

Committee:	Date:
Planning Application Sub Committee	8 th July 2025
Subject: Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.	Public
Ward: Bishopsgate	For Decision
Registered No: 25/00223/FULEIA	Registered on: 03/03/2025
Conservation Area: No	Listed Building: No

Summary

- I. The application relates to a site 0.389 hectares in size and which is bound by Camomile Street, Houndsditch, Outwich Street and St Mary Axe. The site currently consists of two buildings which were built in the 1980s: 63 St Mary Axe and Camomile Court. The application site is not situated within a conservation area, nor are either of the buildings listed. Within the basement levels there is a Scheduled Monument known as London Wall: Remains of Roman Wall and Bastion, Camomile Street. Beneath the southern edge of the site there is potential for archaeological remains forming part of the former Churchyard of St Augustine Papey, which is an above ground and below ground Non-Designated Heritage Asset (NDHA).
- II. Planning permission is sought for the demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the

Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

- III. An Environmental Statement accompanies the scheme which assesses the likely significant environmental effects that have the potential to arise as result from the proposed development, both during the demolition and construction works and on completion and occupation of the proposed development. The environmental disciplines identified in the Environmental Statement include Air Quality, Archaeology, Climate Change and GHG Emissions, Daylight, Sunlight, Overshadowing, Light Trespass and Solar Glare, Noise and Vibration, Townscape Built Heritage and Visual Impact Assessment and Wind Microclimate. This committee must consider the information to make a reasoned conclusion on the significant environmental effects identified in the Environmental Statement and considered in Appendix A of this report.
- IV. Objections and observations have been received from Statutory consultees including Historic England- GLAAS, Historic England, The Council for British Archaeology, Historic Royal Palaces, The City of London Archaeological Trust and third parties including on behalf of The Wardens and Society of the Mystery or Art of the Leathersellers of the City of London. Across the two rounds of consultations, a total of two objections were received. The grounds of objection included the size and design of the development, its impact on designated and non-designated heritage assets, the loss of the burial ground and remains and the impact on the environment and amenity of the surrounding buildings. This report has considered the concerns raised and where there is clear disagreement, clear reasoning has been provided in this report. Further to this, any requisite mitigation would be secured by conditions or S106 obligations.
- V. The site is within the Central Activities Zone in a highly sustainable location. The proposal would deliver a high quality, office-led development in the City Cluster as defined in the Local Plan 2015 and emerging City Plan 2040, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial and professional services centre.
- VI. The scheme would provide 85,624sqm sqm (GIA) of commercial office floorspace (Use Class E (g)), which would be flexible, sustainable Grade A office floorspace suitable for circa 4,500 FTE city workers. The proposal would make a significant contribution to the City's growth modelling and would deliver nearly 4.23% of the required commercial space to meet projected economic and employment growth demand until 2040. The

quantity of floorspace would significantly contribute to maintaining the City's position as the world's leading international financial and professional services business centre. The office floorspace has been designed to be flexible and adaptable for a range of occupier needs and future demand.

- VII. Alongside the office floorspace, a range of flexible uses are proposed on ground floor and the lower levels of the building. Working with a Cultural Partner and Social Enterprise Partner on the lower levels of the building, combined with the creation of Camomile Park, the elevated walkways and retail units, the development would support the aspirations of Destination City to increase footfall and become a 7-day week inclusive destination. The development would create a new pleasant place in the City to linger, enjoy and experience, rather than just pass through.
- VIII. The proposals would optimise the use of land, delivering high quality office space and a multi-layered series of publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would contribute Good Growth by design and be in accordance with all Local Plan policies including, DM3.3, CS7, CS10, CS14, CS16, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies, S10, AT1, S8, DE2, DE3, S14, S21 and OS1, London Plan policies D3, D4, D8, T1, T2, T4 and G4, and the policies contained within the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3, 5 and 6.
- IX. The proposals are classed as a tall building under adopted and emerging policy, and the site is not located in an area identified as inappropriate for a tall building in the City's Local Plan. Officers have thoroughly assessed the proposals and as a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 A, B, C and D, Local Plan Policy CS7, CS 14, emerging City Plan S12, S21.
- X. The proposal would be a striking, ambitious addition to the Cluster, being of a unique architectural character that would combine pragmatism and playfulness in equal measure; it would expand London's public realm and urban greening through open and engaging lower floors, which, combined, would make a significant beneficial contribution to the landmark qualities of the building, befitting the pivotal location of the site at the north eastern edge of the City Cluster. This is in accordance with London Plan policies Local Plan Policies CS10, DM10.1, DM10.3, DM10.4, DM10.8 and DM19.1 emerging City Plan Policies S1, S8, DE2-8, HL1, and London Plan Policies D3, D4 and D8, and relevant sections of the NPPF. The proposals would constitute Good Growth by design and be in accordance with Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 DE2, DE3 and DE4

(1 and 2), London Plan D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5,6.

- XI. Extensive consideration of the City's and London's important views in designing the proposals, and they would accordingly comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. In LVMF London Panoramas, officers conclude the development would consolidate and enhance the visual appearance of the City Cluster on the skyline.
- XII. The proposal has been painstakingly shaped by consideration of views of the Tower of London World Heritage Site (WHS) and it would not harm the attributes or components of the Outstanding Universal Value, significance, authenticity and integrity of the WHS, in accordance with Local Plan Policy CS12 (5), CS13 (3) Emerging City Plan Policy S11 (5), HE1, HE3 London Plan Policy HC2 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and CoL Protected Views SPD.
- XIII. The proposals would enhance the significance of the Churchyard of St Augustine Papey (NDHA) and the significance of the London Wall Scheduled Ancient Monument. It would also preserve the significance (via change in the setting) of heritage assets and an appreciation of that significance. As such, the proposals would accord with Local Plan policies CS12 and DM12.1, emerging City Plan 2040 policies S11 and HE1, London Plan policy HC1, having accounted for and paying special regard to s.66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.
- XIV. There is high potential for the survival of medieval and later burials within the former churchyard and archaeological remains from periods before this; proposals would remove all archaeological deposits on the site if these survive so could have an impact on these. This impact is considered to be appropriately and effectively managed through the use of conditions attached to this permission, with a PhD studentship proposed alongside the usual measures to oversee and manage the recording, excavation and subsequent study of the burials if these are present, a particularly noteworthy and rigorous arrangement to maximise the potential for this site to advance archaeological knowledge in various ways. Subject to the conditions and S106 obligations, the proposal would comply with policies DM12.4 of the Local Plan, policy HE2 of the emerging City Plan 2040 and HC1 of the London Plan.
- XV. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The microclimate, thermal comfort, ground conditions,

solar glare, light spill, air quality and noise credentials of the development are acceptable subject to mitigation, conditions and S106 obligations where relevant. The proposals would result in daylight and sunlight impacts to surrounding residential dwellings. However, considering the BRE Guidance, the location of the application site and impacted residential properties within the Cluster, the dense urban environment of the City particularly the Cluster, and any reasonable increase in massing, which accords with the aims of the development plan and the priorities of the CAZ on the delivery of floorspace, the impact of the above mentioned residential properties are considered acceptable in this instance and not considered to result in a reduction to unacceptable levels. Further to this, in the proposed development in the cumulative scenario only, one amenity space (Devonshire Square A) would not comply with BRE guidance as there would be an 100% loss in terms of the area of this space receiving at least two hours of direct sunlight, the impact on this space is acknowledged and officers consider the benefits of the proposal outweigh the harm caused to this space.

XVI. In transportation terms, the proposals would align with aspiration set out in the City's Transport Strategy. Acceptable levels of cycle parking and facilities are proposed, which would encourage active travel to the site. The proposal would provide a betterment of local public realm and the highway (though S278 Agreement and contribution to the London Wall Corridor Study and works to the south of the building), and with these improvements the additional pedestrian trips on the transport network can be accommodated. Demolition and construction methodologies would be secured by condition and proposals agreed between the Highways Authority and the appointer contractor, in accordance with construction regulations and logistic guidance. The proposed development would take delivery servicing off the street as it would provide an on-site delivery and servicing area, with all vehicles being to access and egress in forward gear, and with sufficient consolidation secured through a delivery and servicing management plan.

XVII. Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. Whilst proposed development would incorporate a large basement (accommodating plant, cycle parking and end of trip facilities), which has an high embodied carbon impact, it is considered that this is required to unlock the greatest number of benefits that would contribute to the wider sustainability and future proofing of the City, this includes optimising the delivery of highest quality office floorspace whilst integrating greening, community and retail uses across multiple levels, benefits which could not be delivered through retrofit where extension and opening up potential was significantly limited, as demonstrated in the pre-development analysis. The building would be designed to high sustainability standards including an increase in local greening and ecological value, operational energy efficiency (including a leading reduction in cooling

demand), targeting BREEAM 'Outstanding' and NABERS UK rating of 5 stars and adopting Circular Economy Principles. The Proposed Development is also one of the first to include a specific 'Cool Routes' strategy detailing how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate.

- XVIII. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Eastern Cluster and public realm would be complied with, and policies relating to design, heritage, tall buildings and strategic views of the local plan would be complied with. Whilst there would be conflict policies S8 (17), S12(h) and DE4(3) of the emerging City Plan 2040 due to the lack of an elevated public space, and policy DE7 of the emerging City Plan as the impact of the proposed development on the nearby hotel have not been assessed, the proposals comply with the development plans when considered as a whole.
- XIX. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and businesses objectives of the City and comply with other relevant design, community, culture, environmental and public realm related policies.
- XX. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
- XXI. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
- XXII. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. The payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and the S106 agreement.
- XXIII. Paragraph 11 of the NPPF sets out that there is a presumption in favour of sustainable development. For decision makers that means approving

development proposals that accord with an up-to-date development plan without delay.

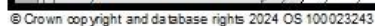
XXIV. As set out in paragraph 215 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). In addition, other material considerations, including the application of policies in the NPPF, in particular the outcome of the paragraph 215 NPPF balancing exercise, and the significant weight to be placed on the need to support economic growth, also indicate that planning permission should be granted.

XXV. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and in the schedules attached.

Recommendations

- I. That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposals in accordance with the details set out in the attached schedule subject to:
 - planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.
- II. The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008).
- III. The application be referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) (England) Direction 2024 and the application not being called in under Section 77 of the Town and Country Planning Act 1990.
- IV. That the Department for Digital, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.
- V. That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278/38 of the Highways Act 1980.
- VI. That you agree in principle that land affected by the building which is currently public highway and land over which the public have right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up plan annexed to this report under the delegated arrangements approved by the Court of Common Council.
- VII. That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

Site Location Plan



CASE No.
25/00223/FULEIA



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SITE PHOTOS

Existing view of the site from south-west:



Existing view from North-west:



Existing view from north east:



Existing view from southeast:



Existing south elevations and historic Churchyard:



APPLICATION COVER SHEET

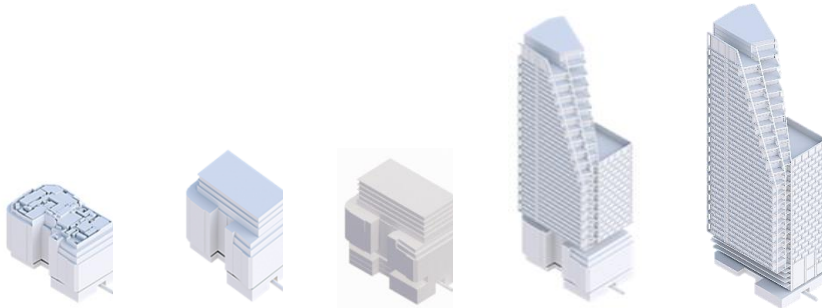
63 St Mary Axe

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	Camomile Court: Ground plus 6 storeys, 1 basement level; 47m AOD/32.4m AGL		Ground plus 45 storeys, 6 basement levels; 190.65m AOD / 176m AGL	
	63 St Mary Axe: Ground plus 8 storeys, 2 basement levels; 50.6m AOD/36m AGL			
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Commercial Office E(g)(i)	17,892.3	E(g) – offices	85,624
	Gym (F2)	717.6	E(a/b/c) - retail/food and beverage/professional services	125
			E(b/g) – food and beverage/ offices	1,849
			E(a/b/g)/F1/F2 – retail/food and beverage/offices/ learning and non-residential institutions/local community	205
			E(b/g)/F1/F2 – food and beverage/offices/learning and non-residential institutions/local community	1,827
			Sui generis – Multi Function Space	461
			Sui generis – Public lavatory	8

			Basements (ancillary)	11,363
	TOTAL	18,609.9	TOTAL	101,462
3. OFFICE PROVISION IN THE CAZ	Existing	17,892.3sqm (GIA)		
	Proposed	85,624sqm (GIA)		
	Uplift	67,731.7sqm (GIA)		
4. EMPLOYMENT NUMBERS	EXISTING	PROPOSED		
	1,789	4,500 employees daily		
5. VEHICLE/CYCLE PARKING	EXISTING	PROPOSED		
	Car parking spaces	n/a	Car parking spaces	2 (blue badge)
	Cycle long-stay	n/a	Cycle long-stay	1,463
	Cycle short-stay	n/a	Cycle short-stay	101
	Lockers	n/a	Lockers	146
	Showers	n/a	Showers	147
	Changing facilities	n/a	Changing facilities	1,463
6. HIGHWAY LOSS / GAIN	Loss: 17.4sqm			
	Gain: 21.9sqm			
	NET: +3,5sqm			

7. PUBLIC REALM	The existing site provides 120 sqm of public realm. The proposed development will provide the following: • 795 sqm of external ground floor public realm • 350 sqm of publicly accessible green elevated walkways • 360 sqm of publicly accessible internal walkways and covered public realm	
8. TREES	EXISTING	PROPOSED
	0	GF: 8 trees Terraces: 4 trees Balconies: 64 Total: 76
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED
	35/day	64 trips a day (50% consolidation).
10. SERVICING HOURS	Refuse, recycling and glass collections between 8pm and 11pm and all other delivery and servicing between 11pm and 7am. All delivery and servicing is required to take place in the on-site loading bay.	
11. RETAINED FABRIC	Substructure retained: <5% Superstructure (Frame) retained: 0% Superstructure (Facades) retained: 0%	

	Total retention (substructure and superstructure combined): <1%																
12. OPERATIONAL CARBON EMISSION SAVINGS	Improvements against Part L 2021: 33% GLA requirement: 35%																
13. OPERATIONAL CARBON EMISSIONS	132,122 tonnes CO2e over 60 years (not accounting for grid decarbonisation) 1,302 kgCO2e/m2 over 60 years (not accounting for grid decarbonisation)																
14. EMBODIED CARBON EMISSIONS	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS ■ GLA Office Benchmark ■ GLA Aspirational Benchmark ■ Proposed Development <table><thead><tr><th>Category</th><th>GLA Office Benchmark (kgCO₂e/m²)</th><th>GLA Aspirational Benchmark (kgCO₂e/m²)</th><th>Proposed Development (kgCO₂e/m²)</th></tr></thead><tbody><tr><td>A1-A5</td><td>950</td><td>600</td><td>945</td></tr><tr><td>B-C Excl. B6/B7</td><td>450</td><td>370</td><td>444</td></tr><tr><td>A-C Excl. B6/B7</td><td>1400</td><td>970</td><td>1382</td></tr></tbody></table> Upfront embodied carbon: 95,883 tonnes CO2e / 945 kgCO2e per square meter Embodied carbon: 140,210 tonnes CO2e / 1,382 kgCO2e per square meter	Category	GLA Office Benchmark (kgCO ₂ e/m ²)	GLA Aspirational Benchmark (kgCO ₂ e/m ²)	Proposed Development (kgCO ₂ e/m ²)	A1-A5	950	600	945	B-C Excl. B6/B7	450	370	444	A-C Excl. B6/B7	1400	970	1382
Category	GLA Office Benchmark (kgCO ₂ e/m ²)	GLA Aspirational Benchmark (kgCO ₂ e/m ²)	Proposed Development (kgCO ₂ e/m ²)														
A1-A5	950	600	945														
B-C Excl. B6/B7	450	370	444														
A-C Excl. B6/B7	1400	970	1382														

15. WHOLE LIFE-CYCLE CARBON EMISSIONS	Total WLC (embodied and operational): 272,332 tonnes CO₂e Total WLC (embodied and operational) per square meter: 2,684 kgCO₂e/m²					
	CARBON OPTIONEERING					
16. WHOLE LIFE-CYCLE CARBON OPTIONS ASSESSMENT						
		Option 1	Option 2a	Option 2b	Option 3	Option 4
	Gross Internal area (GIA) m ²	14,510	16,638	19,645	93,428	93,428
	Increase in GIA (over existing)	0	2,128	5,135	78,918	78,918
	Substructure % retained (by mass)	95	80	70	50	20
	Superstructure % retained (by mass) (frame, upper floors, roof, stairs, ramps)	100	80	60	25	0
	Superstructure % retained (by area) (external walls, windows, doors)	100	60	0	60	0
	Upfront Embodied Carbon (A1-A5) (kgCO ₂ e/m ² GIA) <i>exc. Sequestration</i>	39	282	485	741	837
	In-use & End of Life Embodied Carbon (B-C) (kgCO ₂ e/m ² GIA) <i>excl. B6 & B7</i>	390	351	351	351	351
	Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA)	429	633	836	1,092	1,188

	Whole Building Operational Carbon for building lifetime (B6)(kgCO ₂ e/m ² GIA) (inc. decarbonisation)	1,716	138	108	108	85
	Total WLC Intensity (inc.B6, pre demolition) (kgCO ₂ e/m ² GIA)	2,145	780	958	1,205	1,280
	Upfront Embodied carbon (A1-A5) (tCO₂e)	566	4,692	9,528	69,230	78,199
	In-use embodied carbon (B-C)(tCO₂e)	5,659	5,840	6,895	32,793	32,793
	Operational carbon for building lifetime (B6) (tCO₂e)	24,904	2,300	2,112	10,045	7,893
	Total absolute WLC (inc. B6 & pre-demolition) (tCO ₂ e)	31,129	12,977	18,826	112,613	119,611
17. TARGET BREEAM RATING	Target of BREEAM “Outstanding” for the office space Target of BREEAM “Excellent” for the retail space Policy Target: Excellent					
18. URBAN GREENING FACTOR	0.58 (London Plan requirement of 0.3)					
19. BIODIVERSITY NET GAIN	The Proposed Development will deliver a net gain for biodiversity, with an increase in habitat units of 6943.64 % when compared to the baseline.					
20. AIR QUALITY	The proposed development is Air Quality neutral					

Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by consultation bodies and any representations received from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The Council issued an EIA Scoping Opinion (24/00734/SCOP) on the 13 September 2024. The following topics were scoped in:
 - Air Quality
 - Archaeology
 - Climate Change and GHG Emissions
 - Daylight, Sunlight, Overshadowing, Light Trespass and Solar Glare
 - Noise and Vibration
 - Townscape, Built Heritage and Visual Impact Assessment
 - Wind Microclimate

The following topics were scoped out:

- Traffic and Transport
- Health
- Ecology and Biodiversity
- Geo-environmental and Geotechnical Conditions
- Socioeconomics
- Water Resources, Drainage and Flood Risk
- Waste and Materials
- Project Vulnerability, Major Accidents and Disasters
- Aviation

The submitted ES accords with the Scoping Opinion issued.

4. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - a) To examine the environmental information
 - b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination.

- c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
- d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
5. A local planning authority must not grant planning permission unless satisfied that reasoned conclusion is up to date, if, in the opinion of the relevant planning authority, it addresses significant effects of the proposed development on the environment that are likely to arise as result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by another person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
7. The Environmental Statement is available online, together with the application drawings, relevant policy documents and the representations received in respect of the application.
8. The Applicant provided further information to support the submitted Environmental Statement, which was published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 on May 2025. The additional information (being further information and any other information) which forms part of the environmental information is also available online with any further representations received in conjunction with the information.
9. The interaction between the likely significant effects have been considered in the assessment. Mitigation and monitoring measures are proposed in the ES would be secured through planning conditions and/or planning obligations within the S106 agreement as appropriate.

Site and surroundings

10. The application site is approximately 0.389 hectares and is bound by Camomile Street, Houndsditch, Outwich Street and St Mary Axe. The site currently consists of two buildings which were built in the 1980s; 63 St Mary Axe and Camomile Court.

