

Environment Department

Committee:	Date:
Planning Application Sub-Committee	28 May 2025
1 Old Jewry London EC2R 8DN The change of use of part the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revised access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.	Public
Ward: Walbrook	For Decision
Registered No: 24/00226/FULL	Registered on: 01 March 2024
Conservation Area: Bank	Listed Building: No

Summary

Site and Surroundings

1 Old Jewry is a nine-storey building located adjacent within the Bank Conservation Area and adjacent to the Guildhall Conservation Area. The building is bounded by Old Jewry to the west, Poultry to the south, Grocers' Hall Court to the east and the adjacent building 8-10 Old Jewry to the north. The building is primarily used for office accommodation, with retail units on the ground and basement levels. The site benefits from excellent public transport connections and is situated within a historic townscape. It is noted that the ground floor along Poultry and Old Jewry has narrow openings, reducing activation along primary retail routes. The Poultry shopfront of the site falls within Cheapside Principal Shopping Centre (PSC).

Proposal

The current application seeks to improve the existing office accommodation by extending the office lobby internally and adding amenity areas to the roof level by way of a pavilion extension and the creation of a new roof terrace for the use of the office staff. Alterations to the shopfronts and the prime office elevation at Old Jewry are proposed to create better activation of the building on the streetscape and improve the marketability and presence of the retail units. The existing building above ground floor would be retained, with only minor internal refurbishment works.

Consultation and Background information

The planning application for 1 Old Jewry was initially made valid on 13th March 2024, with site notices displayed on 21st March 2024 and letters sent to nearby properties. No third-party representations were received during this consultation period. Following consultation, the application was deemed to meet relevant policies and was recommended for approval. A Decision Notice was issued on 15th July 2024.

Following the issue of the Decision Notice a judicial review was filed by an adjoining occupier of the former Midland Bank headquarters building ("the Ned Hotel") on 22nd August 2024, challenging the planning permission on a number of grounds including the failure to advertise the application in a local newspaper. The City Corporation and the applicant agreed to the quashing of the permission based on this procedural issue, and a Consent Order was sealed by the Court on 4th December 2024. As a result, the decision was quashed and the application reverts to the City Corporation for reassessment and determination.

The consultation period for the reopened application began on 13th December 2024. Site notices were displayed on 20th December 2024, and a press advertisement was published on 7th January 2025. Letters were sent to 9 nearby addresses, including residential and commercial occupiers (including the claimant in the proceedings).

A total of 11 objections were received during that consultation period which is the reason the planning application now comes before the Planning Applications Sub-Committee for determination.

In response to objections regarding amenity impacts on the hotel neighbours to the east of the site, the applicant made minor amendments to the design to include increased screening at roof level and to limit access to the eastern side of the proposed new roof terrace, protecting the privacy of the neighbouring roof terrace. Updated plans and a Written Scheme of Investigations (WSI) were submitted in March 2025.

A re-consultation took place on 18th March 2025, with site notices displayed on 22nd March 2025, and replaced with new notices on 4th April 2025, and a press advertisement published on 25th March 2025. Letters were also sent to all neighbours consulted in December 2024, on 20th March 2025 including consultation letters to the contributors sent on 17th April 2025.

2 public representations were made following the March 2025 re-consultation, objecting to the proposed development.

Assessment and Policy Context

The assessment of the proposed development considers the London Plan 2021, the City of London Local Plan 2015, and the emerging City Plan 2040, with the latter holding limited weight as it progresses towards adoption. Government guidance from the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) is also taken into account.

Principle of development

The site is located within the Central Activities Zone (CAZ), where office development is a priority. The proposal includes improvements to office accommodation, with the addition of office floor space at roof, ground and basement levels. This increase in office space aligns with policies aimed at supporting employment and office growth within the CAZ, in compliance with the London Plan and the City of London Local Plan.

The proposed development involves the loss of some retail space protected by existing conditions to the ground level. This loss equals to 157sqm as such would represent a loss of floorspace within the Cheapside Principal Shopping Centre (PSC) contrary to Policy DM20.1 of the Local Plan 2015 and emerging policy RE1. However, it is considered that the proposal would retain a significant amount of active retail frontage to the PSC and makes improvements to the shopfront, addressing existing issues with visibility and vacancy. The limited reduction in retail space is considered acceptable and does not compromise the function of the Cheapside Principal Shopping Centre (PSC), in line with relevant policies on retail provision.

Similarly, the condition secured within the original consent requiring the ground floor element to remain as retail is subsequently proposed under this application to ensure the continuation of the PSC as detailed above.

Furthermore, the loss of retail floor space for enhanced office space would align with the Strategic Policy CS1 (Office) which seeks to maintain the City's position as one of the world's leading financial and business centres.

Design, Heritage, and Accessibility

The proposals for an opened-up ground floor frontage on Poultry and Old Jewry would improve the pedestrian experience, enhance visual permeability, and align with the architectural symmetry of the façade. The proposed pavilion is well designed with limited visibility from surrounding streets and is a scale and materiality subservient to the main structure. The new roof terrace would be accessible to all office users and the ground floor office and cycle entrances and would be updated and relocated in terms of the latter to increase inclusivity of the building.

The proposed development creates minimal visual change to the public realm and enhances the building's functionality, accessibility, and energy efficiency. The façade changes are modest and the pavilion roof extension and plant location, scale, design detail and materiality would not harm the character and appearance of the Bank Conservation Area or the settings of other nearby designated heritage assets. It is considered acceptable and complies with relevant design, heritage, and accessibility national and local policies and guidance.

Archaeology

An Archaeological Desk-Based Assessment has been submitted, identifying only minor below-ground impacts from a new lift pit and drainage. The applicant's additional submission of documents in March 2025 included a Written Scheme of Investigations (WSI) which was reviewed by the Greater London Archaeological Advisory Service (GLAAS). GLAAS raised no objection to the proposals and recommended a compliance archaeological condition.

Transportation and Highways

The proposed development seeks to improve and increase the office accommodation provided on site, and enhances cycling infrastructure, relocating the bike entrance and adding 77 cycle parking spaces (including 2 accessible). Amendments have been made to comply with the London Cycle Design Standards (LCDS), including replacing vertical cycle spaces with more practical options. Servicing arrangements will remain unchanged, with a Delivery and Servicing Management Plan will be secured by condition. The site will be served by existing blue badge bays in the area, Travel Plans will monitor on-street disabled parking demand and promote public transport use. A Construction Logistics Plan will also be secured by condition. Overall, the proposals are considered acceptable in transport terms, subject to the recommended planning conditions.

Waste and Refuse

The City's Cleansing team has reviewed the proposed waste facilities and confirmed that they meet the necessary requirements. The proposed waste facilities and collection arrangements are considered acceptable.

Sustainability

As a minor development, the scheme is not required to meet London Plan Policy SI2 or the City of London's Carbon Options Guidance, but it adopts similar energy efficiency principles. Existing glass will be replaced with more energy-efficient materials, such as stone spandrels and openable double-glazed windows. The office element targets an 'Outstanding' BREEAM rating with a target score of 89.1%, although no formal post-completion certificate is required. The development will enhance ecological value through features like a green roof garden and wildlife habitats, achieving a 105% increase in ecological value. While the application does not trigger the Biodiversity Net Gain (BNG) requirements, the proposal maximizes greening opportunities. The development also reduces carbon emissions through material reuse, renewable energy measures, and sustainable landscaping, contributing to sustainability and climate resilience.

Amenity – Overlooking

Policy DM21.3 of the adopted Local Plan 2015 and emerging Policy HS3 of the emerging City Plan 2040 respectively require all developments to be designed to avoid or minimise overlooking and to seek to protect the privacy of the adjacent residential accommodation, although it is acknowledged that some overlooking is unavoidable in dense urban areas. The development includes a roof terrace and a roof pavilion structure, but it is noted there are no immediate residential properties. The immediate hotel neighbour at 27 Poultry and the club members using the hotel's roof terrace, objected to the application due to increased levels of overlooking and loss of their privacy from the proposed development. It is noted that hotels/private members clubs, which serve transient guests and members, have different privacy expectations from residential properties. The proposed development does not result in unacceptable overlooking of nearby residential properties, in line with Policies DM10.3 and DM21.3. The applicant made some minor adjustments to their roof design in order to reduce overlooking towards the east side of the proposed terrace as a response to these objections and this is welcomed and overall will result in an acceptable relationship between the two properties.

Amenity – Daylight and Sunlight

The proposed development, located in a predominantly commercial area, is not expected to have a significant impact on daylight or sunlight. The applicant submitted a Daylight and Sunlight Report which assesses the windows facing the application site and the roof terrace of the neighbouring hotel to the east of the site (the Ned). Given the site's commercial context and the low existing daylight levels at the adjacent Ned

Hotel, the impact is minimal. The assessment found only minor reductions in daylight to a few windows, which are typical in urban environments. There are no significant reductions in sunlight to the hotel, and the overshadowing assessment confirms no impact on external spaces. In context, these impacts are acceptable. The proposal complies with the relevant policies regarding daylight and sunlight impacts.

Amenity – Noise and Disturbance

Noise from the roof terrace and plant room will be controlled through conditions, including limited hours, no amplified music, and no events. CoL Environmental Health has raised no objections, ensuring the development complies with relevant policies.

Air Quality

The development meets Local Plan Policy CS15 and City Plan 2040 policies DE1 and HL2, addressing air quality and achieving air quality neutrality. After a revised Air Quality Assessment, CoL Environmental Health raised no objections, subject to conditions.

Community Engagement

An Engagement Statement was submitted by the applicant detailing discussions with neighbouring occupiers. Statutory consultation requirements and relevant City Corporation guidance was met, allowing stakeholders to engage with the proposal.

Suicide Prevention

The proposal includes railings on the terrace to reduce suicide risk, in line with Local Plan Policy CS3 and the City's Planning Advice Note. Full details will be secured by condition.

Conclusion

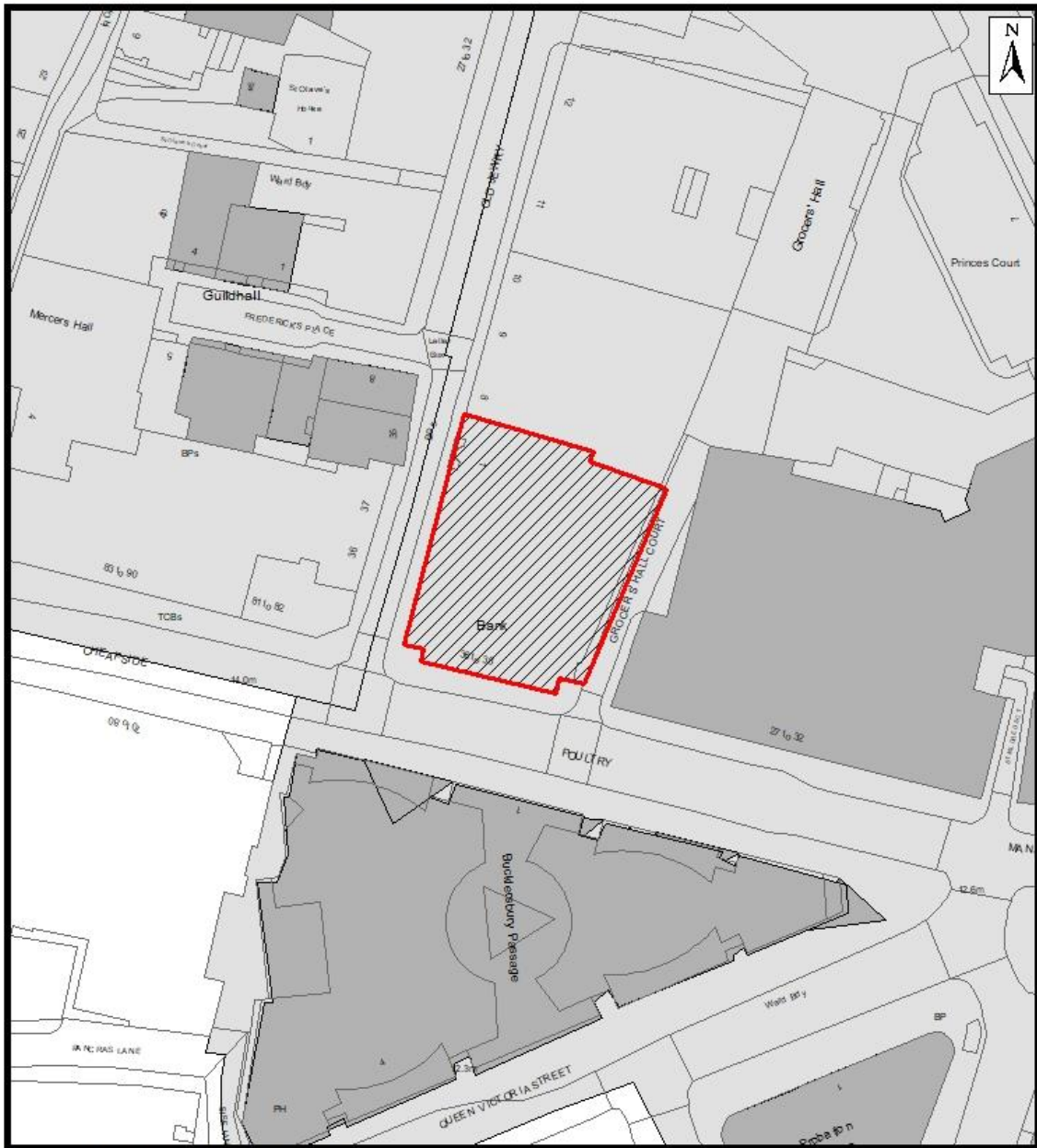
Despite the loss of retail, the development is considered to comply with the development plan taken as a whole, and other material considerations including the NPPF and emerging City Plan 2040 also support the grant of the permission in this instance. Accordingly, the proposals are recommended for approval subject to the imposition of conditions.

Recommendation

- (1) That Planning Permission be granted for the above proposal in accordance with the details set out in the attached schedule.**

Site Location Plan





Site Location Plan



© Crown copyright and database rights 2024 OS 100023243

ADDRESS:
1 Old Jewry

CASE No.
24/00226/FULL

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



ENVIRONMENT DEPARTMENT

Site Photos

Site shown to the centre – photo location on Cheapside, facing east



Poultry shopfronts – Ground floor south elevation



Old Jewry street frontage – west elevation



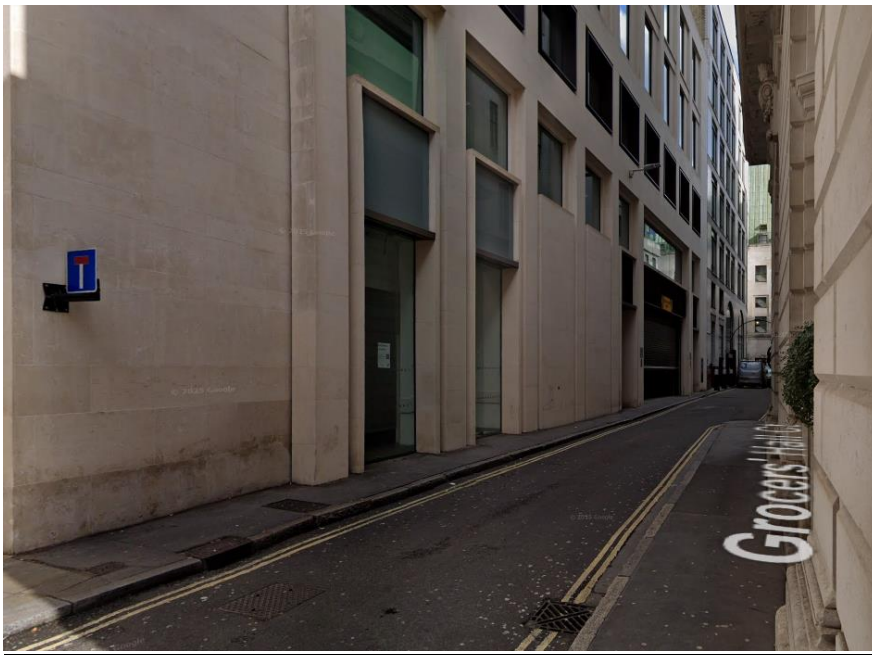
Fenestration – south elevation



Office entrance 1 Old Jewry



Grocers' Hall Court (east elevation) – vehicle and bike entrance



Proposed Ground floor alterations – shopfronts (Poultry)



Proposed Ground floor alterations – office&bike entrance (Old Jewry)



Fact Sheet

TOPIC	INFORMATION				
1. HEIGHT	EXISTING		PROPOSED		
	49.66m AOD		57.45m AOD		
2. FLOORSPACE GIA (SQM)	USES	EXISTING (sqm) (GIA)		PROPOSED (sqm) (GIA)	
	Class E (Office)	8,057		9,078	
	Class E (Retail)	993		463	
		TOTAL	9,050	TOTAL	9,541
				TOTAL UPLIFT	491
3. OFFICE PROVISION IN THE CAZ	Existing: 8,057 sq. m Proposed: 9,078 sq. m Office uplift: +1,021 sq. m (including through loss of existing retail)				
4. EMPLOYMENT NUMBERS (Operational Phase)	EXISTING		PROPOSED		
	Estimated to be Circa 550 – building currently vacant due to standard of facilities.		Circa. 662		
5. VEHICLE/ CYCLE PARKING		EXISTING		PROPOSED	
	Car	0		0	
	Cycle	45		77	
	Lockers	42		116	
	Showers	2		9	
	Changing facilities	0		2	
6. HIGHWAY LOSS / GAIN	No loss or gain of highway proposed				
7. PUBLIC REALM	N/A				

8. TREES	EXISTING	PROPOSED
	0	0
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	A Delivery and Servicing Management Plan will be secured through a planning condition.	
10. SERVICING HOURS	No servicing between: <ul style="list-style-type: none"> - 23:00 - 07:00 Monday to Saturday; and - 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays 	
11. RETAINED FABRIC	100% of the existing substructure. Minimum 95% of the existing superstructure.	
12. OPERATIONAL CARBON EMISSION SAVINGS	45% improvement over GLA baseline carbon emissions (provided for information purposes as application is a minor development scheme and no formal requirement to assess)	
13. OPERATIONAL CARBON EMISSIONS	N/A	
14. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS	
	N/A	
15. WHOLE LIFE-CYCLE CARBON EMISSIONS	N/A	
16. WHOLE LIFE-CYCLE CARBON OPTIONS	CARBON OPTIONS RESULTS	
	N/A	

17. TARGET BREEAM RATING	Targeting an “Outstanding” BREEAM rating. Targeting a 5* NABERS UK rating.
18. URBAN GREENING FACTOR	0.09
19. AIR QUALITY	Air Quality Neutral
20. BIODIVERSITY NET GAIN	N/A

Main Report

Site and Surroundings

1. 1 Old Jewry is an existing 9 storey building with basement levels. It is bounded by Old Jewry to the west, Poultry to the south, Grocer's Hall Court to the east and the adjoining building at 8-10 Old Jewry to the north. The building at part ground and basement and the all the upper levels is existing office accommodation. Along Poultry at part ground and basement levels is a parade of three retail units falling within Cheapside Principal Shopping Centre (PSC).
2. 1 Old Jewry is located at the junction of Old Jewry and Cheapside/Poultry and is located on the edge of the Bank Conservation Area and adjacent to the Guildhall Conservation Area. The primary frontage of the existing building fronts Poultry and sits as a modern insertion to this historic street formed of large city blocks clad in Portland Stone. The townscape context of the locality is of a modest scale with the primary frontage to Cheapside/Poultry and narrow streets running north south. Overall, the existing building sits comfortably within the built context in terms of scale, massing, materiality and appearance however the ground floor fronting Cheapside and Old Jewry is less successful due the narrow deep openings reducing the level of activation along primary retail routes.
3. The site is not located within St Paul's Heights Policy Grid Area or within the Background Wider Background Setting Consultation Area of London Views Management Framework (LVMF).
4. The application site has a PTAL of 6b meaning is highly accessible by public transport. Poultry and Cheapside are a Strategic Cycle Route with a contra flow cycle lane running along Old Jewry.

