hatch

- Social Value Strategy, prepared by Hatch
- Draft Construction Environmental Management Plan, prepared by Mace
- Outline Drainage Strategy, prepared by Robert Bird Group
- Ecological Appraisal, prepared by TMA
- Energy Statement, prepared by Arup
- Equalities Impact Assessment, prepared by Trium
- Flood Risk Assessment and Drainage Strategy, prepared by Robert Bird Group
- Fire Statement (and Fire Engineering Statement), prepared by Arup
- Framework Travel Plan, prepared by Momentum Transport Consultants
- Landscape Statement and Public Realm Management Plan, prepared by Latz und Partner
- Preliminary Ecology Appraisal, prepared by TMA
- Statement of Community Involvement, prepared by London Communications Agency
- Sustainability Statement, (including BREEAM Pre-Assessment), prepared by Arup
- Thermal Comfort Study, prepared by Gordon Ingram Associates
- Transport Assessment, prepared by Momentum Transport Consultants
- Utilities Statement, prepared by Arup
- Whole Life Carbon Assessment, prepared by Arup
- Environmental Statement, prepared by Trium Environmental; including:
  - Volume 1 – Main Assessment
  - Volume 2 – Townscape, Heritage and Visual Impact Assessment
  - Volume 3 – Technical Appendices
  - Volume 4 – Non-Technical Summary
- Environmental Statement Addendum, prepared by Trium Environmental
- Design and Access Statement Addendum, prepared by KPF
- Inclusive Access Addendum, prepared by Arup
- Thermal Comfort Study Addendum, prepared by GIA
- Supplementary Model Views, prepared by Millerhare
- ES Volume 3: Appendix C: Wind and Microclimate CFD Report





## **APPENDIX A**

### **REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS**

#### **Reasoned Conclusions**

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of the report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, archaeology, noise & vibration, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual impact, climate change, greenhouse gas emissions, and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the likely significant effects caused by a number of cumulative developments added into and taken out of the study context since the submission of the original ES. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and cultural uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide (all figures GIA excluding plant):

- Office (Class E(g)(i)) – 78,711sq.m
- Retail/Food and Beverage (City Market) (Class E (a/b)) – 195sq.m
- Cultural Space/Public Viewing Gallery (Sui Generis) – 1,273sq.m

REASON: To ensure the development is carried out in accordance with the approved plans.

2. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.

3. The areas within the development marked as Cultural/Public Viewing Gallery on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11.

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

### **Monitoring Measures**

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan or Scheme of Protective Works, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, and Travel Plan including a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures as required. These, as well as other

measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions, and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

## **Appendix B**

### **Relevant London Plan Policies.**

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspace
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling

- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

### **Relevant GLA Supplementary Planning Guidance (SPG):**

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Planning for Equality and Diversity in London SPG (October 2007);
- All London Green Grid SPG (March 2012);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Transport, Walking and Cycling LPG (November 2022)
- Sustainable Design and Construction SPG (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- London World Heritage Sites SPG (March 2012);
- Social Infrastructure SPG (May 2015);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022).

### **Relevant Draft City Plan 2040 Policies**

S1 Healthy and inclusive city  
 HL1 Inclusive buildings and spaces HL2 Air quality  
 HL3 Noise  
 HL4 Contaminated land and water quality  
 HL6 Public toilets  
 HL9 Health Impact Assessment (HIA)  
 S2 Safe and Secure City  
 SA1 Publicly Accessible Locations  
 SA2 Dispersal Routes  
 SA3 Designing in Security  
 HS3 Residential environment S4 Offices  
 OF1 Office development  
 S5 Retail and Active Frontages  
 RE2 Active Frontages  
 RE3 Specialist Retail Uses and Clusters  
 RE4 Markets  
 S6 Culture and Visitors  
 CV2 Provision of Arts, Culture and Leisure Facilities

CV6 Public Art  
S7 Smart Infrastructure and Utilities  
IN1 Infrastructure Provision and Connection  
IN2 Infrastructure Capacity  
S8 Design  
DE1 Sustainable Design  
DE2 Design Quality  
DE3 Public Realm  
DE4 Terraces and Elevated Public Spaces  
DE5 Shopfronts  
DE7 Daylight and Sunlight  
DE8 Lighting  
S9 Transport and Servicing  
VT1 The impacts of development on transport  
VT2 Freight and Servicing  
VT3 Vehicle Parking  
S10 Active travel and Healthy Streets  
AT1 Pedestrian Movement, Permeability and Wayfinding  
AT2 Active Travel including Cycling  
AT3 Cycle Parking  
S11 Historic Environment  
HE1 Managing Change to the Historic Environment  
HE2 Ancient Monuments and Archaeology  
HE3 Setting of the Tower of London World Heritage  
Site S12 Tall Buildings  
S13 Protected Views  
S14 Open spaces and green infrastructure  
OS1 Protection and Provision of Open Space  
OS2 City Urban Greening  
OS3 Biodiversity  
OS4 Biodiversity Net Gain  
OS5 Trees  
S15 Climate Resilience and Flood Risk  
CR1 Overheating and Urban Heat Island  
Effect  
CR2 Flood Risk  
CR3 Sustainable drainage systems (SuDS)  
S16 Circular Economy and Waste  
CE1 Sustainable Waste Facilities and  
Transport  
S21 City Cluster Key Area of Change  
S26 Planning contributions

**Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)**

- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines 2020

- Wind Microclimate Guidelines, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD, July 2016
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy October 2024

### **Relevant Local Plan Policies**

#### ***CS1 Provide additional offices***

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

#### ***DM1.3 Small and medium business units***

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

#### ***DM1.5 Mixed uses in commercial areas***

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

#### ***CS2 Facilitate utilities infrastructure***

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

#### ***DM2.1 Infrastructure provision***



- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
  - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
  - b) reasonable gas and water supply considering the need to conserve natural resources;
  - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
  - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
  - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

### ***CS3 Ensure security from crime/terrorism***

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

### ***DM3.2 Security measures***

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

### ***DM3.3 Crowded places***

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

### ***DM3.4 Traffic management***

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

### ***DM3.5 Night-time entertainment***

- 1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:
  - a) the amenity of residents and other noise-sensitive uses;
  - b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
- 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

### ***CS10 Promote high quality environment***

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

### ***DM10.1 New development***

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

### ***DM10.2 Design of green roofs and walls***

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

### ***DM10.3 Roof gardens and terraces***

- 1) To encourage high quality roof gardens and terraces where they do not:
  - a) immediately overlook residential premises;
  - b) adversely affect rooflines or roof profiles;
  - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
  - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

### ***DM10.4 Environmental enhancement***

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

### ***DM10.7 Daylight and sunlight***

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

### ***DM10.8 Access and inclusive design***

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

### ***CS11 Encourage art, heritage and culture***

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

#### ***DM11.2 Public Art***

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

### ***CS12 Conserve or enhance heritage assets***

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

#### ***DM12.1 Change affecting heritage assets***

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

### ***DM12.3 Listed buildings***

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

### ***DM12.4 Archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

### ***CS15 Creation of sustainable development***

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

### ***DM15.1 Sustainability requirements***

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
  - a) BREEAM or Code for Sustainable Homes pre-assessment;

- b) an energy statement in line with London Plan requirements;
  - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
  4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
  5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

### ***DM15.2 Energy and CO2 emissions***

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
  - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
  - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
  - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
  - d) anticipated residual power loads and routes for supply.