11. 63 St Mary Axe is located in the south/southeastern portion of the site and consists of two basement levels, ground and eight upper storeys. The building has a height of 50.6m AOD. Camomile Court is located in the north/northwestern part of the site and consists of basement and ground floor and six upper storeys. The building has a height of 47m AOD. In addition, there is a landscaped area recessed into the southern facade of Camomile Court, which was formerly the churchyard to the Church of St Augustine Papey. The existing buildings within the site provide 17,892.3sqm GIA of office floorspace.
12. The application site is located in the Eastern Cluster as defined in the Local Plan 2015; it is noted the site is on the eastern edge of the Cluster. In the emerging City Plan 2040, the application site is situated within the City Cluster Tall Buildings Area. The Eastern Cluster is characterised by the cluster of tallest buildings and highest density of businesses of business activity in the City.
13. The surrounding area is high density and is primarily commercial in nature with some residential properties, religious buildings and some retail units. To the north of the site at One Bishopsgate Plaza (ground plus 45 storeys) is the Pan Pacific Hotel and the Sky Residences apartments. There are other residential properties situated to further to the north and east and some to the west and south. To the northwest is the Salesforce Tower at 46 storeys, to the southwest is 100 Bishopsgate at 40 storeys and to the immediate southeast is 70 St Mary Axe (21 storeys). The centre of the Cluster is situated to the southwest of the application site. To the north and east, buildings step down in height, with lower rise buildings of a smaller grain and scale.
14. The site lies approximately 720m northwest of the Tower of London World Heritage Site.
15. The application site is not situated within a conservation area nor are either of the buildings listed buildings. The application site is adjacent to the Bishopsgate Conservation Area, which wraps around the north and west of the site. The St Helens Place Conservation Area is located to the south of the application site. Creechurch Conservation Area is located to the southeast of the site.
16. Within the basement levels on the site there is a Scheduled Monument known as London Wall: Remains of Roman Wall and Bastion, Camomile Street' and beneath the southern edge of the site there is potential for archaeological remains forming part of the former churchyard of St Augustine Papey, which is a Non-Designated Heritage Asset (NDHA).
17. There are a number of designated and non-designated heritage assets in the immediate vicinity of the site. These include:

- 38 St Mary Axe (The Baltic Exchange) (Grade II)
- Church of St Helen Bishopsgate (Grade I)
- Devonshire Square Group including Port of London Authority's Warehouses, Entrance Gatepiers, East and West Entrance Houses
- 1,3 & 5 Stone House Court (Grade II)
- Church of St Botolph Without Bishopsgate (Grade II*)
- St Botolph's Church Hall (Grade II)
- 2 Drinking Fountains, 3 overthrows and Lanterns, Bishopsgate Churchyard (Grade II)
- Bishopsgate Parish Memorial (Grade II)
- The Bevis Marks Synagogue (Grade I)
- Guild Church of St Ethelburga the Virgin (Grade I);
- Hasilwood House 52-68 Bishopsgate (Grade II);
- Bishopsgate Conservation Area;

18. Other designated and non-designated heritage assets in the wider area include:

- Church of St Andrew Undershaft (Grade I) and Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II)
- Lloyd's Building (Grade I)
- 13 Bishopsgate (Grade I)
- Church of All Hallows (Grade I)
- Royal Exchange (Grade I)
- Finsbury Circus Registered Historic Park and Garden (Grade II)
- London Wall Buildings (25 London Wall) & Salisbury House (31 Finsbury Circus) (Grade II)
- Former Port of London Authority (10 Trinity Square) (Grade II*)
- The Tower of London World Heritage Site (WHS, Scheduled Monument including Listed Buildings);
- St Paul's Cathedral (Grade I);
- Tower Bridge (Grade I);
- Royal Exchange (Grade I);
- St Katherine Cree (Grade I);
- Church of St Botolph, Aldgate (Grade I);
- Sir John Cass School (Grade II*)
- The Monument (Scheduled Monument and Grade I);
- 13 Bishopsgate (Grade I) ;
- Former Port of London Authority (Grade II*);
- Holland House (1-4 Bury Street) (Grade II*);
- Leadenhall Market (Grade II*);
- Lloyd's Registry, 71 Fenchurch Street (Grade II*);
- Bishopsgate Institute (and 6 Brushfield Street) (Grade II*);
- Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II);
- Gateway in yard of Church of St Katherine Cree (Grade II);

- Liverpool Street Station (Grade II);
- 46 Bishopsgate (Grade II);
- 48 Bishopsgate (Grade II);
- Park House and Garden House (Grade II);
- Finsbury House (Grade II);
- London Wall Buildings (Grade II);
- 139- 144 Leadenhall Street (Grade II);
- 147-148 Leadenhall Street (Grade II);
- 38 St Mary Axe (The Baltic Exchange) (Grade II);
- 20 and 21 Billiter Street (Grade II);
- 2-16 Creechurch Lane (Grade II);
- 10 Brushfield Street (Grade II);
- 14 Brushfield Street (Grade II);
- Leadenhall Conservation Area;
- Bank Conservation Area;
- Creechurch Conservation Area;
- Finsbury Circus Conservation Area;
- The Tower of London Conservation Area;
- Bunhill Fields and Finsbury Square Conservation Area;
- St James Park Registered Historic Park and Garden (Grade I);
- Finsbury Circus Registered Historic Park and Garden (Grade II);
- Bunhill Burial Ground Registered Historic Park and Garden (Grade I)
- 113-116 Leadenhall Street (Non-designated heritage asset);
- Liverpool Street Arcade (Non-designated heritage asset);
- 33-34 Bury Street (Non-designated heritage asset);
- 18-20 Creechurch Lane (Cree House) (Non-designated heritage asset);
- 24 Creechurch Lane (Fibi House) (Non-designated heritage asset);
- 12-14 Mitre Street (Mitre House) (Non-designated heritage asset);
- 27-31 Mitre Street (Non-designated heritage asset);
- 30 St Mary Axe (Non-designated heritage asset); and
- Liverpool Street Arcade (Non-designated heritage asset)

Planning History

19. The recent planning history for the application site is set out below:
 - On the 8th April 2008 planning permission (08/00151/FULL) was granted for the replacement of circular entrance doors with a new glass box entrance lobby.
 - On 15th August 2011 planning permission (11/00306/FULL) was granted for the extension and alteration at upper floor level to create two additional floors, and external alterations at lower floor levels, to create additional office B1 floorspace.
 - On 1st December 2011 planning permission (11/00768/FULL) was granted for alterations to ground floor office entrance.

- On 7th August 2014 planning permission (14/00420/FULL) was granted for the change of use of part ground floor and part basement from Class B1 (Office) to Class D2 (Gymnasium) and the installation of a new entrance.
- On 24th October 2017 planning permission (17/00911/FULL) was granted for change of use of Room 124 at first floor level from Class B1 use (office) to a flexible use for either Class B1 (office) or Class D1 (medical clinic) use (10sq.m GIA).
- On 21st December 2021 planning permission (21/00595/FULL) was granted for shopfront works comprising: removal of the stall risers, replacement of shopfronts with new shopfront windows and doors, installation of glazed fascias; and other associated and ancillary works.

Proposals

20. Planning permission is sought for the demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of ground plus storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.
21. The proposed scheme would provide 101,462sqm (GIA) of floorspace comprising:
 - 85,624sqm (GIA) of office floorspace (Use Class E (g))
 - 125sqm (GIA) of retail/food and beverage/professional services (Use Class E (a/b/c) at ground floor level.
 - 1,849sqm (GIA) of food and beverage/ offices (Use Class E (b/g)), split over level 01 and level 03.
 - 205sqm (GIA) of retail/food and beverage/offices/learning and non-residential institutions/local community (Use Class E (a/b/g)/ F1/F2) at ground floor level.
 - 1,827sqm (GIA) of food and beverage/offices/learning and non-residential institutions/local community (Use Class E (b/g), F1/2) on level 02.
 - 461sqm (GIA) of multi-function space (Use Class Sui Generis), split over ground floor and level 01.
 - 8sqm (GIA) of public lavatory (Use Class Sui Generis) at ground floor level.
 - 11,363sqm (GIA) of ancillary basements

22. The maximum height of the proposed building is 190.65m AOD, comprising 45 storeys above ground, including three levels of plant above the office accommodation.
23. The building would incorporate six basement levels which would house cycle parking and associated end of trip facilities, plant and UKPN, bin store, the Roman Wall and ancillary accommodation. Sections of the existing B1 level would be retained.
24. Grade A office space is the predominant use within the proposed building, with office floorspace being provided from Level 4 upwards. Levels 6 to 26 are the larger floorplates, and these could accommodate one or mix of occupiers on each floor. The floorplates from levels 27 to 41 would be smaller than the lower levels, this is due to the cut back in the design of the building. Amenity terraces for the office occupiers are proposed at levels 27 and 28, with smaller 'Bastion' styles terraces on level 4.
25. Across the ground floor, level 1 and level 2, floor space would be provided for a cultural partner. In addition, part of the retail floor space at ground floor level would be operated by a Social Enterprise food and beverage offer and further space would be provided on level 1 or level 3 depending on specific needs of the Social Enterprise provider.
26. The proposed development is a 45-storey tower, massing composed of two main elements: a base podium rising to a shoulder height at level 27; and above this, an elegant tapering tower, which leans away to the west, and folds into backdrop of taller towers which form the City Cluster.
27. Within the site boundary, along the southern elevation, the proposals include extensive new landscaping, including several planted seating areas, and at its centre, the redesigned Churchyard of St Augustine Papey, and a newly revealed section of the Roman Wall. The edges of these spaces would be densely planted, incorporating several large specimen trees, and a variety of seating options. Connected above this, and wrapping around to the west, are a set of planted walkways and balconies, which taken together, would be named Camomile Park. A feature lift and staircase would enable access to these higher-level spaces. A public toilet is also proposed at street level. All spaces would be directly and freely accessible from the street, making them an extension of the public realm. There would also be extensive planting along the western elevation. To the north, the loading bay and disabled parking spaces area would become part of the public realm and be animated in non-servicing hours.

Consultations

Statement of Community Involvement

28. The Applicants have submitted a Statement of Community Involvement prepared by Kanda Consulting dated January 2025, outlining their engagement with stakeholders. This involved working in conjunction with Things Made Public who had been developing a Cultural & Social Value Strategy based upon local engagement, schools and cultural engagement and co-design workshops to help shape the public benefits.

First Phase of Engagement

29. The Applicants first phase of engagement, which took place between 22nd May to 13th June 2024, included:
- A designed newsletter distributed to 1,520 addresses on the 16th May 2024
 - Five meetings with key local stakeholders
 - Two in person drop-in sessions attended by 14 people
 - A dedicated consultation website which was visited 1,843 times by 1,196 different users during the engagement phase.
 - A geo-targeted social media campaign which secured a reach of 15,794 people, generating 81,878 impressions and 640 clicks through to the dedicated project website.

Second Phase of Engagement

30. The Applicants second phase of engagement, which took place between 10th September to 4th October 2024, included:
- Three stakeholder briefings
 - A designed newsletter distributed to 1,520 addresses on 11th September 2024.
 - Two in person drop-in sessions attended by 17 people.
 - A dedicated consultation website which was updated with the detailed proposals which was visited 1,195 times by 952 different users during the consultation process.
 - A targeted social media campaign which secured a reach of 59,408 people generating 14,381 impressions and 374 clicks through to the dedicated website.
31. The dedicated consultation website which went live on the 22nd May 2024 is still live, having been updated throughout each phase of engagement. In addition, throughout the consultation process, a telephone number and email address were supplied and managed by Kanda providing further information to businesses, and stakeholders on request.

Statutory Consultation

32. Following receipt of the application by the Local Planning Authority in February 2025, it has been advertised on site and in the press. Nearby

residential occupiers were also notified directly by letter. The application has been consulted upon twice as follows:

- On the validation of the application in March 2025 for a period of 30 days.
- Under Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 following the receipt of further information, for a 30-day period starting on 9th May 2025. This consultation covered further information in respect of the Environmental Statement.

33. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses are set out below.

Consultation responses	
Hackney Council	No objection. Officer response: Noted.
Active Travel England	Confirmed that they will not provide comments on the application as TfL will provide comments as part of the GLA Stage 1 response. Officer response: Noted.
Gatwick Airport	No objection. Officer response: Noted.
City Airport	No objection subject to the imposition of a condition in relation permanent obstacle lighting scheme. Officer response: The recommended condition has been included in the condition schedule.
Environmental Health	No objection subject to the imposition of conditions. Officer response: The recommended conditions have been included in the condition schedule.
Heathrow Airport	No objection raised in the initial consultation or the re-consultation. Officer response: Noted.
NATS Safeguarding	No objection. Officer response: Noted.

Haringey Council	No objection. Officer response: Noted.
Local Lead Flood Authority	No objection subject to the imposition of conditions in respect of detailed SuDS design and a lifetime maintenance plans for the SuDS. Officer response: The recommended conditions have been included in the condition schedule.
The Royal Borough of Kensington and Chelsea	No objection. Officer response: Noted.
Southwark Council	No comments. Officer response: Noted.
Historic England – GLAAS	Letter dated 08 April 2025 <u>Assessment of Significance and Impact</u> GLAAS advises the City of London on their non designated archaeology. Our Development Advice team will be providing advice on the Scheduled Monument and impacts on the Tower of London World Heritage Site in a separate letter. The submitted planning application is substantially the same scheme we commented on at the pre-application stage in regard to non-designated archaeology. Our pre-application advice is therefore still relevant and applicable. Significance The former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich occupies a small part of the application site situated immediately inside the city wall. The burial ground is believed to date to at least AD1215. It is bounded by the Scheduled Roman and Medieval Wall which formed its northern extent. The relationship between the burial ground and the city wall contributes to the significance of each as part of their mutual settings – this is explained further in the Development Advice letter.

	At least 333 burials were recorded as being placed in the burial ground between the 17th and 19th centuries, with an unknown (but probably larger) number buried there in the approximately four centuries prior to records being kept. The burial ground was closed in the 1850s. It remains as open space within the streetscape and comprises the only extant remains of the two churches it was associated with, both of which were demolished in the post-medieval period. St Augustine Papey is shown on historic maps to have been located just to the north-west of the burial ground and St Martin Outwich was located 250m to the south-west of the site. The base of the medieval ditch around the outside of the city wall may also survive on the site beneath the basements of 23 Camomile Street. Around fifty-eight burial grounds remain extant in the City of London. The majority are likely to have medieval origins. At least 76 are known to have been lost. Historic maps suggest that this burial ground has never been built over previously and there are no records of it having been cleared in the Victorian period. An Environmental Statement and Archaeological Desk-Based Assessment accompanied the planning application. The Archaeology chapter of the Environmental Statement concluded that the development will have a moderate adverse effect on articulated human remains of medieval and post-medieval date and also on the medieval ditch, after mitigation. A minor adverse effect is noted for the burial ground itself. This conclusion was reached as the burial ground has been defined in the ES as having only local significance. This analysis is curious because it disassembles a single heritage asset – the burial ground – into its component parts. Whilst we accept that different components of a heritage asset can hold different levels and types of significance that does not make them separate assets as implied in (for example) ES Table 10.6. As explained below we believe the burial ground as a whole is likely to be of more than local significance.

	The ES suggests that the potential for medieval burials is uncertain. But this is only because archaeological evaluation requested by GLAAS at pre-determination stage has not been carried out. As there is no evidence that the burial ground has been previously impacted by development or been cleared then we have to assume that the burial ground has good survival and currently represents a complete assemblage of a medieval and post-medieval burial ground. The submitted DBA recognises that carrying out the evaluation would 'enable an informed decision in respect of an appropriate mitigation strategy for any significant archaeological assets'. Nationally, historic burial grounds are generally considered to be of archaeological interest and current guidance accords archaeological significance to all human remains over a hundred years old. Therefore, as an apparently largely complete intact (below-ground) example of an historic City of London burial ground we recommend that St Augustine Papey is identified as a non-designated heritage asset. Even though the application site lies within the Roman city of Londinium the Environmental Statement does not identify potential impact on Roman urban archaeology. Whilst such archaeology has been lost over most of the development site survival is likely under the burial ground, as seen recently at All Hallows Staining (50 Fenchurch Street) where well preserved Roman deposits were encountered. This is a significant omission. Pre-determination archaeological evaluation is necessary to establish how significant the burial ground is and what might survive beneath it. Impact Excavation of the basement as proposed would cause total loss of the burial ground and any earlier remains. The burial ground also has value as an open space and its area and layout has been a defined part of the streetscape for over 800 years. The loss of this streetscape layout cannot be fully

	compensated for by the proposed new park design for the area. The Environmental Statement contains an extract from the GLAAS response to scoping, but does not include the key parts of that advice, which requested that the Environmental Statement demonstrate how the burial ground will be preserved within the new development. The Scoping response also requested that the results of the proposed predetermination archaeological evaluation work should be incorporated into the EIA. Neither of these requests have been provided. The Environmental Statement and Non-Technical Summary both state that a 'Written Scheme of Investigation for a programme of archaeological investigation around the burial ground and Scheduled Monument of the Roman city wall has been agreed with Historic England. This will be implemented ahead of construction of the Proposed Development to excavate and record any remains prior to any impact, and determine the appropriate method of archaeological offsetting'. This is misleading. The only WSI that has been agreed is for the pre-determination evaluation that has not been carried out. No WSI has been approved for any post-consent works. The ES also states that 'the programme of archaeological works aims to offset the impacts by increased knowledge and information about the remains'. However, as paragraph 218 of the NPPF states the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. Conclusions and Recommendations: The burial ground represents the only remains associated with the former churches of St Augustine Papey and St Martin Outwich. Medieval churchyards in the City are a finite resource and should be protected rather than removed. We further consider that the impact of development on the burial ground has not been properly assessed in the Environmental Statement and therefore recommend that further information

	should be required through a Regulation 25 request. Archaeological evaluation is essential to making an informed assessment of significance and reach an appropriately informed planning decision. Once the archaeological evaluation report is provided a balancing exercise as defined in the NPPF (paragraph 216) would be carried out. Depending on the outcome we might seek redesign of the scheme and/or recommend attaching a number of planning conditions to allow the remains to be fully recorded and a programme of public benefit work to be undertaken. If you do not receive more archaeological information before you take a planning decision, I recommend that you include the applicant's failure to submit that as a reason for refusal. Officer response: These matters are addressed in the Archaeology and heritage sections of this report. Email dated 16 May Confirmed that the additional information submitted does not affect the comments set out above. Officer response: This is noted as the additional information that triggered the re-consultation was not in respect of archaeology.
Greenwich Council	No observations to make. Officer response: Noted.
Lambeth Council	No objections. Officer response: Noted.
Environment Agency	No objections. Informatives are suggested. Officer response: The recommended informatives have been included in the Informatives schedule.
The Council for British Archaeology	Email dated 16 April 2025