Background Information

5. A planning application (Ref. No. 24/00226/FULL) was submitted for the application site in March 2024 for the following development:

“The change of use of part of the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.”
6. The application was made valid on 13th of March 2024 and following that site notices were displayed on 21st March 2024 and letters were sent to nearby residential properties.
7. No representations were made during the consultation period.

8. The statutory and internal consultees that responded are mentioned in the consultation section further below.
9. Following consultation, an assessment of the material planning considerations was made on the following key planning areas:
 - Principle of development
 - Design and Accessibility
 - Heritage
 - Archaeology
 - Transport and Highways
 - Waste
 - Sustainability
 - Amenity matters (overlooking, daylight sunlight, noise and disturbance)
 - Air quality
 - Suicide prevention
 - Section 106 and CIL officers
10. Officers assessed the proposals against the NPPF, the development plan and other relevant policies and guidance including SPDs and SPGs, and the emerging City Plan 2040.
11. In response to officers feedback some minor updates were made to the proposals over the course of the application to the satisfaction of Planning Officers. Officers concluded that the proposed development would provide improved office floor space in the City with high-quality amenity areas, much needed for modern office tenants' demands. The proposals were found to be acceptable and in compliance with the policies of the development plan, subject to recommendations for the imposition of planning conditions. The planning application was therefore recommended for approval and subsequently a Decision Notice approving the proposed development was issued to the applicant on 15th July 2024.
12. Following the resolution of the planning application, a claim for judicial review was filed in the Planning Court by an adjoining occupier (the Claimant) seeking to challenge the decision issued on 15/07/2024 by the City of London Corporation granting planning permission for the development. The claim was submitted on 22nd August 2024 by the claimants for judicial review on five grounds (one ground was split into two sub-grounds). The parties (the LPA and the Claimant) agreed that the claim should be allowed by consent and the

Permission was quashed on the basis of the first of these grounds only. The first ground in question related to the original failure of the Local Planning Authority to publish a notice advertising the planning application in a local newspaper circulating in the locality of the application site pursuant to regulation 5A of the Planning (Listed Buildings and Conservation Areas) Regulations 1990.

13. In respect of the remaining grounds, neither the LPA nor the Claimant made any concession. These grounds were:
 - That there had been a breach of legitimate expectation set out in the City's Statement of Community Involvement and/or Engagement Guidance that neighbouring owners would be consulted at the pre-application stage and/or after the application had been submitted;
 - That there had been a breach of legitimate expectation contained in the City's Statement of Community Involvement that it would advertise the application in the press;
 - That there had been a failure to take into account the lack of engagement with the Claimants and/or the failure to take into account the lack of a submission of a statement of community engagement by the applicant;
 - That there had been a failure to take into account the visual impact of the proposed roof extension on daylight/sunlight onto the Hotel's users and/or misinterpretation of local plan policies; and
 - That there had been a failure to take into account the impact of overlooking from the proposed roof terrace.
14. The matters raised on the above grounds have been addressed in this report. Please be referred to sections Consultation, Community Engagement, Amenity Daylight Sunlight, and Amenity Overlooking.
15. On that basis, the Consent Order sealed by the Court on 4th December 2024 which allowed the claim for judicial review of the planning permission (application ref. 24/00226/FULL) and quashed the permission issued on 15th July 2024. The planning application (ref. 24/00226/FULL) therefore reverts to the City Corporation as a live application for redetermination. Relevant details about the subsequent consultation period are mentioned below under the consultation section.

Planning History

16. On 26th October 2004, planning application Ref. No. 3822BY granted the "Redevelopment for offices, retail and wine bar uses including the removal of Dove Court".

17. On 12th May 2005, planning application Ref. No. 05/00182/FULL amended the above consent and granted the "Erection of an office building with A1 and A3/A4 uses at ground and basement levels". This consent has been implemented.
18. Condition 5 of the 05/00182/FULL permission read as follows:

"5. Except as may be approved under condition 6 the area marked "retail (A1 only)" on the ground floor plan hereby approved shall only be used for purposes falling within Class A1 of the Town and Country Planning (Use Classes) Order 1987.

REASON: To ensure that retail facilities are provided in accordance with the following policy of the Unitary Development Plan 2002: SHOP5."
19. The whole ground floor retail area is marked as in shop use (A1) on the approved plans under planning permission 05/00182/FULL.
20. On 18th October 2018, planning application Ref. No. 18/00885/FULL granted permission for "Alterations to existing shopfront, consisting of the relocation of the existing entrance doors and the installation of a new glazing panel".

Proposal

21. The current application seeks to change the use of the part of the existing protected retail area at ground level and reconfigure the basement and ground floors in order to create additional office floorspace, alongside to alterations to the ground floor elevations and shopfronts, replacements of all existing windows and the erection of a two-storey pavilion building at roof level, including plantroom, with access to a private new roof terrace for the use of the office staff. The existing building above ground floor would be retained, including the existing stone elevations, with only minor internal refurbishment works.

Consultation

22. As previously mentioned, the application was originally validated on 13th of March 2024 and following that site notices were displayed on 21st March 2024 and letters were sent to nearby residential properties.
23. No third-party/neighbouring representations were made during this consultation period.
24. The statutory and internal consultees responded are mentioned further below.
25. As part of the consultation and assessment of this application, Officers visited the roof terraces of 1 and 27 Poultry on the 24th April 2024. Access to both terraces were limited, however Officers successfully entered both outdoor areas. Regarding the roof terrace at 27 Poultry, this is used as a private members club in connection with the Hotel and access was achieved through a private member accompanying Officers during their visit at the roof terrace

(including the restaurant/seating area, outdoor space and the swimming pool). Officers advised the staff and the member accompanying them of the proposed development and the reasons of their visit.

26. Following the court's order on 4th December 2024 which quashed the permission dated 15th July 2024, the planning application went live again on Friday 13th December 2024. The application includes the same series of documents submitted for the July determination with the addition of four documents. These include:
 - Overshadowing Assessment, prepared by Point 2, 18 October 2024;
 - Daylight Sunlight Report, prepared by Point 2, October 2024;
 - Addendum Letter, prepared by Savills, 5 December 2024; and
 - Engagement Statement, prepared by Savills, received on 13 December 2024.
27. The subsequent consultation period for the proposed development commenced on 13th December 2024. The statutory consultation period of 21 days was extended by 1 week given the consequent holiday season. The proposed development has been advertised on site on 20 December 2024 with site notices attached along the perimeter of the building in visible locations from the public highway. In total three site notices were displayed on the building in locations on the surrounding public highways of Grocer's Hall Court, Poultry and Old Jewry. A press advertisement was also printed on 7th January 2025 in a local newspaper (City AM) circulating in the locality of 1 Old Jewry, notifying the readers of the proposed development and the 21-day period of the consultation. Letters were also printed on 13th December 2024 and sent to residential and commercial occupiers in the immediate surroundings of the application site.
28. The Engagement Statement submitted by Savills has been prepared to provide a summary of the applicant's engagement during the application process. It advises that since the legal challenge to the permission the applicant has engaged with the claimant in an effort to work positively having due regard to the requirements of the planning application process. In line with this statement, three meetings were held during the months of August, September and November where the applicant provided the additional evidence to demonstrate the proposed development would not raise unacceptable impacts on surrounding buildings.
29. In response to the December consultation, on 14th March 2025 the applicant provided additional information to accompany the application, including:
 - Updated Application and CIL forms which rectified an error in the proposed floor areas;

- A letter from Savills providing responses to matters raised by objectors;
 - A set of updated plans:
 - Drawing No: 6982-SRA-XX-09-DR-A-02209 Rev P02 – Proposed Ninth Floor Plan;
 - Drawing No: 6982-SRA-XX-EE-DR-A-02401 Rev P02 – Proposed East Elevation;
 - Drawing No: 6982-SRA-XX-ES-DR-A-02402 Rev P02 – Proposed South Elevation;
 - Drawing No: 6982-SRA-XX-EW-DR-A-02403 Rev P02 – Proposed West Elevation;
 - A privacy screening design report; and
 - A Written Scheme of Investigations (WSI).
30. The design response is discussed in more detail in the following paragraphs.
31. A re-consultation on the additional information commenced on 18th March 2025. As in the previous consultation, site notices were displayed around the perimeter of the building on 22nd March 2025, which were replaced with updated notices on 4th April 2025 to correct an error to the date the public notice was published, and a press advertisement was published on 25th March 2025. Letters were also sent to neighbouring residential and commercial occupiers on 20th March 2025, including consultation letters to the contributors sent on 17th April 2025.
32. For completeness a list of the addresses consulted is provided as follows:
- 1 Poultry London EC2R 8EJ
 - 2 Poultry London EC2R 8EJ
 - 3 Poultry London EC2R 8EJ
 - 35 Old Jewry London EC2R 8DD
 - 36 - 37 Old Jewry London EC2R 8DD
 - 8 - 10 Old Jewry London EC2R 8DN
 - 6 Frederick's Place London EC2R 8AB
 - Grocers Hall Prince's Street London EC2R 8AQ
 - 8 Frederick's Place London EC2R 8AB
 - 81 - 82 Cheapside London EC2V 6EB
 - The Ned Hotel 27 Poultry London EC2R 8AJ

33. For clarity a timeline of the consultation process is provided below with the associated relevant timeframes:

Consultation Type	Recipients	Date Sent/Displayed (21 days unless stated)
Original Consultation – Consultees (email)	Relevant external/Internal Consultees	18/03/2024
Original Consultation – Neighbours (letter)	Neighbouring residential properties (only)	20/03/2024
Original Site Notice	N/A	21/03/2024
<i>Consent Order on 4th December and application reverts for reassessment.</i>		
Consultation – Consultees (email)	Relevant external/Internal Consultees	13/12/2024
Consultation – Neighbours (letter)	As per original with addition of all neighbouring landowners (including commercial)	13/12/2024 (28 days due to winter holidays)
Site Notice	N/A	20/12/2024
Press Notice	N/A	07/01/2025
<i>Amended Plans received 14th March 2025</i>		
Consultation – Consultees (email)	Relevant external/Internal Consultees	18/03/2025
Consultation – Neighbours (letter)	As per original with addition of all neighbouring landowners (including commercial)	21/03/2025
Site Notice	N/A	22/03/2025
Amended Site Notice – to reflect appropriate dates	N/A	04/04/2025 (replacing the above and creating a new 21 day)
Press Notice	N/A	25/03/2025
Consultation – Neighbours (letter and email)	Neighbouring landowners with addition of previous objectors.	17/04/2025 (26 days to allow for extra Bank Holiday days).

Statutory and Internal Consultees

34. The statutory and internal consultees consulted for the proposed development over the course of all consultations, including consultee responses from the March 2024 submission, and subsequent December 2024 and March 2025 re-consultations are shown in the table below.

Consultee	Summary of comments
Internal	
Cleansing Services	<p>Email dated 11/06/2024 and 14/12/2024: The proposed waste and storage collection facilities indicated in Drawings No. 6982-SRA-XX-B1- DR-A-02199 Rev P02 and 6982-SRA-XX-00-DR-A-20100 Rev P06 and as outlined in the Design and Assessment, Feb 23, are adequate for this proposal. Therefore, this division will not raise any objection to this application. Please note, waste store to comply with BS5906 specifications, i.e. FD30 rated, etc., and all occupants of the development must have access and be required to use the waste storage and collection facilities.</p> <p>Officer response: Noted, the relevant plans have been listed in a recommended condition (approved plans) and a compliance condition has been recommended.</p>
Environmental Health	<p>Memos dated 03/04/2024, 18/12/2024 and 21/03/2025: No objection subject to conditions.</p> <p>Officer response: Conditions are recommended.</p>
Air Quality	<p>Memo dated 10/04/2024: No objection subject to condition.</p> <p>Officer response: Condition is recommended.</p>
Transport and Highways	<p>Memo dated 12/07/2024: No objection subject to conditions.</p> <p>Officer response: Conditions are recommended</p>
Energy and Sustainability	<p>Letter dated on 21/06/2024: No objection.</p> <p>Officer response: Noted.</p>
Access Advisor	<p>Email dated 11/06/2024: No objection.</p> <p>Officer response: Noted.</p>
Lead Local Flood Authority (LLFA)	<p>Memo dated 27/03/2024: Did not wish to be consulted.</p> <p>Officer response: Noted.</p>
Planning Obligations	<p>Letter dated 07/06/2024 and 09/01/2025: No objection, recommended informative.</p>

	Officer response: Informative is recommended.
Conservation Area Advisory Committee (CAAC)	<p>Letter dated 10/04/2024:</p> <p>The Committee had no objection to the proposed ground floor alterations, but expressed concerns about the proposed timber cladding and requested further detail on the strategic views, specifically in relation to the pavilion and plant room. They advised that further detailed information was required prior to commenting on the potential impact of the proposed new pavilion and plant room at roof level on the character and appearance of the Conservation Area.</p> <p>Officers presented the proposed development on a follow-up meeting on the 10th April 2025. CAAC provided the following response.</p> <p>Letter dated 10/04/25:</p> <p>The Committee objected to the revised application considering that the proposed balustrade was too far forward and needed to be pulled back from the front elevation in order to reduce the adverse impact on the character and appearance of the Conservation Area.</p> <p>Officer response: The comments are noted and are addressed in the Architecture, Urban Design and Public Realm, and Heritage sections of the report.</p>
External	
London Underground	<p>Email dated on 04/04/2024 and 03/01/2025:</p> <p>No objection subject to conditions.</p> <p>Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground tunnels and infrastructure. This site is adjacent to Central Line. It will need to be demonstrated to the satisfaction of LUL engineers that: the proposed redevelopment will not have any detrimental effect on our tunnels and structures either in the short or long term; the design must be such that the loading imposed on our</p>

	<p>tunnels or structures is not increased or removed; we offer no right of support to the development or land. Therefore, we request that the grant of planning permission be subject to conditions.</p> <p>Officer response: Conditions are recommended.</p>
<p>Historic England</p>	<p>Letter dated on 21/03/2024 and 17/12/2024: Thank you for your email regarding the above application. On the basis of the information provided, we do not consider that it is necessary for this application to be notified to Historic England under the relevant statutory provisions, details of which are attached.</p> <p>Officer response: Noted.</p>
<p>Greater London Archaeology Advisory Service (GLAAS)</p>	<p>Letter dated 11/07/2024: Assessment of Significance and Impact All of the City of London 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.</p> <p>The site was previously partially excavated prior to development works in 2007. Much of the archaeology was preserved in situ beneath the single basement, but some areas were excavated in the locations of new pile pits and service runs. Extensive archaeological remains of Roman and medieval date were recorded, including a Roman road, clay and timber buildings and masonry buildings.</p> <p>An archaeological desk based assessment has been submitted with the planning application (MOLA 2024) which identifies that the only areas of proposed below ground impact from the new development comprise a new lift pit and some drainage. Given that archaeology is known to survive on the site, an archaeological condition is recommended in order to excavate and record remains in the areas of impact.</p> <p>Letter issued on 25/03/2025:</p> <p>A Written Scheme of Investigation for Archaeological Excavation and Monitoring and Recording (MOLA 2025) has been submitted with this application, which outlines</p>

how the archaeological mitigation will be managed on the site. The WSI is acceptable and a compliance condition is now recommended to allow the archaeological work to proceed.

Planning Policies

NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 207 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.

NPPF paragraphs 202 and 210 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.

If you grant planning consent, paragraph 218 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

Recommendations

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

This condition is necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to this condition please let us know their reasons and any alternatives suggested. Without this condition being imposed the application should be refused as it would not comply with NPPF paragraph 218.

I envisage that the archaeological fieldwork would comprise the following:

	<p>Watching Brief</p> <p>An archaeological watching brief involves observation of groundworks and investigation of features of archaeological interest which are revealed. A suitable working method with contingency arrangements for significant discoveries will need to be agreed. The outcome will be a report and archive.</p> <p>Excavation</p> <p>Archaeological excavation is a structured investigation with defined research objectives which normally takes place as a condition of planning permission. It will involve the investigation and recording of an area of archaeological interest including the recovery of artefacts and environmental evidence. Once on-site works have been completed a 'post-excavation assessment' will be prepared followed by an appropriate level of further analysis, publication and archiving.</p> <p>Officer response: Compliance condition and an informative are recommended.</p>
<p>Thames Water</p>	<p>Email on 02/04/2024:</p> <p>Waste Comments</p> <p>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</p>

02035779483 or by emailing
trade.effluent@thameswater.co.uk .

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.

Thames Water would advise that with regard to WASTE WATER NETWORK and SEWAGE TREATMENT WORKS infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Water Comments

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.

If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater. On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, we would not have any objection to the above planning application.

Thames Water recommends 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

	<p>should take account of this minimum pressure in the design of the proposed development.</p> <p>Supplementary Comments Thames Water have been unable to determine the drainage strategy for this development, in particular the points of discharge for Foul & Surface Water. Design & Access statement, Section 9.2 (flood risk & drainage) refers to current flood risk and SuDS consideration, however, there is no stated discharge points for refurbishment and net dwelling increase.</p> <p>Officer response: Informatives are recommended.</p>
--	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Public representations

35. The public representations made for this application are shown in the following table. The full comments are available for public view on the online City of London website of this application, some comments have been summarised due to their length.