### ***DM15.3 Low and zero carbon technologies***

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

#### ***DM15.4 Offsetting carbon emissions***

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

#### ***DM15.5 Climate change resilience***

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.



6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

#### ***DM15.7 Noise and light pollution***

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

#### ***CS16 Improving transport and travel***

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

#### ***DM16.1 Transport impacts of development***

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
  - a) road dangers;
  - b) pedestrian environment and movement;
  - c) cycling infrastructure provision;
  - d) public transport;
  - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

### ***DM16.2 Pedestrian movement***

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
  - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
  - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

### ***DM16.3 Cycle parking***

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

### ***CS17 Minimising and managing waste***

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

#### ***DM17.1 Provision for waste***

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

### ***DM17.2 Designing out construction waste***

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

### ***CS18 Minimise flood risk***

To ensure that the City remains at low risk from all types of flooding.

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
  - b) the benefits of the development outweigh the flood risk to future occupants;
  - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
  - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
  - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.
4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

### ***DM18.2 Sustainable drainage systems***

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

### ***CS19 Improve open space and biodiversity***

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

### ***DM19.2 Biodiversity and urban greening***

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

### ***CS20 Improve retail facilities***

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

### ***DM20.1 Principal shopping centres***

1. Within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:
  - a) maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
  - b) the contribution the unit makes to the function and character of the PSC;

- c) the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.
2. Proposals for the change of use from shop (A1) to financial and professional service (A2) restaurant and cafes (A3) drinking establishments (A4) or hot food takeaways (A5), use at upper floor and basement levels will normally be permitted, where they do not detract from the functioning of the centre.

### ***CS21 Protect and provide housing***

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

#### ***DM21.3 Residential environment***

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

### ***CS22 Maximise community facilities***

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

#### ***DM22.1 Social and community facilities***

1. To resist the loss of social and community facilities unless:

- a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
  - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
  - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:
- a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
  - b) in locations which are convenient to the communities they serve;
  - c) in or near identified residential areas, providing their amenity is safeguarded;
  - d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.
4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

## Appendix C

### Methodology for daylight (including radiance), sunlight and overshadowing assessment

Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.

Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's (BRE) guidelines 'Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice' (2022).

Policy DE8: 'Daylight and sunlight' of the Draft City Plan 2036 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight.

Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations.

Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals.

Within the BRE Guidance, it states that the methods of assessment can be applied to non-domestic buildings where the occupants have a reasonable expectation to light. In this case it is Officers' view that the impact to student residential should be considered.

### Methods of Assessment

#### Daylight to Existing Buildings

The BRE guidelines present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

**1. Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the



loss would be noticeable.

**2. Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

### Sunlight to Existing Buildings

**Sunlight to windows: Annual Probable Sunlight Hours (APSH):** Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

### Overshadowing

**Sunlight to open spaces: Sunlight Hours on the Ground (SHOG):** The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an

existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

### Radiance Assessment

A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the Radiance methodology, radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values, which recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

Whilst student accommodation is not explicitly discussed within the BRE Guidelines, it is understood that it is common practice is to assign a minimum target of 1% ADF to student rooms (the target for bedrooms), which is considered by officers to be reasonable.

Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within room, which range between 0% and 5%. In addition, the average value of the individual daylight factors within a room can be expressed as a 'radiance based' ADF percentage for the room as a whole.

It should be noted that the Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessments, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring properties.

### Setting Alternative Target Values (including Mirror Massing)

Appendix F of the BRE guidelines provides advice on setting alternative target values for daylight and sunlight. This notes that the numerical target values are purely advisory and different targets may be used based on the characteristics of the proposed development and/or its location.

Alternative targets may be generated from the scale/layout of existing development within the surrounding context or be based on an extant planning permission. The BRE guide provides an example of a narrow mews in an historic city centre where the VSC values derived from the obstruction angle could be used as a target value for development in that street if new development is to match the existing layout.

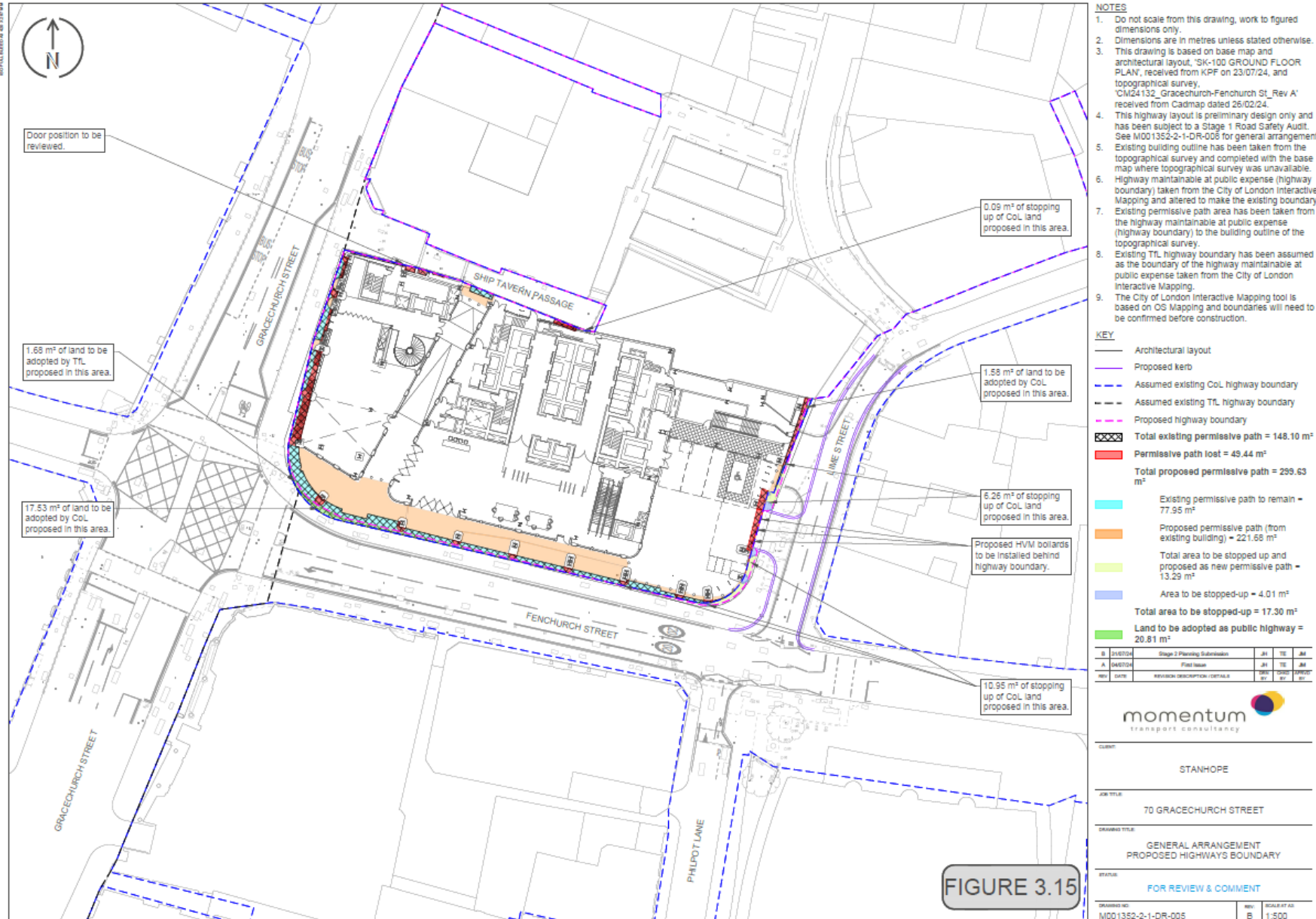
The guide notes that a similar approach may be adopted in cases where an existing building has windows that are unusually close to the site boundary and taking more than their fair share of light. In that case, to ensure that new development matches the height and proportions of existing buildings, the VSC and APSH targets for the relevant windows could be set to those for a 'mirror-image' building of the same height and size, an equal distance away on the other side of the boundary.