	We do not wish to make detailed comments on existing proposals at this stage but would like to express our serious concerns over the applicant's failure to follow the clear advice offered by GLAAS at a pre-application stage. The application site is highly archaeologically significant, with remains from the Roman period and a medieval and post-medieval burial ground. Archaeological evidence about the city's past is a finite resource of high evidential value, and this site is extremely rare in that there are no records of modern development which would have disturbed the surviving archaeological remains. The proposed new development on this site would cause permanent and substantial harm to this archaeology. This harm cannot be justified by an archaeological mitigation strategy (under para. 218 of the NPPF). The application does not demonstrate an adequate understanding of the significance or nature of the archaeological remains on the site, as required by para. 207. The probable presence of undisturbed Roman archaeology is not acknowledged and insufficient assessment work has been done to enable an understanding of the site and the survival of archaeological remains, against the previous advice offered by GLAAS. The CBA do not consider that this application meets the requirements of para 207 of the NPPF or Policy HE2 of the City Plan 2040. Unless a detailed archaeological evaluation is undertaken and a detailed scheme of mitigation works is agreed with GLAAS, we recommend that this application be refused due to insufficient information and the substantial harm which would be caused to the unique archaeology of the site. Email dated 10th June 2025 While the applicants have provided additional information on the above-ground impacts on the setting of nearby heritage assets, no archaeological assessment of the site has been undertaken, as previously recommended by the CBA and GLAAS. As such, we maintain our previous objection to the scheme. If an archaeological evaluation of the site

	which permits an understanding of the probable surviving archaeology on site is not provided, we recommend that this application be refused. Officer response: These matters are addressed in the Archaeology and Heritage sections of this report.
Historic Royal Palaces	Letter dated 22 April 2025 We write in relation to the current consultation on the above referenced planning application, to express HRP's concerns about aspects of the scheme, which relates to the redevelopment of the site at 63A St Mary Axe, based on its impact on the Outstanding Universal Value (OUV) of the Tower of London (ToL) World Heritage Site (WHS). Tower of London (ToL) World Heritage Site (WHS). HRP has previously been invited to view proposals for the site while these were in development, in March and July 2023. In response to the scheme presented in July 2023, which had been amended since March, HRP advised that it welcomed the reduction in height of 3 storeys and some enhancement in the lean away from the White Tower that had been achieved. However, it emphasised it wished to see a greater degree of leaning to the eastern apex of 100 Leadenhall Street to enhance the sky space between the White Tower and better define the eastern edge of the City Cluster, and to preserve the LVMF view 10A.1 which is the key view that has most impact on the OUV of the World Heritage Site in terms of this proposed development. HRP also highlighted that, although the proposals sat within the draft city cluster profiles at that time, HRP was not in agreement with the tall vertical edge of that profile on the eastern edge and indicated it would be advocating for a more angled profile during the formal consultation (which it has since done so). With regard to the submitted proposals (ref 25/00223/FULEIA), HRP wishes to reiterate its concerns about the profile and massing of the proposed tower element of the development, and its impact on the silhouette of the White Tower in LVMF view 10A.1. Whilst the slant achieved since

	the earlier iterations of the design are acknowledged, HRP maintains that the impacts on the OUV of the Tower of London could(should) be further mitigated with a steeper lean and a further reduced height. HRP would also highlight that there remains a lack of consensus over the appropriate outline for the City Cluster, including at the eastern edge. Although the design appears to continue to sit within the proposed cluster profile, HRP does not agree that this provides sufficient protection to the Tower of London and LVMF view 10A.1. It therefore requests that the profile is modified as suggested above to mitigate the impact on the silhouette of the White Tower and thereby help to preserve the OUV of the Tower of London. HRP is also concerned that the lower-level shoulder of the proposals might be more apparent in winter, without the benefit of tree cover, and requests that winter versions of View 10A.1 are provided so that this risk can be reviewed. Officer response: The matters raised HRP are addressed in the Heritage and Strategic Views sections of this report.
Historic England	Letter dated 16 April 2025 These proposals would harm attributes of the Tower of London World Heritage Site's Outstanding Universal Value and consequently harm its integrity. This weighs very heavily against the application. The proposal includes revealing and conserving the London Wall scheduled monument. This would represent an enhancement of its significance and the ability to appreciate it. However, we are concerned that removing the associated, non-designated burial ground (which forms part of the London Wall's setting that is likely to contribute highly to its significance) may cause a level of harm that would not be outweighed by the heritage benefit of showcasing the wall, nor would it be capable of outweighing the harm to the World Heritage Site.

	The burial ground, believed to date from c.1215, is the only extant physical evidence of the two churches it was associated with, St Augustine Papey and St Martin Outwich. The Greater London Archaeological Advisory Service (GLAAS) has advised that further information is required to fully assess the nature of the harm which may be caused by the development. Our advice does not preclude the redevelopment of the site, but these considerable heritage impacts together indicate that the proposals represent neither sustainable development as required by national planning policy, nor the optimum capacity for the site, as required by the London Plan's design-led approach. It would be possible to redevelop the site without causing the harm we have described and we encourage that this should instead be pursued. We recommend that planning permission for the current proposals should therefore not be granted. <u>Impact of proposals</u> a) <u>Tower of London</u> Compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed detailed design. The additional height that would be introduced at its eastern edge, would result in an upward step in scale directly beside the White Tower, creating a greater cliff edge than the current situation. The further encroachment of this development into the sky space around the Tower would present a greater distraction in views of its silhouette. The White Tower's silhouette is recorded in the 2016 WHS Management Plan as a key component of the World Heritage Site's attributes of OUV as an internationally famous monument, in a landmark siting, and reflecting the physical dominance of the White Tower. The latter reflects the Tower as a symbol of Norman power - an appreciation of this is similarly reliant on the clear sky backdrop.

	The proposed building would appear different to the character of the existing cluster because of the unusual form that results from its eastern edge being twisted to face south, the staggered terraces and the contrast of materials on that eastern edge. It would therefore be more eye-catching than the existing Cluster buildings, which would compound the impact described above. The proposals would make the Cluster increasingly overbearing overall, adding to the existing cumulative harm to the attributes conveying the WHS's OUV referred to above. The experience from Tower Bridge, as an example of the views of the Tower where this harm would be appreciated, is kinetic and the composition of the view changes considerably within a very short distance when moving north from viewpoint 10A.1. This is explained in the Tower's Local Setting Study and was highlighted in the Tulip decision (IR 14.28). Here the Inspector noted that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it. The proposals would leave less of the kinetic experience unimpacted. Consequently, the Tower would appear less apart from the City. The important sky space around its silhouette, which is essential to sustaining the attributes and values of the Tower discussed above, would be further compromised when compared to the existing situation. This would add to the cumulative harm to the attributes of OUV described above. In its Technical Review report on the refused schemes at 31 Bury Street, regarding the LVMF view 10A.1, ICOMOS advised that "when that same protected view is considered from a kinetic perspective, the work to maintain a separateness from the Tower is completely unsuccessful. Whilst that comment concerned a different scheme - proposals at 63 St Mary Axe would be shorter - it is notable that the silhouette of the White Tower and its visual separation from the City would be impacted in a similar way. b) <u>The London Wall scheduled monument</u>

	The current proposals have been developed to include an area from which the London Wall can be readily viewed by the public. We currently do not know what the condition of the wall is; however, there will likely be a need for a programme of conservation and/or consolidation. There will also likely be further design considerations that would need to respond to the condition of the wall when revealed. Specifically, there will be a need for closer analysis of the likely environmental conditions of the proposed space and if they would be appropriate for preserving the wall. There is a small potential for harm to the fabric of the wall which could result from exposing it to the wider environment. However, it is likely that this harm could be adequately limited through appropriate conservation works, suitable environmental controls, and commitment to a programme of ongoing management. Therefore, we think that the proposals for revealing the wall within the design would enhance the significance of the monument through increasing its legibility and accessibility. However, we also consider that there would be harm to the scheduled monument caused by the complete removal of the non-designated heritage asset of the former medieval and post-medieval burial ground of St Augustine Papey and St Martin Outwich. Removal of the burial ground will likely destroy archaeological remains which have a direct historical association with the London Wall and which contribute to an understanding and appreciation of the scheduled monument. The extent of this harm cannot be fully defined as no archaeological evaluation has been undertaken to confirm the level of retention of archaeological remains within the burial ground and to characterise any remains. It should also be noted that no assessment of impacts on the London Wall scheduled monument (both adverse and beneficial) has been presented as part of the Environmental Statement or Archaeological Desk Based Assessment.

	c) <u>The medieval and post-medieval burial ground</u> As previously stated, the archaeological advisor for the City of London is the primary contact for advice in relation to the burial ground as a non-designated heritage asset. However, we note here her position that the development proposal as submitted would result in the total loss of this non-designated heritage asset and that the impact of development on the burial ground has not been properly assessed in the Environmental Statement due to a lack of archaeological evaluation. <u>Historic England's Position</u> The proposals would cause harm to attributes of OUV of the World Heritage Site, the significance of the scheduled monument and result in the total loss of the non-designated burial ground. Overall, we do not consider that the proposals have been developed in a way that sufficiently accords with the requirements of national and regional planning policy, which stipulate that heritage significance must inform the form of development proposals early on in the process. Our advice does not preclude the redevelopment of the site. Harm could be greatly reduced, or potentially avoided, in each case with a lower building, which would avoid all three elements of heritage harm (to attributes of OUV of the WHS, the significance of the monument and the total loss of significance of the burial ground) while still achieving a considerable uplift in office space, thereby delivering sustainable development. Such a scheme would accord with the design-led approach required by the London Plan, responding to all elements of the site's highly significant heritage context and its capacity for growth. a) <u>The Tower of London World Heritage Site</u> Whilst the proposals were reduced in scale in response to our pre-application advice, we do not consider that this has adequately reduced the harmful impact. These proposals would continue

	to have a comparable impact to the 31 Bury Street proposals. That application (ref. 24/00021/FULEIA) was recently refused because the proposals were considered to harm the contribution to the OUV of the Tower of London World Heritage Site made by its setting, in particular in views that best allow that OUV to be appreciated. In this case, we consider that the same attributes of OUV (as an internationally famous monument, a symbol of Norman power, its landmark siting and its physical dominance) and the integrity of the WHS would be harmed. We therefore recommend that the current application should be refused for the same reason. The City's adopted policies CS7, CS12, CS13 and CS14 require tall building proposals to avoid harm to the City's historic environment and its skyline, including the OUV of the WHS. Similarly, the London Plan provides for a robust protection of OUV in policies HC1, HC2, HC3 (and associated LVMF guidance) and D9. The proposals do not meet the requirements of these policies and are in clear conflict with them. For the purposes of the NPPF, we would categorise that harm as being located in the low to middle part of the range of 'less than substantial'. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals. For the purposes of the NPPF, we would categorise that harm as being located in the low to middle part of the range of 'less than substantial'. Given the especially great weight which needs to be given to the conservation of World Heritage Sites, which are internationally recognised for their OUV as an irreplaceable resource, this weighs very heavily against the proposals. The submitted heritage impact assessment features many inconsistencies with the methodology required by UNESCO, the adopted SOUV and previous commentaries from ICOMOS as an advisory body to the World Heritage Committee. It has scoped out attributes of OUV

	where setting makes an important contribution (attributes that were identified in the Tulip decision, set out above). Furthermore, it has not assessed the kinetic impact, instead treating the viewpoint as static, and presents a limited assessment of the cumulative impact of the proposals. ICOMOS has previously stated that ‘the cumulative effect of existing buildings, planning proposals that are pending and proposals that have received consent but are not yet built is already severe’ (31 Bury Street Technical Review, 20/00848/FULEIA; 24/00021/FULEIA) and that ‘integrity of the World Heritage property the Tower of London has already reached its limit in terms of visual impact (Land adjacent to Bury Street Technical Review, 18/01213/FULEIA). The World Heritage Centre subsequently requested that the UK State Party submit a State of Conservation Report for the WHS, indicating UNESCO’s serious concerns. The application submission does not therefore adequately assess the impact on attributes of OUV, which is required by Para 200 of the NPPF and Policy HC2 of the London Plan. b) <u>London Wall scheduled monument</u> In relation to the London Wall scheduled monument, we acknowledge that there is a more complex exercise to be had in weighing the level of harm caused by complete removal of the non-designated, but associated, medieval burial ground and the enhancements proposed through exposing the wall, providing interpretation, and expressing it further through elements of the design. This weighing exercise is further complicated by the lack of archaeological evaluation, and therefore the lack of key details regarding the condition and nature of the archaeological resource here. The Environmental Statement has not assessed impacts (adverse or beneficial) to the scheduled monument. However, we think that removing the associated, non-designated burial ground (which forms part of the London Wall’s setting) would cause a level of harm to the scheduled monument which would not be

	outweighed by the heritage benefit of showcasing the wall. Recommendation Historic England objects to the application on heritage grounds. We recommend that it should be refused or withdrawn. We note that the advice provided to you by the Greater London Archaeological Advisory Service recommends that further assessment of the impact of development on the burial ground be provided. As the burial site is intricately linked to the London Wall, we agree that further information and an assessment of the impacts on the scheduled monument should be required through a Regulation 25 request. Historic England has advised that this proposal has potential to affect the Outstanding Universal Value (OUV) of a World Heritage Site (WHS). The Department for Culture, Media & Sport (DCMS), representing the UK State Party to the 1972 World Heritage Convention, has therefore decided to notify the case to UNESCO, via the World Heritage Centre in accordance with Paragraph 172 of the World Heritage Committee's Operational Guidelines for the Implementation of the World Heritage Convention. Historic England would recommend that any decision on this application be deferred until a response from the World Heritage Centre and/or the advice of the World Heritage Committee's Advisory Bodies has been received. Email 29th May 2025 A revised Heritage Impact Assessment and a video of the 3D model of the proposed development illustrating the kinetic experience of Tower Bridge have been submitted. We continue to refer you to advice letter of 16 April 2025 – the additional information does not overcome the concerns that we have previously set out. The video in particular illustrates the harmful impact of the proposals on the Outstanding Universal Value of the Tower of London World Heritage Site that we have described.

	Officer response: The matters in the Historic England objections are addressed in the Architecture, Urban Design and Public Realm, Heritage and Strategic Views sections of this report.
Natural England	No objection. Officer response: Noted.
London Borough of Richmond Upon Thames	No objection. Officer response: Noted.
Surveyor to the Fabric of St Paul's Cathedral	No comments to make. Officer response: Noted.
Cleansing services	No objection. Officer response: Noted.
GLA	Stage 1 Strategic Issues Summary Land Use Principles: The proposal for the delivery of an office building in the CAZ is supported in line with Policies E1 and HC7 of the London Plan. The cultural and community floor space is supported and requires suitable obligations. Urban Design and Heritage: The proposed building is of high architectural quality and will deliver new public realm, however the final assessment under Policy D9 of the London Plan will be made at Stage 2. There is a very low to middle level of less than substantial harm identified to heritage assets, including to the setting of Tower of London. This minor adverse impact would not significantly diminish / compromise the ability to appreciate the OUV of the Tower of London WHS. GLA officers consider it likely that the harm identified would be outweighed by the public benefits of the scheme, once these are secured by the Corporation.

	Transport: Further information is requested on the Transport Assessment, public transport impacts, impact on the strategic and local highway networks, car and cycle parking, delivery and servicing, and construction logistics. Environment and sustainable infrastructure: Further information is required for the energy strategy, whole life cycle carbon, circular economy, green infrastructure, water and air quality. Officer response: The above points are addressed in the Proposed Uses, Architecture Urban Design and Public Realm, Heritage, Highways and Transport, Sustainability and air quality sections of the report.
Network Rail	In reviewing the application, it is important to highlight the forecast additional growth in rail demand at Liverpool Street Station, considered on an individual development basis, can be accommodated by the available and planned on-train capacity. However, NR remain concerned about the cumulative impact of multiple consented and proposed major developments in the immediate vicinity of LST — particularly in relation to medium-term pedestrian flow and station concourse capacity. At present, there is no committed or funded scheme to address this growing pressure on pedestrian infrastructure within and around the station. This is a material consideration that should be weighed by the City of London when assessing the overall acceptability of ongoing development in the area. NR would therefore encourage the City to continue to consider potential allocation of its Community Infrastructure Levy (CIL) funds in addressing the collective infrastructure challenges created by cumulative growth. Officer response: It is noted that CIL is not ringfenced from a particular site for any infrastructure and as such, no CIL can be secured for Network Rail.

	The City of London addresses cumulative impacts of approved development sites via securing public realm improvements through Section 278 Agreements. These are mainly delivered in the vicinity of the sites, than in areas located further away, such as in this instance the LSS.
TfL Infrastructure Protection	No objection in principle, however there are a number of potential constraints on the redevelopment of a site situated close to London Underground infrastructure and as such a condition is requested to ensure the development does not have an impact on existing London Underground/DLR transport infrastructure. Officer response: The recommended condition has been included in the condition schedule.
City of London Police – Counter Terrorism Security Advisor (CTSA)	Advice was provided to the applicant which is sensitive in nature, and the relevant conditions are included in the condition schedule.
Hammersmith and Fulham	No objections raised. Officer response: Noted.
The City of London Archaeological Trust (CoLAT)	CoLAT CoLAT is fully in support of the comments and criticisms of Historic England, sent to you in their letters of 8 April and 16 April 2025. We restrict our own comments to those concerning the treatment of the archaeological monuments and strata, not the shape of the future building. We underline the deficiencies in the application pointed out by the HE letter of 8 April: 1. The archaeological evaluation of the medieval churchyard requested by GLAAS at pre-determination stage has not been carried out; 2. The Roman archaeology is not adequately assessed; 3. The Environmental Statement does not demonstrate how the burial ground will be preserved; 4. The requested pre-determination archaeological evaluation has not been undertaken; 5. No WSI has been approved by EH for any post-consent archaeological work.

	We therefore support the HE request that if these various kinds of archaeological information are not provided, you should refuse the application. Officer response: These matters are addressed in the Archaeology and Heritage sections of this report.
Thames Water	<u>Waste Comments:</u> The proposed development is located within 15 metres of a strategic sewer. Thames Water requests a Piling Method Statement condition to be added to any planning permission. 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. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Thames Water would advise that with regard to the Combined Waste Water network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided. <u>Water Comments:</u>

	The proposed development is located within 15m of a strategic water main. Thames Water requests a Piling Method Statement condition to be added to any planning permission. Following initial investigations, Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. As such Thames Water request that a condition be added to any planning permission requiring appropriate upgrades required to accommodate the additional demand to serve the development have been completed or a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development. 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. <u>Officers Response:</u> Thames Water advice has been taken into consideration and conditions and informatives are imposed to the schedule of conditions.
Tower Hamlets	Letter dated 16 May 2025 The application proposes a development which would provide c85,000sqm Grade A office floorspace. The London Borough of Tower Hamlets (LBTH) acknowledges that this has the potential to make a significant contribution towards the growth in office development, and consequent

	long term economic and employment growth, that is sought in the City of London's Local Plan 2015 and the emerging City Plan 2040. In considering the effect of the proposal on land within LBTH, particular regard has been had to the Townscape and Visual Impact Assessment and Heritage Impact Assessment submitted with the application. In the majority of views the development does not raise significant concerns, as it is either fully or partially obscured by existing buildings, appears at a sufficient distance from the White Tower to avoid a meaningful impact, or is read as part of a wider backdrop of tall buildings. LVMF View 10A.1 does, however, warrant particular attention due to the increased visual proximity of the development to the White Tower and its potential effect on the composition of the view. From this viewpoint, the cluster of tall buildings in the City appears much closer to the White Tower, which is the central feature of the WHS, with only a narrow gap separating them. The LVMF guidance highlights that the appreciation of the Tower of London's detailed architecture and historic layering is enhanced by the surrounding free sky space. The proposed development would be visible in this view, positioned in front of existing tall buildings, including the Salesforce Tower (formerly Heron Tower). Although it would retain the final part of the gap between the cluster and the White Tower, its presence would intensify the visual dominance of built form and contribute to the crowding of the White Tower's immediate setting. The development would also appear taller than the current building at the cluster's edge, reducing the sky space between the cluster and the White Tower and competing visually with the tower's corner turrets. While the building leans away from the White Tower, mitigating some sky space loss, this design also introduces a more striking and potentially distracting form, where a calmer appearance might better respect the WHS setting. Overall, LBTH consider that the proposed development would result in only limited harm to the WHS, taking into account the number and

	variety of views in which they are experienced together. However, in the context of viewing location 10A.1, the proposed development is considered to cause some harm to the setting of the WHS. The decision maker should carefully consider this harm and weight it against the public benefits of the scheme. Officer response: The matters in the Tower Hamlets observations are addressed in the Architecture, Urban Design and Public Realm, Heritage and Strategic Views sections of this report.
City of Westminster	Confirmed that they have no comments to make. Officer response: Noted.
Suicide Prevention Officer	Requested further information regarding balustrade design, management and planting. Officer response: A condition has been added to cover these matters in detail.

Letters of Representation

34. Three letters of objections have been received from members of the public. These are set out in the table below.

Representation 1:

As residents of the local area, including residing at the Pan Pacific Hotel and Residences, we are particularly concerned about the loss of light, privacy, increased noise levels, and overall disruption that this project may bring to the neighbourhood. Given the scale of the development, we believe it is crucial to assess its implications on both residential and hotel communities in the vicinity.