No.	Address	Comment
1	2 Salford Road Balham SW2 4BH 08.01.2025	<p>Objects on the following grounds:</p> <ol style="list-style-type: none"> 1. Impact on Historic Character: The proposed development is not in keeping with the character of the Grade I listed building and other historic buildings nearby. These structures contribute significantly to the architectural heritage and cultural identity of the area. Allowing this development could set a precedent for further projects that might undermine this unique historic fabric. 2. Visual Impact: The introduction of modern construction in this sensitive location could disrupt the aesthetic and historic integrity of the area, detracting from the viewing experience of several iconic buildings. 3. Potential Precedent: Approving this application may encourage similar developments, leading to cumulative impacts that further erode the area's historic charm and architectural cohesion. <p>I urge the planning department to carefully consider the long-term implications of this proposal and prioritise the</p>

		<p>preservation of the area's unique historic and cultural value.</p> <p>Officer response: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, and Heritage sections.</p>
2	<p>Flat 28 Dorset House, 14 Mount Pleasant, London, WC1X 0BU</p> <p>09.01.2025</p>	<p>Objects on the following grounds:</p> <p>I am a frequent guest at the Ned hotel, using the roof to facilities. One of the main attractions of the rooftop is the privacy it affords, particularly for users of the swimming pool. The proposed rooftop extension will overlook the Ned hotel's rooftop. I am also concerned about the noise that will be generated from the rooftop extension, as I understand that it will be used for various functions and events.</p> <p>I do not think the design of the proposed development respects the setting of the Ned hotel, a Grade I listed building, which is of exceptional interest as only around 2.5% of listed buildings are Grade 1. The hotel is also in a conservation area. In combination this means that even more important should be given to ensuring that the proposed design of the rooftop extension is appropriate, being so close to a Grade I listed building in a conservation area. The bulk and scale of the proposed development will have a detrimental effect on the conservation area and the setting of the Ned hotel.</p> <p>No consideration has been given to the construction of the development and how constrained the site is. There is a very narrow road (Grocers Hall Court) between the development site and the hotel which is used by many commercial operators and by construction traffic if the application is granted. Old Jewry and Poultry already suffer from heavy traffic which will only be exacerbated during the construction period.</p> <p>I am aware that the applicant refers to having met with the owners of the Ned hotel and that they have sought to work positively and proactively with them. I cannot therefore</p>

		<p>understand why the planning application is not different to the previous scheme and takes no account of the overlooking and inappropriate bulk and scale of the rooftop extension. This is a major planning application. The lack of any real engagement by the planning applicant with the public is concerning and I hope that the Planning Committee can consider the matter so that the application is thoroughly debated and discussed.</p> <p>Officer response: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage, Consultation and Amenity sections.</p>
3	<p>243 Lauderdale Mansions Lauderdale Road London W91LZ</p> <p>10.01.2025</p>	<p>Objects on the following grounds:</p> <p>As a London resident, City worker, and frequent visitor to the area, including as a member of The Ned private members' club, I am concerned about the potential impact of these works. The notice makes clear that the proposed alterations will affect the setting of listed buildings and the character and appearance of the conservation area. Given the historical and architectural significance of this part of the City of London, any changes must be approached with the utmost care and sensitivity.</p> <p>The scale and nature of the proposed alterations, particularly changes to elevations, appear to be substantial. Such works risk irreparably disrupting the skyline, diminishing the historical integrity of the area, and undermining the distinctive character that makes this part of London so unique.</p> <p>As someone who spends a great deal of time in the area, I can attest to its cultural and historical importance. It is vital that this heritage is preserved for current and future generations. I am also concerned about the practical impact of prolonged construction work, which would undoubtedly impose significant disruption on The Ned and its thousands of members, visitors, and staff.</p>

		<p>For these reasons, I wish to register my objection to the application and request that my concerns be taken into full consideration as part of the planning process.</p> <p>Officer response: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage and Amenity sections. Conditions have been recommended to safeguard the amenity of the neighbouring occupiers.</p>
4	<p>16 Barons Court Road, London W14 9DT</p> <p>11.01.2025</p>	<p>Objects on the following grounds:</p> <p>I live and work in London and am in the City most days of the week with work, for my gym to maintain my physical health and socially — particularly as a member of The Ned private members' club — I have significant concerns about the potential effects of the proposed changes. The notice clearly indicates that these works will impact the setting of listed buildings and alter the character of the conservation area.</p> <p>This part of the City of London holds immense historical and architectural value – which does not just impact us as locals but significantly impacts the appeal of London to the global tourist trade and industry for all international visitors who bring with them their investments and tourism income - and any modifications must be handled with exceptional care and sensitivity.</p> <p>The proposed changes, particularly the alterations to the building elevations, seem considerable in scope. Such modifications risk damaging the unique skyline, eroding the historical significance of the area, and compromising the character that makes this part of London distinctive. Having spent substantial time in this area, I can personally vouch for its cultural and historical importance. This particular area is a key representation of how the rest of the world views London and forms a significant identity of the United Kingdom, which is why it is featured in so many Hollywood movies. Preserving this heritage is essential not only for current residents and workers but for future generations as well. Additionally, the prospect of prolonged</p>

		<p>construction is concerning, as it would likely cause significant disruptions to The Ned and its many members, guests, and staff.</p> <p>For these reasons, I strongly oppose the application and urge that my objections be carefully considered during the planning process.</p> <p>Officer response: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage and Amenity sections. Conditions have been recommended to safeguard the amenity of the neighbouring occupiers.</p>
5	<p>Anonymous comment – address removed by request</p> <p>13.01.2025</p>	<p>Objects for the following reasons:</p> <p>As a London resident, City worker, and frequent visitor to the area, including as a member of The Ned private members' club, I am concerned about the potential impact of these works. The notice makes clear that the proposed alterations will affect the setting of listed buildings and the character and appearance of the conservation area. Given the historical and architectural significance of this part of the City of London, any changes must be approached with the utmost care and sensitivity.</p> <p>The scale and nature of the proposed alterations, particularly changes to elevations, appear to be substantial. Such works risk irreparably disrupting the skyline, diminishing the historical integrity of the area, and undermining the distinctive character that makes this part of London so unique.</p> <p>As someone who spends a great deal of time in the area, I can attest to its cultural and historical importance. It is vital that this heritage is preserved for current and future generations. I am also concerned about the practical impact of prolonged construction work, which would undoubtedly impose significant disruption on The Ned and its thousands of members, visitors, and staff.</p>

		<p>Officer response: The planning material considerations raised in this comment are addressed in the report under the Architecture, Urban Design and Public Realm, Heritage, and Amenity sections. Conditions have been recommended to safeguard the amenity of the neighbouring occupiers.</p>
6	<p>5 The Green Richmond TW9 1PL</p> <p>14.01.2025</p>	<p>A former lead architect on James Stirling Michael Wilford and Associates Ltd Number 1 Poultry has commented on this application stating the following (neutral comment):</p> <p>This Application is in many respects very detailed but appears to be missing - a careful and complete site analysis and a clear statement of the project brief as outlined below (see 1 to 4). In my opinion it is only when this information is provided that the Application can be fully assessed.</p> <p>Drawings in context</p> <p>There are only very limited Elevations or Sections in this submission showing the building in the broader context. To fully understand the impact of massing and bulk of the proposals the following should be provided with OD levels of the proposals and its neighbours-</p> <ul style="list-style-type: none"> - Elevations along Cheapside and Poultry (similar to those submitted in a previous application for the same site Application 05/00182/FUL) - Elevations along Old Jewry including sections of 1 Poultry showing the terraces /restaurant - More expansive Sections through The Ned - Midland Bank across Old Jewry and through neighbouring buildings. <p>Based on the limited information provided the Applicant's drawings show a top of roof level of 54.456m above a Ground Floor FFL – 14.77m. The roof level appears to be considerably higher than all the neighbouring buildings and as such may be considered detrimental to the setting of listed buildings in the conservation area.</p> <p>Site's Neutral Contribution</p>

		<p>The Applicant states in the Heritage and Townscape Assessment that the existing building makes a neutral contribution to the surroundings and does not hold any architectural or historic interest. It is this very neutrality and respect for its neighbours that makes No 1 Old Jewry of architectural interest. The fundamental question is therefore are the new proposals respectful to the surroundings and do they maintain the building's historical carefully designed neutrality?</p> <p>The Applicant describes the rooftop as a "pavilion" rooftop extension with additional plant above and that this has been designed to be sensitive to the surroundings. Does the "pavilion" respect the neutrality of the existing/proposed building?</p> <p>Is the pavilion, plant room and terrace respectful to the neighbouring buildings?</p> <p>These points appears not to have been satisfactorily addressed in this Application.</p> <p>Design & Access – Function of the pavilion and terrace</p> <p>There appears to be no explanation of the function of and access to the rooftop pavilion and terrace. The Applicant states that the terrace provide a flexible space for a variety of users.</p> <p>The drawings do not show a plausible layout</p> <ul style="list-style-type: none"> - who will have access – only tenants of the building? - how will the pavilion be accessed? - will everyone need to check-in at a reception? - is there any limit on the capacity? - will any food or drink be available if yes how will this be serviced? - will there be a kitchen - bar etc? - although not a planning matter it would be useful to know if a licence will be applied for? <p>Overlooking</p> <p>The Applicant clearly hopes to exploit selected views from the proposed terrace but has failed to provide information on the views from neighbouring terraces towards 1 Old Jewry as requested in Pre-App 02 - 18/12/2023 "<i>The visual</i></p>
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<p><i>impact from neighbouring accessible terraces should be assessed especially from the adjacent listed buildings, One Poultry and The Ned”.</i></p> <p>Officer response: The matters discussed in this comment are addressed in the Architecture, Urban Design and Public Realm, and Heritage sections of the report as well as under the Amenity section which relates to outlook. Officers note that a pre-application advice is a paid service that the Local Planning Authority provides and does not hold any weight in the assessment and decision making of this application. Officers found the application documents sufficient to validate the application upon submission, when additional information was requested, the applicant provided this to the Officers who at the time of this report are satisfied that they have proportionate and satisfactory information to understand and make a proper assessment of the proposals and to draw informed conclusions.</p>
7	<p>Farrer & Co LLP on behalf of Vivas Invest & Finance Limited</p> <p>23.01.2025</p>	<p>Farrer & Co LLP acts on behalf of Vivas Invest & Finance Limited the owner of the Grade I listed former Midland Bank headquarters building which is used as the five star Ned hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel).</p> <p>Requests that the Council refuse the application on the following grounds (objection):</p> <ul style="list-style-type: none"> - the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; - the extent of the Proposed Development (including the increase in floorspace) is inconsistent across the Application documents and does not clearly identify the scope of the proposed works; - the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area;

		<ul style="list-style-type: none"> - the Proposed Development results in unacceptable negative impacts on the Ned Hotel’s business by virtue of the privacy, overlooking and noise impacts; - the Proposed Development harms surrounding heritage assets; - the Application fails to correctly assess the daylight and sunlight impacts; and - lack of adequate community engagement on the Proposed Development. <p>The full comments are available on the City’s website, above is the summary points as outlined in the submitted letter.</p> <p>Officer response: It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks. In respect of additional land required for the construction phase of development that is not part of the land where permanent development will be carried out, it is also noted that there are permitted development rights for the use of adjoining land to be used in connection with and for the duration of operations being carried out.</p> <p>The applicant submitted an updated Application and CIL forms as mentioned further above in this section of the report which provides the correct figures of the proposed floor areas.</p> <p>Officers note that a pre-application advice is a paid service that the Local Planning Authority provides and does not hold any weight in the assessment and decision making of this application.</p> <p>Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation sections. Conditions have been</p>
--	--	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements.
8	MVHC LTD on behalf of Vivas Invest & Finance Limited 24.01.2025	<p>MVHC Ltd has been commissioned by the owner Vivas Invest & Finance Limited and tenant Poultry Tenant Limited (Our Clients) of the Grade I Listed former Midland Bank headquarters building converted into five star Ned Hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel), to prepare this report as an objection to the planning application (24/00226/FULL). This document examines the submitted documentation accompanying the application for the planning permission and includes a brief summary of the significance of the identified heritage assets (in this case, relevant listed buildings and the Bank & Guildhall Conservation Areas) as well as the assessment of the potential impact of the proposed development on The Ned Building and other relevant heritage assets.</p> <p>The full comments are available on the City's website, following is a summary of the issues that predicated the objection as identified in the submitted report:</p> <ul style="list-style-type: none"> - The design does not satisfy the requirements of NPPF. - Detrimental Impact on the setting of the Grade I Listed Building. - The proposal fails to preserve or enhance the character of the relevant heritage assets and their settings and therefore contravenes the tenets of NPPF and by implication, local plan policies. - The proposal will have detrimental impact on the enjoyment, use and interpretation of the significance of the Grade I Listed building. - The proposed two-storey roof extension resulting in increased height and its bulk, scale and materiality have harmful impact on the neighbouring Grade I Listed building. - The loss of outlook, and loss of privacy. <p>Officer response: The issues raised are addressed in the Architecture, Urban Design and Public Realm, and</p>

		Heritage sections of the report as well as under the Amenity section which relates to outlook. A design condition, including request of further details of the proposed materiality on all external faces of the building, has been recommended.
9	<p>Ned-Soho House LLP 180 The Strand, London, WC2R 1EA</p> <p>27.01.2025</p>	<p>Ned-Soho House LLP (Soho House), under a long-term hotel management agreement with Poultry Opco Limited (the Tenant), operate the Grade 1 listed former Midland Bank headquarters building at 27 Poultry, London, EC2R 8AJ as the five star hotel known as the Ned Hotel (the Ned Hotel). The commentors request that the Council refuse the application for the reasons (objection):</p> <ul style="list-style-type: none"> - the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area; - the Application fails to correctly assess the daylight and sunlight impacts; - the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - lack of adequate community engagement on the Proposed Development; - the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; and - the construction of the Proposed Development has not been properly considered and results in unacceptable negative impacts and risks for pedestrians, cyclists and other users of Poultry and Grocers Hall Court. <p>The full comments are available on the City's website, above is the summary points as outlined in the submitted letter.</p> <p>Officer response: Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban</p>

		<p>Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation, and Transportation and Highways sections. Conditions have been recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements.</p> <p>It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. There are permitted development rights which are likely to apply to any adjacent land needed for the construction phase of the development. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks.</p>
10	<p>2 Nightingale Close Tring Herts HP23 5FS</p> <p>27.01.2025</p>	<p>Objects for the following reasons:</p> <ul style="list-style-type: none"> - the design of the proposed development does not respect the setting of the Ned hotel nor is it appropriate to the setting of 1 Poultry which is Grade II* listed and directly opposite the development. - the roof top extensions proposed will result in the applicants building becoming taller than the Ned and suddenly the setting of the listed building and the benefits of its rooftop amenity will be seriously and harmfully affected. - The applicant has failed to adequately assess the rooftop extensions in the context of the neighbouring listed buildings and the street views are not a true representation of the impact of the development on the conservation area. - Whilst the improvement to the energy efficiency is of course welcomed the remainder of the development does not provide any social, cultural or economic benefit to justify the harm that is caused. - The development also reduces the amount of street facing retail space on Cheapside which is really the "High Street" of the City of London. This is reducing

		<p>the accessibility of the building to retail users and is detrimental to the community that work and reside in the City of London.</p> <ul style="list-style-type: none"> - The applicant has made no attempt at any public or neighbourly consultation which is contrary to the guidance published by the City of London. <p>Officer response: The matters raised are addressed in the relevant sections of this report, including Architecture, Urban Design and Public Realm, Heritage, Consultation, Sustainability, and Principle of development.</p>
11	<p>87 Lambton Road London SW20 0LW</p> <p>27.01.2025</p>	<p>Objects for the following reasons:</p> <ul style="list-style-type: none"> - One of the main attractions of the rooftop is the privacy it affords, particularly the rooftop and for use of the swimming pool. The proposed rooftop extension will overlook the Ned hotel's rooftop. I am very concerned by the significant impact the proposed construction of the new pavilion and roof terrace will have on this privacy. I understand that it will be used for various functions and events and therefore I am also concerned about the noise that will be generated from the rooftop extension. - the design of the proposed development respects the setting of the Ned hotel, a Grade I listed building, which is of exceptional interest as only around 2.5% of listed buildings are Grade I. The hotel is also in a conservation area. In combination this means that even more importance should be given to ensuring that the proposed design of the rooftop extension is appropriate, being so close to a Grade I listed building in a conservation area. The bulk and scale of the proposed development will have a detrimental effect on the conservation area and the setting of the Ned hotel. - There are also a number of architecturally significant buildings next to and around 1 Old Jewry, including the Ned Hotel building (27 Poultry) and No. 1 Poultry, designed by James Stirling. The proposed design is certainly not consistent with the

		<p>quality and visual appeal of these buildings or the wider area. One would expect that new developments / extensions should enhance or build upon the beautiful neighbourhood. Or, at worst, they should provide a neutral backdrop for these buildings. Neither of these standards is met by the proposed development; I believe it would have an overwhelmingly negative impact on the area. It is also noteworthy that the planning application fails to even consider the visual or design impact of the rooftop extension on the surrounding buildings and area.</p> <ul style="list-style-type: none"> - No consideration has been given to the construction of the development and how constrained the site is. There is a very narrow road (Grocers Hall Court) between the development site and the hotel which is used by many commercial operators and by construction traffic if the application is granted. Old Jewry and Poultry already suffer from heavy traffic which will only be exacerbated during the construction period. In particular, I regularly commute by bicycle and could foresee a dangerous situation being created for cyclists and pedestrians; and - the applicant refers to having met with the owners of the Ned hotel and that they have sought to work positively and proactively with them. I cannot therefore understand why this planning application is no different to the previous scheme and takes no account of the overlooking and inappropriate bulk and scale of the rooftop extension. This is a major planning application. The lack of any real engagement by the planning applicant with the public is concerning. <p>Officer response: The matters raised are addressed in the relevant sections of this report, including Architecture, Urban Design and Public Realm, Heritage, Consultation, Transportation and Highways, and Amenity (noise, overlooking).</p>
--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

12	<p>Poultry OpCo LTD, The Ned, 27 Poultry, London, EC2R 8AJ</p> <p>27.01.2025</p>	<p>Requests that the Council refuses the Application for the following reasons (objection):</p> <ul style="list-style-type: none"> - the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area; - the Application fails to correctly assess the daylight and sunlight impacts; - the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - lack of adequate community engagement on the Proposed Development; - the Proposed Development harms surrounding heritage assets; - the site location plan does not include all land necessary to carry out the Proposed Development contrary to national validation requirements; and - the construction of the Proposed Development has not been properly considered and results in unacceptable negative impacts and risks for pedestrians, cyclists and other users of Poultry and Grocers Hall Court. <p>The full comments are available on the City's website, above is the summary points as outlined in the submitted letter.</p> <p>Officer response: Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation, and Transportation and Highways sections. Conditions have been recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements.</p>
----	----------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<p>It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks.</p>
13	<p>The Lutyens Trust, Goddards Abinger Common, Dorking Surrey, RH5 6JH</p> <p>28.01.2025</p>	<p>Objects for the following reasons:</p> <ul style="list-style-type: none"> - The above site sits alongside the grade I former Midland Bank Headquarters, designed by Lutyens, recently skilfully and sensitively converted to The Ned Hotel. It was originally built between 1924-39 at a time of rapid acquisition, consolidation, and expansion by the Midland Bank. The project was of sufficient significance to the status of the bank to warrant employing Sir Edwin to collaborate with one of its usual commercial architects, Gotch and Saunders. Lutyens was entirely responsible for the external form, the banking hall, vault, the Directors 'palatial accommodation on the top floor, and important staircases. His role was to add refinement and timelessness to a modern steel frame. <p>The external elevations are of monumental and sophisticated design with subtle set-backs and diminishing courses that demonstrate Lutyens's concern for the smallest detail. The building is widely considered to represent one of the pinnacles of Lutyens's achievement, and is therefore a highly important building by one of England's greatest architects. In particular, the top floors are carefully articulated to create a roofline of some distinction.</p> <p>The Lutyens Trust is concerned that the neighbouring proposal risks presenting an awkward profile alongside Lutyens's elegant roofscape. We ask that all significant viewpoints are investigated to ensure that the proposed new floors do not intrude alongside the elegantly composed Lutyens roofline.</p> <p>Of no less concern is the impact on the amenities of The Ned. The hotel developers endeavoured to civilise the formerly utilitarian hidden roofs to the</p>

		<p>rear of Lutyens’s domain. They created a swimming pool with private terrace that introduces a space of both spatial quality and amenity. The neighbouring proposal (just across the narrow Grocers ’Hall Court) will intrude on both the setting and privacy of this feature. The viability of the Lutyens building in its appropriate current use depends on the success of the hotel. The commercial and amenity value of its investment will be compromised by the proposed intrusion. The Montagu Evans Heritage Assessment majors on the valuable amenity that the new rooftop pavilion and terrace would bring to One Old Jewry but then fails to consider the intervisibility with The Ned's own amenity (described above) at this level. Montagu Evans advise there is no harm in the proposals to surrounding property only because they find - in para 4.32 - a 'lack of intervisibility from surrounding streets' yet fail to consider the same at roof level, despite recognising how considerable this amenity is for One Old Jewry.</p> <p>Officer response: The matters raised are addressed in the relevant sections of this report, including Architecture, Urban Design and Public Realm, Heritage, and Amenity (overlooking).</p>
--	--	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

36. In response to objections regarding amenity impacts to the hotel neighbours to the east of the application site, the applicant updated their design to increase screening of the east side of the roof and made some minor rearrangements of the proposed roof terrace and pavilion access to limit access to the eastern side of the roof as much as possible as a way to safeguard the privacy of the neighbouring hotel roof terrace.
37. Following these updates and the March 2025 re-consultation, the following comments were made by the public. The full comments are available for public view on the online City of London website of this application, some comments have been summarised due to their length.