In undertaking assessments a judgement is made as to the level of impact on affected windows and rooms. Where there is a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable.

It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

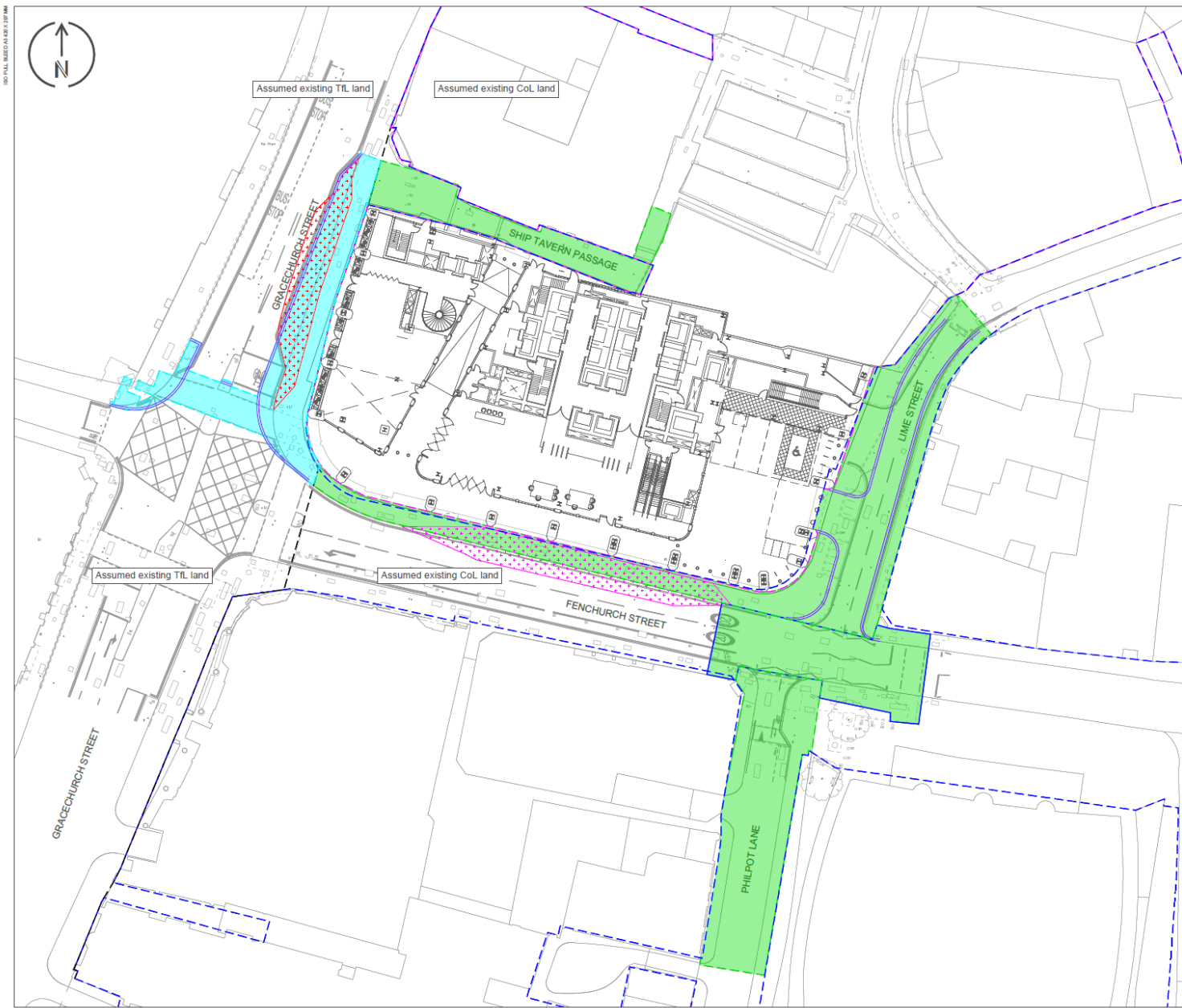
- Percentage change (10% reduced to 8% = 20% reduction); and
- Actual/Absolute change (10% reduced to 8% = 2% change).

# Appendix D – Stopping Up Plan



**FIGURE 3.15**

# Appendix E - Section 278



- NOTES**
1. Do not scale from this drawing, work to figured dimensions only.
  2. Dimensions are in metres unless stated otherwise.
  3. This drawing is based on base map and architectural layout, 'SK-100 GROUND FLOOR PLAN', received from KPF on 23/07/24, and topographical survey, 'CM24132\_Gracechurch-Fenchurch St\_Rev A' received from Cadmap dated 26/02/24.
  4. This highway layout is preliminary design only and has been subject to a Stage 1 Road Safety Audit. See drawing 'M001352-2-1-DR-008' for general arrangement.
  5. See drawings 'M001352-2-1-DR-004', 'M001352-2-1-DR-005' and 'M001352-2-1DR-006' for details on assumed existing highways boundaries and proposed highways boundaries.
  6. The City of London Interactive Mapping tool is based on OS Mapping and boundaries will need to be confirmed before construction.