Officer Response: These matters are addressed in the Daylight & Sunlight, Overlooking, Privacy & Overbearing, and Noise & Vibration sections of this report

We would appreciate your guidance on the following:

1. Public Consultation Status: Could you confirm whether the application has now been published for public consultation, if so could you provide details on the timeline for submitting comments?

2. Engagement Process: How can we formally communicate our concerns to the planning team? Is there an upcoming meeting, consultation or forum where we can raise these issues?
3. Impact Assessments: Has a thorough daylight/sunlight, noise and environmental impact assessment been conducted? If so, we would appreciate access to these reports to better understand how this development will affect the surrounding area.

Officer Response: It is noted that these comments were received prior to the consultation being sent out on this application; a response was provided to the individual. For the avoidance of doubt, the individual was told the consultation deadlines, how they can respond to the consultation and that all of the assessments are on Public Access for review.

Representation 2:

We currently enjoy comfortable living conditions at 80 Houndsditch with privacy and plenty of light available. The plans proposed will destroy this as will be overlooked by the new building which is proposed to have a roof terrace on levels 27 to 29, which corresponds with approximately 31-34 of the Pan Pacific.

The new building will be uncomfortably close to our living space windows, and furthermore, the roof terraces will also provide views into the apartment.

The proximity of the proposed building will make our apartment feel hemmed in on three sides destroying our views which are aesthetically pleasing. The new building will create an uncomfortable sense of enclosure.

Officer Response: These matters are addressed in the Daylight & Sunlight and Overlooking, Privacy & Overbearing sections of this report

Eversheds Sutherlands on behalf of The Wardens and Society of the Mistery or Art of the Leathersellers of the City of London.

Our client owns a number of substantial property holdings in the City, including the following freehold interests within the immediate vicinity of the Site:

- (a) 3, 5, 6, 7, 15, 16 and 17 St Helen's Place;
- (b) 33 Great St Helens;
- (c) 52-68 and 88 Bishopsgate;
- (d) 12/20 Camomile Street;
- (e) 25-51 (odd), 61 St Mary Axe; and
- (f) 7-11 Wrestlers Court

We have undertaken an initial review of the above planning application and we have substantive concerns as to the potentially adverse effect the

Proposed Development could have on the levels of available light to our client's properties. It is also the case that we have further concerns that the amenity and natural light at these properties will be prejudiced. Our client has yet to conclude its detailed impact assessment of the scheme and reserves its position in relation to these issues.

Daylight and Sunlight Impacts

Trium Environmental Consulting LLP prepared the Environmental Statement ('ES') pursuant to the planning application. Chapter 8, Daylight, Sunlight and Overshadowing, Light Trespass and Solar Glare of the ES submitted with the application purports to assess the key impacts associated with the Proposed Development once completed in relation to:

- Changes to the quantity of daylight and sunlight experienced by sensitive receptors in the proximity to the Site;
- Changes to the amount of overshadowing at amenity areas surrounding the Site;
- The potential for light trespass from the proposed commercial uses at surrounding sensitive receptors; and
- The potential for solar glare to surrounding road viewpoints.

It is noted in this Chapter that the existing baseline for the assessment was determined by undertaking a review of the Site and surrounding land uses, achieved via data sources from the Council and Google Maps. In paragraph 8.2, the buildings which were identified as sensitive receptors, were selected based on the criteria, identified in the BRE Guidance, where, "if the angle to the horizontal subtended by a new development, at the level of the centre of the lowest window of a neighbouring property is less than 25°, then it is unlikely to be affected by the Proposed Development. Therefore, those sensitive receptors which intersect with the 25° angle planes have been assessed in the baseline condition". Although the Applicant has made reference to the BRE Guidance, we would query whether this is sufficient in the context of the Proposed Development and the nature of the sensitive receptors in close proximity to the Site.

Three scenarios are assessed and reported on in Chapter 8, the Existing Baseline Scenario, the Proposed Development Scenario and the Cumulative Scenario. However, solar glare and light trespass were omitted from consideration of the baseline scenario on the basis that "The light trespass analysis and solar glare analysis are not comparative assessments, i.e. the occurrence of light trespass in the baseline condition would not justify the occurrence of light trespass from the Proposed Development. The current and evolved baseline are, therefore, not relevant with respect to the light trespass". Solar glare and light trespass assessments were also not considered in the Proposed Development Scenario and the Cumulative Scenario.

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (“the EIA Regulations”) (Schedule 4) requires a description of the current state of the current environment being the Existing Baseline and the identification of significance effects as a result of a new development:

A description of the relevant aspects of the current state of the environment (baseline scenario) and an outline of the likely evolution thereof without implementation of the development as far as natural changes from the baseline scenario can be assessed with reasonable effort on the basis of the availability of environmental information and scientific knowledge. (Regulation 18(3), Schedule 4, Section 3, the EIA Regulations)

While Chapter 8 provides an assessment of the baseline conditions, it is surprising that the buildings in surrounding areas, namely Camomile Street, are not considered in more detail. Room layouts were considered to assess No Sky Line (NSL) criteria, however only two properties were selected, 80 Houndsditch and 16 New Street – Tapestry Building (Paragraph 8.53). This is a significant limitation, given the impact of the Proposed Development on the daylight distribution and potential reduction of that daylight distribution on existing buildings, and there is no justification for acquiring data from these properties only.

In paragraph 8.60 the methodology for defining effects, receptors and receptor sensitivity for daylight and sunlight is discussed. It is noted that “existing surrounding residential properties (i.e. receptors) are considered highly sensitive to daylight and sunlight levels, specifically habitable rooms” and accordingly, all existing residential receptors assessed within the ES are considered highly sensitive, but commercial buildings have “not been assessed as they are not typically considered to have a reasonable expectation of daylight” this is despite the BRE Guidelines (2022) advising that the guidelines may also be applied to any existing non-domestic building where the occupants have a reasonable expectation of daylight.

In paragraph 8.88 it is acknowledged that the baseline considers the existing daylight and sunlight conditions at neighbouring residential properties, with the potential to be affected by the Proposed Development, however, again, a full definitive list of properties is not provided. It is also acknowledged that sensitive receptors that are in close proximity to the Site, but their views are “obstructed or otherwise shielded” and are therefore excluded from the assessment, examples are given, Bevis Marks Synagogue, but again a full list of excluded properties is not provided.

Baseline, Daylight and Sunlight Results

The results assessing Vertical Sky Component (VSC) show that out of 787 windows assessed, only 175 (22.2%) would meet BRE’s criteria in the Baseline condition. For No Sky Line (NSL), of the 216 rooms assessed, only 130 (60.2%) would meet BRE’s criteria in the Baseline condition. For

sunlight of the 634 windows assessed, 310 (48.2%) windows assessed would meet BRE's criteria in the Baseline condition.

The Map at Figure 8.1, showing Daylight, Sunlight and Light Trespass Receptors in the areas surrounding the Site, is not in high definition so it is not possible to see exactly where the sensitive receptors are located. Table 8.5 however, does show that addresses in which our client owns properties, including Bishopsgate and St Marys Axe, which is listed as having a High Sensitivity to Daylight and Sunlight, Overshadowing, Light Trespass and Solar Glare, yet limited analysis appears to have been undertaken (or made available) in respect of the specific properties in these areas. It is therefore not entirely clear what specific baseline information has been compiled and assessed in respect of our client's properties, and thus how this is then affected by the Proposed Development.

Completed Development

Only 6 properties (identified as sensitive receptors) have been assessed for daylight, and out of the 787 total windows in these receptors assessed for VSC, only 393 (49.9%) would meet the BRE criteria.

In assessing the future environment, the Chapter concludes at 8.214 that out of the 6 properties assessed, 3 would experience an overall negligible effect, one minor adverse and one property would experience a major adverse significant effect. For sunlight, the same 6 properties were assessed. We would like to reiterate that this limited sample (6 properties) is small and may not provide a sufficiently accurate representation of the full impact of the Proposed Development. Moreover, we are not able to appreciate the specific impacts of the Proposed development on our client's properties.

We have yet to conclude our detailed impact assessment of other aspects of the Proposed Development and reserve our position in relation to these issues. We do, however, have serious concerns that our client's properties could experience a significant adverse impact as a result of the construction of another tall building in this area. The Environmental Statement simply does not provide sufficient detail, to enable our client to confirm and appreciate whether the impact of the Proposed Development on their properties in the surrounding area have been fully scrutinised and assessed.

For the reasons set out above, our client objects to the planning application and would ask that these concerns are brought to the attention of the relevant Planning Committee.

Officer Response:

It is highlighted that some of the properties listed in objection are offices and commercial properties. The assessment and impact on properties of this nature are set out in the Daylight and Sunlight section of this report.

The objection has made series of comments in respect of the scope of the assessment in terms of the EIA and the properties assessed. It is highlighted that BRE undertook a third-party review of the Chapter 8 of the Environmental Statement, who confirmed they are generally satisfied with the assessment methodology and concluded that the overall scope of the review was reasonable.

The objection has made comments in relation to the Solar Glare and Light Spill assessment only be undertaken in the proposed development scenario. It is noted that as set out in the relevant sections of the report, these assessments are not comparative and as such, it is acceptable they have only been undertaken in the proposed development scenario. It is also noted that a lighting strategy would be secured by condition to ensure that the impact of lighting from the development has an acceptable impact.

Since the receipt of the objection, the applicant has provided a response, prepared by their Daylight and Sunlight Consultants. The response is included in full in the background papers.

Daylight and Sunlight matters are considered in full in the Daylight and Sunlight section of this report.

Policy Context

35. 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. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, was submitted to the secretary of state on 29th August 2024. The City Plan 2040 is now subject to an independent examination to be conducted by the Planning Inspectorate. This is a continuous process running from the date of submission through to receipt of the appointed Planning Inspectors' final report, with the Examination in Public beginning on 25th March and concluding on 19th June 2025.
36. Emerging policies are a material consideration with limited weight, with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
37. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2025 and the Planning Practice Guidance (PPG), which was last updated in February 2025.

The NPPF

38. 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.
39. Chapter 2 of the NPPF focuses upon achieving sustainable development. Paragraph 8 states that achieving sustainable development has three overarching objectives, being economic, social and environmental. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. Paragraph 11 sets out that presumption.
40. Chapter 4 of the NPPF focuses upon determining applications. Paragraph 49 states that local planning authorities may give weight to relevant policies in emerging plans according to: a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given); b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
41. Chapter 6 of the NPPF seeks to build a strong and competitive economy. 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. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.
42. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places. 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. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
43. 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.

44. Paragraph 117 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
45. 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.
46. Chapter 11 of the NPPF seeks to make effective use of the land. Paragraph 124 advises that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
47. 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.
48. 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 and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

49. 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.
50. 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.
51. Chapter 14 of the NPPF relates to meeting the challenge of climate change flooding and coastal change. Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings, and support renewable and low carbon energy and associated infrastructure.
52. 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, and help to reduce greenhouse gas emissions, such as through its location, orientation and design.
53. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, amongst other things, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.
54. 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.

55. 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.
56. Paragraph 212 of the NPPF advises that, 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.
57. Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of: a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional; b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
58. Paragraph 215 of the NPPF states that, 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.
59. Paragraph 216 of the NPPF states that 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.

Statutory Duties and Considerations

60. The Corporation, in determining the application has the following main statutory duties to perform:
 - To have regard to the provisions of the development plan, so far 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).
61. 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 possessed. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
 62. In considering the application before you, account has to be taken of the documents accompanying the application, the environmental information including Environmental Statement, the further information, consultation responses, letter of representations and the statutory and policy framework.
 63. There are policies in the Development Plan which support the proposals and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
 64. The principal issues in considering this application are:
 - a) The economic benefits of the proposal.
 - b) The appropriateness of the proposed uses, including the site's cultural offer.
 - c) The appropriateness of the site to accommodate a tall building.
 - d) The appropriateness of the architecture and urban design of the proposals, and the new public realm.
 - e) The impact on Strategic Views in the London Views Management and on other strategic local views.
 - f) The impact of the proposals on the Tower of London World Heritage Site.
 - g) The impact of the proposals on the setting and significance of heritage assets.
 - h) The potential impacts of the development on buried archaeological remains and upon removal of particular archaeological remains.
 - i) Whether the scheme is accessible and inclusive.
 - j) The ability of the proposed highway and transportation arrangements including servicing, cycle parking provision, and impact on highways.
 - k) The acceptability of the scheme in terms of its environmental effects including wind microclimate, thermal comfort, flood risk, air quality, contaminated land, building resource efficiency, energy consumption and sustainability.
 - l) The impact of the proposed development on the amenity of nearby residential occupiers, including noise and vibration, overlooking, daylight and sunlight, solar glare and light pollution.
 - m) Acceptability of the proposed security, suicide prevention and fire safety arrangements.

- n) The impact of the development on flood risk.
- o) The outcome of the Health Impact Assessment
- p) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
- q) Duties under the Public Sector Equality Act (section 149 of the Equality Act 2010) and the Human Rights Act 1988.
- r) The requirement for financial contributions and other planning obligations.

Economic Development and Uses

Economic Issues

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

66. The City is home to banking, insurance and maritime industries supported by legal, accountancy and other professional services and growing cluster of technology, media and communications (TMT businesses). These office based economic activities have clustered in or near the City to benefit from economies of scale and in recognition that physical proximity to business customers and rivals can provide a competitive advantage. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way that encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The newly launched Small and Medium Enterprises Strategy (2024) includes the City's strategy to attract and support the growth of SMEs. The London Recharged: Our Vision for London in 2025 report sets out the needed to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

67. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

68. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
69. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long terms demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally orientated financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed used development in the City in order to achieve this aim.
70. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well connected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.
71. London Plan policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, to conserve and enhance London's competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support Londo's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.
72. In terms of the Local Plan 2015, Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m GIA during the period 2011-2026, to provide for an expected

growth in workforce of 55,000. The Local Plan 2015, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

73. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.
74. The application site is located within the Eastern Cluster as defined in the Local Plan 2015. The cluster policy area is defined by an illustrative diagram on the policies map, this area is intended to a general strategic area where tall buildings can be delivered on appropriate sites. In the emerging City Plan 2040, the application site is in the area appropriate for tall buildings as identified in the policies map, Figure 28 and Figure 14, where tall buildings may be appropriate subject to the requirements of Policy 12 and other relevant policies, but it is not located within the Key Area of Change, as defined in Figure 27.
75. Despite the uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporation's 'Destination City' vision for the square mile.
76. The proposed scheme would deliver on the City's strategic economic objectives and support the City's economic role by providing a superlative and strategic contribution of 85,624sqm (GIA) of flexible office floorspace, alongside a complimentary retail and cultural offer and enhanced public realm. Therefore, the proposed development would support the strategic

objectives of the development plan and the emerging City Plan. The anticipated economic benefits of the proposed development are material and weigh in favour of the proposed development.

Land Uses

77. This section of the report provides an overview in respect of the layout and proposed mix of uses on the site before appraising the acceptability of the uses:
- 85,624sqm (GIA) of office floorspace (Use Class E(g))
 - 125sqm (GIA) of flexible retail/food and beverage/ professional services floorspace (Use Class E (a/b/c) at ground floor level on the Outwich Street elevation
 - 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g)) at first and third floor.
 - 205sqm (GIA) of flexible retail/food and beverage/offices/ learning and non-residential institutions/ local community floorspace (Use Class E(a/b/g), F1/F2) at ground floor level on the Houndsditch elevation.
 - 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2) on the second floor.
 - 461sqm (GIA) of a multi-function space (Use Class Sui Generis) at ground and first floor levels.
 - 8sqm (GIA) externally accessible public lavatory (Use Class Sui Generis) at ground floor level.
 - 11,363sqm (GIA) of ancillary basements.
78. A breakdown of the existing and proposed uses (GIA) is set out in the table below:

Land Use	Existing	Proposed
Office (Use Class E (g))	17,892.3sqm	85,624sqm
Gym (D2)	717.6sqm	0Sqm
Flexible retail/food and beverage/ professional services floorspace (Use Class E (a/b/c)	0sqm	125sqm
Flexible food and beverage and office floorspace (Use Class E (b/g))	0sqm	1,849sqm
Flexible retail/food and beverage/offices/ learning and non-residential institutions/ local community floorspace (Use Class E(a/b/g), F1/F2	0sqm	205sqm

Flexible food and beverage/ offices/ learning and non-residential intuitions/ local community floorspace (Use Class E (b/g), F1/F2)	0sqm	1,827sqm
Multi-function space (Use Class Sui Generis)	0sqm	461sqm
Public Lavatory (Use Class Sui Generis)	0sqm	8sqm
Ancillary Basements	3000sqm	11,363sqm

Provision of Office Accommodation

79. 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 DM1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.
80. The predominant use of the proposed development is as office space comprising of 85,624sqm (GIA) of Class E (g), this would be an uplift of 67,731.7sqm of office floorspace on this site. The office space is classified as Grade A office space.
81. Adopted Local Plan policy CS1 seeks a significant increase in new office floorspace in the City. The emerging City Plan 2040, in Policy S4, seeks to deliver a minimum of 1.2 million sqm NIA of new office floorspace, which approximately equates to 1.6 million square metres GIA, in the period between 2021 and 2040.
82. At 31st March 2022, 835,000sqm net increase in office floorspace has been delivered since 2016 and a further 576,000sqm net was under construction or was permitted in the City. 360,000sqm of flexible office floorspace was approved in 2021.
83. The Offices Topic Paper as part of the evidence base for the emerging City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The proposed development sits within the City Cluster category which is modelled at being able to achieve an office floorspace uplift of 630,000sqm-770,000sqm. The proposed development would deliver a significant amount of floorspace target, providing an uplift of 67,731.7sqm

(GIA), which accounts for 4.23% of the total office floorspace (1.6 million sqm GIA) to be delivered by 2040 as required by the emerging City Plan 2040.

84. The proposed office spaces are designed to support a range of tenants, with flexibility to accommodate a variety of tenant requirements and the demands of business growth, with option which offer a range of interior environment amenity, floor area and choice of outlook. This would accord with emerging City Plan 2040 policy S4 which encourages new floorspace to be designed to be flexible and allow adaption of space for different types and sizes of occupiers.
85. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and policy S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan 2015 and the emerging City Plan 2040. The proposed development would result in a substantial uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international and financial professional services centre.

Loss of Gym

86. In the basement of the existing building there is a gym, 717.6sqm (GIA) in size; members of the public pay a membership to use the gym. Policy DM19.3 of the Local Plan 2015 states that proposals involving the loss of public sport and recreation facilities will be resisted unless:
 - replacement facilities are provided on-site or within the vicinity that meets the needs of the users of that facility; or
 - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - it has been demonstrated that there is no demand for sport and recreation facilities which could be met on the site.
87. Any such loss must be accompanied by evidence of a lack of need for the facilities and that the loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed at reasonable terms for sport and recreational use. Paragraph 3.19.18 of the supporting text of this policy states that there are numerous private gyms and sport clubs in the City which mostly serve the needs of daytime working population, whilst these facilities are important in meeting sport and recreational needs it will not always be necessary to prevent their change of use, due to the fluid nature of the private market. Policy HL7 of the emerging City Plan 2040 states that existing public sport and recreational facilities will be protected. The supporting text of this policy states '*there has been an*

increase in sport and recreational facilities in the City in recent years, with much of the increase resulting from additional private gym facilities, including those within office developments and some hotels. While this is welcome, many facilities charge substantial fees and are not available to those seeking more informal, occasional and cheaper sport and leisure opportunities' and 'however, any proposals involving the loss of public sport and recreational facilities must be accompanied by evidence of a lack of need for those facilities'. The emerging City Plan 2040 makes a distinction between public and private gym facilities.

88. It is noted that on the 1st September 2020 changes were made to the Use Classes Order 1987 (as amended) where the former use classes of shops, financial and professional services, restaurants and cafes, non-residential use institutions, and assembly and leisure uses merged into one use class (Use Class E), which allows changes between Class uses at any time without the need for planning permission, unless there is an existing planning restriction for a particular site.
89. As set out above, the proposals would result in the loss of the gym at basement 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 a continuous use of the former commercial uses, planning would not be required for their loss given the now interchangeable nature of the new Use Class E. In this instance, no restrictions have been placed on the basement gym under the planning application that approved it (14/00420/FULL).
90. The existing gym is private and operates as a spinning studio and as such no loss of public sport or recreational facilities results from the proposed development. There are numerous local private provisions of similar facilities (spinning studios and other gym facilities) within the vicinity of the application site and the ability to change the use away from a private gym under the Use Class Order is a material consideration. It is therefore considered that the loss of the private gym is acceptable and as a matter of planning judgement policy DM19.3 of the Local Plan and policy HL7 of the emerging City Plan 2040 are complied with.