No.	Address	Comment
1	147 Warehouse Court Major	<p>Objects to the application on the following grounds:</p> <p>1. Loss of retail space on the ground floor. There is a</p>

	<p>Draper Street London</p> <p>12.05.2025</p>	<p>current high demand for such space in Central London and it would be a shame to lose further space to a scheme that does not take this into account. This area of the City especially has very little in the way of vacant retail units - something that will only be exacerbated as further office units which have already been given consent (numerous within walking distance to the site) are completed. Indeed, these seem to be a couple of the very limited number of vacant units in the City - which I can only assume is a choice to prioritise this development.</p> <p>2. Given this is a conservation area, one would query the decision to place significant amounts of plant onto the roof of the development, which could be (and indeed under its current construction already is) located elsewhere within the development. The plant is not pleasing to the eye to say the least.</p> <p>3. The current plans would overlook a public pool on the roof of an adjacent property, which is an invasion of privacy and reduces the benefit of an amenity which is rare for central London and should be protected.</p> <p>Officer response: The matters raised are addressed in the relevant sections of this report, including Principle of development, Architecture, Urban Design and Public Realm, Heritage, and Amenity (overlooking).</p>
2	<p>Farrer & Co LLP on behalf of Vivas Invest & Finance Limited</p> <p>Incl. attachments of GIA letter (13/05/2025); MVHC letter (May 2025))</p> <p>13.05.2025</p>	<p>Farrer & Co LLP acts on behalf of Vivas Invest & Finance Limited the owner of the Grade I listed former Midland Bank headquarters building which is used as the five star Ned hotel at 27 Poultry, London, EC2R 8AJ (the Ned Hotel).</p> <p>Requests that the Council refuse the application on the following grounds (objection):</p> <ul style="list-style-type: none"> - the site location plan does not include all land necessary to carry out the Proposed - Development contrary to national validation requirements; - the extent of the Proposed Development (including the increase in floorspace) is inconsistent across the Application documents and does not clearly identify the scope of the proposed works;

		<ul style="list-style-type: none"> - the loss of retail frontage and floorspace is contrary to policy and the advice of the City during pre-application; - the design of the Proposed Development is harmful to the Bank Conservation Area and adjacent Guildhall Conservation Area; - the Proposed Development results in unacceptable negative impacts on the Ned Hotel's business by virtue of the privacy, overlooking and noise impacts; - the Proposed Development harms surrounding heritage assets; - the Application fails to correctly assess the daylight and sunlight impacts; and - lack of adequate community engagement on the Proposed Development. <p>Officer response: It is considered that the site location plan submitted for this application is sufficient as it includes all the land relevant to the proposed development and ways of access. The construction phase of the proposed development would require the applicant to obtain licences from the relevant Highways Authority which falls under separate legislative frameworks. In respect of additional land required for the construction phase of development (that is not part of the land where permanent development will be carried out), it is also noted that there are permitted development rights for the use of adjoining land to be used in connection with and for the duration of the main operations (the subject of this application) which are to be carried out. According officers are satisfied that the redline location plan identifies the relevant land subject to the application based on the description of the development within the application, and that it complies with the guidance in the Planning Practice Guidance which advises that the location plan <i>'should include all land necessary to carry out the proposed development (e.g. land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings).'</i></p>
--	--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

		<p>The grant of planning permission does not override any private rights or overcome the need to secure access rights from third parties to enable the delivery of a development where they are needed. It is normal for other consents to be required post permission to enable the delivery of a development and planning permission does not grant any interest in land, provide any licences or easements.</p> <p>The applicant submitted an updated Application and CIL forms as mentioned further above in this section of the report which provides the correct figures of the proposed floor areas.</p> <p>Officers note that a pre-application advice is a paid service that the Local Planning Authority provides and does not hold any weight in the assessment and decision making of this application.</p> <p>Matters raised in this letter are addressed in relevant sections of the report, including Proposals, Principle of development, Architecture, Urban Design and Public Realm, Heritage, Amenity (noise, overlooking, daylight sunlight), Consultation sections. Conditions have been recommended where deemed necessary to protect the amenity of the site's and neighbouring occupiers as well as additional design details in relation to the proposed elements.</p>
--	--	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Policy Context

38. 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.
39. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which has undergone Regulation 19 consultation. The City Plan 2040 has been submitted to the Secretary of State and it is currently being examined in public (with hearings having commenced in March). 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 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

40. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 and the Planning Practice Guidance (PPG) which is amended from time to time.
41. 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.
42. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
43. 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:
 - c) approving development proposals that accord with an up-to-date development plan without delay; or
 - d) 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:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or
 - 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. [Footnote 9: The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.]
44. 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

- a) 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).”
45. 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.
 46. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
 47. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
 48. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
 49. 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”.
 50. 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.
 51. 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”.
 52. 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.”
 53. 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, with a high standard of amenity for existing and future users.

54. 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...'
55. 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.
56. 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. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
57. 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 and help to reduce greenhouse gas emissions, such as through its location, orientation and design.
58. Paragraph 167 provides that Local planning authorities should also give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights). Where the proposals would affect conservation areas, listed buildings or other relevant designated

heritage assets, local planning authorities should also apply the policies set out in chapter 16 of the Framework.

59. 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.
60. 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."
61. 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".
62. 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:
 - grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - 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.
63. 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".

64. 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”.
65. 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.”

Considerations

66. 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).
67. 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).
68. In considering whether to grant planning permission for development within a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (S.72(1) Planning (Listed Buildings and Conservation Areas) Act 1990. When considering the impact of proposed development on a conservation area it is the entirety of the proposal which is in issue.

Assessment

69. When assessing the proposed development consideration has been given to the Development Plan which consists of the London Plan 2021 and the City of London Local Plan 2015. Often it will be the case that there will be policies in the Development Plan which support a 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 the proposal does or does not accord with the development

plan as a whole. In respect of this application, for the reasons explained in this report, officers are of the view that the development complies with the development plan when read as a whole.

70. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which has undergone Regulation 19 consultation. The City Plan 2040 has been submitted to the Secretary of State and it is currently being examined 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 48 of the NPPF.
71. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 and the Planning Practice Guidance (PPG) which is amended from time to time.

Principle of development

Office Use

72. The site is within Central Activities Zone (CAZ) as defined in the London Plan, the core business location and one of the main areas where new office development should be prioritised. 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 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.
73. Policy DM10.3 (Roof gardens and terraces) of the Local Plan 2015 and emerging Policy DE4 (Terraces and Elevated Spaces) of the City Plan 2040 both encourage elevated spaces where appropriate. The supporting text for the policies generalises that roof gardens and terraces are becoming increasingly common in the City, in response to demand from developers and occupiers. Public and private roof gardens and terraces present an opportunity for additional amenity space, urban greenery and the creation of new viewpoints of the City and the surrounding areas, thereby reinforcing London's cultural and historic attractions.
74. The existing office occupiers are in the process of vacating the accommodation. By the time Officers visited the site, in Spring 2024, some floors of the office accommodation had already become vacant.
75. The application proposes improvements to the efficiency and overall quality of the office accommodation. An upward extension by way of a new pavilion structure at the roof level is proposed to provide an additional 385sqm of office floorspace. The new pavilion would provide direct access to the newly formed

roof terrace. In order to create the proposed roof structure and terrace the proposals infill the existing sunken plant areas at eighth floor, which provide an addition of 106 sqm to the overall floorspace. The proposed development will therefore result in an increase of office floorspace of 491sqm by way of additional build elements to be used for office accommodation, amenity and ancillary purposes.

76. This provision of additional office space at roof level and additional surrounding amenity (terrace) would align with the ambitions of policies DM10.3 of the Local Plan and emerging policy DE4 of the City Plan 2040. The private terrace would increase the amenity facilities for the application site, thereby creating a more enticing office offer, while also adding to the network of surrounding private terraces which are becoming more common place within the city. This is particularly pertinent within the immediate locality with such terrace examples as located at the Ned Hotel (approved under reference 13/01036/FULMAJ and subsequent applications), 1 Poultry (reference: 4616AG) and 100 Cheapside (reference: 12/00772/FULL).
77. The proposal also seeks to introduce additional office floorspace on the ground and basement levels by reconfiguring the existing Class E space (retail and office) to allocate more of the existing floor space for office and less for retail use. The basement currently provides 373sqm of retail space (Class E) which would be converted to office (Class E). In terms of the ground floor, it currently comprises office accommodation to the north part and three retail units to the south part. The proposal retains some of the ground floor retail and seeks to convert 157sqm of retail for office accommodation. This rearrangement would create some 530sqm of additional office floorspace on site. The relevant assessment on the loss of retail floor space on site is discussed in the following section of the report.
78. 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 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 an uplift of office accommodation and would improve the operational efficiency of the building contributing to the long-term activation of the office accommodation in the City.

Loss of Retail

79. Core Strategic Policy CS20 of Local Plan 2015 and Strategic Policy S5 of the emerging City Plan 2040 seek to promote and encourage new retailing in the Principal Shopping Centres (PSC) with active frontages. Policy DM20.1 and

emerging Policy RE1 state that within the PSC the loss of existing ground floor retail frontages and floor space will be resisted.

80. It is highlighted that the legal context to Policy DM 20.1 has changed, following changes to the Use Class Order 1987 (as amended) on 1st September 2020 where the former use classes of shops, financial and professional services, restaurants and cafes, non-residential institutions, and assembly and leisure uses merged into one use class (Class E), which allows changes between Class E uses at any time without the need for planning permission (i.e. changes from a shop to a café or offices), unless there is an existing planning restriction for a particular site. The assessment of the proposals has therefore taken these changes into consideration.
81. As mentioned in the site and surroundings section, the south frontage of the application site falls within the Cheapside Principal Shopping Centre (PSC) and therefore the relevant PSCs policies would apply.
82. The proposed development would result in the loss of the whole retail space in the basement levels (373sqm) and approximately 157sqm of retail space at ground level. Since the introduction of Use Class E as mentioned above, unless a restriction applies (i.e. a condition attached to a previous permission for example) for the continuous use of the former commercial uses, planning permission would not be required for their loss given the now interchangeable nature of the new Use Class E. In this instance, only the ground level retail space is protected by Condition 5 of planning permission Ref. No. 05/00182/FULL, which requires the continuous use of this area as shops given their location within the PSC. No such restrictions have been imposed to the basement retail areas. In light of this the current application seeks permission to only change a limited part of the existing ground retail space into office use to allow for the enhanced office lobby area proposed. Changes within Use Class E for the remaining areas (i.e. the basement) would not constitute development under Section 55 of the TCPA 1990 and therefore would not be assessed under this application. This basement area, in effect has carte blanche to transition to uses within the Class E Use class and as such the focus of the assessment of change of use is wholly with regard to the ground floor element.
83. The submitted planning statement provides a background of the existing retail conditions on the site. The existing shopfront creates lack of visibility due to the narrow windows and deep reveals which affects the letability of the units. One of the three retail units, located at the beginning of the PSC to the southeast, has remained vacant for the past couple of years ever since the pandemic occurred. At the time of this report, it is noted that none of the ground floor retail units are occupied. For the avoidance of doubt officers agree with the comment made by an objector to the effect that where an applicant has allowed a retail space to become vacant in anticipation of a proposed development, that this

cannot be used to justify the removal of a retail space, and officers note that this is not the basis on which the recommendation is made.

84. The proposed development would result in the loss of approximately 157sqm of protected retail floor space at ground floor level, within the Principal Shopping Centre. The thrust of policy DM20.1 (Principal shopping centres) is to protect against loss of retail frontage and floor space within these areas and therefore the proposal would be in conflict with this Policy. The proposed development, however, would seek to retain the existing retail frontages and provide revisions to their shopfront to make the units more attractive and legible. The existing retail floorspace at ground level is approximately 511sqm of which 157sqm would be lost. This equated to 30% loss of the total retail area as identified and protected by existing planning conditions for the site. The retention of the active retail frontage and the limited reduction in retail space, while in conflict with Policy DM20.1, is not considered to compromise the functionality of the units or their continuous presence in Cheapside PSC. While the proposal would lead to a limited reduction in retail floor space which DM20.1 would seek to protect, the proposed alterations are considered to provide a greater, more efficient usage of space while also creating a vibrant, welcoming retail experience within the PSC. The proposal would therefore, on balance in these particular circumstances, still support the retention and enhancement of the PSC as a shopping destination within the City which is one of the reasons for policy DM20.1.
85. Furthermore, the existing restrictions imposed by the implemented consent (Condition 5 of planning permission Ref. No. 05/00182/FULL) would continue to apply to the site and will be carried over to the new permission (in an updated form) to ensure the continued retention and enhancement of the PSC.
86. Overall, therefore, the proposed development would lead to a loss in floorspace contrary to Policy DM20.1 of the Local Plan and emerging Policies S5 and RE1. However, the proposed alterations are considered to provide a greater, more efficient usage of space while also creating a vibrant, welcoming retail experience within the PSC. Furthermore, the loss of retail floor space for enhanced office space would align with the Strategic Policy CS1 (Office) which seeks to maintain the City's position as one of the world's leading financial and business centres.

Architecture, Urban Design and Public Realm

Policy Context

87. The relevant Local Plan 2015 policies for consideration in this section are CS10, DM10.1, DM10.3, DM10.4, DM10.5, DM10.8, CS12, DM12.1, DM12.2, DM12.3, CS13, CS16, DM16.2, emerging City Plan 2040 Policies HL1, S8, DE1, DE2, DE3, DE4, S10, AT1, S11, HE1, S13, and London Plan Policies D3, D4, D5, D8, HC1, HC3, HC4.

The Existing Site and Surrounding Townscape Context

88. 1 Old Jewry was completed in 2008 by Sheppard Robson Architects and is located at the junction of Old Jewry and Cheapside/Poultry and is located on the edge of the Bank Conservation Area and adjacent to the Guildhall Conservation Area. The primary frontage of the existing building fronts Poultry and sits as a modern insertion to this historic street formed of large city blocks clad in Portland Stone. The building makes a neutral contribution to Conservation Area and is not a non-designated heritage asset. The townscape context of the locality is of a modest scale with the primary frontage to Cheapside/Poultry and narrow streets running north south. The roofscape is of a varied character formed of traditional mansard roofs, utilitarian plant rooms and well considered modern insertions which are stepped back from primary elevations, as found at the neighbouring Midland Bank.
89. Overall, the existing building sits comfortably within the built context in terms of scale, massing, materiality and appearance however the ground floor fronting Cheapside and Old Jewry is less successful due the narrow deep openings reducing the level of activation along primary retail routes.

Proposal

90. The proposal is for the erection of a two-storey pavilion building at roof level with a private roof terrace, alterations to the ground floor elevations and facade upgrades.

Architecture and Materiality

Bulk, Height and Massing:

91. The disposition of the final massing and bulk has followed a design-led approach considering local townscape views, relationship with neighbouring buildings and surrounding heritage assets. The massing of the rooftop pavilion has developed through the pre-application process to create a well-integrated piece of design which sits comfortably in the varied roofscape. The additional bulk and massing of the pavilion and plant would increase the total height of the building from 49.660m AOD to 57.455m AOD. The modest scale of the rooftop pavilion and plant would result in minimal visual impact and there is limited visibility from the public realm of surrounding streets. The additional massing

would only be glimpsed from the public realm in fleeting oblique views along Old Jewry. The pavilion and plant are set snugly to the party wall line of 8 Old Jewry and would be set back from the existing parapet line on all other aspects creating a generous amenity terrace for the office users and so maintaining the consistent existing shoulder height along Cheapside/Poultry.

92. The pavilion and plant structure would result in an overall height which is taller than direct neighbours and would be visible from the surrounding roof terraces and high-level windows. The rooftop extension would be a complimentary addition to in the existing varied roofscape of the surrounding townscape. When viewed from public realm along Old Jewry this height, scale and massing is not visually prominent and is commensurate with neighbouring building's roof roofscapes when glimpsed from the local public realm. As demonstrated in the digitally testing of local townscape views submitted within the Design and Access Statement.

Expression and Materiality:

93. By virtue of the proposals, much of the Portland stone façade is to be retained with minor alterations to window openings and ground floor elevations. However, the approach to the top of the building differs and will be read as legibly modern insertion into the roofscape. Owing to the building's location within the Bank Conservation Area and surrounding heritage assets, the character and expression of the pavilion has been carefully considered to ensure it constitutes good design through its well-proportioned, simple, compatible yet subtly contrasting facade treatment. With careful consideration given to the thoughtful materiality and colour palette to create a legibly different yet complimentary extension. The building has a clear base, middle and top, elaborated upon below.

Base

94. The proposals to the base of the existing building would increase the amount of glazing, opening up the ground floor frontage to Poultry and Old Jewry. Improving the activation along a key retail route and enhancing the pedestrian experience of the street, while also responding to the existing architectural symmetry of the facade.
95. The proposed changes to the base along Old Jewry would comprise of removing the three solid bays which would create more visual permeability into the building. The central four bays would be combined to create two double bays, one of which would create a new office entrance. The existing office entrance would become a dedicated cycle entrance connecting into improved end of trip facilities in the basement. The improved pedestrian experience and cycle facilities would encourage active travel and comply with Local Plan policy DM10.1 and Emerging policies S8 (1) (2) (6) and DE2.

96. The proposed works along Poultry would create larger shopfronts creating more visual permeability into the building while still respecting the architectural rhythm of the existing building and its context and would incorporate a unified signage strategy for all three retail units in line with the shopfront policy DM10.5.

Body of the Building

97. The proposed alterations are modest and would retain the existing rhythm of the body of the building while introducing facade alterations which would include the replacement of all the windows within the existing openings, removal of the louvers along Poultry, introduce openable windows and replacement of the existing balustrades to the terraces along Old Jewry at levels 05 and 07, Grocers' Hall Court at level 05 and along Poultry at level 07.
98. The proposed works along Poultry would remove the existing louvers creating a more uniformed treatment to all the elevations. To mitigate the risk of solar gain from removing the louvers, the lower portions of the southern windows are replaced with new solid panels. Additionally, side hung solid opening vents would be introduced into the narrow-glazed elements across alternating bays on the façade on levels 3, 4, 5 and 6.
99. Openable windows would also be introduced to the east and west elevations within alternating bays. The new window module would be inserted into the existing opening and would be formed by dividing the existing window in two vertically, creating one opening window with a fixed pane below and one fixed vertical window. The verticality and rhythm of solid and void would be retained.

Rooftop Pavilion and Plant

100. The architecture and materiality of the pavilion would be simple and recessive creating a subservient and modest but clearly modern extension. The architectural detailing of the extension would contrast with the existing solid Portland stone facades and would comprise timber cladding, timber soffits, dark bronze metalwork and dark bronze acoustic louvers. The plant enclosure would screen all the plant equipment from view while ensuring consistent architectural language between the pavilion and the plant enclosure, creating an integrated architectural design. The overall architectural language sits in contrast with the lower portion of building creating its own architectural set piece albeit through the use of the material palette, particularly the use of dark bronze metal work, there would be a consistency across the building.
101. The proposal would be of a high quality and when glimpsed from surrounding streets, as seen in Townscape View 04, it would quietly integrate into the wider layering of varied roof tops on the local skyline. It would be directly visible from the surrounding elevated private roof terraces at One Poultry and the Ned Hotel. The proposal has been designed with a richness of material and detail

to ensure that the quality is retained at this high level, through the use of punched windows, timber cladding which would be formed of varied widths adding visual interest and texture and high-quality landscaping. Further design detail including material samples would be secured via condition to ensure this quality is delivered to construction stage.

102. The new roof terrace would provide a fully accessible roof terrace for all office users providing views across the City. The proposed balustrade would be a minimum of 1400mm and formed of a decorative metal railing. Further detail regarding suicide prevention would be secured via condition. Officers note CAAC's objection to the location of the proposed balustrade at the perimeter of the new roof terrace being too far forward on the south elevation and their recommendations that a setback approach would reduce impact to the character and appearance of the Conservation Area. A full assessment has been undertaken further below within the Heritage section of this report that responds to this comment. The balustrade has been designed to be minimal and subservient to reduce the visual impact when viewed from the public realm including longer range views from Bank Junction, as seen in Townscape View 01 and 04. Further design detail will be secured via condition.

Outdoor Amenity and Landscape Design

103. The proposed amenity terrace at level 09 would wrap around the new pavilion structure. The space would incorporate planters, fixed and unfixed furniture to create a flexible space while ensuring inclusivity and safety. To the east of the site the amenity terrace of the neighbouring building is across the street and to limit overlooking high level planted screens would be installed to obscure views out from within the pavilion. Further detail regarding planting and maintenance would be secured via condition.
104. The terrace layout and balustrading would be designed in line with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. Further detail regarding suicide prevention and inclusivity and landscaping would be secured via condition.
105. The final details of the landscaping including full planting specification, hard and soft materials, furniture, maintenance regime, and irrigation, will be conditioned to ensure the design and materials are of high quality, so the landscape thrives and is of acceptable design quality, and is fully inclusive.
106. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City by night. Further detail would be secured by condition.