- KEY**
- Architectural layout
  - Proposed kerb
  - Assumed existing CoL highway boundary
  - Assumed existing TfL highway boundary
  - Proposed highway boundary
  - Highway works within TfL boundary = 389.17 m<sup>2</sup>
  - Highway works within CoL boundary = 1704.40 m<sup>2</sup>
  - Indicative area for potential pedestrian crossing improvements and subject to further study
  - Construction Phase works associated with facilitating vehicle pit lane. Subject to agreement with TfL
  - Construction Phase works associated with facilitating vehicle pit lane. Subject to agreement with CoL

E	27/01/25	Updated Highway Works Within TfL Boundary	JH	TE	BS
D	16/01/25	CoL Issue - Updated Drawing Date	JH	TE	BS
C	21/11/24	Updated Key and Annotations	JH	JT	BS
B	31/07/24	Stage 2 Planning Submission	JH	TE	JM
A	03/07/24	First Issue	JH	TE	JM
REV	DATE	REVISION DESCRIPTION / DETAILS	DRW	CHKD	APPROV
			BY	BY	BY

**momentum**  
transport consultancy

CLIENT  
STANHOPE

JOB TITLE  
70 GRACECHURCH STREET

DRAWING TITLE  
INDICATIVE HIGHWAYS WORKS AND CONSTRUCTION WORKS PLAN

STATUS  
FOR REVIEW & COMMENT

DRAWING NO. M001352-2-1-DR-007	REV E	SCALE AT AS 1:500
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This work has been prepared for the client and is not to be used for any other purpose without the client's written consent.

## **SCHEDULE**

APPLICATION: **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.**

CONDITIONS

*SEE OVERLEAF*

<b>Compliance</b>	
	<p><b>Time Limit</b></p> <p>The development hereby permitted shall be begun before the expiration of five years from the date of this permission.</p> <p>REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.</p>
	<p><b>Approved Drawings</b></p> <p>The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:</p> <p><b>PA-001 SCHEDULE OF DRAWINGS/MATERIAL LIST</b>  <b>PA-002 SECTION CUT AND ELEVATION MARKER KEY PLAN</b>  <b>PA-006 SITE LOCATION PLAN</b>  <b>PA-007 LAND OWNERSHIP PLAN</b>  <b>PA-008 GROUND FLOOR BLOCK PLAN</b>  <b>PA-039 DEMOLITION PLANS BASEMENT 3, B2, B1 AND LG</b>  <b>PA-040 DEMOLITION PLANS GROUND FLOOR</b>  <b>PA-041 DEMOLITION PLANS LEVEL 01, L01MEZZ, L02 AND L03</b>  <b>PA-044 DEMOLITION PLANS LEVEL 4, L05, L06 AND L07</b>  <b>PA-048 DEMOLITION PLANS LEVEL 08 AND ROOF PLAN</b></p> <p><b>PA-050 DEMOLITION ELEVATIONS NORTH AND SOUTH</b>  <b>PA-051 DEMOLITION ELEVATIONS EAST AND WEST</b></p> <p><b>PA-097 PROPOSED PLANS BASEMENT 03</b>  <b>PA-098 PROPOSED PLANS BASEMENT 02</b>  <b>PA-099 PROPOSED PLANS BASEMENT 01</b>  <b>PA-100 PROPOSED PLANS GROUND FLOOR</b>  <b>PA-101 PROPOSED PLANS LEVEL 01, 02, 03 AND 05</b>  <b>PA-106 PROPOSED PLANS LEVEL 06, 07, 08 AND 10</b>  <b>PA-111 PROPOSED PLANS LEVEL 11, 16, 18 AND 19</b>  <b>PA-123 PROPOSED PLANS LEVEL 23, 24, 26 AND 27</b>  <b>PA-128 PROPOSED PLANS LEVEL 28, 29, 30 AND 31</b>  <b>PA-132 PROPOSED PLANS LEVEL 32 AND ROOF PLAN</b></p> <p><b>PA-200 PROPOSED NORTH AND SOUTH ELEVATION CONTEXT</b>  <b>PA-201 PROPOSED EAST AND WEST ELEVATION CONTEXT</b></p> <p><b>PA-220 PROPOSED NORTH ELEVATION</b>  <b>PA-221 PROPOSED SOUTH ELEVATION</b>  <b>PA-222 PROPOSED EAST ELEVATION</b>  <b>PA-223 PROPOSED WEST ELEVATION</b></p> <p><b>PA-250 PROPOSED SECTION AA</b>  <b>PA-251 PROPOSED SECTION BB</b>  <b>PA-252 PROPOSED SECTION CC</b></p>

	<p><b>PA-301 PROPOSED WALL TYPE 1A</b>  <b>PA-302 PROPOSED WALL TYPE 1B</b>  <b>PA-303 PROPOSED WALL TYPE 1C</b>  <b>PA-310 PROPOSED WALL TYPE 2A</b>  <b>PA-320 PROPOSED WALL TYPE 3A</b></p> <p>REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.</p>
	<p><b>Parking</b></p> <p>A minimum of one car parking space suitable for use by people with disabilities shall be provided on the premises in accordance with the approved details prior to occupation of the development, and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking. Passive Electric Vehicle charging facilities shall be provided for the space, as well as a plan to make it active, when it is safe to do so.</p> <p>REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.</p>
	<p><b>Larger Cycle Spaces</b></p> <p>Unless otherwise approved in writing by the Local Planning Authority, a minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.</p> <p>REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.</p>
	<p><b>Showers and Lockers</b></p> <p>Unless otherwise agreed in writing by the Local Planning Authority, a minimum of 56 showers and 739 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.</p> <p>REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.</p>
	<p><b>Servicing</b></p> <p>Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.</p>



	<p>REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.</p>
	<p><b>Public Realm Levels</b></p> <p>The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.</p> <p>REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.</p>
	<p><b>Refuse Facilities</b></p> <p>Refuse and recycling, storage and collection facilities shall:</p> <p>(a) be provided within the curtilage of the site to serve each part of the development in accordance with details, which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and</p> <p>(b) thereafter be maintained as approved throughout the life of the building.</p> <p>REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.</p>
	<p><b>No doors over public highway</b></p> <p>No doors, gates or windows at ground floor level shall open over the public highway.</p> <p>REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 1900.</p>
	<p><b>GPDO Telecoms</b></p> <p>Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building (to the roof above the building line), including any plant or telecommunications equipment permitted by the Town &amp; Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.</p> <p>REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.</p>
	<p><b>BMU</b></p> <p>At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.</p>