Flexible Uses

A series of flexible uses are proposed across the ground to third floors, these are set out below:

- 125sqm (GIA) of flexible retail/food and beverage/ professional services floorspace (Use Class E (a/b/c) at ground floor level on the Outwich Street elevation
- 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g)) at first and third floor.

- 205sqm (GIA) of flexible retail/food and beverage/offices/ learning and non-residential institutions/ local community floorspace (Use Class E(a/b/g), F1/F2) at ground floor level on the Houndsditch elevation.
 - 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2) on the second floor.
91. The assessment below assesses the suitability of each use within the flexible uses proposed.
92. As set out in the office provision section of this report, the provision of office floorspace is supported. It is noted that due to the flexible nature of the Use Class being applied for, the office floor space is not accounted for in the office floor space figures for this site.
93. Across the range of flexible uses being applied for, there could be up to 330sqm of retail floor space at ground floor level. This would be on either the prominent Outwich Street elevation and/or on the Houndsditch elevation. The site is not situated within Principal Shopping Centre or along a Retail Link as defined by Local Plan 2015 and emerging City Plan 2040. The provision of the active retail offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that “The City Corporation will seek to make the City’s retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City”. The supporting text to policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City’s growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.
94. Each of the flexible use classes applied for incorporate food and beverage use (Use Class E(b)) and if all these areas operated in a food and beverage use this would equate to 4,006sqm. The site is not situated within Principal Shopping Centre or along a Retail Link as defined by Local Plan 2015 and emerging City Plan 2040. The provision of the active food and beverage offer is welcomed. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that “The City Corporation will seek to make the City’s retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City”. As the application site is located within the CAZ area, where the provision of flexible floorspace is supported given that it serves the CAZ function, it is considered that the proposal would be compliant with the development plan.
95. Learning and non-residential institutions and local community floor spaces (Use Class F1/F2) are also proposed in the flexible use classes, and these are proposed on levels on the ground floor on the Houndsditch elevation or

on the second floor. Local Plan policies CS22 and DM22.1 support the provision of community services. It is advised that development of “*new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*

- *Where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office us;*
- *In locations which are convenient to the communities they serve;*
- *In or near identified residential areas, providing their amenity is safeguarded;*
- *As part of major mixed-use developments subject to an assessment of scale, character, location and the impact of the proposal on existing facilities and neighbouring uses.”*

96. Policy HL5 of the emerging City Plan 2040, expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered to make a significant contribution to people’s mental, spiritual and physical well-being, sense of community, learning and education. As such the proposed F1 and F2 uses within the flexible use classes are supported.
97. The proposed flexible uses including the mix of uses would provide a complimentary use to the offices within the proposed building on site in accordance with Policy DM1.5, as well as provision for other workers, visitors and residents of the City in accordance with emerging City Plan policy OF1.

Lack of proposed Elevated Public Space

98. Local Plan 2015 policy DM10.3 and emerging City Plan 2040 policies S8, S12 and DE4 seek the delivery of high quality, publicly accessible elevated viewing spaces at upper levels. Public access to tall buildings within the City is important in creating an inclusive City.
99. Policy D9 (D) of the London Plan states that free to enter publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should be located at the top of the building to afford wider views across London.
100. No elevated public space is proposed on the upper levels of the proposed building. Officers note that, of the aforementioned policies, DM10.3 of the Local Plan, S8 (17) of the emerging City Plan 2040 and D9 (D) of the London Plan encourage that such spaces should be provided where appropriate, not that they must be provided, while emerging City Plan 2040 are more directive, requiring tall buildings to provide such spaces.
101. Officers consider that such a space would not be appropriate in this location given its proximity to residential properties, and due to the proposed cultural offer (set out below in this report) which are significant public benefits in and

of themselves, and due to the provision of the publicly-accessible walkways on the lower levels.

102. As such, the public benefits associated with the proposals and other justification sufficiently outweighs the lack of public viewing gallery on the upper level of the proposed development. However, this would result in non-compliance with emerging policies S12 (h) and DE4 (3) of the City Plan 2040. It is noted that these policies have limited weight as the plan is going through Examination in Public.

Public Toilet(s)

103. Policy S6 Public toilets of the London Plan states that large scale developments that are open to the public, and large areas of public realm, should provide and secure the future management of free publicly accessible toilets for a range of users and free 'changing places toilets designed in accordance with the guidance in the British Standard. Policy HL6 'Public toilets' of the emerging City Plan 2040 also requires the provision of a range of directly accessible public toilets for a range of users and for the provision for free 'changing places' facilities.
104. An externally accessible toilet (8sqm is in size and Use Class Sui Generis) is proposed to be accessed within the relandscaped former Churchyard of St Augustine Papey, which is on the southern elevation of the building accessed via Camomile Street. The accessible toilet would be open between the hours of 06:00 – 22:00 and would be free of charge. A condition will be imposed ensuring that the toilets would be made available to the public during 06:00 and 22:00 hours, free of charge.
105. At basement level 1, a changing places toilet is proposed. This would be accessed via two accessible lifts at ground level and would be accessible to member of the public between the hours of 06:00 to 22:00 The full details of the 'changing places' toilet would be secured by condition to ensure that it complies with the British Standard and a condition is also imposed in respect of the hours it is made available to the public and that it is free of charge.
106. Details of the maintenance and management of the above-mentioned facilities would be secured via a planning obligation within the S106 agreement.
107. Subject to the imposition of conditions of conditions and S106 obligations, the provision of the external publicly accessible toilet and the changing places facilities at basement level would comply with policy S6 of the London Plan and policy HL6 of the emerging City Plan 2040.

Cultural Offer and Strategy

108. Policy CS11 of the Local Plan 2015 seeks to maintain and enhance the City's contribution to the London's world class-cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences in accordance with the City Corporation's Visitor Strategy by:
- Providing, supporting and further developing a wide range of cultural facilities.
 - Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
 - Protecting existing cultural facilities where there is need.
 - Providing visitor information and raising awareness of the City's cultural and heritage assets.
 - Allowing hotel development where it supports the primary business or cultural role of the City.
109. Local Plan policies CS22 and DM22.1 support the provision of community services. It is advised that development of *“new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*
- *Where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office us;*
 - *In locations which are convenient to the communities they serve;*
 - *In or near identified residential areas, providing their amenity is safeguarded;*
 - *As part of major mixed-use developments subject to an assessment of scale, character, location and the impact of the proposal on existing facilities and neighbouring uses.”*
110. The emerging City Plan 2040 under policy CV2 seeks opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and weekend and attract significant numbers of visitors into the City. Policy HL5 of the emerging City Plan 2040, expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered to make a significant contribution to people's mental, spiritual and physical well-being, sense of community, learning and education.
111. The cultural offer for the proposed site is set out in the submitted Culture & Social Value Strategy for the site which has been prepared by Things Made Public (January 2025). The strategy presented in this document was informed by the following engagement:
- Desk based research
 - Creative consultation with communities and user groups through interviews, workshops and events to understand key cultural and social value priorities.
 - Detailed engagement with user groups, potential partners and design teams to defend propositions and integrate directly into the project design

112. As a result of the feedback provided from evidence gathering it was identified that the Site's cultural programme needed to:
- Embrace differences: Design with diversity in mind, creating a friendly face to the City, appealing to the many, not the few.
 - Bringing people together: Champion exploration and engagement that draws people, into across and around the building.
 - Working within our places: Create meaningful connections and collaborations with surrounding partners.
 - Incubate to generate: Encourage the growth and development of social entrepreneurs, cultural talent, inviting new audiences to experience the City of London.

113. The Strategy sets out that the above, informed the cultural and social value offer.

Cultural Offer

114. A flexible, fully accessible multi-function space is proposed over ground and first floor level; providing 461sqm of floor space. This space would be operated by a cultural partner, whilst the content of the programming of this space would be dependent on the cultural partner, the multi-function space has the ability to host art, music, theatre and dance performances, creative residencies, participatory workshops, open rehearsals and festivals. This space would have the ability to open up to the newly created Camomile Park to the south and the ability to accommodate tiered auditorium style seating.
115. In addition, the floorspace provided over the ground floor and level 1, at level 2 a minimum 189sqm of floor space would be provided. This floorspace would provide space for rehearsals, workshops or production space. It is noted that the exact location on the second floor has not been identified this is because it would depend on the needs of the cultural partner. Due to the Use Class applied for the second floor, there is the potential for further space to be provided if required by the cultural partner. The minimum of 189sqm on the second floor would be secured within the S106 agreement.
116. Whilst the Cultural Partner for this space has not been confirmed to date, the applicant team have been in consultation with range of cultural operators to aid in designing this space to ensure that it would be meet the needs of and has been flexibly designed for a range of cultural partners; New Diorama Theatre is an example of one cultural partner the applicant team have engaged with and they provided a statement of support within the Culture & Social Value Strategy document.
117. The submission sets out the cultural partner for this space would need to commit to a minimum number of discounted tickets per year, a minimum number of outreach, engagement and participation activities per year (such

as school programmes, community events and learning activities), and diversity and inclusion targets including commissioned artists/performers, staff or audiences. These details would be agreed as part of the Cultural Management Plan secured via the S106 agreement. In addition to this, there is a commitment from the applicant to a peppercorn rent for the cultural operator, a fair and reasonable service charge and the all necessary and reasonable costs related to fit-out would be covered by the owner; these details are secured within the S106 agreement.

118. To ensure that multifunction space is primarily used and run by the charitable operator or by a community group, no part of the space can be used for more than two private events a month (this will not exceed 10 hours in length and would not be able to take place over more than two calendar days). The full details of the management of this will be secured within the Multifunctional Cultural Space and associated cultural and visitor management plans.

Food and Beverage Social Enterprise Offer

119. A food and beverage social enterprise offer is proposed at ground floor level and either at level 01 or level 03. A minimum of 30sqm would be provided at ground floor level within the proposed retail units; this would be public facing. On either the first or third floor a minimum of 120sqm of floor space would be provided, this is proposed at either the first or third floor depending on the needs of the operator, the floor space at first floor would be publicly accessible. The operator would be required to be a social enterprise, charity or operator with demonstrable social purpose that provides employment, training and outreach. It is noted that exact location on the first or second floor has not been identified this is because it would depend on the needs of the social enterprise operator. Due to the Use Class applied for on the first and third floors, there is potential for further space to be provided if required by the social enterprise operator. The minimum of 120sqm on either the first or the third floor would be secured within the S106 agreement.
120. An example social enterprise operator that the applicant team have been in consultation with are Fair Shot. Fair Shot is a social enterprise café and registered charity that aims to provide adults with disabilities and/or autism with employment and training opportunities to become skilled baristas and café assistants. Beyond Food Foundation is another social enterprise operator and charity that the applicant team have been in consultation with, this organisation that provides support to people who have suffered trauma, poor mental health or incarceration through the delivery of practical kitchen-based training as well as a publicly accessible restaurant. Both Fair Shot and Beyond Food Foundation have provided a statement of support within the Culture & Social Value Strategy document.

121. The submission sets out that the Social Enterprise operator would need to commit to a minimum number of employments, training or apprenticeships per year, a minimum number of community engagement activities per year, a minimum percentage of the workforce from underrepresented communities or target groups. These details would be secured within a Social Enterprise Retail Space Management Plan secured by the S106 agreement. In addition to this, there is a commitment from the applicant to a peppercorn rent for the social enterprise operator, a fair and reasonable service charge and the all necessary and reasonable costs related to fit-out would be covered by the owner; these details are secured within the S106 agreement.
122. It is considered that the proposal would provide a robust and compelling new cultural offer for the site and would act as a new destination for the City in line with the Destination City initiative and in accordance with policies CS11 and DM11.1 of the Local Plan, as well as policy CV2 of the emerging City Plan 2040.

Design and Heritage

123. The relevant local policies for consideration in this section are S10, DM10.1, DM10.3, DM10.4, DM10.8, CS12, DM12.1, CS12 CS13, CS14, CS16, DM16.2, CS19, DM19.1, DM19.2 of the Local Plan policies and HL1, S8, DE1, DE2, DE3, DE4, DE8, DE9, S10, AT1, S11, HE1, HE2, HE3, S12, S13, S14, OS1, OS2, OS3, OS5 of the draft City Plan 2040, and London Plan policies D3, D4, D5, D8, D9, HC1, HC2, HC3, HC4, GG1-3, GG5, GG6.

Principle of a Tall Building

124. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), >75m AOD) and London Plan D9 (A).
125. The application site is in the Central Activities Zone, and the proposal would complement the unique international, national and London-wide role of the CAZ, as an agglomeration and rich mix of strategic functions, including nationally and internationally significant economic activity, in line with London Plan Policy SD4. It would be in a highly accessible and sustainable location, with the highest PTAL Level of 6B, with excellent access to transport infrastructure including active travel.
126. The City's long-term, plan-led approach to tall buildings is to cluster them to minimise heritage impacts and maximise good growth. As such, the adopted Local Plan seeks to consolidate tall buildings into a singular, coherent Eastern Cluster (CS7 and CS14 (1)), an approach carried forward in the emerging City Plan 2040 (as the 'City Cluster'; policies S12 (2) and S21).
127. The application site is located within the 'Eastern Cluster' policy area in the adopted Local Plan (CS7, fig G). In the draft City Plan 2040, the proposal is within the City Cluster Tall Buildings Area (fig. 14). The application site is not

within the City Cluster Key Area of Change in the emerging Plan and, as such, emerging policy S21 does not apply.

128. The application site is not in an area identified as inappropriate for a tall buildings as shown on fig. N of the 2015 Plan, and is within the City Cluster Tall Buildings Area, shown in fig.15 of the emerging City Plan 2040.
129. Within the latter, the relevant contour lines (fig.15) to the application site are the 100m line to the east and the 120m-180m 'stack', 200m and 220m lines which cross the site. The proposal would comprise a lower 'shoulder' between the 100m and 120m-180m 'stack' and a tower element leaning pronouncedly within and away from the 120m-180m 'stack' and well below the other relevant 200m and 220m lines. As such, the proposal would not exceed the height of the contour lines crossing the site and would, in the language of S12 (3), mediate successfully between those contour lines relevant to the application site. As such it is considered to be of an appropriate height and comply with emerging City Plan 2040 policy S12 (3).
130. Taking all these matters into account, the proposal would accord with the locational requirements of London Plan D9 and the relevant parts of Local Plan policy CS 14 and emerging City Plan policy S12.

Tall Building – Impacts

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

Visual impacts:

132. The proposal would be read as part of the consolidating City Cluster, helping to consolidate its northern zone and, particularly when viewed from Tower Bridge and other south-easterly viewing points, its eastern edge. The height and form of the proposal has been almost wholly shaped by the Outstanding Universal Value of the Tower of London World Heritage Site, as experienced particularly through LVMF view 10A.1 from Tower Bridge; it has been amended following extensive pre-app discussions, including with Historic England, to ensure a sensitive relationship with the WHS, the Cluster, wider London skyline, historic skyline features, local views and the significance of strategic heritage assets.
133. The proposal has been designed with the future evolution and consolidation of the Cluster in mind, from strategic London-wide and riparian views, in addition to local closer-range viewing experiences.
134. The siting and height of the proposal have been carefully designed so that its massing and eastern elevations lean into, and towards the centre of the

Cluster, in order to display clear deference to and clear sky separation from the WHS and other sensitive heritage receptors to the east. Equally, by virtue of its dynamic elevational design, it would be read as a positive architectural diversification of its northern edge which complements the cluster's overall composition.

135. Relative to the wider Cluster, the proposal would relate appropriately to the emerging and consolidating Cluster form, with its height of a scale commensurate with the stepping down from the apex of the Cluster at 22 Bishopsgate and specifically chosen to create gentle undulation among the rooftop heights of the existing and consented neighbouring towers to the north that step down towards the northern fringe. Its height and form are considered to integrate and layer well with the overall composition of the Cluster. Such an approach to the future form of the Cluster has been informed by significant 3D modelling activity to ensure that the Cluster can develop and consolidate while minimising the possibility of harm to the City's strategic heritage assets.
136. The proposal is, comparatively, of a more modest height than some of the other existing and consented Cluster towers, listed here in descending AOD order:
 - Undershaft: 309.6m (2024 consent)
 - 22 Bishopsgate: 294.94m
 - 55 Bishopsgate 284.68m (resolution to approve)
 - 99 Bishopsgate 253.5m (resolution to approve)
 - 100 Leadenhall 263m
 - 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
 - Heron Tower: 217.80m
 - 52-54 Lime Street: 206.50m
 - Tower 42: 199.60m
 - 30 St Mary Axe (the 'Gherkin'): 195m
 - Leadenhall Court: 182.7m
 - 20 Fenchurch Street: 177m
 - 50 Fenchurch Street: 165m
 - 60 Gracechurch Street: 162m
 - 85 Gracechurch Street: 155.70m
 - 70 Gracechurch Street: 155m

Visual impacts:

The views of buildings from different distances:

137. Of the long range views D9 C (1; a; i), these have been tested in the HTVIA March 2025 view Nos 1, and appendix views I, J, K, L, M, N, O. Following representations made to the EIA scoping and initial consultation by Tower Hamlets, an additional long range view was added to the addendum pack. Some of the comments received from statutory consultees, including Historic England and Tower Hamlets, relate to these views, the impacts of which are discussed throughout the report and in detail in the Strategic View and Heritage sections of the report. In all relevant LVMF views, baseline and cumulative, because of the proposal's siting on the north-eastern side of the Cluster and its form and modelling, it would preserve the setting of St Paul's Cathedral as the Important Landmark as well as the composition, features and characteristics of the LVMF views. In relation to long range views, the development would comply with Policy D9 C (1 a; i).
138. In relation to mid-range views, and consideration of London Plan D9 C (1; a; ii), the impacts are largely demonstrated in Views no. 2, 3, 4, 5, 6, 7, 8a, 8b, 8c, 9, 10, 11, 12, 13, 14, 15, 16, 23, 24, 28, 30, 31, and appendix views A, B, C, E F, G, H, P. Some of the comments from statutory consultees, including the GLA and the LB Tower Hamlets, relate to these views and the impacts are discussed through the report and in detail in the Strategic View and Heritage sections of the report.
139. In both baseline and cumulative scenarios, in mid-range views from all directions, the proposed development would compatibly integrate into the Cluster and would be intrinsic to reinforcing and defining its overall silhouette and form. The development would appear as a striking new part of the northern periphery of the Cluster, mediating down in height from the taller building at 110 Bishopsgate, to 70 St Mary Axe.
140. From the west, the observer would begin to experience the dynamic form of the proposals with its striking rectilinear expression, leaning form, playful bay detailing, and expressive biophilic base and corners. From the south and east, the south elevation would be prominent, and in views from the east glimpses of the eastern elevation would also be experienced revealing the expressive leaning profile, and double height biophilic corners that feature trees, as well as the large areas of façade which are made up from a refined and playful bay module, which would be applied in a dynamic way that responds to environmental conditions and the structural diagram of the building. Therefore, in relation to mid-range views, the proposed development is considered to comply with London Plan D9 C (1; a; ii).
141. In relation to immediate views, (London Plan D9 C (1; a; iii)), views no. 17, 18, 19, 20, 21, 22, 25, 26, 27, 29, 32, 33 illustrate the closer range views of the building and how the building is experienced at street level from Bishopsgate, London wall and Houndsditch (west), Bevis Marks (east) and St Mays Axes (south). Within this immediate environment, the proposed building would be seen in the context of other modern and contemporary tall

buildings with a landmark status, with a uniquely permeable, lightweight, and highly biophilic base. While these immediate views would change, as the proposed building would be larger and wider than the existing buildings, it would however have a positive relationship with the street, creating a vitality and activation through the public realm – Camomile Park – designed on this southern elevation which would also be an inclusive and highly planted space. In relation to immediate views the proposals would comply with D9 C (1; a; iii).