Conclusion on Architecture, Urban Design and Public Realm

107. Third party representations object to the visual impact of the proposal due to its contrasting design and materiality within the historic setting of the area these are addressed in the heritage section of the report.
108. Officers consider that the architectural design of the building would be high quality and whilst contrasting with the main building would be compatible with the existing context in terms of scale and massing and would have minimal visual connection to the public realm. When viewed from neighbouring roof terraces and high-level buildings the materiality and detailing would be of a high quality adding to the varied layered roofscape of the surrounding area. The alterations to the existing facade would improve the sustainability of the building and while maintaining the building's contribution to the local townscape. The ground floor would also be transformed to be outward-facing and visually permeable, encouraging a positive interaction with surrounding streets. The proposals would introduce landscaping to level 09, providing new planting and opportunities for sitting and external amenities.
109. The proposals would comply with Local Plan Policies CS10 and DM10.1, Draft City Plan Policy S8, DE2, HL1, and London Plan Policy D3, and paragraphs 135 and 137 of the NPPF.

Heritage

110. The CAAC have objected to the application due to the setting out of the proposed balustrade, stating that it should be pulled back from the front elevation in order to reduce the adverse impact on the character and appearance of the Conservation Area.
111. Historic England did not consider their engagement would add value to this planning application, therefore did not provide a comment.
112. Third party representations have raised objections regarding the impact of the proposal, raising concerns on the alterations to the elevations of the existing building, the scale, massing and materiality of the extension on the setting of the surrounding listed buildings and the character of the conservation area.
113. Officers have undertaken a full assessment, through a digital model and townscape views, of the impact on the setting of surrounding heritage assets and the character and appearance of the Bank Conservation Area as set out below.

Direct Impacts

Bank Conservation Area

Significance

114. First designated in 1971 with the SPD adopted 2012. This, the City's largest conservation area, comprises the commercial heart of the City around the focal point of Bank Junction. The majority of it comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, creating the sense of an intact historic townscape. There is high architectural and historic interest in the contrast of medieval street plan, elegant, high quality C19 and C20 (primarily high finance) buildings and more modern but largely sympathetic office developments.
115. The characteristics which contribute to the special interest of Bank Conservation Area, are summarised as follows:
- An area where buildings and streets are harmonised by their predominant use of solid masonry facades with regular punched openings, enriched by abundant classical modelling and surface detail;
 - A number of nationally significant and well-known buildings, the headquarters of major corporations, and internationally significant churches;
 - An area defined by the design and use of buildings for banking and associated commercial activities;
 - An area of large-scale commercial buildings set on principal thoroughfares within a network of historic streets, courtyards and alleyways, which creates a distinctive and dense urban environment;
 - The largest concentration in the City of London of Grade I, Grade II* and Grade II listed buildings, as well as numerous unlisted buildings of high architectural quality from different periods;
 - A visual character and groundscape that is enriched by a wealth of materials, features, monuments, public sculpture, signs, plaques, statuary, and other structures;
 - An area characterised by the restrained presence of modern signage and advertising;
 - An area associated with nationally significant cultural and historic events and notable people.
116. The Conservation Area is formed of four sub areas, the proposal site is located in the Bank Junction sub area. The majority of buildings on the Junction are detached or occupy an entire block with streets and lanes to every side, most of which are historic thoroughfares. This specific part of the City is unusual in that it is possible to view buildings face-on from a distance, either across the space or on approach from one of the radiating roads. Buildings away from the main open space are seen obliquely when approaching the junction and make

a contribution to its character. Each building makes a distinctive contribution to the area's character and appearance, and there are a number of common architectural characteristics that unite individual buildings and the space as a whole. It is the monumental scale of buildings, and their predominant use of Neo-Classical architecture and Portland stone that gives the area its special character.

117. Buildings around the junction are all of a similar scale, with the majority having additional set-back attic storeys or mansard roofs including the modern insertion of a setback storey at the Midland Bank next door. The visual impact of building height is alleviated by a variety of surface features and treatments, including rustication, entablatures, string courses, sculpture, and architraves.
118. Buildings which depart from the predominant use of Portland stone are no.1 Queen Victoria Street, which is built of sandstone that provides a warm contrast to the expanses of limestone on other buildings; and No. 1 Poultry which is faced with contrasting bands of Australian beige and Gloucester "Wilderness Red" sandstone that are integral to the character of this distinctive late 20th century postmodern building.
119. 1 Old Jewry is described in the Bank Conservation Area SPD as being appropriately proportioned with a simple grid of Portland Stone incorporating deep window reveals and is deemed to have a neutral contribution to the Conservation Area.

Impact

120. Third-party representations object to the bulk and massing of the pavilion alongside its modern architectural language. Officers have undertaken a full assessment including townscape views and digital model and conclude the pavilion would only be glimpsed in oblique views along 1 Old Jewry, and in this case, the presence, form and materiality would be subtle and well designed.
121. The site appears in two local townscape views, no.38 and no.72, highlighted in the Bank Conservation Area Character Summary & Management Strategy SPD as having a strong contribution to the character of the conservation area. View 38 is taken from Lombard Street looking North-West to Bank Junction and View 72 is taken from the junction of Lombard Street and King William Street looking North-West towards 1 Princes Street. 1 Old Jewry is a background element in these views with its primary elevation is visible on the oblique and a limited portion of the eastern flank wall. Both these views are characterised by grand Portland stone buildings centred around Bank Junction including, 1-6 Lombard Street, 1 Cornhill, 1 Princes Street and the Midland Bank. The view would remain largely unchanged due to the site being located at a significant distance and the significant setback of the rooftop pavilion, however, the alterations to the existing primary elevation and the new decorative balustrade would be visible, as demonstrated in Views 2 and 3 in the Design and Access Statement.

The extension would be neither distracting nor dominant and would not be a noticeable skyline feature.

122. The proposals would increase the overall height and massing of the building by a two-storey set back extension and roof terrace with a 1400mm balustrade. The bulk of the pavilion has been designed to ensure that it is not visible in key views from within the Conservation Area. However, it would be visible in fleeting oblique views along Old Jewry and high-level windows and terraces of neighbouring buildings. When glimpsed in oblique kinetic views moving down Old Jewry, as demonstrated in View 04 of the Design and Access Statement, it would appear as its own unique architectural set piece while retaining a subdued and unobtrusive presence and would be understood as a new subordinate architectural moment within an already varied roofscape which defines this part of the Conservation Area.
123. The proposal would be visible from neighbouring historic and modern private terraces, and this has formed the basis of a number of objections. Officers have considered the representations received and are satisfied that the architectural quality of the proposals would be of high quality for these closer upper-level experiences and would blend into the varied utilitarian roofscape. From the neighbouring buildings terraces, No. 1 Poultry and the Midland Bank, the key views out across the Bank Conservation Area, which are characterised by Bank Junction in the foreground and the Eastern Cluster in the background would be retained with the additional massing at 1 Old Jewry being located behind the viewer. The additional structure would be noticeable from the terrace but would have a neutral presence in respect of the character and appearance of the Conservation Area.
124. The proposed materiality of dark stained timber, CLT soffits and dark bronze metalwork of the Pavilion would sit in contrast to the prevailing aesthetic of the Bank Junction sub area which is characterised by predominant use of Portland Stone. However, as stated above there is no intervisibility between proposed pavilion structure when viewed from Bank Junction. Where viewed from the public realm along Old Jewry and from neighbouring building the proposal would sit within the wider variety of materials found within the Conservation Area, such as the sandstone of No.1 Queen Victoria Street and contrasting bands of Australian beige and Gloucester "Wilderness Red" sandstone at No.1 Poultry. The surrounding roofscapes are characterised by variety of materials, from the traditional slate and metalwork roofs to modern insertions such as the highly glazed and black metalwork pavilion at the Midland Bank. It is considered the area is sufficiently robust to accommodate the proposed modest use of more contemporary materials at a high level.
125. CAAC's raised an objection relating to the location of the proposed balustrade however officer have come to a different conclusion. The existing building terminates abruptly, and the introduction of the decorative metal balustrade

would add additional detail to the shoulder of the building, and parapet line, in line with prevailing character of the Conservation Area which has highly articulated cornice lines, eaves and parapets. The balustrade would read as a well-designed, subtle and minimal embellishment.

126. The proposals to the existing facades would retain the existing rhythm of the building and the removal of the louvers from the Cheapside/Poultry elevation, improving the solid to void ratio as is characterful of the other prominent masonry buildings within the Conservation Area. This would have a neutral impact on the character of the Conservation Area through the increased visibility of the punched opening within the primary elevation, a key harmonising feature of the Bank Junction sub area of the conservation area.
127. The pavilion when glimpsed in the Conservation Area in the kinetic view along Old Jewry will bring a distinctive but subtle new architectural feature to the historic roofscapes, whilst remaining deferential to the strong architectural language of Bank Junction this is due to its subdued scale, set back and suppressed form and massing which mitigate any adverse impacts. When considered against this large Conservation Area as a whole, the impact on character and appearance would be very limited and not adverse and so would preserve the character, appearance and significance of the Conservation Area.

Indirect Impacts

Midland Bank – Grade I

Significance

128. Designed as the headquarters of the Midland Bank in 1924 by Sir Edwin Lutyens and converted to hotel use in the early 21st century. The Midland Bank occupies a prominent location within the Bank Conservation Area. Classical in style, with the majority of the external facades in Portland stone, it joins a group of other imposing listed buildings around Bank Junction, including 1 Prince's Street (Grade II), the Bank of England (Grade I), Mansion House (Grade I), 1 Queen Victoria Street (Grade II) and the Royal Exchange (Grade I). Having been described as one of Lutyens's "finest urban buildings", the former Midland Bank has historic interest owing to its association with Edwin Lutyens, one of the most prominent architects of the early-20th century. The building derives further historic interest as the City's oldest surviving premises for a joint-stock bank. It also articulates the period of commercial development within this area of the City, in which the majority of buildings constructed in this period were defined by their use as banks and associated financial institutions.
129. In 1992 the building was vacated and in 2013 it underwent a comprehensive refurbishment and change of use to the Ned Hotel, which was completed in 2017. The conversion includes 252 hotel rooms, conversion of the lower levels into hotel facilities such as spa, swimming pool, bars and restaurants and the

introduction of a private members club at roof level. The member's club is formed of roof terrace, with a swimming pool and pavilion restaurant, characterised by the lightweight dark metal structure and its highlight glaze facade. The conversion to hotel and external alterations at roof level are not deemed to contribute to the significance of the listed building.

Contributing of Setting

130. Further to the building's intrinsic architectural and historic interest, its setting makes a positive contribution to its overarching significance, comprising the civic centre of Bank Junction. Owing to its position on Poultry, immediately to the west of Bank, the building is surrounded by commercial development dating to a similar period and of a similar architectural style, bound by a consistent use associated with commerce and banking, as well as being consistent in terms of materials, with high levels of Portland stone and classical detailing.
131. 1 Old Jewry is a sympathetically designed neighbour to the listed building, clad in complimentary Portland Stone with a repetitive gridded facade which follows similar proportions, matching the existing shoulder line. 1 Old Jewry is a neutral contributor to the setting of the Midland Bank.

Impact

132. Third party representations object to the introduction of the pavilion structure due to its lack of visual integration into the existing building and the wider roofscape as a whole. As well as the impact on the outlook from the rooftop terrace of the hotel which is addressed elsewhere in the report. Officers have undertaken a full assessment of the indirect impacts on the Midland Bank including visiting the roof top terrace and reach different conclusions.
133. The proposed development includes external alterations to the existing façade which would increase activation at ground floor and would provide a more uniform, ordered façade, with a regular rhythm and a more resolved/ improved solid to void ratio. These alterations would be a change within the setting of the Midland Bank but would have a neutral impact on its significance due to the horizontal proportions, materiality and subservient nature being retained.
134. The pavilion rooftop extension, with additional plant above is well set back from the building frontage, with an external amenity terrace. The setting back of the proposed pavilion has been designed to be responsive to the building's surrounding sensitivities, including key views across Bank Junction towards the primary elevation of Midland Bank. This has been illustrated within the supporting Design and Access Statement View 1, illustrating that only the proposed terrace balustrade would be slightly discernible but not distracting, and the principal elevation of the listed building would remain unblemished within these moments of intervisibility. At no point would the extension or balustrade occlude or back drop the Midland Bank and the ability to appreciate

its elegant roofscape, the architectural and historic values from surrounding streets would be entirely preserved.

135. The proposed extension and landscaping will be visible from the private roof terrace of the listed building and there would be a change to the setting at this level. While this has generated objections, it is not considered to constitute a negative effect on its significance as a former, early-mid-20th century banking headquarters, which did not historically have external terraces or outdoor rooftop amenity space. Accordingly, the setting and significance of the Midland Bank would be preserved.

No.1 Poultry – Grade II*

Significance

136. No. 1 Poultry is an exceptional example of commercial post-modernism, constructed as a speculative commercial building incorporating both offices and retail units, a restaurant and rooftop garden. The building was designed in 1985-88 by the prolific post-war British architect James Stirling, though was not completed until 1997. Being one of James Stirling's last projects, No. 1 Poultry expresses Stirling's singular approach to design, formed on a monumental scale on a restricted triangular site, at the intersection of Queen Victoria Street and Poultry. Much of its architectural interest is derived from its form and appearance, as well as spatial arrangement, with the design of the building being characteristic of Stirling's work in its exploration of space and movement through interlocking geometrical forms and through its combination of motifs and materials. On the building's eastern frontage, the apex of the buildings is distinguished by its prominent tower, with a circular window in the form of a clock.

Setting

137. No. 1 Poultry occupies a triangular plot, between Poultry and Cheapside to the north, and Queen Victoria Street to the immediate south. The building addresses the Bank Junction to the east and following the form and layout of the surrounding street network. The building's immediate setting comprises an eclectic mix of historic and modern buildings including the application site, associated with various phases in the development of the City and its evolution over the past two centuries. 1 Old Jewry while maintaining the sense of scale and grain prevailing around Bank Junction does not specifically contribute towards the significance of the listed building and is a neutral element to its setting.

Impact

138. Third party representation have raised objections relating to the introduction of the pavilion structure due to its lack of visual integration into the existing building and the wider roofscape as a whole. Officers have carried out a full assessment

of the indirect impacts on No. 1 Poultry including a site visit and reached different conclusions.

139. The proposed development includes external alterations to the existing façade which would improve activation at ground floor and would provide a more uniform, ordered façade, with a regular rhythm and a more resolved/ improved solid to void ratio. No.1 Poultry is experienced in kinetic views looking north and south along Poultry however both would only be glimpsed in oblique views. These alterations would have a neutral impact on the significance and setting of No.1 Poultry.
140. The proposals include the introduction of a pavilion rooftop extension, with additional plant above. The pavilion is to be set back from the building frontage, with an external amenity terrace. The setting back of the proposed pavilion has been designed to be responsive to the building's surrounding sensitivities, including key views across Bank Junction and towards the prominent tower of No. 1 Poultry as illustrated within the supporting Design and Access Statement View 1 only the proposed terrace balustrade would be discernible as a distant feature and the principal elevation of the listed building will be unblemished.
141. The proposed extension would be visible from the terrace associated with the restaurant at roof level and this has been the cause of objections. The proposal is located on the opposite side of Poultry and due to the new massing location at the northside of the site would be recessive and subservient. The visibility of the new massing, balustrade and landscaping would be minimal due to the distance, and level difference between the two building. The proposal is not considered to constitute a negative effect on setting of the listed building due the limited intervisibility and views towards Royal Exchange across Bank Junction to the east remain uninterrupted. Accordingly, the proposals would have a neutral presence, and the setting and significance of No.1 Poultry would be preserved.

Guildhall Conservation Area

Significance

142. First designated in 1981, it is located at the centre of the City of London and shares a boundary with the Bank Conservation Area on the eastern side. The conservation area is rooted in the civic complex comprising the Guildhall and its associated buildings disposed about the Yard, and incorporates a hinterland of C18, C19 and C20 commercial buildings to the east and south. The street pattern, which has been retained after the Great Fire, is characterised by narrow alleys, courtyards and predominantly small building plots. Only King Street and Queen Street were cut through the surviving medieval fabric after the Fire to create a processional route from the River Thames to the Guildhall Yard. Further interest is derived from the presence of the Georgian residential developments, associated with Robert and James Adam, within Frederick's

Place, which provide an appreciation of a mid-late-18th century perspective on the historic streetscene prior to the mass expansion of the City.

Setting

143. The conservation area boundaries are defined by Cheapside to the south, King Street, Lawrence Lane, Gresham Street and Aldermanbury in the west, Old Jewry and Coleman Street east side, part of Basinghall Street and the 15th century Guildhall. Owing to the dense, urban character beyond the conservation area boundary, views beyond its immediate context are limited, though the main lateral vistas along Gresham Street, eastwards towards the Eastern Cluster. To the south, the conservation area borders the Bank Conservation Area, with the two having a close visual and functional relationship. There are significant views in and out of the area, such as those towards Tivoli corner as well as those along Old Jewry and within Frederick's Place. These illustrate the historical evolution of the City, including its former residential context of the 19th century. 1 Old Jewry while maintaining the sense of scale and grain prevailing along the eastern boarder of the Conservation Area does not specifically contribute towards significance and is a neutral element to its setting.

Impact

144. A key point of contention raised by the third party representations has been the bulk and massing of the pavilion alongside its modern architectural language, as previously stated officers have come to a different view as there would be limited intervisibility from within the public realm of the Conservation Area.
145. The Conservation Area is located directly to the west of the proposal site. The proposal would increase the overall height and massing of the building by a two-storey set back extension and roof terrace with a 1400mm balustrade. The bulk of the pavilion would have limited visual impact on the Conservation Area and would only be seen incidentally as fleeting presence from Old Jewry and Frederick's Place. When considered against conservation area as a whole, it is considered that the impact on setting would be limited, incidental and not detrimental to the setting, character, appearance or significance of the conservation area.

Wider Indirect Impacts on Heritage Assets:

146. Officers have also assessed the impact of the scheme on other nearby designated heritage assets. These are as follows:
- No.35 Old Jewry – Grade II
 - No.3,4,6,7 and 8 Frederick's Place – Grade II (separately listed)

147. No perceptible impact, given that the views of the listed buildings are only glimpsed together in fleeting localised views. Officers consider that their special architectural and historic interest and setting would be preserved.

Conclusion on Heritage

148. The proposals will create a minimal visual change to the elevation and roofscape when viewed from the public realm. The rooftop pavilion is set back from the building line and is only glimpsed in obliqued momentary views in and around the Bank Conservation Area and surrounding heritage assets. There would be no harm to the character and appearance of the Bank Conservation Area and setting of the surrounding designated heritage assets and accordingly the proposed development would comply with Local Plan policies DM10.1, CS12, and DM12.1 and DM12.2.

Access and Inclusion

Policy Context

149. Accessible and inclusive design is covered by NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2040 – Revised Proposed Submission Draft HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.
150. Local Plan policy DM 10.8 requires proposals “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.

Entrance

151. The proposed changes to the primary office entrance would replace the existing revolving door with a recessed barrel door. Improving the inclusivity of the primary entrance by removing the undue separation created by revolving doors, in line with D5 3.5.9 of the London Plan and DM10.8 of CoL Local Plan.
152. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2. Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details will be secured by condition.
153. Security barriers between the reception and main core would feature at least one barrier in each location with a minimum clear-opening width of 1000mm.

Cycle and End of Trip Facilities

154. The long and short stay cycle parking would be accommodated within the basement and would be accessed via Old Jewry. The internal access to the cycle store is via a cycle lift which opens directly into the basement cycle store providing step free access.
155. A minimum of two spaces which can accommodate larger accessible cycles will be provided. Dedicated male, female and accessible changing facilities will be provided within close proximity of the bike store. Full details of the cycle stand types and the setting out of the bike store, and end of trip facilities are reserved for condition to ensure these are well-detailed and are useable promoting a safe, inclusive and welcoming environment.

Vertical Movement

156. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure. There is one firefighting and EVAC lift which will serve ground level to 9th floor level.

Horizontal Movement

157. Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and will be subject to detailed design development.

Amenity Terrace

158. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.
159. The landscape layout will be conditioned to ensure that it is welcoming and inclusive for a wide range of users and provides a variety of seating options for a range of people including handrails, backrests, and sufficient contrasts.
160. The terrace doors should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via condition.

Sanitary Facilities

161. It is confirmed that an accessible toilet will be provided at ground floor in close proximity of the reception area.

162. A mixture of left- and right-hand transfer options should be provided throughout the building to accommodate a wider range of users. Further detail will be secured via condition.