	<p>REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.</p>
<b>Air Quality</b>	
	<p><b>Generators</b></p> <p>Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. Where it is not possible to deploy alternatives, any diesel generators must 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.</p> <p>REASON: In accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.</p>
	<p><b>AQ Report</b></p> <p>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.</p> <p>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</p>
	<p><b>AQNA</b></p> <p>Prior to the installation of any generator(s) 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 and approved in writing by the Local Planning Authority. The air quality neutral assessment must follow the latest air quality neutral guidance.</p> <p>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.</p>

	<p><b>Air Quality Positive Assessment</b></p> <p>Prior to the installation of any generator(s) 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.</p> <p>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</p>
	<p><b>Flues</b></p> <p>Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.</p> <p>REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2025, Local Plan Policy DM15.6 and London Plan policy SI1.</p>
	<p><b>NRMM</b></p> <p>Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.</p> <p>REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.</p>
<b>Environmental Health</b>	
	<p><b>Roof Terrace Hours</b></p> <p>The roof terraces hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day, other than in the case of emergency or for maintenance.</p>

	<p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
	<p><b>Roof Terrace Music</b></p> <p>No amplified shall be played on the roof terraces.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
	<p><b>No Promoted Events</b></p> <p>There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.</p> <p>REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
	<p><b>Scheme of Protective Works - Demolition</b></p> <p>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).</p> <p>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.</p>
	<p><b>Scheme of Protective Works - Construction</b></p> <p>There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other</p>

	<p>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).</p> <p>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.</p>
	<p><b>Sound insulation</b></p> <p>The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.</p>
	<p><b>Fume extract arrangements</b></p> <p>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 should 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.</p> <p>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.</p>
	<p><b>Extract and ventilation</b></p> <p>No cooking shall take place within any commercial kitchen hereby approved until fume extract arrangements and ventilation have been installed to serve</p>

	<p>that unit in accordance with a scheme approved by the Local Planning Authority. Flues shall terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.</p> <p>REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.</p>
	<p><b>Ventilation Maintenance</b></p> <p>All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of ‘Control of Odour &amp; Noise from Commercial Kitchen Extract Systems’ dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.</p> <p>REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3</p>
	<p><b>Plant Noise</b></p> <p>a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation. Noise sensitive premises includes office accommodation. Emergency plant will be expected to meet this criterion.</p> <p>(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority. Noise levels should be measured adjacent to the plant where possible and the levels at the receptor extrapolated from the measured data.</p> <p>(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.</p> <p>REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.</p>
	<p><b>Vibration</b></p> <p>Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.</p>

	<p>REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.</p>
	<p><b>Site Investigation</b></p> <p>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.</p> <p>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.</p>
	<p><b>Contaminated Land</b></p> <p>No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 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.</p> <p>REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
	<p><b>Contaminated Land Remediation</b></p>

	<p>Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 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.</p> <p>REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
	<p><b>Piling – Sewer Vents</b></p> <p>Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.</p> <p>REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
	<p><b>NRMM</b></p> <p>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.</p>



	<p>REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.</p>
<b>Flooding/Water</b>	
	<p><b>Thames Water – Foul water capacity</b></p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ol style="list-style-type: none"> <li>1. Foul water Capacity exists off site to serve the development, or</li> <li>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</li> <li>3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed.</li> </ol> <p>ASON: 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</p>
	<p><b>Thames Water – Surface water capacity</b></p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ol style="list-style-type: none"> <li>1. Surface water capacity exists off site to serve the development, or;</li> <li>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;</li> <li>3. All Surface water network upgrades required to accommodate the additional flows from the development have been completed.</li> </ol> <p>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</p>
	<p><b>Thames Water – Piling Method Statement</b></p> <p>No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and Piling Layout Plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved Piling</p>

	<p>Method Statement and Piling Layout Plan.</p> <p>Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure</p>
	<p><b>Thames Water – Network upgrades</b></p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ol style="list-style-type: none"> <li>1) all water network upgrades required to accommodate the additional demand to serve the development have been completed; or</li> <li>2) a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.</li> </ol> <p>REASON: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development</p>
	<p><b>Thames Water – Construction within 5m of water main</b></p> <p>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.</p> <p>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</p>
	<p><b>SuDS Design</b></p> <p>Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ol style="list-style-type: none"> <li>(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>;</li> </ol>

	<p>(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.  REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.</p>
	<p><b>SuDS Maintenance</b></p> <p>Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  (a) A Lifetime Maintenance Plan for the SuDS system to include:  - A full description of how the system would work, it's aims and objectives and the flow control arrangements;  - A Maintenance Inspection Checklist/Log;  - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.</p> <p>REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.</p>
<b>Archaeology</b>	
	<p><b>Written Scheme of Investigation</b></p> <p>No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.</p> <p>If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works  B. Where appropriate, details of a programme for delivering related positive public benefits  C. The programme for post-investigation assessment and subsequent analysis, publication &amp; dissemination and deposition of resulting material.</p>

	<p>This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
<b>Aviation</b>	
	<p><b>Aviation – Construction Methodology</b></p> <p>No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius, and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.</p> <p>It should be noted that no construction equipment shall be permitted to infringe any Instrument Flight Procedures or critical obstacle limitation surfaces, without further agreement with London City Airport.</p> <p>REASON: The use of cranes or tall equipment in this area has the potential to impact London City Airport operations and Instrument Flight Procedures, therefore they must be assessed before construction.</p>
	<p><b>Aviation – Building Obstacle Lighting</b></p> <p>Details of obstacle lights shall be submitted to and approved in writing by the Local Planning Authority. The obstacle lights must be in accordance with the requirements of regulation CS ADR DSN Chapter Q ‘Visual Aids for Denoting Obstacles’ and will be installed and illuminated prior to the decommissioning of any temporary obstacle lighting associated with the construction of the development.</p> <p>REASON: Aviation obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport</p>
<b>Sustainability</b>	
	<p><b>Circular Economy</b></p> <p>Prior to commencement of development (excluding demolition and enabling works):</p> <ol style="list-style-type: none"> <li>a) a re-use strategy of the façade stone shall be submitted to and approved in writing by the Local Planning Authority. The strategy must detail how the existing façade stone (in part or full) will be integrated into the new façade system, or justify alternative opportunities for reuse.</li> <li>b) If the reuse of the assigned 120 tonnes of deconstructed structural steel onsite identified in the pre-demolition audit is not feasible, a detailed justification shall be submitted to the Local Planning Authority. To help mitigate the carbon impact of this change in</li> </ol>