142. In relation to D9 C (1; b) the proposal has been designed to assist the future evolution and consolidation of the City Cluster. It would define the Cluster's northern edge and reinforce the Cluster's skyline form, which would accentuate the important place of the City Cluster in the mental 'mind map' of the City and London, assisting wayfinding and London-wide legibility. The skyline impact is commensurate with a recognition of the importance of the City and the Cluster in the wider historical and socio-economic topographical reading of the capital. As such, it is considered the proposal would reinforce the existing and emerging Cluster of tall buildings, reinforcing the local and wider spatial hierarchy, aiding legibility and wayfinding. Therefore, the development is considered to comply with D9 C (1; b).
143. In relation to D9 C (1; c), the architectural quality of the facades is exemplary and would be maintained throughout its life span. In addition to its unique silhouette, the tower would be wrapped in high high-quality, deeply modelled and interesting facade, with playful contextual references, and successful proportions, which seek to mitigate a number of environmental challenges. The development would also provide the Camomile Park - a densely greened public realm - across multiple levels at the base of the building, offering visual relief and unique public amenities. Overall, the architecture is well-considered in the round, and of a high quality, which would be visually distinctive and an attractive addition to the skyline in of itself, and is considered to comply with D9 C (1; c).
144. In relation to D9 C (1; d), a full assessment of impact on heritage assets is set out in the Heritage section of the report. Officers have not identified harm to any heritage assets and have identified that the proposals would result in enhancement of the significance of the London Wall SAM and the former Churchyard of St Augustine Papey, both of which are on the application site. For the reasons set out in the detailed assessment of the architecture and urban design of the proposal, the proposal would positively contribute to the character of the area. As such, the proposal is considered to comply with D9 C (1; d).
145. In respect of D9 C (1; e) the proposal would be visible in relation to the Tower of London WHS as demonstrated by Views in the HTVIA March 2025. The proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value (OUV) of the

Tower of London World Heritage Site, or the ability to appreciate it. This is by reason of its strategic siting, recessive tower profile (shaped almost entirely by considerations of OUV) within the long-established and consolidating Cluster backdrop, the intervening distance and height when viewed from in and around the Tower of London. The development would comply with D9 C (1; e).

146. In respect of D9 C (1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area as such, it would preserve the open quality and views of/along the River, avoiding a 'canyon effect' when seen in association with the London Bridge Cluster, in accordance with D9 C (1; f).
147. In respect of D9 C (1; g), the potential impact of solar glare from the proposed development is considered to be minor adverse but the effects are not significant as discussed in the relevant section of this report. Further details would be requested as a S106 obligation to require a detailed solar glare assessment to be submitted post completion but prior to occupation of the proposed development which would include details of a mitigation measures (if considered necessary). Subject to any necessary mitigation measures secured by S106 obligation, the proposed development would comply with Policy D9 C (1; g) of the London Plan.
148. In accordance with D9 C (1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity. The development would comply with Local Plan policy D9 C (1; h).

Functional Impact

149. Through the pre-app process and consultation, the internal and external design, including construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants, these issues have been covered in more detail in the architecture and accessibility and inclusivity section of this report and are considered to be in accordance with London Plan policy D9 C (2; a).
150. The proposed servicing strategy would create a new vehicular access on Houndsditch to access a newly formed dual use area which would host blue badge parking bays and be activated with public use between 7am and 7pm and outside of these hours, the area would facilitate delivery, servicing, refuse and recycling activities. There are two servicing bays in this area to

accommodate movements associated with the type of vehicle needed to complete such activities. Swept path analysis has been provided demonstrating the manoeuvring in and out of the servicing area. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm in accordance with D9 C (2; b). Further details in respect of the servicing approach are set out in the Transportation section of this report.

151. The proposed permeable ground floor with pedestrian routes through the building, the setting back of the building line and the creation of Camomile Park result in an increase in the amount of useable public realm around the perimeter of the site. Locations of entrances and access routes would comfortably accommodate peak time use, avoiding unacceptable overcrowding or isolation in the surroundings. The site has an excellent accessibility rating of 6B, with underground and rail stations in close proximity, as well as numerous bus routes and cycle superhighway nearby in accordance with D9 C (2; c).
152. As discussed in the transport section of this report, there will be an uplift in pedestrian and cyclist activity on the wider transport network as result of the development. The impact will require some intervention to the public highway which will be developed in detail as part of the S278/38 agreement and there would also be a S106 contribution. Such interventions comprise a pedestrian priority scheme within Camomile Street, which will be subject to feasibility studies, detailed design and consultations. The S106 agreement will require the developer to enter into a S278/38 agreement with the City of London to undertake any works to mitigate the impact of development in accordance with D9 C (2; d).
153. In particular, the provision of the office floor space, the flexible uses including retail and food and beverage and the multi-function cultural floor space would promote the creation of jobs, services, facilities and economic activity and will act as a catalyst for future growth and change in the locale in accordance with D9 C (2; e).
154. No adverse effects have been identified on the operation of London's aviation navigation and the proposals also have been found to avoid significant detrimental effect on solar energy generation on adjoining buildings and thereby comply with D9 C (2; f).
155. Overall, it is considered that the proposals would meet the functional considerations of Policy D9 C (2).

Environmental Impact

156. In regard to D9 C (3; a), the proposals have been found to provide safe and satisfactory levels of wind, daylight and sunlight and temperature conditions

would not compromise the comfort and enjoyment of the public realm at ground floor level around the building, and on the public and private walkways and terraces of the building. In regard to (D9 3b-c), the design has given consideration for how the proposals can assist with the dispersal of air pollutants and which will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space. Thermal comfort, pollutants dispersal and solar glare are analysed in detail elsewhere in the report.

157. It is considered that the proposal would meet the environmental consideration of Policy D9 (C; 3).

Cumulative Impacts

158. As discussed in the preceding paragraphs, and within the architecture and heritage assessments below, the cumulative visual impacts of the proposal on consented and planned tall buildings in the area have been considered at every level, from macro skyline relationships (strategic views) to local streetscape details. The functional and environmental impacts have also been robustly assessed, in accordance with D9 C (4; a).

Public Access

159. The proposal would not incorporate an elevated public space and this is, in this instance, considered acceptable for the reasons set out above in the section on uses, noting also that D9 (D) requires that these areas 'should', not must, be incorporated.
160. Free to enter, publicly accessible area would instead be provided by in the form of a striking new multi-level public park at street level, better signify the history of the historic churchyard on site and newly reveal a section of the Roman wall below. This would add extensive greening to the street, legible in far-reaching views from surrounding approaches, in addition to illuminating the City's rich history. Located at street level, direct step free accesses is afforded these spaces from the public realm and would include a public toilet. The upper levels would be accessible via a prominent feature lift.
161. As such, the proposal would accord with D9 (D).

Tall Building, Principle, Conclusion

162. Overall, officers considered the site to be appropriate for a tall building and a strategic delivery site supporting the consolidation of the City Cluster. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9, and all relevant parts of Local Plan Policy CS 14 and emerging City Plan 2040 policy S12.

Architecture and Urban Design

Existing Context and Building

163. The development site is located towards the north of the City Cluster, and comprises two buildings, and to their south, located centrally between them, a historic churchyard and burial ground. The buildings are not listed or identified as non-designated heritage assets or located within a Conservation Area. However, the churchyard and burial ground are identified as a Non-Designated Heritage Asset (NDHA). Furthermore, the buildings traverse the known remains of the Roman Wall – designated as a Scheduled ancient monument.
164. The site forms part of a regular street pattern comprising other large-scale tall buildings, however, they do not directly adjoin any other development and, as such, are freestanding with all elevations addressing streets. To the north, south and west, the site is bound by wide, heavily trafficked fast fast-flowing roads, Houndsditch A1211, Bevis Marks A1211, and Outwich Street, respectively. The east of the site fronts St Marys Axe, a pedestrian priority cycle way, with some hard and soft landscaping. The layout of the street pattern is such that it forms the western edge of a major traffic peninsula which curves/bends quickly round to the north, which limits sightlines to oncoming traffic, most acutely at the corner of Houndsditch. While there are formal signalised crossings, the current configuration means that there are a high number of informal crossings at key pedestrian design lines, which do not offer good visibility, making crossing the road challenging and unsafe. On all but the eastern edge, the pavements widths are constrained and offer no urban greening, in the form of street trees or rain gardens, or any other amenity or seating.
165. Set behind the pavement line between the two buildings towards the middle of the southern elevation, is a small green space that delineates the former medieval and post-medieval burial ground of St Augustine Papey and remains of the St. Martin Outwich Churchyard. This space offers a degree of soft landscaping through low-laying evergreen shrubs, however, owing to its southern boundary wall and railing, it has an inconsequential visual presence on the street scene, with no inscriptions to indicate the plot's historic function or entrance. The churchyard is also flanked to the west by the service route to Camomile Courts internal bin store, where bins are wheeled out for on-street servicing. As such, this area reads as a curious back-of-house space, which pedestrians are detached from and disincentivised from engaging with.
166. The buildings themselves are a pair of 1980s, to early 1990s office buildings. Camomile Court (western building) measures 7 storeys in height whilst its neighbour 63 St Mary Axe (eastern building) rises to 9 storeys. In terms of scale, the buildings on site are among the smallest on the surrounding streets being flanked by: Heron Tower (230m) immediately adjacent to the west; by the Pan Pacific Tower (158m) diagonally to the north west; 100 Bishopsgate (172m) diagonally adjacent to the south west; and 70 St Marys Axe (90m) adjacent to the east. Further north the scale of development drops, to be more

in keeping with the historic character of townscape around Devonshire square and the Bishopsgate Conservation area to the North.

167. In terms of their character and appearance, both buildings take on a typical postmodern style, with their facades ordered around classical architectural hierarchies and motifs such as tall and fortified/muscular base of granite with limestone elevations above featuring weighty stone pediments and cornice lines, metal window balustrades, and in the case of Camomile Court, highly reflective green glazed windows. With respect to their contextual streetscape response, the ground floor of Camomile Court, which turns the corner onto Houndsditch, sets back its building line to give a little generosity to the street, albeit that the space is guarded by muscular granite columns and small upstand, so that it remains inaccessible to pedestrians. This frontage is particularly hostile with a high degree of solid frontage and dark tinted glazing which offers minimal intervisibility and animation to the street. 63 St Mary Axe is the more successful of the two, since the ground floor offers a number of shop front bays, and on its south eastern corner double height clear glazed shop windows which animate the corner and public realm – providing some additional passive surveillance to the route. While the buildings' entrances are at grade and all face onto the primary streets they address, unlike 70 St Mary Axe, the overall urban design quality of the ground floors along these street frontages is poor with very low levels of activity and engagement with the street. Instead, taken together, these frontages are experienced and characterised as being generally hostile, with very few pedestrian amenities and narrow hardscaped pavements, which combine to make the base of the buildings uninviting, and the routes that they line, places that people move quickly through. Owing to the poor quality of the ground floor frontages, though made from high quality materials, the buildings are not considered to be of any particular architectural quality, and as such, reveal an opportunity for considerable townscape and urban design enhancement.

Proposed design

Bulk, scale and massing

168. The proposal is for a tall building to be erected on site, rising at its highest point to 190.65m AOD. The massing diagram of the building can be broken into three elements: the base, middle, and upper tower.
169. The massing and bulk of the base of the building has been designed to step in from the existing pavement lines along the south and west and parts of the north, to create greater breathing space around the base of the building, and enlarge the public realm, albeit behind large structural columns. To the south, this setback would be 12.5m deep from the kerb edge and 22m tall, and within it enough space to delineate the historic churchyard and create a new public park – Camomile Park- around it which would also be layered vertically, providing additional public spaces at higher level. The north-west corner is also deeply set back and voluminous, giving relief to the street corner, in

addition to the north east corner where there would be a double height space, publicly accessible during the day when not in use for out-of-hours servicing. Again, forging additional space at the street for people to move through. Suspended in front of the primary glazed base podium are a series of balconies, walkways and 'Bastions' which offer places to rest and dwell, and which have been designed to exemplify the radically public character, and verdant nature, of the building's base.

170. Above this, the middle stages of the building would extend to level 27, filling out laterally, just beyond the existing building lines, and creating a shoulder height marginally taller than the top of 70 St Mary Axe to the east. At this point, the massing would step back considerably from the northern elevation, revealing a series of large terraces for office occupiers, and from which the tower element would ascend to its full height.
171. The tower has been carefully and successively designed in relation to viewing experiences from Tower Bridge (LVMF view 10A.1; and to a lesser extent the views from Queen's Walk (LVMF 25A.1-3) to interpret the Outstanding Universal Value of the Tower of London WHS. More specifically, its form is kept narrow, at two bays wide, on its eastern elevation, which has also been inclined so that it leans back away to the west, away from the ToL, to which it would present a clearly deferential raking profile, and considerable clear sky separation, in the Tower Bridge view particularly.
172. The total height of the proposal would be less than the Gherkin to the south, and the Heron Tower to its west. Within these parameters, the tower would be given a unique and elegant silhouette, which tapers upwards, and assimilates into the folds of the Cluster, the composition and character of which is comprised of a rich variety of unique tower forms which step up in height towards its centre. The total height of the tower, which is shorter than the height of its neighbours to the west and south, is also considered to successfully respond to its strategic context and location, in addition to the shoulder height struck at level 27, which marks a concerted stepping down in scale towards the northern boundary of the City Cluster tall building policy area, and smaller scaled development to the north east. Consequently, officers consider the bulk, massing and scale of the tower to be successful.

Architectural expression:

Upper levels

173. The expression of the tower is derived from its elevations that would be wrapped by a highly modelled and crisply detailed structural frame of light neutral-toned concrete, in set with a layered concrete bay module. The elevations take on a generally horizontal emphasis, with repeating rectangular bays, typically 6m long and a storey high, staggered and stacked in bands, much like a brick bond, to create visual interest and movement as the tower rises in height. Depending on the aspect of the elevation and the

environmental conditions, the bay module varies to provide varying degrees of shading and solidity, which at its greatest would be 650mm, and at its shallowest, 200mm. The result being a deeply modelled façade of vertical and horizontal elements, with areas of playful detailing and texture. Each bay types would be fabricated with pre-installed components.

174. The components of the typical module include a projecting outer concrete frame, textured solid spandrel upstand and vertical panels, pattern perforated metal side panels to provide ventilation, and a high-performing low-iron glazing designed for easy maintenance and internal glass replacement. The configuration of these elements varies, with there being 4 typical bay types, to promote environmental efficiency, as well as provide interest across the façade, but also in response to technical constraints, such as the column line, which though this design would be fully concealed from external view. Passive solar shading from the high degree of solidity within the façade, designed to generally achieve a 60:40 proportion of transparency to opacity, and opening ventilation panels that would be automated to facilitate night purging, and are integral parts of the building's sustainability strategy, and its architectural appearance, which at night also has the benefit of significantly reducing the perception of artificial lighting from the building's interior.
175. The solid internal panel components are proposed to be concrete textured with aggregate and patterned to provide relief and playful detailing. Taking inspiration from the name of the street, the pattern proposed to be debossed into the textured aggregate panel is that of the camomile plant's petal array. Further detailing and design development of these features will be secured via condition, to ensure the design quality and intent follow through to technical design.
176. Areas of facade needed to screen plant enclosures – located at levels 14-16 and 42-45, would use a different internal panel design - a small-scale perforated stretcher bond - to provide the necessary ventilation requirements for mechanical plant equipment.
177. Double order bay types are used as a defining feature of the northern elevation, marking the shoulder height, to provide a more successful promotion to the top of this element, and also to express the towers corners through a unique arrangement of external terraces. Each corner of terraces are two bays wide, and staggered vertically to create generously sized, two-storey outdoor spaces on each level, accommodating trees of 5-6 meters in height – so that every floor has access to nature and fresh air. The trees will be set within an fully integrated planters, and their species selected to suit the varying environmental conditions as the building rises in height to ensure that they thrive. A detailed landscape condition, specifying the species, soil, planter design and management plan for these trees will be secured via condition. The balustrades to these terraces are purposefully subtle, designed as simple metal railings at 1.6m tall, to ensure they are not overly prominent

in views. Final details of which will be conditioned to ensure full compliance with the CoL suicide prevention SPD. Architecturally, the terraces form bookends to the building's southern elevation and act as green signposts for the building.

178. On the southeast corner, the linear run of deep set terraces characterise the leaning profile of the tower, further pushing the massing away from sensitive heritage receptors to the east, and softening the eastern elevation in these views, while being careful not to be overly visually distracting – through the use of a very refined palette of plants. In such views, the crisply refined structural frame of the building would remain the primary architectural element. Overall, the inclusion of these terraces on the corners of the building is considered a highly successful architectural flourish, which helps to humanise the architecture, give it interest, promote high levels of urban greening, and celebrate the building's contribution to local townscape.

Top

179. The building's top and upper levels would be crowned by the architectural frame, set within which would be the building's fully screened plant floors and BMU store. The frame would extend beyond the entire enclosure, in a double-storey arrangement, enveloping it while creating voids that introduce a sense of lightness and provide shifting visual relationships from different vantage points. The very top roof elevation would also be wrapped by this frame, to ensure all plant is fully integrated within the architectural envelope. To meet ventilation requirements, the enclosure incorporates an open masonry architectural screen, scaled down to echo the primary façade modules, achieving a cohesive and uniform aesthetic. While being a functional piece of design, the designs would also offer interest and successfully refine the crowning expression of the tower's top, while ensuring all plant and BMU equipment are visually integrated and screened from view.

Base

180. The design intent of the base of the building is to provide a more active, engaging and welcoming base to the tower, with a distinctly public and open character, better rooted into the fabric of the city. On the south and western elevations it does this through floor-to-ceiling clear glazing that maximizes views internally to publicly accessible areas, such as; the two routes through the interior of the building on the east and west; the retail units lining the western ground floor frontage; the south eastern cultural auditorium space; and to the cultural/amenity spaces which make up the first three floors of the building. The auditorium's southern façade would also be fully openable, so that the interior and exterior space can coalesce. The high degree of clear glazing would also enable unobstructed views externally to the green space of Camomile Park and the planted balconies and walkways, which are the defining feature of the principal west and southern elevations. That said, there are moments of solidity, required to screen functional internal areas, which bring balance to the elevations, in addition to the use of solid textured

aggregate bands, which wrap floors 0-4, in a warmer earthy tone, in homage to strata of the Roman wall below. On the north and eastern elevation, the bays would take a double height order and be framed with projecting concrete – to coalesce with the expression of the framing system used above. The majority of these bays would also be clear glazed, though a small proportion would be required to provide ventilation, and so would be louvered by an architectural screen, again, matching the design proposed above. The soffits for all areas within the external base of the building are to be coffered timber, though final details of all materials and finishes will be reserved for condition.

181. The building's 4 main entrances have been designed to be highly visible and generously scaled, marked by large, brightly coloured, hanger-style sliding doors. The size and playful use of colour of these entrances would make them highly legible arrival zones, which inspires interest and engagement with the base of the tower in a unique way. Similarly, the structural columns would be clad in concrete and given bespoke patterns, playfully referencing the historic street names of the site. While full details of these elevations, their materials and finishes will be specified via condition, officers consider that the configuration, layout and appearance of the building's base and ground floor register would be highly permeable and dynamic, with engaging active edges that would radically transform the site's contribution to the street scene.