Conclusion on Access and Inclusion

163. The proposal has been designed to ensure that the site meets the highest standard of inclusive design. In order for the proposed office use to fulfil its goal of being an inclusive and welcoming place to work, high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the primary entrance, end of trip facilities and the design of the new amenity terrace in order to secure the optimal solution for the greatest range of building users. Subject to further design details which will be secured by condition, it is considered that the proposal accords with the access related policies outlined above.

Archaeology

164. Policy DM12.4 of the Local Plan 2015 and Policy HE2 of the emerging City Plan 2040 outline the requirements with regards to archaeology, that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.
165. An Archaeological Desk-Based Assessment has been submitted with the application (MOLA 2024). The only areas of proposed below ground impact from the new development comprise a new lift pit and some drainage.
166. In March 2025, the applicant submitted a Written Scheme of Investigation (WSI) for Archaeological Excavation and Monitoring and Recording, MOLA 2025 which outlines how the archaeological mitigation will be managed on the site.
167. The Greater London Archaeological Advisory Service (GLAAS) has reviewed the information submitted and advised that the WSI is acceptable and recommended a compliance condition to allow the archaeological work to proceed.
168. Subject to the satisfaction of the compliance condition recommended by GLAAS, the proposals are considered to be in accordance with Policy DM12.4 and emerging Policy HE2.

Transportation and Highways

169. Strategic Policy CS16 of the Local Plan 2015 is relevant to transportation, it promotes improvements to the public transport capacity and the conditions of walking and cycling, Policy DM16.1 requires assessment to be submitted with applications for developments likely to have an effect on transport, Policy DM16.2 is relevant to pedestrian movements, Policy DM16.3 is relevant to cycle parking, Policy DM16.4 encourages active travel and Policy DM16.5 is relevant

to parking and servicing standards. Relevant policies of the emerging City Plan 2040 are Strategic Policy S8 and S9 and Policies VT1, VT2, VT3, S10, AT1, AT2 and AT3. The relevant London Plan 2021 policies relevant to transportation and highways are T1, T2, T3, T4, T5, T6, T6.2, T6.3, and T7.

170. The application creates additional office floorspace of 491 sqm by way of new build elements. It is proposed to enhance the cycling in journey and relocate the existing bike entrance from Grocers' Hall Court to Old Jewry with an access lift to the basement. In line with the existing planning conditions under planning permission 05/00182/FULL a minimum of 33 cycle parking spaces should be available on site. The applicant has stated that 45 cycle parking spaces are principally located in a small store as identified on the existing basement plan (33 spaces) with an additional 8 spaces provided beneath the suspended lift pits. The majority of the existing spaces would not meet the relevant standards and some are not considered to be practically useable given low head heights and accessibility.
171. In accordance with Policy T5 of the London Plan 2021, the proposed office uplift would require 7 long stay spaces and 1 short stay space. At least 2 supporting facilities per 3 long stay spaces and 1 shower facility per 10 long stay spaces should be provided. The proposed development creates 77 cycle parking spaces including 2 accessible spaces. Given that 45 spaces should be re-provided for the existing site, the proposals provide an addition of 32 cycle parking spaces, which is well in excess of the minimum requirements for the proposed uplift. Enhanced end-of-trip facilities with changing spaces would be located in the basement adjacent to the cycle parking offering 9 showers, of which 1 will be accessible, and 116 lockers. The initial submission was not in compliance with London Cycling Design Standards and amendments have been made by the applicant to meet them. In particular the applicant was requested to remove the fully vertical cycle parking spaces as there are not acceptable. A new submission was made on 7th June with a revised proposed basement plan showing semi-vertical spaces instead alongside Sheffield stands which is considered to be more appropriate for daily use. It is considered that the improved pedestrian experience and cycle facilities would encourage active travel. The proposals would therefore support active travel and comply with Local Plan Policies DM10.1, DM16.4 and emerging Policies S8 and S9. The proposed cycle parking provision is compliant with Policy T5 of the London Plan, in terms of the minimum number of spaces required these are being exceeded. To ensure that short term cycle parking spaces are used as intended, further details would be required under planning condition, including how visitors of the building can access and use them. A condition has also been recommended to ensure the cycle facilities would be provided for the lifetime of the development.

172. The delivery and servicing arrangement would maintain the existing situation, with access via Grocers' Hall Court. Due to the altered layout at ground, basement and upper levels a Delivery and Servicing Management Plan would be secured by condition. Environmental Health has also recommended time restrictions for servicing between 23:00 and 7:00 to safeguard the amenity of the adjoining premises and the rest of the area in general. These restrictions would be secured by planning condition.
173. Any demand arising for wheelchair accessible parking would be met via blue badge parking bays within close proximity to the site. The submitted Transport Assessment identifies the closer bay within 100m of the site.
174. Through Travel Plans, the applicant must monitor the demand for on-street disabled car parking spaces coming from their development, and encourage the use of the public transport through travel planning measures. Annual surveys to establish the mode of transport for all users of this development is required. The findings of the surveys to be compiled on a report, with measures to further support the use of the sustainable modes of transport.
175. A Construction Logistics Plan would be secured by condition to mitigate construction impacts on the highway network and this will also help the City Corporation ensure that any risks to cyclists and pedestrians are managed and mitigated during the construction period which is an area of concern that has been raised by objectors.
176. In addition, the CoL Transport Officer has requested a planning condition to be secured that requires the applicant to enter a Section 278 Agreement with the City Highways Authority for the reinstatement of the adjacent highways affected by the construction logistics arrangements. A condition has been recommended on that basis.
177. The proposals are considered acceptable in transport terms, provided the applicant complies with the recommended planning conditions.

Waste and Refuse

178. Local Plan Policies CS17 and DM17.1 require development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials, with waste facilities integrated into the design of the buildings.
179. Local Plan Policy DM16.5 states that an on-site servicing area 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. The emerging Policy CE1 is relevant to sustainable waste facilities and transport.
180. The City's Cleansing team has reviewed the details included in in Drawings No. 6982-SRAXX- B1-DR-A-02199 Rev P02 and 6982-SRA-XX-00-DR-A-20100

Rev P06 and as outlined in the Design and Assessment, Feb 23 and confirmed they are adequate for this proposal. As discussed above, the collection arrangement will remain as existing.

181. The proposed waste facilities and collection are considered to be acceptable.

Sustainability

182. As a minor development the scheme is not required to meet London Plan Policy SI2 requirements (scheme to be net zero-carbon, to include a detailed energy statement using the energy hierarchy framework, to calculate WLC emissions) or to follow CoL's Carbon Options Guidance. However, the submitted Sustainability and Energy Statement outlines how the design approach adopts similar principles and hierarchy methodology to inform and justify the development proposal.
183. Existing glass spandrels above the ground glazing will be replaced with stone spandrels and existing double-glazed units will be replaced with new openable double-glazed windows. The properties of the existing glass are considered unsuitable to match required properties for thermal comfort and energy efficiency and as such will be recycled/reused offsite instead.
184. London Plan Policy DM 15.1 requires BREEAM assessment for major developments only. However, the Sustainability Statement references a target for the Proposed Development which aligns with BREEAM credits: the office element of the scheme is targeting an 'Outstanding' BREEAM rating with a targeted score of 89.1%. Albeit there is no requirement for the post-completion certificate to be approved by the Local Planning Authority, this will be requested for information purposes only.
185. The proposed development seeks to enhance ecological value of the existing site within the loading limits of the existing structure. This will be achieved through features including the provision of a green roof garden at level 9, invertebrate habitat features, nectar-rich wildlife planting and species-specific boxes.
186. The proposed development currently demonstrates a total net increase of 105% in ecological value. A UGF score of 0.3 was considered unfeasible due to the highly confined nature of the site which features limited opportunities for greening at ground level. Notwithstanding this, the proposals have sought to maximise available roof and facade areas for planting to achieve a UGF score of 0.09.
187. It terms of Biodiversity Net Gain (BNG), it is noted that the planning application was submitted in March 2024, therefore before the BNG regulations became mandatory for minor development applications in April 2024. Even so the development site comprises a roof structure with no elements of greenery or habitat life, the site would be exempt from the BNG requirements as the site

would be below a de minimis threshold (i.e. development that does not impact a priority habitat and impacts less than 25 square metres (e.g. 5m x 5m) of non-priority onsite habitat). The proposals increase urban greening on the roof through the addition of soft landscaping elements to be provided at either side of the pavilion structure and aside the new roof terrace seating.

188. The proposed scheme would result in significant carbon emission savings by reducing embodied carbon through large-scale retention of the existing building and reducing operational energy demand through upgrades to the existing building fabric. The introduction of renewable energy measures would further help to contribute to energy savings. The proposals demonstrate the use of circular economy principles with the prioritisation of material re-use on-site and the exploration of off-site re-use potential where this is not possible. The proposed landscaping strategy would have a positive impact on biodiversity, whilst contributing to climate resilience.
189. Overall, the proposals indicate that the refurbishment and extension scheme would provide significant sustainability benefits compared to the existing building. The submitted documents demonstrate the effort and commitment to enhancing the sustainability of the building and reducing the risk of any adverse environmental impacts associated with the proposed development.

Amenity – Overlooking

190. Policy DM21.3 of the Local Plan 2015 and Policy HS3 of the emerging City Plan 2040 respectively require all developments to be designed to avoid or minimise overlooking and to seek to protect the privacy of the adjacent residential accommodation. However, the supporting text to the policies recognise that due to the density of the City, it may not always be possible to entirely avoid overlooking or other impacts on amenity.
191. Policy DM10.3 of the Local Plan 2015 and Policy DE4 of the emerging City Plan 2040 seek to encourage roof terraces whilst protecting residential premises from immediate overlooking from terraces and other elevated open spaces such as roof gardens.
192. The planning system does not normally protect specific views from private properties but can consider whether a proposed development is intrusive, particularly to residential properties, due to the massing and proximity, and whether this would cause demonstrable harm to the amenity of that property. A view from a private property would only normally be protected where in the circumstances of the case it was in the public interest to do so.
193. Consideration has to be given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.

194. The application proposes a pavilion and a roof terrace. There are no immediate residential properties to the site. The nearest property is situated at 6 Frederick's Place towards the west.
195. The roof terrace would mainly occupy the south side of the roof which is situated at higher levels to the residential property with a considerable distance between them.
196. During the December 2024 consultation period, objections were received on the loss of privacy to the existing roof terrace at the neighbouring hotel (the Ned, 27 Poultry) to the east of the site arising from the creation of a new roof terrace to the application site and the erection of a pavilion building for the enjoyment of the office staff. The applicant subsequently submitted a set of updated plans regarding amendments to the roof level and the relevant elevations, which relate to the detailed design of the proposed pavilion and roof terrace. These amendments include the relocation of the previously proposed east door to the pavilion offering access to the eastern part of the roof terrace, to now being proposed at the west elevation. Other amendments involve the removal of benching on the eastern section of the roof terrace, the re-orientation of the southeastern landscaping plinth to face away from the Ned, and the introduction of planted screening to the east of the pavilion extension. The applicant considered these amendments and updates to the design not to be necessary or material for the acceptability of the proposals, but were made in order to respond to the concerns raised by the objectors regarding the loss of privacy of the hotel's roof level.
197. The above changes are welcomed. It is highlighted that hotels are not subject to the same privacy considerations as residential properties because they serve a different purpose but nevertheless regard has been had to the concerns raised about privacy and officers visited the Ned Hotel and Club (including the roof terraces and swimming pool) to understand the exact relationship between the buildings. As commercial establishments accommodating transient guests and club members, privacy concerns are less critical compared to long-term residential use. Planning policies that protect residential privacy are not applicable to hotels, which operate under different standards. When considering the scheme on this basis the proposed development is for additional office use and as such would, for the majority of the time, likely be used within typical working hours. This relationship between two adjacent commercial uses is very typical within the immediate context and the wider City, and the limited amount of overlooking from the commercial office to a transient hotel and members club use is not considered to be of such detriment that would justify a reason for refusal. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not, inter alia, immediately overlook residential premises. The proposal would allow for some potential limited views to both the neighbouring

hotel rooms and hotel/club roof terrace. That being said, the pavilion and terrace are laid out as such that the main external use would be primary adjacent the southern side of the building and there would be limited space for use either to the east or west of the pavilion area. While officers are cognisant that both the proposed pavilion fenestration and terrace would introduce additional potential for overlooking, this would be a modest addition to the existing mutual level of overlooking within the relationship between the two properties. The addition of such areas would therefore not exacerbate this level to such a significant degree as that it would be unacceptable in the surrounding context and as discussed above, this relationship between two adjacent commercial uses is very typical and is not considered to be inappropriate in this built up inner city location. This is particularly pertinent within the immediate locality as there are clear examples of existing terraces that overlook or are overlooked by surrounding commercial uses such as the terraces located at the Ned Hotel (approved under reference 13/01036/FULMAJ and subsequent applications), 1 Poultry (reference: 4616AG) and 100 Cheapside (reference: 12/00772/FULL).

198. No residential premises would be detrimentally impacted given the location and surrounding commercial uses.
199. It is therefore not considered that the proposed development would have an unacceptable impact in terms of overlooking to nearby residential properties. The proposal accords with Policies DM21.3, DM10.3 and emerging Policies HS3, DE4 on that basis. The relationship with the neighbouring building is considered acceptable and the changes made since the scheme was originally submitted are welcomed.

Amenity – Daylight Sunlight

200. 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.
201. 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.
202. Emerging Policy DE7 of City Plan 2040 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby other sensitive receptors, including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.
203. 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 emerging City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.

204. The immediate environs of the development site are predominantly characterized by commercial uses including the hotel and club use at the Ned. Given the scale of the proposed development, it is not anticipated that the development would have a detrimental impact on properties located further afield from the immediate surroundings.
205. The March 2024 submission was accompanied by a letter which states that Daylight and Sunlight assessment would not be required for this application given the lack of proximity to residential occupiers as discussed above. Officers agreed with this approach. With the re-opening of the application in December 2024, the applicant submitted a Daylight and Sunlight Report and an Overshadowing Assessment prepared by Point 2 which are now taken into consideration and discussed in the following paragraphs.
206. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required however the guidance states that it “may also be applied to any existing non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices”. The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight.
207. In light of the above, Officers are cognisant that the majority of surrounding properties contain offices, or similar uses, and as such the requirement for these properties is somewhat lesser in comparison to the needs of a private residential property. The dense urban environment of the City is such that the juxtaposition of commercial office buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial office buildings in such locations often require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended. This is typical within other approvals both within the immediate vicinity and the wider City and as such these specific surrounding commercial premises are not considered to be subject to the same daylight/sunlight test requirements as residential properties.
208. Officers note that there is a hotel and members club located within an adjacent building (the ‘Ned Hotel’) and this use would potentially have a reasonable expectation of daylight as per the BRE Guidelines. Considering that the proposed development includes development above the existing roof level

this would therefore increase the level of massing and form within the immediate area, potentially to the detriment to the hotel. The proposed development however has been designed as such to be set back from the main elevations of the building to be read as a subservient addition, which in turn would reduce the potential impact on its surrounding properties. The existing relationship is such that the majority of the western facing hotel rooms and windows from ground floor up would only be separated from the 50m high application building by Grocer's Hall Court which is approximately only 6m wide. This incredibly compact and unyielding relationship between the properties is symptomatic of the historic layout of the City (including the fact that many buildings are built right up to their site boundaries) and as such Officers consider that there is likely already to be existing impacts on both properties given the close-quarter relationship, particularly at lower levels where there would be low levels of daylight. While the proposal would introduce mass at roof level, given the separation distance Officers consider that the majority of windows would likely already suffer low levels of light or would have an oblique relationship to mass at roof level regardless. At upper floors the proposal would likely have more of an impact on windows and rooms that face this property however this would be a modest number when considering the neighbouring site as whole. Furthermore, given that this neighbour is not residential in nature, the requirement for daylight is lessened as apparent by the existing rooms which already have low daylight level. Finally, the modest impact to the neighbouring site is also considered acceptable on the basis that this relationship has been approved elsewhere within the immediate vicinity, for example at Princes Court (reference: 22/00158/FULMAJ), and as such not out of keeping with the immediate locality.

209. With regard to the roof top terrace for the member club, similar to the above, this would likely be impacted by the development in terms of daylight however given the more subservient design of the extension being set back this impact would be somewhat modest. Furthermore, this terrace would be commercial in nature (i.e. non residential) and still benefit from good levels of daylight given its roof top location. Officers consider that the level of area impacted would be modest when considering the roof terrace and members club as a whole which stretches a good percentage of the existing roofscape of the building and as such the proposal is considered acceptable on this basis. Officers note that the supporting text of Policy DM 10.7 (Daylight and sunlight) states that the amount of daylight and sunlight received has an important effect on the general amenity of dwellings, the appearance and enjoyment of open spaces and streets, and the energy efficiency of all buildings. However, the glossary of the Local Plan especially details open space as "Land which is not built on" and as such the terrace/roof of a property would not fall under this category.

210. Despite the above, the submitted Daylight and Sunlight report has considered the building to the east side of the application site, the Ned Hotel at 27 Poultry, for daylight and sunlight assessment.
211. For background information, it is noted that daylight impacts are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied. In addition sunlight impacts are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms. Lastly, overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.
212. The hotel is arranged over 8 floors. The site facing elevation of the hotel building is considered to be the secondary face of the hotel located at Grocers' Hall Court which is a narrow side street. The report takes into account the surrounding built environment and states that it cannot be considered that there is an expectation of good daylight levels to the hotel rooms given the existing, close-knit arrangement.
213. The daylight assessment considered seventy windows serving thirty rooms, including bedrooms and a kitchen. Of these, sixty-seven windows and thirty rooms experienced no noticeable alterations to Vertical Sky Component (VSC) or No Sky Line (NSL), with changes of less than 20%. Three windows showed minor reductions in VSC, notably in bedroom R6/116 on the sixth floor, where windows W6/116 and W7/116 experienced reductions of 29.7% and 29.2%, respectively. The existing VSC values for both windows is 24.8% and with the proposed development in place a VSC of 17.7% and 17.6% would be achieved, respectively, which equals to a 7.4 and 7.2 absolute loss. These reductions, though noticeable and material, are relatively minor and typical for this area of the City in the context of the urban environment and relationship between properties described above. After the development, these windows will retain a residual VSC of approximately 17.5%, which remains a good level of light for a hotel in the context and compared to the existing low levels of daylight available to this elevation windows of the building.
214. Additionally, window W5/114, serving bedroom R4/144 on the fourth floor, experienced a minor reduction in VSC (22.3%), with existing light levels already

very low at 5.9%. The existing low levels to that window is attributed to the location of the window next to an existing projecting structure that inhibits light entering into the room. Whilst the BRE guidelines advise that the change would be noticeable the small percentage point reduction (1.3%) does not significantly alter the light levels in the room. The one noticeable NSL reduction occurred in room R4/114, being served by the above window, where the reduction was 29.2%. However, this room already experiences low daylight levels, as mentioned above, and the relative reduction whilst noticeable is minor in the context of the existing conditions and when taking account of the hotel use.

215. It is therefore evidenced that from all the windows assessed, three windows and one room would fail to meet BRE guidelines. However, the one room and one window already experience very low levels of daylight and as such any alteration would affect the daylight values but would not be noticeable in real life. The two other windows impacted retain daylight values after the proposed development is implemented which would be considered good within the context of the City, where much lower daylight values are normally experienced.
216. The assessment further indicates that the affected windows are in close proximity to the development site, and the low existing light levels suggest that there is limited expectation of daylight in these rooms. While the reductions in daylight are more pronounced in percentage terms due to the low existing light levels, the overall impact remains minor.
217. In terms of sunlight, the assessment confirms that all six rooms with windows oriented within 90 degrees of due south meet the BRE recommendations and experience no reduction in sunlight as a result of the proposed development.
218. The submitted Overshadowing Assessment further demonstrates that the three external spaces of the neighbouring hotel, all currently enjoy 2 hours of more of direct sunlight to greater than 50% of their area. The assessment does not identify any changes to direct sunlight received to these areas after the implementation of the proposed development.
219. No other properties, other than the neighbouring hotel to the east of the site have been identified for assessment in the submitted reports. Given that the submitted reports were not required to make an informed assessment and draw conclusions on the daylight and sunlight impact from the proposed development for the reasons mentioned above, this is an acceptable approach. In terms of overbearing impacts and the assessment of whether the proposal is considered to increase a sense of enclosure the proposal is considered acceptable by Officers. The proposed rooftop pavilion structure is not considered to create a sense of overbearing given its set back position on the roof and its subordinate scale to the host building. The proposed development at roof level is set away from neighbouring properties and furthermore the surrounding highway network would add additional separation. While the proposal would inevitably add bulk

and massing at roof level this is not considered to cause an unacceptable level of detrimental overbearing or sense of enclosure in the context of the inner city location.