	<p>specification, exemplary initiatives to reduce embodied carbon emissions associated with the new building structure and for the reuse of the existing steel, shall be developed and agreed with the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study.</p> <p>REASON: To ensure whole life-cycle carbon is reduced and circular economy principles are applied to demonstrate compliance with Policy SI 2 of the London Plan and emerging City Plan 2040 policy DE1. To satisfy the Local Planning authority that the proposed development has prioritised re-use and the reduction of waste in accordance with London Plan policies D3, SI 7, SI 8, Local Plan policies CS17 and DM 17.2, and emerging City Plan 2040 policy DE1.</p>
	<p><b>Post-Construction Circular Economy</b></p> <p>No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the 501 proposed targets stated in the approved Circular Economy Statement for the development. The statement shall also be submitted to the GLA at: <a href="mailto:circulareconomystatements@london.gov.uk">circulareconomystatements@london.gov.uk</a>.</p> <p>REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.</p>
	<p><b>Whole Life Cycle Carbon Emissions</b></p> <p>Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark ( as current at the time of planning decision and to the same methodology) set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on whole life-cycle carbon assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development in accordance with London Plan policies SI 2, SI 7; Local Plan policies CS 17, DM 15.2, and emerging City Plan 2040 policies S8 and DE1.</p>

	<p><b>Whole Life Cycle Carbon</b></p> <p>Prior to commencement of development (excluding demolition and enabling works), if less than 50% of the existing substructure can be retained - for the purpose of supporting the new development, thereby avoiding emissions associated with new construction - a detailed justification for substructure demolition shall be submitted to the Local Planning Authority prior to the commencement of construction except below ground works. To help mitigate the associated impact of substructure demolition and replacement on carbon emissions and construction waste, exemplar initiatives to reuse any materials from the existing building shall be developed and agreed with the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study.</p> <p>REASON: To ensure whole life-cycle carbon is reduced and circular economy principles are applied to demonstrate compliance with Policy SI 2 of the London Plan and emerging City Plan 2040 policy DE1. To satisfy the Local Planning authority that the proposed development has prioritised re-use and the reduction of waste in accordance with London Plan policies D3, SI 7, SI 8, Local Plan policies CS17 and DM 17.2, and emerging City Plan 2040 policy DE1.</p>
	<p><b>Post-construction whole-life cycle carbon emissions</b></p> <p>Once the as-built design has been completed (upon commencement of RIBA Stage 6 the <b>post-construction Whole Life-Cycle Carbon (WLC) Assessment</b> (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: <a href="mailto:ZeroCarbonPlanning@london.gov.uk">ZeroCarbonPlanning@london.gov.uk</a></p> <p>REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.</p>
	<p><b>Façade System</b></p> <p>Prior to the commencement of development, excluding demolition, details of the façade system confirming the detailed design in relation to reducing the operational and embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings and shall remain in place for the lifetime of the development.</p>

	<p>REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1</p>
	<p><b>District Heating Network Connection</b></p> <p>The development shall be designed to enable connection into a district heating network if this becomes available during the lifetime of the development. If feasible, before the network comes into operation, a strategy shall be submitted to and approved in writing by the Local Planning Authority which includes relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site.</p> <p>REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.</p>
	<p><b>Climate Change Resilience Sustainability Statement</b></p> <p>Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to: solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated and managed in accordance with the approved CCRSS for the life of the development.</p> <p>REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.</p>
	<p><b>Climate Change Resilience Measures – completion details</b></p> <p>Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development</p>

	<p>is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.</p> <p>REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.</p>
	<p><b>BREEAM</b></p> <p>A post construction BREEAM assessment for the office use and separately for the Sui Generis use, demonstrating that a target rating of 'Excellent' shall be submitted as soon as practicable after practical completion.</p> <p>REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.</p>
	<p><b>Updated Biodiversity Net Gain</b></p> <p>Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment should be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS4. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.</p>
	<p><b>Greening and Biodiversity</b></p> <p>Prior to the relevant works, a detailed landscaping strategy describing the quality and maintenance of the proposed urban greening and biodiversity measures. During design development stage the strategy shall identify further opportunities to improve the greening and biodiversity contribution (at ground level and on buildings) with a set of enhancement measures to be agreed with the Local Planning Authority. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.</p> <p>REASON: To ensure the development delivers the highest quality public realm with the highest feasible levels of greening and biodiversity and supports wellbeing, and climate resilience including minimising the urban heat island, and reducing heat stress and flood risk in line with the following policies in the Development Plan and draft Development Plans: London Plan policies GG2, G5 and G6, Local Plan policies DM15.5, DM 18.3 and DM19.2, emerging City Plan 2040 policies DE2, OS2, OS3 and OS4.</p>



	<p><b>Ecological Management Plan</b></p> <p>Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following:</p> <ul style="list-style-type: none"> <li>• details of ecological landscaping, along with associated management and monitoring</li> <li>• detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided</li> <li>• details of habitat created for solitary bees</li> <li>• details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided</li> <li>• Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible).</li> </ul> <p>The measures as set out in the plan shall be carried out and so maintained.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.</p>
	<p><b>Post Construction UGF and BNG</b></p> <p>Within 6 months of completion details of the measures to meet the approved minimum Urban Greening Factor of 0.33 and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.</p>
	<p><b>Energy Strategy</b></p> <p>Prior to the commencement of development, excluding demolition, an <b>updated Energy Assessment</b> confirming the detailed design stage opportunities for operational carbon reduction from the building to futureproof the development for low carbon operation is required to be submitted to and approved in writing by the Local Planning Authority. These opportunities should include:</p> <ol style="list-style-type: none"> <li>a. Further exploration of passive measures to reduce cooling demand</li> <li>b. Further exploration of opportunities to incorporate/maximise green/low carbon technologies e.g. PV panels</li> </ol> <p>The development shall be carried out in accordance with the approved Energy Assessment and the carbon reduction measures contained with the approved Energy Assessment shall remain in place for the lifetime of the</p>

	<p>development.</p> <p>REASON: To ensure that the development is sustainable and that operational greenhouse gas emissions have been minimised as far as possible including minimising both annual and peak energy demand and maximising opportunities for renewable energy, improving performance against the GLA target of a 35% emissions reduction over Part L. Also to ensure optimal climate resilience (overheating, heat stress, resource efficiency) including that the risk of overheating has been reduced as far as practical and that all passive measures have been explored in line with the following policies in the Development Plan and draft Development Plans: London Plan policies GG6, SI 2, SI 3 and SI 4 - Local Plan 2015 policies DM 15.2, 15.5 - emerging City Plan 2040 policy CR1.</p>
	<p><b>Green/Blue Roofs</b></p> <p>Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.</p> <p>REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.</p>
	<p><b>Emergency Power Supply</b></p> <p>Prior to the commencement of development, excluding demolition, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development.</p> <p>REASON: To demonstrate that operational carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan policies: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policies S8, DE1.</p>
<b>Design and Public Realm</b>	
	<p><b>Maximum Heights</b></p> <p>The maximum heights of the approved building shall be 149.67m AOD to the uppermost point of the Tower (including lift overrun).</p> <p>REASON: In the interests of visual amenity and heritage protection in accordance with the following policies of the Local Plan: CS10, DM10.1, CS12 and CS14.</p>
	<b>Design Details</b>