Public realm and green spaces:

182. The creation of additional public realm and green space in the form of Camomile Park is proposed on the set back southern elevation. Here, in addition to enhancements at ground level, the proposals would introduce a new vertical park, comprising a number of publicly accessible levels from ground to level 5, providing a unique integration of nature within the urban environment. The southern elevation offers the greatest levels of natural sunlight to the ground, and as such, this location is the best suited on site for emblematic biophilic design, and new pedestrian dwell spaces.
183. At ground level, the landscaping areas are arranged in a linear fashion adjacent to the street edges, with large planting beds located at the base of the building's columns, creating pockets of dense greening and seating nooks away from major people flows. These provide intimate spaces to relax in, as well as helping to frame the main building entrances. The landscaped planting beds are of a scale and design that would facilitate a high density of planting, including trees. In addition to several smaller 3-4m multi-stem trees, the south elevation would also be lined with four large specimens of differing varieties, sitting beneath the canopy of the building above. Two smaller trees are also proposed within the internal north/south route on the western side of the building.
184. The proposed planting beds and integrated tree pits would be partially located over the building's basements. However, adequate soil depths have been proposed. Officers' strong preference is for the planting beds to be

interconnected, in underground trenches, as this would provide a greater continuous rooting volume and improve water distribution, leading to more resilient tree growth, which would be better for the large trees proposed. A condition for the detailed design of the tree pits will be applied to the consent to ensure their technical design can facilitate the ambitious levels of planting proposed, and incorporate interconnected pits as far as feasible. A mechanical irrigation and nutrient delivery system, with soil moisture sensors is proposed for all planted areas, though further details will also be secured via condition following detailed design development.

185. The planting palette has been carefully selected based on the conditions of the site, and to be naturalistic in character, and provide necessary habitat, comprising a variety of woodland shrubs, grasses and perennials. The planted veils proposed for the southern elevation, spanning multiple floors and adding vertical drama, would be grown from climbing plants trained up steel cables between the walkway soffits. Closest to the building facade, shade-tolerant evergreen plants such as cultivars of ivy that are well adapted to the reduced light levels would be installed, whereas, on the external face of the suspended walkways, flowering climbing plants are proposed, some of which will be fragrant, and respond to increased light levels. Trees at higher levels have also been selected to provide berries or seeds as food for wildlife. In addition, the palette would utilise a wide variety of species, mixing native species with drought-tolerant species from other climates to balance enhanced biodiversity with the need to future-proof, for a lasting foraging and nesting habitat for animals.
186. The planter beds edges would also incorporate integrated seating, with arm and back rests, and on the eastern end, a long in-built stone bench and table, with drinking water fountain adjacent. While the proposals offer a range of seating, the final specification of all seating and urban furniture will be conditioned to ensure it meets the highest standards of inclusivity and design quality. The ground plane would be paved with high-quality materials, which denote the pocket parks, internal routes, and importantly, clearly delineate the location of the historic church yard.
187. Located within the centre of Camomile Park, the Churchyard of St. Augustine Papey would be reimagined, made accessible, and prominence enhanced through the upgrading of both hard and soft landscape materials. The space would be legibly different from other areas of public realm through the use of contrasting, and larger scale paving slabs, taller perimeter upstands, and different planting which takes inspiration from churchyard species – white Martagon lilies. There would also be greater interpretation of the history of the site through new signage and artwork, both at grade through engraving in the surface of the paving and perimeter, in addition to elevations and the soffits above. A condition on the final specification and detailed design of the churchyard, its planting, artwork and historic interpretation will be introduced, to ensure the layers of history are sufficiently captured within the texture and detailing of this important space, such that every opportunity for interpretation

is explored. Immediately adjacent to the churchyard would be a newly revealed section of Roman Wall, which people would be able to experience at close quarters. The entangled histories of both assets would be made more accessible and would reinforce the historic roots of the site, and the City more generally. Overall the design of the space is considered to be refined, and in keeping with the character of a churchyard, being quiet and contemplative, while providing a better framework for understanding the history and relationship between former church yard and London Wall and greatly enhancing their settings.

188. Above these spaces the design proposes a series of suspended walkways and balconies and corner 'bastions' spaces, again referencing the Roman wall below, with integrated planter bed and framed by vertical veils of climbing plants. On the western elevation, it is envisioned that spill out from the ground floor retail units would be to the balconies above. Access to these is announced by a feature lift – colourful structural frame, with green roof, and stairs – also brightly coloured to ensure vertical access to these upper levels is legible and clear. Camomile Park would also include a publicly accessible toilet – providing much needed amenity for its users. While the intention is for these balconies and walkways, to be lightweight in appearance, and have coffered timber soffits, full details of all materials will be conditioned to ensure they are of high quality, and inclusive.
189. To the north, the servicing bay, with two blue badge parking spaces would also be a public realm feature, which would be activated by adaptable uses, including events such as markets, pop-up retail, and community engagement events. A S106 obligation will be attached to the permission whereby a plan for how this space will be used in the non-servicing hours will be secured to meet this aspiration.
190. With regard to the management of all public realm and the cultural spaces proposed on site, a Cultural Implementation Strategy, secured via condition/s.106 will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8 and guidance in the LPG (London Plan Guidance) 'the Public London Charter'.
191. At this design stage, the only hostile vehicle mitigation (HVM) proposed is for a line of bollards to run around the perimeter of the north east loading bay. Any other necessary building-related security measures are expected to be discreetly integrated into the proposed facades and landscape designs of the building, such that it would not negatively impact the quality of the landscape, public realm, or architectural design of the proposed development. Details of the HVM strategy will be conditioned to ensure high quality design.

192. Higher up the building, at level 27 and 28, two large private terraces are proposed as office amenity, and would also comprise high levels of greening, with a diversity of planting species, and integrated external seating. The level 28 terrace, being set further from the west, would also incorporate some multi-stem trees, and which would screen the BMU parking area in the western corner.
193. Overall, officers consider that the proposed designs for the landscape, which are central to the overarching design vision of the site, are well considered and transformative; creating new spaces that cater for a wide range of users, and are supported by important facilities to ensure the space is equitable and sustainable. The ambitious levels of greening, plant variety and naturalistic aesthetic quality are also welcome and would help encourage nature to repropagate within the city, and in doing so bring people, including residents from local communities, closer to it. Equally, the dramatic vertical nature and large scale of the tree planting, would mean that the visual impact of the proposal would be great and far reaching, such that these landscape features would become a beacon or oasis of green within the city, signalling from afar that they can be freely and spontaneously engaged with – radically transforming the character of the streets within the northern Cluster for the better.

Conclusions Architecture and urban design:

194. The proposals would optimise the use of land, delivering high quality office space, and a multi-layered series of publicly accessible spaces. It would improve the site's interfaces with, and contribution to its surroundings. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals would constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 Policy DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.
195. The proposed development would be a sophisticated interplay of expressive, playful design and functionality, combining office, public, and cultural spaces within a visually compelling and contextually responsive form. The design throughout seamlessly integrates public amenities and generous urban greening, with the towers' edges defined by tree canopies, and at its lower levels, the multi-levelled Camomile Park, which would host the reimaged Churchyard and revealed Roman wall. Collectively, these elements would endow the proposals with a landmark quality, making it a fitting and distinguished addition to the City Cluster. This is in accordance with London Plan policies D3 City Plan policies S10 and DM 10.1, and Draft City Plan 2040 policies S8, relevant sections of the NPPF and National Design Guide.

196. In terms of design and provision of public realm the proposals represent compliance with Policies D3, D4, D8, G4, T1 and T2 of the London Plan 2021, as well as CS3.3, CS10, CS16, DM10.1, DM10.4, DM10.8, CS16, DM16.2, CS19, DM19.1, DM19.2 of the City of London Local Plan (2015) policies and policies OS1, S10, AT1, S8, DE2 and DE3 and S12 of the emerging City Plan (2040), and, The City of London Open Space Strategy SPD and the City Public Realm SPD. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm aspect of the proposals are considered by officers to be a benefit of the scheme.

Delivering Good Design and Design Scrutiny

197. Officers consider that the application process has adhered to the intentions of London Plan D4 Delivering Good Design. In respect of D4 A, the applicant's evolution of site development was design-led to deliver high quality design and place making and this is detailed in the Tall Building, Architecture, Urban Design and heritage sections of the report.
198. In respect of D4 D, the proposals have been to the London Review Panel and been workshopped by the City of London Access Group (COLAG), in addition to a rigorous local borough process of design scrutiny as required by the policy. The applicants also undertook extensive preapplication engagement with a variety of stakeholders, including the GLA, Historic Royal Palaces, Historic England and others. At pages 48 to 52, the design and access statement sets out how the scheme has changed and evolved as a result of officer and stakeholder feedback, showing the evolution of the scheme in response to feedback from these external organisations and officer comments.
199. In relation to D4 E, parts 1-6, there has been a City level of scrutiny comprising extensive officer topic-based reviews over multiple pre-application meetings; external input has been provided by other experts as set out above. In addition, the applicants brought the scheme to the London Review Panel which was attended by experts from different disciplines, these comments were mindful of the policy context and clearly set out recommendations. The London Review Panel set out several recommendations which have been considered by the design team. City of London officers views on topics which the LRP comments have been set out elsewhere in the architecture, heritage and views section of this report.
200. In relation to D4 F, parts 1-4, officers have been mindful to ensure that building heights, land use and materials for the buildings and the landscape are stipulated on the drawings to minimise ambiguity and avoid deferring large elements of the development to the conditions. The recommendation is also supported by a robust relevant condition to ensure the scheme is implemented to an exemplary standard.
201. Overall, the application process has adhered to the policy approach set out in London Plan D4 Delivering Good Design.

Strategic Views and Heritage

202. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and CS14 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. The Strategic Views referred to London Plan policies HC3 and HC4 are listed in Table 7.1 (pp. 293-4 of the London Plan). The Mayor's London View Management Framework (LVMF) SPG (the SPG) provides further guidance on the management of views designated in the London Plan. The City's Protected Views SPD gives further guidance on the implementation of policies relating to protected views.
203. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. The views selection was informed by extensive testing. The split of view visualisation types (render, wireline, and computer-modelled representation) is based on the proximity and sensitivity of the views, to represent the impact of the proposed development. All of the viewpoints were agreed in consultation with officers. The split of assessment and appendix views, of verified and non-verified views, and of render, wireline and computer modelled representation, is based on the proximity and sensitivity of the views.
204. Consultee responses and objections have been received from Historic England, Historic Royal Palaces and London Borough of Tower Hamlets, which relate to the perceived impacts of the proposed tower on strategic views and the OUV of the Tower of London World heritage site, and best practice in terms of impact assessment in accordance with policy guidance for Impact Assessment in a World Heritage context (2022). These are referenced and discussed in detail below. Some months ago, Historic England notified the World Heritage Centre of the application, but at the time of going to print no response from them has been received, nor an indication of when it is likely to be received.

Tower of London World Heritage Site

OUV and Relationship to Setting:

205. The impact of the proposal on the World Heritage Site (WHS) has been assessed against the seven attributes, and their components, of Outstanding Universal Value (OUV) contained within the adopted Statement of OUV. It is considered that all attributes of OUV draw on the contribution of setting for significance and an appreciation of it, but in particular the attributes: (i) an internationally famous monument, (ii) landmark siting, (iii) symbol of Norman power and (iv) physical dominance (of the White Tower); and, to a lesser extent, (v) concentric defences, (vi) surviving medieval remains and (vii) physical (historical) associative evidence.

206. Whilst the Tower of London comprises a scheduled ancient monument, various listed buildings and is within a conservation area (in the LB Tower Hamlets), it is considered proportionate and robust to consider the impact on OUV in order to draw a conclusion on the impact on these heritage assets.
207. The WHS Management Plan establishes a 'Local Setting', 'Immediate Setting' and non-spatially defined 'Wider Setting'; the proposal site is within the latter. The Local Setting Study (LSS) identifies those most representative views and/or viewing areas to and from the Tower of London which are deemed to exemplify the OUV and their components, with management guidance providing a baseline for assessing change. These representative views/viewpoints overlap with some LVMF viewing locations and these are assessed together here.
208. Importantly, the WHS Management Plan acknowledges the City Cluster as signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. Here is important recognition that the Cluster has an emerging, distinct identity and the relationship between the Tower and the Cluster is long-established, having existed for over half a century, forming a backdrop to many views of the Tower such as from within the Inner Ward.
209. In recognising the place of the Cluster in the Wider Setting, the Management Plan acknowledges (at para 7.3.18) that it will intensify as a distinct and separate element to the Tower. At para 7.3.27 it states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider (i) their effect on the established Cluster, (ii) the space between it and the Tower, and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.
210. The intervisibility between the royal Tower and the commercial City, over which it was intended to command and defend from the river approach, is an integral part of the attributes (i) to (v) of OUV outlined above. Both the Tower and the City are ancient entities with a rich ceremonial life accrued through hundreds of years of existence, giving them a unique sense of place both central to and yet set apart from modern London. In the case of the City, that original commercial purpose remains and contributes to a relationship between the two entities that is nearly one thousand years old and therefore of unique interest.
211. The impact assessment set out below uses the assessment framework in the Mayor's London World Heritage Sites: Guidance on 'setting' SPG, which is based on the relevant ICOMOS/UNESCO guidance.

Impact on OUV/Significance

212. The proposal would be visible within, and would therefore result in a change to, the wider setting of the WHS. However, change is not necessarily harmful.

Views, including those identified within the LVMF view management framework, and ToL Local setting study, where the proposal will be experienced in conjunction with WHS are identified and assessed below.

213. Consultee responses have been received from Historic England, Historic Royal Palaces, the GLA, and London Borough of Tower Hamlets (LBTH). Historic England have objected to the proposed development stating that the proposal would cause harm to the OUV of the WHS and that the original submission did not adequately assess the impact of the proposal in the OUV of the WHS, going as far as to identify categorise that harm in NPPF terms as in the low to middle part of the range of 'less than substantial'. In the amended submission a fuller HIA has been provided by the applicant.
214. Historic Royal Palaces have raised concerns over the impact of the proposals on the WHS and ToL from LVMF View 10A and contend that the profile and massing of the proposed tower element of the development, would fail to preserve this key view.
215. The GLA have identified a low level of indirect harm, 'less than substantial' to the "setting of the ToL" due to the closing of the sky gap between the White Tower and the Eastern Cluster. As the proposal is considered to result in a very low to middle level of less than substantial harm to heritage assets, the proposed development is therefore contrary to Policy HC1 and HC2 of the London Plan.
216. London Borough of Tower Hamlets (LBTH) have observed that the proposed development, when viewed from LVMF view 10A.1, would result in 'only limited harm to the WHS, taking into account the number and variety of views in which they are experienced together'.
217. Whilst officers give the views of these stakeholders significant weight, officers reach a different conclusion to Historic England, Historic Royal Palaces and LB Tower Hamlets on the proposal and conclude that there would be no harm to OUV as captured in views 4, 5, 6, 8a, 8b, 8c, 9, 10, 11, 12, 13, 14, 15, 16, and appendix views E, F, and G of the HTVIA March 2025, and the model video of the kinetic viewing experience over Tower Bridge, for the reasons set out below.

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

218. This viewpoint is also identified as a Representative View in the Local Setting Study (LSS) (View 9), whilst the impact here is also representative of the impact from Approach 14 (Tower Bridge) in the LSS. The view is of particular importance in appreciating the 'Internationally Famous Monument' and 'Landmark Siting' attributes of OUV.
219. The LVMF SPG states that this location enables the fine details and the layers of history of the Tower of London to be readily understood. The LVMF states that such understanding and appreciation is enhanced by the free sky space

around the White Tower, and that where this has been compromised its visual dominance has been devalued. It also states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such as the spires of City churches and the Monument. It is also noted that the lantern and upper dome of St Paul's Cathedral can be seen, while other prominent buildings or structures in the background include the Cannon Street Station towers, BT tower, Centre Point and Tate Modern (para 182), which all combine to draw and hold the attention of the observer.

220. In the foreground of this view, the Tower of London WHS forms an important visual centre of gravity, with its legible and consistent stretch of historic townscape and iconic silhouette of the White Tower. Due to the elevation of the viewing point and the topography of the City, the area of the WHS west of the White Tower does not form a historic skyline because the modern City is seen immediately behind it as a backdrop; in this area of the view the towers of the Cluster form a distinctive modern skyline.
221. The visual management guidance anticipates the consolidation of the Cluster which, it is said, 'will add considerably to the character and stature of the view', and that any new skyline buildings must account for how they relate to skyline features (para 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground, applying particularly to the Monument (para 185). The visual management guidance states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).
222. From this view point (HTVIA View 8b), the proposed development would appear at the north eastern edge of the Cluster, sitting in front of 110 Bishopsgate (Salesforce/Heron Tower) and 136 Bishopsgate (Pan Pacific), providing an eastern endpiece to the baseline and cumulative Cluster form. The proposed tower would be visible between 30 St Mary Axe (the Gherkin) and the White Tower, with a slim sliver of the 136 Bishopsgate projecting beyond. The proposal has been fundamentally shaped by this view and, accordingly, 'leans' back into the Cluster at a clearly deferential angle, away from the WHS.
223. Historic England have objected to the impact of the proposal on the OUV of the WHS in this view, claiming that the proposal would create a 'cliff edge' that would present 'a greater distraction' in the view, in addition to making the Cluster 'increasingly overbearing overall'. More specifically, "compared to the existing backdrop to the Tower in View 10A.1, as defined by 80 Houndsditch, these proposals would fill more sky space, rise higher than the corner turret of the White Tower and appear in closer proximity to it. The proposed tall building would also stand out from the Cluster due to the proposed detailed design."
224. This sentiment is broadly echoed by HRP, though they only raise concerns over the impact of this view, and the GLA who note that from this view "an area of open sky will be obscured by the proposed development" and that "

the building will be closer to the viewer than either the Salesforce Tower or the Pan Pacific Hotel.” Similarly, LBTH observe that when viewed from 10A.1, the proposed development would intensify the visual dominance of built form and contribute to the crowding of the White Tower’s immediate setting...reducing the sky space between the cluster and White Tower and competing visually with the corner turrets. LBTH also suggest that a tall building without a leaning form and calmer appearance might better respect the setting.

225. In this view, the proposals' leaning/sloping eastern edge, tapering tower form and calm geometric fenestration would be read tilting back and away, deferentially, from the WHS and into the Cluster. The form of the tower, and its unique leaning massing, has been designed and refined successively at preapplication stages in response to this highly sensitive view, and site constraints at ground level, to maximise the visual separation between the White Tower, and consolidate the composition of the cluster in its backdrop. More specifically, in response to this view, its design has been curated around a set of existing massing parameters, and visual relationships, such that it conforms to the stepping down of Cluster towers – sitting below the crowing pinnacle and BMU rails of the Gherkin, and below the height of the Salesforce/Heron Tower beyond; and below the ToL White Tower’s weathervane. In addition to the massing of the tower, its tonality has been designed to align with the Cluster, using cooler tones, to ensure ToL White Tower’s Caen Stone remains visually prominent and distinctive.
226. The baseline and consented (cumulative) Cluster of towers steps downwards from the centre at 22 Bishopsgate (and 1 Undershaft in the cumulative) in a deferential manner towards the WHS. This profile has been carefully negotiated through numerous planning decisions to mediate between the Cluster and the WHS. Under both baseline and cumulative scenarios, the height and stepped form of the proposal are considered to create a successful terminus to the Cluster when seen from this viewpoint and would be consistent with the long-term Cluster curation described above.
227. The LVMF SPG (para 186) seeks to maintain ‘some’ visual separation between the upper parts of the White Tower and the Cluster; the guidance in the Local Setting Study (LSS) for this view seeks to ensure that ‘buildings behind or close to the White Tower should not diminish its perceived scale from this vantage point’. Officers acknowledge that the proposal would occupy a small degree of additional clear sky space between the White Tower and the Heron/Salesforce tower and Pan Pacific - which currently form its distant background. However, the encroachment into this space is minor, with the building moving no closer to the Tower into this space (in the vertical plane) than the Pan Pacific Tower. Equally, being sited immediately adjacent to both towers, at over 700m away from ToL, the proposed development would maintain a clear sense of visual distance, separation, and visual dissociation, all of which would clearly reinforce and maintain visual separation between the Cluster and the WHS.
228. Although it would add some additional built form into this view, through the height of the proposed tower rising approximately to the level of the

weathervane of the ToL south-west turret, its leaning form would create a softened and recessive edge which would step deferentially back and assimilate into the Cluster. As such, it is considered that its profile would be sufficiently deferential so as not to dominate the White Tower or diminish its perceived scale by drawing that of the centre of the Cluster too close or challenge the iconic qualities of this silhouette or the gravitas of the WHS as a whole.