220. Equally in terms of outlook, similar to the above, whilst the outlook from some parts of the roof terraces at the Ned Hotel would change, given its design and the proposed subserviency of the rooftop extension the proposal is not considered to cause to have an unacceptable detrimental impact to the outlook of neighbouring commercial occupiers. Officers are cognisant that objections have been received from neighbouring commercial occupiers, notably the adjacent Ned Hotel and their members, however given the scale of the proposal and the surrounding commercial setting the proposal is considered acceptable on this basis. Whilst it is not the function of the planning system to protect private rights as private rights, or simply because they are private rights, case law makes it clear that the converse is not correct either and that the fact that there is, absent a covenant, no private right to a view over another's land, does not mean that it is irrelevant in planning considerations either (*Watton V Cornwall Council [2023] EWCH 2436 (Admin)*). Whilst that case considered residential amenity it is noted that the Court found that it was for the local planning authority to consider if there is a public interest in the protection of a view or outlook currently enjoyed by an occupier. When considering the impact of the extension on the views out of the roof top terrace at the Ned Hotel and Club, officers do not think that it is necessary in the public interest to protect the view from a single property in these circumstances which concern the relationship between two commercial developments, in the inner city context when taking into account of the nature of the surrounding built environment and the scale of the development proposed.
221. Officers consider that the proposed extensions would not unduly compromise the business function of the adjacent commercial properties and, with particular regard to the Ned Hotel, any such impact would be limited to a small proportion of the overall Members Club use that spans the majority of the roofscape.
222. In conclusion, the proposed development has been carefully assessed against relevant policies, including Policy D6(d) of the London Plan, Local Plan Policy DM10.7, and emerging Policy DE7 of the City Plan 2040. The submitted Daylight and Sunlight Report demonstrates that the majority of impacts are minimal, with only minor reductions in daylight levels to a few windows, which are typical in the urban environment described above. The commercial context of the site, along with the low existing daylight levels at the adjacent Ned Hotel, further reduces the significance of the impact. Given the minor impact on daylight and sunlight to a small number of rooms, the proposal is considered to result in daylight and sunlight to the hotel which is appropriate in the context and the development will allow acceptable standards of daylight and sunlight to be retained. Accordingly the development would not result in unacceptable

daylight and sunlight impacts to the neighbouring buildings that would warrant the refusal of this application.

Amenity – Noise and Disturbance

223. London Plan Policy D13 requires the proposed development to mitigate noise generating uses and Policy D14 aims to avoid significant adverse impacts on health and quality of life, and Local Plan Policies DM15.7 and Policies S1 and HL3 of the emerging City Plan 2040 seek to ensure that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.
224. The impact of the proposed development in terms of noise associated with the operational stage of the development would be linked to the use of the roof terrace and the proposed plant room at roof level. The terrace would provide amenity for office workers and their use would be appropriately limited by conditions. The proposal has been reviewed by Environmental Health in respect of amenity to nearby occupiers who raised no objection subject to a series of conditions to mitigate against noise and disturbance impacts to the receptors. These include conditions that restrict the hours of access of the terrace, prevention of the use of amplified music and the prevention of promoted events. In terms of the noise emitted from the new plant room a condition has been recommended. Subject to the condition being satisfied the proposed plant is not considered to result in an unacceptable impact in terms of noise.
225. A condition is also proposed to protect the amenity of nearby occupiers during construction.
226. Subject to the recommended conditions by Environmental Health, the development should not detrimentally impact the amenity of surrounding occupiers in respect of noise and disturbance. Therefore the proposed development complies with London Plan Policies D13 and D14 and Local Plan Policies DM15.7 and emerging Policies S1 and HL3.

Air Quality

227. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the emerging City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all 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 S11 of the London Plan.
228. The initial proposal did not include all the information required to assess the application and further information was requested by Officers. An updated Air

Quality Assessment was issued on 10th April which was reviewed by Environmental Health in respect of air quality who raised no objection to the proposal subject to a condition and an informative being attached to decision. It is therefore considered that the proposed development, subject to condition being satisfied, complies with Strategic Policy CS15 and emerging Policy DE1 and HL2.

Community Engagement

229. The City's Statement of Community Involvement (July 2024) and Developer Engagement Guidance (May 2023) aims to guide applicants and developers to communicate and engage positively and meaningfully with the City's communities and stakeholders.
230. Whilst pre-application guidance was given advising that a statement of community involvement should be submitted with the application and this is always encouraged, the City's Validation Checklist February 2016 states that a Statement of Community Involvement is only required for new buildings, major changes of use or major extensions. This application is considered by officers to be a minor extension and is not considered to fall into these categories, and as such this application would not trigger this requirement. It is also noted that the table at paragraph 5.5 of the City's Developer Engagement Guidance suggests methods of communication for different scales of development. For non-major development (which this is) a number of methods of communication are suggested where the impact of the proposal or impact of construction would have a significant impact on stakeholders. It is not considered that this application falls into that category.
231. While the City's SCI and Engagement Guidance do encourage applicants to discuss proposed schemes with neighbouring occupiers, and this is normally detailed at pre-application stage, this is not a statutory requirement given the scale of the scheme. That being said the non-submission of a SCI with the initial application was an issue raised by the Claimant in the judicial review proceedings who were concerned about the impact on their building and that they hadn't been consulted or engaged. Whilst neither the City Corporation or the applicant accepted the submission of a SCI was either a legal requirement or needed to make the application valid, the applicant has submitted an Engagement Statement during the application process which details a timeline of discussions with neighbouring occupiers. This is welcomed. The submitted documentation shows that interested parties have been meaningfully engaged and as such were afforded the opportunity to discuss the proposal to Officers satisfaction.
232. Furthermore, the statutory consultation and notification requirements have been carried out in accordance with the relevant requirements (i.e. Regulation 5A of the Planning (Listed Buildings and Conservation Areas) Regulations 1990

and The Town and Country Planning (Development Management Procedure) (England) Order 2015).

Suicide Prevention

233. Local Plan 2015 policy CS3 requires that security and safety measures are of an appropriate high quality design. The City Corporation has adopted the Planning Advice 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.
234. The proposal incorporates railings that run along the perimeter of the terrace. The balustrading of the new roof terrace has been designed with suicide prevention in mind and would be a minimum of 1.4m high and set back from the building edge by over 700mm. The proposal seeks to provide external furniture within the terrace area and these have been designed to be placed away from the edges to prevent any misuse. Furthermore, the stepped pattern of the top of the building works as a prevention measure itself as there are projecting structures/terraces at seventh and fifth floors below the new roof terrace, which act as a prevention mechanism from falling and deterrent. Officers consider that the balustrading has the potential to include further consideration on suicide prevention measures in more exposed corners of the roof that have a shear drop, such as the southeast corner and as such a condition is proposed to secure these finer details. It is also noted that the roof terrace would not be accessible by members of the public, and would support a managed access, including the use of CCTV. The terrace would be closed outside of operational hours with no access available during these times.
235. The proposed development has considered the prevention measures in line with the City's Preventing Suicides in High Rise Buildings and Structures Planning Advice Note. Full details would be secured by design conditions, including the design of the balustrade and landscaping, and a suicide prevention condition is proposed to ensure that any arrangements and management plan would comply with the City's Planning Advice Note and be secured into perpetuity. The proposal is therefore considered to be acceptable on this basis.

Fire Safety

236. London Plan Policy D12 requires development proposals to achieve the highest standards of fire safety, embedding these at the earliest stage. The submitted materials include details of various fire safety measures including fire-fighting lifts, fire-fighting Access (Secondary Cycle Entrance), fire rated battery chargers, a fire-fighting lobby and smoke vents. While the proposal is for a

modest extension to an existing property, which has its own current fire strategy, a condition is proposed securing an up-to-date strategy.

237. The applicant is also however reminded that the Building Regulations 2010 legislation covers the construction and extension of buildings and these regulations are supported by Approved Documents. Approved Document B addresses fire safety precautions which must be adhered to, to ensure the safety of occupiers.

Solar Glare

238. Policy D8 of the London Plan, Local Plan policy DM10.1 and emerging City Plan 2040 policy DE8 require development to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.
239. The application represents a development that includes a modest extension at roof level and the replacement of existing fenestration and as such a development of this scale is not considered to cause detrimental solar glare issues. It is considered that due to the design of the building, with vertical rather than sloped, convex or concave facades, the impacts from solar glare or convergence would be limited. Furthermore, the facades of the building are not made of primarily large areas of reflective glass. The elevational design of the building is such that there is a balance between the glazed and bricked/solid elements.
240. For the aforementioned reasons, it is considered that no further assessment of the solar glare impacts of the development is required, as these are expected to be minimal and as such considered acceptable by Officers.

Wind Microclimate

241. Policies DM10.1 of the Local Plan 2015, Policy S8 of the emerging City Plan 2040 and Policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of the development should avoid unacceptable wind conditions.
242. In terms of the proposed development the main physical alterations of the proposal relate to the ground floor amendments and the proposed addition of a rooftop extension. Given that the proposed ground floor elements mainly relate to modest shopfront or office lobby entrance appearances the proposal is not considered to cause any additional wind issues at ground floor to the point it would be considered detrimental. Equally, the roof extension is set subserviently within the existing roof scape and is modest in size so given this the proposal is not considered to cause any additional wind issues to the point it would be considered detrimental to surrounding occupiers or highway users.

Section 106 and CIL

243. A S106 agreement is not required for this application.
244. Mayoral and City CIL applies to developments where there is an uplift in Gross Internal Area (GIA) of at least 100sqm or creation of one or more dwellings. Social housing, and development for charities for charitable purposes, are offered relief or are exempt from the levy. Education and Health related developments are charged at a nil rate. In the case of MCIL2 a rate of £80 per sqm is applied to eligible developments however, as the City is located within the Central Activity Zone (CAZ), differential rates apply to office, retail and hotel developments and are set at £185, £165 and £140 respectively. City CIL is also set at differential rates for riverside residential £150 per sqm and £95 per sqm for 'Rest of City' residential and £75 for offices and all other uses.
245. MCIL2 has been calculated to be £41,945 (excl. indexation) and the City CIL is £36,900 (excl. indexation) based on the uplift in floorspace of 491sqm (GIA).
246. In accordance with the CIL regulations the City Corporation would retain 4% of MCIL2 and 5% of the City CIL for its expenses associated with administrating City CIL and Mayor of London CIL.

The Public Sector Equality Duty (section 149 of the Equality Act 2010)

247. 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.
248. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.
249. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
250. It is the view of officers that a decision to grant permission subject to appropriate conditions, would not disadvantage those who are protected under the Equality Act 2010. The proposed development would reduce barriers to access for disabled people through the provision of an enhanced office main entrance, a relocated and improved bike entrance in terms of access and wayfinding, accessible toilets and shower facilities and more legible and open shopfronts. As noted above in this report, final details of some design features have been

secured by condition to ensure that the final design is satisfactory and achieves equality of opportunity.

251. For the reasons set out above officers consider that overall the proposal would have a positive impact on Protected Characteristics. Any potential negative impacts that could arise through construction and operation would be managed by the recommended conditions.
252. In relation to policy GG1 of the London Plan, the proposals are considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender reassignment, pregnancy and maternity, marital status, race, religion or beliefs, sex and sexual orientation, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

253. 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)).
254. It is the view of the officers that there would be no infringement of the ECHR.

Conclusion

255. The proposed development has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance including SPDs and SPGs, the NPPF, the emerging City Plan 2040 and considering all other material considerations.
256. The proposed development would provide ancillary floor space and a roof terrace to the existing office building, thereby creating a more welcoming and efficient use of office space. While the proposed development would result in a limited loss of retail, contrary to Local Plan 2015 Policy DM20.1 and emerging Policy RE1, the enhanced re-provision of a more legible shop front would align with the aspirations of the Principal Shopping Centre requirements.
257. The proposed development is considered to be a high-quality design and is not considered to cause harm to any surrounding heritage assets. The proposed development would not result in an unacceptable impact on neighbouring amenity, subject to imposition of conditions in respect of the use of the roof terrace and landscaping. In addition, the proposal exceeds the minimum requirements for cycle parking within the site and offers accessible end of trip facilities that are considered to improve the current conditions and are acceptable. The development will have a positive impact on accessibility, sustainability, urban greening and biodiversity.
258. The development is considered to comply with the development plan taken as a whole, and other material considerations including the NPPF and emerging

City Plan 2040 also support the grant of the permission in this instance. Accordingly, the proposals are recommended for approval subject to the imposition of conditions.

Appendix A

Background papers:

Covering letter, Agent, 20th February 2024;
CIL form, revised sent on 7th June;
Air Quality Assessment (ref: 34345-HML-ZZ-XX-RP-U-820001, P03), prepared by Hilson Moran, 10th April 2024;
Archaeological Assessment, prepared by MOLA, January 2024;
Sustainability Statement (ref: XX-HML-XX-XX-RP-V-79008,P02), prepared by Hilson Moran, 19th February 2024;
Energy Strategy (ref: XX-HML-XX-XX-RP-V-80002, P02), prepared by Hilson Moran, 21st March 2024;
Daylight and Sunlight Amenity Letter, prepared by Point 2, 18th January 2024;
Design and Access Statement, prepared by Sheppard Robson;
Heritage Statement, prepared by Montague Evans;
Ecological Appraisal (ref: 34345-HML-XX-XX-RP-U-590001, P03), prepared by Hilson Moran, 9th February 2024;
Planning Statement, prepared by Savills;
Noise Assessment (ref: 34345-HML-XX-XX-RP-O-500002, P03), prepared by Hilson Moran, 12th February 2024;
Transport Statement (including Travel Plan, ref: 4345-HML-XX-XX-RP U-78001, P03), prepared by Hilson Moran, 12th February 2024;
Email in response to Air Quality Officer, Agent, 10th April 2024;
Historic England, Letter, 21st March 2024;
LLFA, Memo, 27th March 2024;
Thames Water, Email, 2nd April 2024,
Environmental Health, Memo, 3rd April 2024;
TfL (Infrastructure Protection), Email, 4th April 2024;
CAAC, Letter, 10th April 2024;
Air Quality Officer, Memo, 10th April 2024;
Transport, Email, 4th June 2024;
Planning Obligations, Letter, 7th June 2024;
Cleaving, Email, 11th June 2024;
Sustainability Officer, Letter, 21st June 2024;
Design and Access Statement – Access Door 27 June 2024;
GLAAS, Letter, 11th July 2024;
Design Officer, Letter, 11th July 2024;
Email with proposed office floorspace, agent, 10th July 2024;
Transport comments, Letter, 12th July 2024;
Overshadowing Assessment, prepared by Point 2, 18 October 2024;
Daylight Sunlight Report, prepared by Point 2, October 2024;
Addendum Letter, prepared by Savills, 5 December 2024; and
Engagement Statement, prepared by Savills, received on 13 December 2024;
Cleaving, Email, 14th December 2024;

Historic England, Letter, 17th December 2024;
 Planning Obligations, Letter, 10th January 2025;
 Savills, Submission of amendments, Email, 11 and 13 March 2025, including 6982-SRA-XX-XX-DS-A-029050 Rev P03 – Privacy Screening Pack;
 Cover Letter, Savills, 13 March 2025;
 CAAC Letter, 19th April 2025;
 Transport Officer, Email, 12th May 2025.

Public Representations

07/01/2025	Ankush Khanna	Email	Objection
07/01/2025	Anonymous by request	Email	Objection
09/01/2025	Dan Zaum	Email	Objection
11/01/2025	Akiko Takashima	Email	Objection
14/01/2025	Laurence Bain	Email	Neutral
23/01/2025	Farrer & Co (on behalf of Vivas Invest & Finance Limited)	Email	Objection
23/01/2025	The Lutyens Trust	Email	Objection
23/01/2025	MVHC Ltd (on behalf of Vivas Invest & Finance Limited and Poultry Tenant Limited)	Email	Objection
25/01/2025	Stuart Adolph	Email	Objection
27/01/2025	The Yucaipa Companies (on behalf of Soho House)	Email	Objection
28/01/2025	Douglas Marvin	Email	Objection
27/01/2025	The Ned (on behalf of Poultry Opco Limited)	Email	Objection
12/05/2025	Mr Benjamin Peacock	Email	Objection
13/05/2025	Farrer & Co (on behalf of Vivas Invest & Finance Limited)	Email	Objection

Consultees Responded

External list

21/03/2024	Historic England
02/04/2024	Thames Water
04/04/2024	Transport For London

10/04/2024	City of London Conservation Area Advisory Committee
11/07/2024	Historic England - GLAAS
17/12/2024	Historic England
03/01/2025	Transport For London
25/03/2025	Historic England
19/04/2025	City of London Conservation Area Advisory Committee

Internal list

27/03/2024	Lead Local Flood Authority
04/04/2024	Environmental Health
10/04/2024	Air Quality
04/06/2024	Transport
11/06/2024	Planning Obligations
11/06/2024	Community Facilities Manager (Public Conveniences)
27/06/2024	Sustainability
12/07/2024	Transport
18/12/2024	Environmental Health
09/01/2025	Planning Obligations
03/03/2025	Planning Obligations
21/03/2025	Environmental Health
12/05/2025	Transport

Appendix B

Relevant London Plan Policies

Policy GG1 Building Strong and Inclusive Communities

Policy GG2 Making the best use of land

Policy GG3 Creating a Healthy City

Policy GG5 Growing a good economy

Policy GG6 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 D11 Safety, security and resilience to emergency

Policy D14 Noise

Policy E1 Offices

Policy E2 Providing suitable business space

Policy E9 Retail, markets and hot food takeaways

Policy E10 Visitor infrastructure

Policy HC1 Heritage conservation and growth

Policy HC2 World Heritage Sites

Policy HC3 Strategic and Local Views

Policy G5 Urban Policy G6 Biodiversity and access to nature Greening

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 T4 Assessing and mitigating transport impacts
Policy T5 Cycling
Policy T6 Car Parking
Policy T7 Deliveries, servicing and construction

Relevant GLA Supplementary Planning

Accessible London: Achieving an Inclusive Environment SPG (October 2014)
Planning for Equality and Diversity in London SPG (October 2007)
Control of Dust and Emissions during Construction and Demolition SPG (September 2014)
Sustainable Design and Construction (September 2014)
Sustainable Transport, Walking and Cycling LPG (November 2022)
Mayoral CIL 2 Charging Schedule (April 2019)
Central Activities Zone (March 2016)
Mayor's Transport Strategy (2018)

Relevant Emerging City Plan 2040 Policies

S1 Healthy and inclusive city
HL1 Inclusive buildings and spaces
HL2 Air quality
HL3 Noise
S2 Safe and Secure City
SA1 Crowded Places
SA3 Designing in security
HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retail and active frontages

RE1 Principal Shopping Centres

RE2 Active frontages

S7 Smart Infrastructure and Utilities

Policy IN1 Infrastructure provision and connection

S8 Design

DE1 Sustainable Design

DE2 Design Quality

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

Policy 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

S13 Protected Views

S14 Open spaces and green infrastructure

OS2 Urban greening

OS3 Biodiversity

S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
S26 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017)
Lighting SPD, October 2023
Developer Engagement Guidance PAN, May 2023
Preventing suicides in high rise buildings and structures PAN, November 2022
Sunlight PAN, July 2017
Archaeology in the City PAN
Archaeology and Development Guidance SPD, July 2017
Freight and Servicing SPD February 2018
Office Use SPD, January 2015
Planning Obligations SPD 2021
City Transport Strategy October 2024

Relevant Local Plan 2015 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, by:

1. *Increasing the City's office floorspace stock by 1,150,000m² gross during the period 2011–2026 to meet the needs of projected long term economic and employment growth, phased as follows: 2011 – 2016: 650,000m² 2016 – 2021: 250,000m² 2021 – 2026: 250,000m²*

A pipeline of at least 750,000m² gross office floorspace with planning permission but not yet commenced will be maintained to provide office occupier choice.