	<p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>(a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;</li> <li>(b) details of the proposed new facades including details of a typical bay of the development for each facade and fenestration;</li> <li>(c) details of canopies;</li> <li>(d) typical masonry details, including jointing and any necessary expansion/movement joints;</li> <li>(e) details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards;</li> <li>(f) details of semi-internal elevations fronting the ground floor public routes;</li> <li>(g) full details of the Public viewing gallery and winter garden, including all elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;</li> <li>(h) details of soffits, hand rails and balustrades, including those soffits in the semi-external areas of the podium between ground and garden level</li> <li>(i) details all party wall treatments;</li> <li>(j) details of junctions with adjoining premises;</li> <li>(k) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;</li> <li>(l) details of all drainage and irrigation;</li> <li>(m) details of the integration of M&amp;E in all external and semi-external public elevations in the podium from ground to garden level;</li> <li>(n) details of the legible London wayfinding sign and porous wind mitigation screen within the new north/south route; and</li> <li>(o) details of the improvement works at the junction of Lime Street and Fenchurch Street.</li> </ul> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.</p>
	<p><b>Masonry Facades</b></p> <p>Before the works thereby affected are begun, sample panels of agreed sections of the masonry facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan:</p>

	DM3.2, DM10.1, DM10.5, DM12.2.
	<p><b>Balustrades and Suicide Prevention</b></p> <p>Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for all external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM 10.1, DM10.3</p>
	<p><b>Landscaping Details</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>(a) full details of the of the public spaces, including flooring, street furniture, boundary treatments, seating, lighting, soffits, bollards;</li> <li>(b) particulars and sample of the materials to be used on all external surface treatments in areas where the public would have access;</li> <li>(c) details of handrails and balustrades and staircases and steps;</li> <li>(d) details of all drainage, irrigation and rainwater harvesting;</li> <li>(e) details of bollards and integrated HVM; and</li> <li>(f) details of gradients and levels.</li> </ul> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS3, DM3.2, CS10, DM10.1, DM10.4, DM10.8.</p>
	<p><b>Unbuilt Surfaces</b></p> <p>All unbuilt surfaces, including the podium, terraces, balconies, roof terrace, tenant garden, undercroft, new public route and trees approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details of:</p> <ul style="list-style-type: none"> <li>a) Irrigation;</li> <li>b) Provision for harvesting rainwater run-off from road to supplement irrigation;</li> <li>c) Spot heights for ground levels around planting pit;</li> <li>d) Soil;</li> <li>e) Planting pit size and construction;</li> <li>f) Tree guards; and</li> <li>g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development.</li> </ul> <p>to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved</p>

	<p>details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.</p> <p>REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.</p>
	<p><b>Urban Greening Details</b></p> <p>Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for</p> <ul style="list-style-type: none"> <li>(a) planters, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;</li> <li>(b) the incorporation of green roofs into roof surfaces; and</li> <li>(c) the landscaping of the public realm;</li> </ul> <p>Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.</p> <p>REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.</p>
	<p><b>Lighting Strategy</b></p> <p>Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:</p> <ul style="list-style-type: none"> <li>(a) lighting layout/s;</li> <li>(b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits);</li> <li>(c) a lighting control methodology;</li> <li>(d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;</li> <li>(e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;</li> <li>(f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering; and</li> </ul>

	<p>(g) details of aviation lights including locations.</p> <p>All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and DM15.7.</p>
	<p><b>Street Lighting</b></p> <p>Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details and comply with the adopted Lighting Strategy SPD.</p> <p>REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1, and DM15.7</p>
	<p><b>Wind Mitigation</b></p> <p>No development other than demolition shall take place until the detailed design of all wind mitigation measures has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.</p> <p>REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
	<p><b>Signage Strategy</b></p> <p>Prior to occupation of the relevant building, the following details relating to wayfinding and signage strategy shall be submitted to and approved in writing by the Local Planning Authority. The strategy shall address the</p>

	<p>following:</p> <ul style="list-style-type: none"> <li>(a) Key access points for the office and retail uses;</li> <li>(b) Key access points for the publicly accessible spaces and facilities including the public viewing gallery and winter garden;</li> <li>(c) Cycle parking;</li> <li>(d) Publicly accessible WC's and Changing Places Facilities;</li> <li>(e) Accessible Car Parking; and</li> <li>(f) Servicing and Delivery</li> </ul> <p>Each of the above must highlight accessible routes.</p> <p>All signage placed on the development site shall be in accordance with the approved strategy and shall be installed prior to occupation of each relevant use and retained as such for the life of the uses.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM 10.1, DM10.5, DM10.6, DM10.8, and DM15.7.</p>
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<b>Accessibility</b>	
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	<p><b>Inclusion and accessibility</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>(a) entrance to accessible parking including siting of controlled entry system at a scale of no less than 1:20</li> <li>(b) all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate</li> <li>(c) security measures including provision of wider aisle gates at all controlled points of entry</li> <li>(d) Planting to all public landscape areas including path widths and seating</li> <li>(e) An inclusive entrances strategy including details of doors, opening mechanisms, surface contrast and any control points</li> <li>(f) Public Realm at grade details including: recesses in seating for wheelchair users and buggies and assistance animals; seating at a range of heights; seating should allow for wheelchair users to transfer; back rest and arm rests for support when rising; and single and group seating.</li> <li>(g) Lifts showing internal fit out, size, capacity and that they can accommodate people using larger motorised wheelchairs and Class C mobility scooters and stair access.</li> <li>(h) Horizontal movement through the building demonstrating that there is sufficient space for wheelchair users to pass, rest points, colour contrast of 30 LRV and clear wayfinding through the building.</li> <li>(i) Inclusive Toilet Strategy including details of the fit-out of the Changing Places, facilities, wheelchair accessible, ambulant accessible and larger toilets, single sex toilets, and baby changing facilities.</li> </ul> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the</p>
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	London Plan.
	<p><b>Access Management Plan</b></p> <p>Prior to occupation, an Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved, which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:</p> <p>Website information including photos and an easy read version with information on:</p> <p>Travel distances from key points of arrival and rest points</p> <p>Location of dropped kerbs</p> <p>c) Facilities available on-site including dimensions and photos for (as appropriate):</p> <ul style="list-style-type: none"> <li>i) Entrance to accessible parking and details of how to reserve spaces</li> <li>ii) entrances, lift access and queues and how these will be managed</li> <li>iii) controlled entry points (showing wider gates)</li> <li>iv) accessible toilets including access to keys for operation including at ground floor</li> <li>v) Changing Places toilets provision including but not exclusively at lower ground floor and for the other publicly accessible areas</li> <li>vi) Baby changing facilities including at ground floor and for the other publicly accessible areas</li> <li>vii) 'universal', female and male toilet provision at ground floor and for the other publicly accessible areas</li> <li>viii) facilities for assistance animals</li> <li>ix) equipment loan</li> <li>x) assistive listening system and other assistive technology</li> <li>xi) rest and recovery facilities</li> <li>xii) room for reflection/quiet room</li> <li>xiii) culture space</li> </ul> <p>2) Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering.</p> <p>Inclusive Entrances Strategy</p> <p>The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.</p>
<b>Highways and Transportation</b>	



	<p><b>Restricting numbers of deliveries/servicing</b></p> <p>There shall be no more than 88 delivery and servicing motorized vehicles daily trips in total over any 24-hour period (accounting for a consolidation rate of at least 50%) excluding cargo bikes.</p> <p>REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.</p>
	<p><b>Restricting Hours of deliveries and servicing</b></p> <p>Deliveries and servicing, including refuse/recycling vehicle trips (excluding any on-foot and cargo bike deliveries) shall take place between the hours of 22:00 to 06:00, Monday to Sunday, including Bank Holidays.</p> <p>REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: CS16, DM15.7, DM16.2, DM 16.1, DM21.3</p>
	<p><b>Site Condition Survey</b></p> <p>Prior to the commencement of works including demolition, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out and detailed report of the findings must be submitted to and approved in writing by the local planning authority. Proposed threshold levels at finished floor levels (highways boundary) and levels at basement in relation to existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels unless otherwise agreed in writing by the local planning authority.</p> <p>REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
	<p><b>Gradients</b></p> <p>Prior to the commencement of works including demolition, details of the proposed gradient levels for the dual-use space at ground level must be submitted to confirm the gradients for the accessible parking space and the surrounding area to ensure level thresholds.</p> <p>REASON: To ensure continuity between the level of the proposed ground floor levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2, 16.1 These details are required prior to commencement</p>

	<p>in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
	<p><b>Demolition Logistics and Management Plan</b></p> <p>Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition shall be carried out other than in accordance with the approved details and methods. The Demolition Management Plan to include:</p> <ul style="list-style-type: none"> <li>• Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.</li> <li>• Details specific to the demolition phase should be captured within the overarching DLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.</li> <li>• Deconstruction vehicle routes to and from the site to be approved with CoL Highways</li> <li>• Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).</li> <li>• Deconstruction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request.</li> <li>• encouraging the use of cargo bike deliveries throughout the deconstruction process.</li> <li>• Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.</li> <li>• A commitment to the use of FORS Silver vehicles (or above) throughout deconstruction will be required.</li> <li>• The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL’s Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: <a href="http://www.clocs.org.uk/standard-for-clocs/">http://www.clocs.org.uk/standard-for-clocs/</a>.</li> </ul> <p>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.</p>

	<p><b>Construction Logistics and Management Plan</b></p> <p>Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with the latest guidance, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No construction shall be carried out other than in accordance with the approved details and methods. The Construction Management Plan to include:</p> <ul style="list-style-type: none"> <li>• Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.</li> <li>• Details specific to the construction phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any construction commencing.</li> <li>• Construction vehicle routes to and from the site to be approved with CoL Highways</li> <li>• Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).</li> <li>• Construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request.</li> <li>• Encouraging the use of cargo bike deliveries throughout the construction process.</li> <li>• Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.</li> <li>• A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.</li> <li>• The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: <a href="http://www.clocs.org.uk/standard-for-clocs/">http://www.clocs.org.uk/standard-for-clocs/</a>.</li> </ul> <p>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.</p>
	<p><b>Changing Facilities and Showers</b></p> <p>Notwithstanding the details shown on the approved drawings, details of the changing facilities, showers and lockers shall be submitted and approved</p>

	<p>by the Local Planning Authority. The areas shall be implemented and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.</p> <p>REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.3.</p>
	<p><b>Travel Plan</b></p> <p>An Interim Travel Plan shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the building hereby permitted. Within 6 months of first occupation a full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The offices in the building shall thereafter be operated in accordance with the approved Travel Plan for a minimum period of 5 years from occupation of the premises. Annual monitoring reports shall be submitted to the Local Planning Authority during the same period.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: CS16, DM16.1.</p>
	<p><b>HVM</b></p> <p>The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works excluding demolition hereby permitted are begun.</p> <p>REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.</p>
	<p><b>Paving and drainage</b></p> <p>Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.</p> <p>REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.</p>
	<p><b>Cycle Parking</b></p>

	<p>Details of the cycle parking shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details, to the following, shall be provided in a drawing (scale of no less than 1:20):</p> <p>(a) Full layout of long stay and short stay cycle parking;  (b) of the accessible routes to the parking areas;  (c) The cycle lifts to be shared at times with goods delivered. Further details are required to ensure that this solution does not interfere with functions of each, as proposed;  (d) Assessment on the numbers of cyclists arriving/departing at peak periods. It must be shown that there is sufficient capacity for cyclists to move from the cycle entrance to get to/from the cycle parking areas. List the security measures, if any, required to open the door;  (e) Provide details on the cycle rail channels, including the cycle parking journey from on-street to the parking space, showing full dimensions and gradients.</p> <p>The details shall further comprise of long stay cycle parking of 1,106 spaces and short stay cycle parking of 65 spaces unless otherwise agreed in writing. 5% of cycle parking spaces to be provided for larger accessible cycles/adapted cycles, and suitable cycle lifts and other associated facilities provided.</p> <p>The cyclist facilities shall thereafter be retained and operated in accordance with the approved details for the life of the building. The cycle parking provided within the buildings must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1, DM 16.3.</p>
<b>Fire</b>	
	<p><b>Fire Safety</b></p> <p>The development shall be carried out in accordance with the approved details within the Fire Statement prepared by Arup dated July 2024.</p> <p>REASON: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan policies D5 and D12.</p>
<b>Land Use</b>	
	<p><b>Uses</b></p> <p>The development shall provide (all figures GIA excluding plant):</p>

	<ul style="list-style-type: none"> <li>• Office (Class E(g)(i)) – 78,711sq.m</li> <li>• Retail/Food and Beverage (City Market) (Class E (a/b)) – 195sq.m</li> <li>• Cultural Space/Public Viewing Gallery (Sui Generis) – 1,273sq.m</li> </ul> <p>REASON: To ensure the development is carried out in accordance with the approved plans.</p>
	<p><b>Offices</b></p> <p>The areas within the development marked as Office (Class E(g)(i)) on the floorplans hereby approved, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020).</p> <p>REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and in accordance with policy CS1 of the Local Plan 2015.</p>
	<p><b>Retail/Food and Beverage</b></p> <p>The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant) and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.</p> <p>REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.2.</p>
	<p><b>Cultural/Public Viewing Gallery</b></p> <p>The areas within the development marked as Cultural/Public Viewing Gallery on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.</p>

	<p>REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11.</p>
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