2. *Encouraging the assembly and development of large sites, where appropriate, to meet the accommodation needs of the City's biggest occupiers, protecting potential large office sites from piecemeal development and resisting development that would jeopardise the future assembly and delivery of large sites.*
3. *Encouraging the supply of a range of high quality office accommodation to meet the varied needs of City office occupiers.*
4. *Promoting inward investment and encouraging developers and businesses to invest and locate in the City.*
5. *Protecting existing office accommodation where there are strong economic reasons why the loss of offices would be inappropriate, including losses that would prejudice the primary business function of the City, and the variety of accommodation required by the business City.*
6. *Managing short-term over supply in the office market through a flexible approach to alternative temporary uses for vacant offices and sites, where such uses would not prejudice the eventual return of the site to office use.*

CS10 Promote high quality environment

To promote a high standard of design and sustainable buildings, streets and spaces, having regard to their surroundings and the historic and local character of the City and creating an inclusive and attractive environment, by:

1. *Ensuring that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.*
2. *Encouraging design solutions that make effective use of limited land resources.*
3. *Ensuring that development has an appropriate street level presence and roofscape and a positive relationship to neighbouring buildings and spaces.*
4. *Requiring the design and management of buildings, streets and spaces to provide for the access needs of all the City's communities, including the particular needs of disabled people.*
5. *Ensuring that new development respects and maintains the City's characteristic network of streets and alleyways.*
6. *Delivering improvement in the environment, amenities and enjoyment of open spaces, play areas, streets, lanes and alleys through schemes in accordance with public realm enhancement strategies.*
7. *Ensuring that signs and advertisements respect the restrained character of the City.*

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, by:

1. *Safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses.*
2. *Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them.*
3. *Protecting and promoting the evaluation and assessment of the City's ancient monuments and archaeological remains and their settings, including the interpretation and publication of results of archaeological investigations.*
4. *Safeguarding the character and setting of the City's gardens of special historic interest.*
5. *Preserving and, where appropriate, seeking to enhance the Outstanding Universal Value, architectural and historic significance, authenticity and integrity of the Tower of London World Heritage Site and its local setting.*

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, by:

- 1. Requiring all redevelopment proposals to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and “end of life” phases of development. Proposals for major development should aim to achieve a BREEAM rating of “excellent” or “outstanding”. Residential development should aim to achieve a minimum standard of Code for Sustainable Homes level 4, rising to level 6 by 2016 or in line with government targets.*
- 2. Requiring development to minimise carbon emissions and contribute to a City wide reduction in emissions:*
 - (i) adopting energy-efficiency measures;*
 - (ii) enabling the use of decentralised energy, including the safeguarded Citigen Combined Cooling Heating and Power (CCHP) network, CCHP-ready designs in areas where CCHP networks are not yet available, and localised renewable energy technologies;*
 - (iii) adopting offsetting measures to achieve the Government’s zero carbon targets for buildings.*
- 3. Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.*
- 4. Requiring development to positively address:*
 - (i) local air quality, particularly nitrogen dioxide and particulates PM10 (the City’s Air Quality Management Area pollutants)*
 - (ii) protection of the City’s quiet areas and quiet times of day for businesses (daytime) and residents (night time);*
 - (iii) the need to limit the City’s contribution to light spillage and ‘sky glow’;*
 - (iv) water quality and flood risk particularly in areas at risk of sewer flooding;*
 - (v) land contamination, ensuring development does not result in contaminated land;*
 - (vi) the need to enhance biodiversity and provide for its conservation and enhancement, particularly for the City’s flagship species and the City’s priority habitats (urban green spaces, churchyards and cemeteries, built structures and the tidal Thames).*

5. *Incorporating climate change adaptation measures into development and the City's infrastructure, including street scene, transport and utility infrastructure, social and emergency infrastructure, and heritage assets, having regard to the need to protect their historic significance.*

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) by:

1. *Enabling waste minimisation and adherence to the waste hierarchy:*
 - (i) *requiring the provision of facilities for waste segregation, handling and management within new developments;*
 - (ii) *increasing the proportion of municipal solid waste recycled to at least 45% by 2015 in line with the City of London Waste Strategy;*
 - (iii) *promoting improved waste management choices for businesses and residents.*
2. *Enabling waste to be managed at the nearest available suitable location:*
 - (i) *identifying waste management capacity in the City, or elsewhere in London, to meet the City's London Plan waste apportionment target, including through partnership working with the London Borough of Bexley*
 - (ii) *safeguarding Walbrook Wharf as a waste handling site and investigating the potential for waste management, alongside its waste transfer function;*
 - (iii) *co-operating with other waste planning authorities to ensure appropriate waste management facilities are available to manage waste generated in the City.*
3. *Enabling the sustainable transport of materials including waste and recyclables by river:*
 - (i) *safeguarding Walbrook Wharf as a wharf suitable for river transport of materials including waste;*
 - (ii) *exploring the potential for further use of waterways for the transport of waste and construction materials subject, where appropriate, to the potential impact on Natura 2000 sites.*

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:

- *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;*
- *all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;*
- *appropriate, high quality and durable materials are used;*
- *the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;*
- *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;*
- *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;*
- *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;*
- *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;*
- *there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;*
- *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;*
- *there is provision of amenity space, where appropriate;*
- *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.

DM 10.3 Roof gardens and terraces

1. To *encourage high quality roof gardens and terraces where they do not:*
 - *immediately overlook residential premises;*
 - *adversely affect rooflines or roof profiles;*
 - *result in the loss of historic or locally distinctive roof forms, features or coverings;*
 - *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:

- *the predominant use of the space, surrounding buildings and adjacent spaces;*
- *connections between spaces and the provision of pleasant walking routes;*
- *the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;*

- *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;*
- *the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;*
- *sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;*
- *the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;*
- *the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;*
- *the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;*
- *the use of high quality street furniture to enhance and delineate the public realm;*
- *lighting which should be sensitively co-ordinated with the design of the scheme.*

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- *respect the quality and architectural contribution of any existing shopfront;*
- *respect the relationship between the shopfront, the building and its context;*
- *use high quality and sympathetic materials;*
- *include signage only in appropriate locations and in proportion to the shopfront;*
- *consider the impact of the installation of louvres, plant and access to refuse storage;*
- *incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;*
- *not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;*
- *resist external shutters and consider other measures required for security;*
- *consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;*

- *be designed to allow access by users, for example, incorporating level entrances and adequate door widths.*

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:

- *inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;*
- *convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;*
- *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.*

DM12.1 Managing change affecting all heritage assets and spaces

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.*

Policy DM 12.2 Development in conservation areas

1. *Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.*
2. *The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.*
3. *Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.*

Policy DM 12.4 Ancient monuments and archaeology

1. *To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.*
2. *To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.*
3. *To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.*

DM15.1 Sustainability requirements

1. *Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.*
2. *For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:*
 - *BREEAM or Code for Sustainable Homes pre-assessment;*
 - *an energy statement in line with London Plan requirements;*
 - *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.*

DM15.6 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.*

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:*
 - *road dangers;*
 - *pedestrian environment and movement;*
 - *cycling infrastructure provision;*
 - *public transport;*
 - *the street network.*
2. *Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.*

DM16.3 Cycle parking

1. *On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.*
2. *On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.*

DM16.4 Encouraging active travel

1. *Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.*
2. *Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.*

DM16.5 Parking and servicing standards

1. *Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.*

2. *Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.*
3. *Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.*
4. *On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.*
5. *Coach parking facilities for hotels (use class C1) will not be permitted. 142 6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.*
6. *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.*

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.*

Policy DM 18.2 Sustainable drainage systems (SuDS)

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 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.*

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- green roofs and walls, soft landscaping and trees;
- features for wildlife, such as nesting boxes and beehives;
- a planting mix which encourages biodiversity;
- planting which will be resilient to a range of climate conditions;
- maintenance of habitats within Sites of Importance for Nature Conservation.

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:
 - 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;
 - the contribution the unit makes to the function and character of the PSC;
 - 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.

Policy DM 20.4 Retail unit sizes

- 1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.*
- 2. Major retail units (over 1,000m²) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.*

Policy DM 21.3 Residential environment

- 1. The amenity of existing residents within identified residential areas will be protected by:*
 - resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;*
 - 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.*

SCHEDULE

APPLICATION: 24/00226/FULL

1 Old Jewry London EC2R 8DN

The change of use of part the ground floor retail space to be used for office accommodation (Class E(g)), refurbishment works including reconfiguration of commercial floorspace at basement and ground floor levels; alteration to elevations (including new shopfronts, replacement of existing windows and revise access); erection of a new pavilion and plant room at roof level; and creation of external roof terrace.

CONDITIONS

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

2. 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:
 - a) particulars and samples of the materials to be used on all external faces of the buildings including external ground and upper level surfaces;
 - b) details of all elevations of the buildings including details of typical bays, the fenestration and entrances and upper floor extensions;
 - c) details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;
 - d) typical details of all office terrace doors;
 - e) details of all ground floor elevations;
 - f) details of windows;
 - g) details of all soffits, hand rails and balustrades;
 - h) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;

i) details of new provision of sanitary facilities including the range of left- and right-hand transfer options;

j) details of plant, ductwork, ventilation and air-conditioning; and

k) details of the plant enclosure.

l) details of external lighting including light levels, temperature, tone and hours.

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, DM 10.8, DM12.2 and emerging policies SE1, DE2, DE6, HL1 and HE1 of the Emerging City Plan 2040.

3. 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:

a) particulars and samples of the materials to be used on all external surfaces within the site boundary including hard and soft landscaping and materials;

b) the position, size and types of planting;

c) method of Irrigation including provision for harvesting rainwater run-off from surfaces to supplement irrigation;

d) details of all soft landscaping including species and contribution to enhance biodiversity;

e) Planters and seating;

f) Contribution to biodiversity enhancement of all landscaping including greening, green walls and green roofs;

g) Management and maintenance Plan (including ecological management) for all proposed landscaping to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced.

REASON: In the interests of visual amenity, access and inclusivity and to limit overlooking in accordance with the following policies of the Local Plan: DM10.1, DM10.8 and DM19.2.

4. Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 77 pedal cycles. A minimum of 2 no. of the cycle spaces shall be accessible for larger cycles including adaptive cycles for disabled people. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use

of the occupiers thereof and their visitors without charge to the individual end users of the parking.

REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

5. Details of the short stay cycle parking and facilities linked to the cycle stores shall be submitted to and approved in writing by the Local Planning Authority, prior to the occupation of the building hereby permitted. Details should also include how visitors/customers of the office and retail units gain access to the cycle parking area and demonstrate that the bike lift fits the accessible cycles.

REASON: To ensure provision is made for short stay cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

6. A minimum of 9 showers, including 1 accessible shower, 2 changing facilities, and 116 lockers shall be provided adjacent to the bicycle parking hereby approved, and these facilities shall be maintained throughout the lifetime of the building for the use of the occupiers in accordance with approved plans.

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: DM16.4.

7. The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers. The waste storage hereby approved shall comply with BS5906 specifications and all occupants of the development must have access and be required to use the waste storage and collection facilities.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

8. Details of a Delivery and Servicing Management Plan demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved by time to time by the Local Planning Authority) for the life of the development.

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: DM16.1.

9. Prior to the commencement of any construction works, details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing. The details shall be drafted in accordance with the Mayor of London's Construction Logistics Plan Guidance dated April 2021, 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. Traffic management drawings must accompany the document and be drafted in accordance with the "Safety at Streetworks and Road Works – A Code of Practice". No demolition or construction shall be carried out other than in accordance with approved details and methods.

REASON: To ensure that demolition and construction works do not adversely impact public safety and the transport network, in accordance with London Plan Policy T7 and Local Plan policies DM15.6 and DM16.1. These details are required prior to the commencement of demolition and construction works to minimize the impact on the transport network from the start of these activities.

10. 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 (or any amended Travel Plan that may be approved from time to time by the Local Planning Authority) 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.

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.

11. The development hereby permitted shall not commence until the following documents, in consultation with London Underground Limited (LUL), have been submitted to and approved in writing by the local planning authority which:
 - a) accommodate the location of the existing London Underground structures and tunnels;
 - b) accommodate ground movement arising from the development construction. The Ground Movement Assessment (GMA) should consider the temporary

and/or permanent changes in loading which may affect the London Underground structures and tunnels;

c) provide details on what impact the proposed load path and construction activities will have on LUL assets;

d) provide detailed design and Risk Assessment Method Statement for all demolition, temporary and permanent works;

e) mitigate the effects of noise and vibration arising from the adjoining railway operations;

f) no claims to be made against TfL or London Underground by the tenants, occupants or lessees of the development for any noise or vibration resulting from London Underground running, operating and maintaining the adjacent railway.

The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

12. Following completion of the works, a BREEAM post-completion certificate shall be submitted to the Local Planning Authority for information purposes only.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

13. Prior to the occupation of the roof terraces, details of suicide prevention measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. All development pursuant to this permission shall be carried out in accordance with the approved details and maintained for the life of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure adequate safety measures are in place in accordance with Local Plan Policy CS3 and emerging draft City Plan 2040 Policy DE2 and DE4.

14. No live or recorded music that can be heard outside the premises shall be played.

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.

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

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance.

16. The roof terraces hereby permitted shall not be used or accessed between the hours of 23.00 on one day and 08.00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

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

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

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

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

19. The proposed Class E development sharing a party element with office/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 existing neighbouring premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

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

20. (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 nearest 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.

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

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

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

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

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

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

REASON: 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.

23. Works shall not begin 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 development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local

Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.

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

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

25. No demolition or development shall take place except in accordance with the submitted Written Scheme of Investigation (*Written Scheme of Investigation for Archaeological Excavation and Monitoring and Recording*, MOLA 2025). For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI.

REASON: To safeguard the archaeological interest on this site in accordance with the following policy of the Local Plan: DM12.4.

26. Unless otherwise approved by the Local Planning Authority, the area marked 'commercial' on the ground floor plan (Ref. No. 6982 SRA XX 00 DR A 02200 Rev P02) hereby approved shall only be used for purposes falling within Class E (a) 'display or retail sale of goods, other than hot food' of the Town and Country Planning (Use Class) Order 1987 (as amended in 2020) and for no other purposes within Class E.

REASON: To ensure that retail facilities are provided in accordance with Local Plan 2015 Policy DM 20.1.

27. All Parish Markers and commemorative plaques on the existing building shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new

building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.

28. Prior to occupation, a Fire Statement shall be submitted to and approved in writing by the Local Planning Authority. The Fire Statement shall be prepared by a suitably qualified professional and shall detail how the development proposals and the building meet the requirements of Policy D12 (part A) of the London Plan (2021).

The development shall thereafter be implemented in accordance with the approved Fire Statement, unless otherwise approved by the Local Planning Authority.

REASON: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan Policy D12.

29. No occupation of the site shall take place, unless and until the applicant has entered into a S278 Agreement with the City Corporation as Highways Authority (in accordance with the current S278 Agreement processes) for the reinstatement of the adjacent highways affected by the construction logistics arrangements.

REASON: To mitigate construction impacts on the highway network, ensure that any risks to cyclists and pedestrians are managed and mitigated after the construction period and to ensure the satisfactory reinstatement of the highways, upon completion of construction work, in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

30. 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:

6982-SRA-XX-XX-DR-A-02102 P01, Proposed Site Plan; 6982-SRA-XX-B2-DR-A-02198 P01, Proposed Sub-Basement Floor Plan; 6982-SRA-XX-B1-DR-A-02199 P02, Proposed Basement Floor Plan; 6982-SRA-XX-00-DR-A-02200 P02, Proposed Ground Floor Plan; 6982-SRA-XX-01-DR-A-02201 P02, Proposed First Floor Plan; 6982-SRA-XX-02-DR-A-02202 P01, Proposed Second Floor Plan; 6982-SRA-XX-03-DR-A-02203 P01, Proposed Third Floor Plan; 6982-SRA-XX-04-DR-A-02204 P01, Proposed Fourth Floor Plan; 6982-SRA-XX-05-DR-A-02205 P01, Proposed Fifth Floor Plan; 6982-SRA-XX-06-DR-A-02206 P01, Proposed Sixth Floor Plan; 6982-SRA-XX-07-DR-A-02207 P01, Proposed Seventh Floor Plan; 6982-SRA-XX08-DR-A-02208 P01, Proposed Eighth Floor Plan; 6982-SRA-XX-09-DR-A-02209 P02, Proposed Ninth Floor Plan; 6982-SRA-XX-10-DR-A-02210 P01, Proposed Pavillion Roof

(Tenth) Plan; 6982-SRA-XX-RF-DR-A-02211 P01, Proposed Plant Roof (Eleventh) Plan; 6982-SRA-XX-EN-DR-A-02400 P01, Proposed North Elevation; 6982-SRA-XX-EE-DR-A-02401 P02, Proposed East Elevation; 6982-SRA-XX-ES-DR-A-02402 P02, Proposed South Elevation; 6982-SRA-XX-EW-DR-A-02403 P03, Proposed West Elevation; 6982-SRA-XX-ZZ-DR-A-02300 P01, Proposed Section AA; 6982-SRA-XX-ZZ-DR-A-02301 P01, Proposed Section CC; 6982-SRA-XX-00-DR-A-02500 P01, Bay Study West - Cycle Store Entrance; 6982-SRA-XX-00-DR-A-02502 P01, Bay Study West - Reception Bay 3; 6982-SRA-XX-00-DR-A-02503 P01, Bay Study West - Retail Shopfronts; 6982-SRA-XX-00-DR-A-02504 P01 Bay Study South - Retail Shopfront Bay 1; 6982-SRA-XX-00-DR-A-02505 P01 Bay Study South - Retail Shopfront Bay 2; 6982-SRA-XX-00-DR-A-02506 P01 Bay Study South - Retail Shopfront Bay 3; 6982-SRA-XX-XX-DR-A-02507 P01 Bay Study South - Curtain Wall Brise Soleil windows; 6982-SRA-XXXX-DR-A-02508 P01 Bay Study Curtain Wall Cladding with Stone Spandrel; 6982-SRA-XX-09-DR-A-02509 P01 Bay Study Pavilion Curtain Wall Typical Window Sections; 6982-SRA-XX-00-DR-A-02510 P01 Bay Study South - Retail Shopfront.

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.

INFORMATIVES

1. In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

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

3. The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sqm

Retail £165 sqm

Hotel £140 sqm

All other uses £80 per sqm

These rates are applied to "chargeable development" over 100sqm (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sqm for offices, £150 per sqm for Riverside Residential, £95 per sqm for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the

owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.co.uk/planning/policy-and-legislation/CIL/download-the-forms).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

4. Waste Comments

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

Water Comments

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

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-yourdevelopment%2Fworking-nearourpipes&>

[data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab0](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-yourdevelopment%2Fworking-nearourpipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab0)

[64154b7302a008dc53233be5%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638476657994527086%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=Bf4DbQmYvIZnj4fTy%2B3cWvROnNkIihuMLiNDOZ](https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-yourdevelopment%2Fworking-nearourpipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cd890cab064154b7302a008dc53233be5%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638476657994527086%7CUnknown%7CTWFpbGZsb3d8eyJWljiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=Bf4DbQmYvIZnj4fTy%2B3cWvROnNkIihuMLiNDOZ)

tNaDc%3D&reserved=0 If you are planning on using mains water for construction purposes, it's important you let Thames Water know before you start using it, to avoid potential fines for improper usage. More information and how to apply can be found online at thameswater.co.uk/buildingwater.

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 into account of this minimum pressure in the design of the proposed development.

5. GLAAS envisages that the archaeological fieldwork would comprise the following:

Excavation

An archaeological excavation should be carried out in the new lift pit area in order to remove all archaeological deposits in this area down to the lift pit formation level, in advance of construction.

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

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

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