229. In addition, the tonality and ordered nature of the facades would ensure the proposed development would assimilate successfully with the character and composition of the Cluster, again, comfortably disassociated from the WHS, which would remain clearly legible and appreciable by the viewer. The WHS would be the closer and would remain the dominant and indisputable focus of this view. In respect of LBTHs observations, officers consider that the proposed tower design strikes the appropriate balance of deferential, recessive, massing through its leaning form, while being clad with an ordered and calm façade, that subtly contrasts with the materiality of the Tower, such that it would not be a distracting presence within the setting of the WHS.
230. For the aforementioned reasons, the proposal would, under baseline and cumulative scenarios, preserve the ability to appreciate the WHS as an internationally famous monument, that sense of its landmark siting in relation to the City and the physical dominance of the White Tower, the attributes of OUV that are particularly captured by this view. It would not 'dominate' the WHS, would not directly interact with the protected silhouette of the White Tower and would maintain visual separation between it and the Cluster, all in accordance with paras 183 and 186 of the LVMF SPG. The proposal would relate appropriately to existing skyline features and, in the way it would consolidate and 'complete' the eastern edge of the Cluster when seen from here, would support the Cluster's contribution to the character and stature of the view, in line with para 187 of the SPG.
231. The proposal, then, would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13, emerging City Plan policy S11, HE1, HE3 and S12, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and the CoL Protected Views SPD.
232. The Monument is also within this view and situated at a distance from the orientation 'pivot' of the view. The proposal would leave undiminished the Monument as an important landmark element and would not affect the skyline presence or pre-eminence of those other landmark elements: City Hall, HMS Belfast or a recognition and appreciation of St Paul's as a Strategically Important Landmark (SIL). It would preserve their strong group value with other elements and allow for an appreciation of the scale and geography of London, in accordance with para 185 of the LVMF SPG.
233. Thus, it is considered that the proposal would preserve those attributes of OUV (and their relevant components), which have been identified in accordance

with Local Plan Policy CS12, CS13 (3) Draft City Plan Policy S11, HE1, HE3 London Plan Policy HC2 HC4 associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG and the CoL Protected Views SPD.

Dynamic/kinetic journey across Tower Bridge

234. Historic England has identified harm from the impact of the proposed building in the sequence of views of the WHS as one proceeds northwards over Tower Bridge, approaching the WHS, and onto the northern bridge approach. Historic England considered that the proposal would 'leave less of the kinetic experience unimpacted. Consequently they consider that the Tower would appear less apart from the City.' HE also reference the Tulip enquiry (IR14.28) noting how the inspector identified 'that the Gherkin already impinges on the sky space around the Tower of London because it rises higher than the overall height of the closest turret of the White Tower when it moves through the sky space behind it'.
235. The experience is identified in the LSS as Route 14 of the Approaches and Arrivals (Section 5), which acknowledges the overlap between these local views and the LVMF 10A.1 viewpoint from the bridge discussed above. The identified aim is 'to create views in which the Tower of London is perceived as a riverside gateway lying at the edge of the City rather than 'lost in the City', in which the scale of the White Tower is perceived as more prominent than the buildings surrounding it; and in which the military architecture of the Tower and its defences can be appreciated.'
236. A video sequence from a computer model and viewpoints corresponding to this experience have been assessed in the submitted application. Moving north, from the south end of Tower Bridge to the North Bastion, the proposal would appear as an eastern endpiece to the City Cluster which gradually draws closer to the WHS as one moves over the bridge. At the North Bastion, the proposal (and the Cluster) would appear as described in the section on 10A.1 above. Beyond the North Bastion and onto the northern bridge approach, the proposal would continue to appear as part of the City Cluster which at this point in the journey has appeared behind the WHS.
237. Throughout this journey, the Cluster forms a long-established background presence that gradually draws closer to, then is seen (from the North Bastion) in poised juxtaposition with, and then gradually draws behind and moves beyond, the WHS. The proposal would be at its most prominent when seen from the North Bastion, as discussed at length in the paragraphs above. As demonstrated by the kinetic video sequence, when moving north past 10A.1 around the north bastion northwards up the bridge, it is only a matter of metres before the rest of the cluster is seen in conjunction with the White Tower, as part of its existing juxtaposing backdrop. For the rest of the journey, the proposal would read as a comparatively modest (in respect of overall height and form) addition to the Cluster that would consolidate further and be well integrated with it; particularly on the northern end of the journey where, due to the lines of sight, the proposal would cease to read as the Cluster's eastern

edge and would instead become more 'merged' with the existing buildings in the field of view.

238. As with the specific viewpoint on the North Bastion, officers strongly consider that, throughout this dynamic journey, the viewer is always conscious of the fact that the WHS and the Cluster are two entities, historic and contemporary, that are physically separated by a considerable portion of low-rise townscape, including the Local Setting area, and as such visually separated in most of the viewing experiences, including from Queen's Walk and much of the Tower Bridge experience. Much of the drama and interest in this journey derives from the way in which the WHS remains the commanding focal point but is contrasted with, and set off by, the presence of the modern Cluster which underscores and enhances that ancient and overarching relationship between Tower and City.
239. Officers strongly consider that, having reached the northern bridge approach where the proposal and the wider Cluster has fallen in behind the WHS, the viewer is in no doubt that this is because the lines of sight, not the fundamental balance of this relationship, have changed; in moving across the bridge, the viewer has had ample opportunity in which to appreciate each of these entities on their own terms, as a contrasting pair, and the clear physical and varying amounts of visual separation which exists between them. While consuming a comparatively minor amount of further clear sky in the viewing experience, the proposal would not fundamentally alter this existing dynamic and would not unbalance the existing relationship between the Cluster and the WHS.
240. As such, in baseline and cumulative scenarios, officers consider that the proposal would preserve those attributes of OUV (and their relevant components) which have been identified in accordance with Local Plan policy CS12, CS13 (3), emerging City Plan policy S11, HE1, HE3, London Plan policy HC2, HC4, associated guidance in the World Heritage Site Management Plan and Local Setting Study.

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

241. This view is identified in the ToL WHS Management Plan (7.3.22) as the most iconic view of the Tower, and within the LSS (View 10). The focus of the view is the ToL, which is the sole Strategically Important Landmark, inclusive of a Protected Vista, the Landmark Viewing Corridor of which is focused on the White Tower, benefiting from a dynamically protected sky-backed silhouette between the three Assessment Points (25A.1-3). The Monument and Tower Bridge are also identified as landmarks. The LVMF recognises the juxtaposition of built elements from a variety of eras as an aspect of the view (paragraph 413). The visual guidance acknowledges the long-established presence of the consolidating City Cluster in the view which, alongside those historic landmarks, reflects over 900 years of London's development (para 410). The juxtaposition of the WHS with the modern city and of built elements from a variety of eras is deemed a central characteristic of the view (para

411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.

242. View 10 of the LSS equally identifies that development must ensure that the White Tower is able to continue to reveal its relationship to the City as a 'gateway' to the City and should not become 'lost' in the City, continuing to 'tower' over its surroundings in this view as a landmark and a symbol of Norman power. And that clear sightlines to it, Buildings behind or close to the White Tower should not detract from its silhouette or diminish its perceived scale from this vantage point. In both baseline and cumulative viewing experiences, including those at night, at location 25A.1 (LSS view 10) only a small sliver of the proposed development's easterly elevation – the reclining ladder of terraces - can be seen beyond the eastern edge of 40 Leadenhall Street, where it would sit just below its shortest/lowest easterly setback. View 25A.2, located to the east, reveals fractionally more of the southern elevation, and again illustrates the proposed development's leaning form, which inclines away from the ToL and into the folds of the City Cluster.
243. No objections have been received in relation to this LVMF view.
244. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the proposal, which would only be glimpsed as part of the north easter periphery of a consolidating Cluster, it would not undermine the composition and characteristics of the view or those landmark elements. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it.
245. The height and location would relate well to the existing Cluster buildings, stepping down to the north, and set in behind other prominent buildings like 40 Leadenhall Street. As such, the siting, height, and scale, set a significant distance from the WHS and would respect the setting of the Tower and not dominate it, in accordance with LVMF visual management guidance at paragraphs 414-415. The proposal would preserve the relevant attributes of OUV and those associated components. The proposal would not affect the foreground/midground of the views or the close relationship with the River Thames and principal setting from this iconic view (LVMF SPG para 416-417). It would not appear in the background of the ToL, preserving the sky-backed Protected Silhouette between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct juxtaposing urban forms, in accordance with the visual management guidance (paragraphs 57, 418-422) and guidance contained in the Local Setting Study.
246. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57).

247. The proposal would help to reinforce and make more legible the relationship between two related skyline identities. The proposal would not affect the fore/middle grounds of the views, or the close relationship with the River Thames and principal setting of this iconic view (SPG paras 416-417). It would not appear in the background of the ToL preserving the sky-backed Protected Silhouette of the ToL between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct, juxtaposed urban forms, in accordance with the visual management guidance (SPG paras 418-422) and relevant parts of the LSS. The proposal would preserve the relevant attributes of OUV and their associated components preserving the relationship with the River, the City, and the iconic form, silhouette and 'dominance' of the White Tower.
248. In nighttime experiences, including those from LVMF 10A.1, the proposed lighting would appear subdued, with lower levels of illuminance than existing developments. This is achieved because the design of the building is significantly more solid in its elevational treatment than others in the Cluster, and the depth, staggered and solid nature of the eastern elevations terraces which would reduce the emittance of light from internal office floors and terraces. A lighting condition which restricts the levels of illumination and requires the local planning authority to assess the technical lighting design to ensure a satisfactory external appearance in sensitive viewing experiences such as this, would also be applied to this consent. Overall, in baseline and cumulative scenarios no single development within the Cluster would dominate the nocturnal skyline and the cluster would remain distinct from the prominence of the ToL and the darkness of the river would be preserved.

Other LSS Views:

Inner ward Tower Green

249. The LSS Inner Ward views are deemed to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. The LSS aims to maintain views illustrating the living tradition of the WHS, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls, where the relationship between the scale of individual buildings can be appreciated.
250. Under 'key issues' the LSS states that tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or affect the scale of the enclosing historic buildings. The associated 'Objectives and guidance' states that development should (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.
251. The LSS acknowledges the Inner Ward to have a range of views, and the submitted application provides a comprehensive assessment of the visual impact on this place. Being entirely occluded behind the Chapel of St Peter ad Vincula, the proposal would not be visible from the Scaffold Site viewpoint

(LSS view 1, HTVIA View 13). It would be visible (along with the existing towers of the Cluster) to varying degrees from other places within the Inner Ward. From the south east corner of the green (HTVIA appendix View E), the top floors of the tower would appear beyond the western end of the Chapel, the background of which is characterised by the existing, layered background of tall buildings within the City. From the northeast corner of the Green (HTVIA appendix View F) the upper floors, and the leaning elevation of the tower would be glimpsed, at considerable distance, between the western end of the chapel and the range of buildings which enclose the Green's western edge. In views from the eastern edge of the Green, aligned with the southern elevation of the White Tower (HTVIA appendix View G), the tower would be glimpsed beyond the western end of the Chapel, not rising above its roofline, and as above, be experienced at great distance in conjunction with layers of townscape including tall buildings within the City. In these occasional instances, the level of visibility of the proposed development is minor and fleeting, and at such a distance to be entirely dissociated from the intimate and historically rich character of the Inner Ward, and the dynamic viewing experiences which characterise and reveal the significance within it. At no point would one's appreciation of the historic composition of Tower Green or the outstanding palace buildings of the inner ward be altered; or the Towers unique sense of place, apart from the city, be detracted from.

252. Where visible, in both baseline and cumulative scenarios, the proposal would appear as a subsidiary, recessive edge component of the Cluster. Its deeply modelled, calm geometric architecture would shed rather than draw attention, especially when contrasted against the larger existing forms of the Cluster. As such, the proposal would maintain that balanced, deferential relationship between WHS and the Cluster and the recessive, occasional presence of the latter in the Inner Ward views.
253. In accordance with the guidance in the LSS, the proposal would (i) respect the distinct sense of place and the pre-eminent stage in which those rich traditions would continue to take place and (ii) allow those enclosing Inner Ward buildings to remain the focus of the observer. It is considered that the iconic, strategic landmark siting and dominance of the White Tower would be unchanged in relation to OUV attributes and components, while the relationship between the WHS set away from the City beyond would be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct, long-established backdrop entity.
254. No objections have been raised with respect of these viewing experiences.

Inner curtain wall south:

255. Views from the Inner Curtain Wall were assessed. The guidance in the LSS recognises it as a 360 degree viewing experience where the aim is to maintain an appreciation of the Tower as a riverside gateway, the historic relationship between the Tower and the river, whilst under the associated guidance seeking

to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond.

256. From the identified viewpoints from the south section of the Inner Curtain Wall (HTVIA View 12) looking northwards, the proposal would appear immediately to the north of the Gherkin – significantly below its apex, and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the existing cluster. The height and leaning profile of the proposal would ensure it reads as a contextually sensitive and responsive endpiece to the northeastern edge of the Cluster, receding down in height from taller buildings within the centre, to the smaller scaled developments on its fringes. As such, it would assist in consolidating the Cluster's distinct urban form and separate, long-established identity.
257. With its substantive, rock-built architectural presence, the White Tower would continue to command the foreground of these views, while views to the scaffold site, and the WHS's relationship with the river would remain undiluted by the proposal. The LSS recognises that 'modern buildings provide a clear contrast between the historic Tower and contemporary city outside its walls' – an acknowledgement of the concept of the contrast between ancient and modern buildings helping to reinforce one another's presence and contributing to the Landmark Siting attribute of OUV as a gateway to the City, and the component of this which is the established relationship between the WHS and the City beyond.
258. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Inner curtain wall north (east and west):

259. The LSS, in assessing views from this place, acknowledges that this is a 360-degree experience and demonstrates a 'clear contrast between the historic Tower and the modern city outside its walls.' The identified aim is to (i) maintain views that reveal the relationship between the Tower and the City and (ii) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' it recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting, stating that such buildings, under the associated guidance, should continue to reveal the historic relationship between Tower and City and that clear views of the concentric defences should be preserved.
260. From the identified viewpoints from the north section of the Inner Curtain Wall, to the west and east (HTVIA Views 15 and 14 respectively), looking northwards, the proposal would appear immediately to the north east of the Gherkin and Heron Tower and, in the cumulative scenario, the consented scheme at 100 Leadenhall Street, all off of which it sits at significant height below. Of a clearly modern architectural form and design, it would be clearly visually disassociated and distant from the WHS and be read as part of the

existing Cluster. The height and sloping profile of the proposal would ensure it read as an eastern endpiece to the Cluster. It would assist in consolidating the Cluster's distinct urban form and separate, long-established identity. The concentric defences would remain pre-eminent and their appreciation undiluted.

261. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Main entrance:

262. The LSS acknowledges that this is a 360-degree experience which reveals the 'Tower's relationship to the river Thames and the City and emphasises the Tower's defensive architecture. The identified aims are (i) to maintain views which reveal the relationship between the Tower, the river to the south and the City to the north and (ii) enhance appreciation of the medieval military architecture of the Tower.
263. In the view from the Main Entrance (HTVIA View 11), the proposed building, appearing to the northeast of the existing 40 Leadenhall Street tall buildings and substantially lower than it, would consolidate and strengthen the eastern profile of the Cluster. In the baseline and cumulative scenarios, both the Tower's relationship with the City and Thames and the qualities and pre-eminence of its defensive architecture and their appreciation would remain undiluted.
264. Under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Other views and approaches:

265. In other the views and approaches to the WHS identified in the LSS, the proposal, though visible, appears as a peripheral feature on the skyline some distance from the WHS. The City Cluster has become an integral, long-established part of the setting and views of the WHS and the proposal would be consistent with this. In these other views and approaches, under both baseline and cumulative scenarios, the proposal would preserve the relevant attributes and components of OUV and comply with the guidance in the LSS.

Conclusion on the Tower of London World Heritage Site

266. The proposal would preserve the OUV of the WHS and the ability to recognise and appreciate the WHS as a Strategically Important Landmark and would accord with the visual management guidance in the LVMF SPG.
267. The proposal's relationship with the WHS has drawn strong objections from Historic England and Historic Royal Palaces; whilst giving great weight to

these representations, officers simply cannot see that harm would be caused and reach a different conclusion. At the heart of the matter are differences in opinion on the visual resilience of so famous a monument as the Tower and the ability of the average viewer to be capable of discerning between ancient and modern entities in the same field of view, comprehending the visual proximity and physical distance involved, and appreciating them individually and as part of an overall skyline.

268. The proposal's striking, raked angle or 'lean' into the Cluster is a clear and appropriate response to the sensitive view from Tower Bridge; here, as for so many other Cluster schemes, the World Heritage Site has clearly and fundamentally influenced the design approach, interpreting OUV in line with the explicit direction in London Plan policy HC2.
269. Perhaps most fundamentally, officers consider that, for all the reasons set out in preceding paragraphs, the evolving City Cluster, and therefore the proposal, is consistent, in principle, with the ancient dynamic between Tower and City which is particularly enshrined in the OUV attribute 'Landmark Siting'. The proposal would appear as a new element of the Cluster, with varying degrees of prominence in the views of the Tower, but officers, for the reasons set out in the preceding paragraphs, do not consider that it would upset the balance of this existing relationship and cause harm to the WHS in the way objectors have claimed.
270. As such, the proposal would not harm the setting or significance of the Tower of London, whether in relation to the WHS or any of the component heritage assets which comprise it. The proposal would not harm the attributes and their components and would preserve the Outstanding Universal Value and significance, authenticity and integrity of the WHS, in accordance with Local Plan policies CS12, CS13 (3), City Plan 2040 policies S11, HE1, HE3, London Plan policy HC2 and HC4 and the associated guidance in the World Heritage Site Management Plan, Local Setting Study, LVMF SPG and CoL Protected Views SPD. Although Officers conclude that the proposal would not harm the setting or the OUV of the WHS, for good practice, DCMS have been notified about the scheme (see paragraph 172 of the Operational Guidelines for the Implementation of the World Heritage Convention).

London View Management Framework (LVMF) Impacts

271. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's identity and character at a strategic level.
272. The site is located on the northeastern periphery of the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital (paras 57 / 87 / 129 / 130 / 144 / 146 / 187). It is considered that the Cluster aids the observer's appreciation of the wider geography of London as a recognisable and important landmark. Officers consider it symbolises the

historic commercial and economic heart of the capital, important in reading the wider socio-economic and cultural topography of London.

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

London Panoramas

274. Designated London Panoramas at View 1A (Alexandra Palace), View 2A.1 (Parliament Hill), View 3A.1 (Kenwood), View 4A.1 (Primrose Hill), View 5A.1 (Greenwich Park) and View 6A.1 (Blackheath Point) are all assessed in the submission. In views from the north, the magnitude of change in these broad panoramas is considered negligible, with the site being almost fully occluded by other development. From views in the south, the proposed development would be more readily visible, though experienced as a smaller, more peripheral built element stepping down in height from the apex of the Cluster, and forming its northern peripheral boundary. In all viewing experiences, it would accord with the visual management guidance by fitting within the prevailing pattern of buildings, consolidating the City Cluster which is identified as a landmark in these views, preserving their composition and the viewers' ability to recognise and appreciate the Strategically Important Landmarks, including St Paul's Cathedral.

River prospects

275. Officers have assessed the extent of visibility of the proposed development in LVMF river prospect viewing experiences, both at pre-application and application stages. In views from the west, owing to the location of the site on the north eastern edge of the City Cluster, in the majority of these views, the proposed development would be fully occluded by tall buildings and other built development, which sit in-between the view point location and the site.
276. Views LVMF 15B.2 Waterloo Bridge (HTVIA View 2) and LVMF 16B Gabriels Wharf (HTVIA appendix view P) demonstrate that where the development would be visible, at considerable distance, through minor gaps in the Cluster, the level of visibility would be inconsequential/minor and fleeting, where only a glimpse of the south eastern diagonal elevation would be registered. The magnitude of change in these broad viewing experiences is considered negligible, as the proposed development would be read, albeit in a limited number of places, as a background layer within the existing composition of the City Cluster – at great distance from the strategically important landmark/s in these views – resulting in no change to their overall composition. As such, the proposed development would not obscure or detract from any identified landmark element in these views and would give further context to those relevant Cluster landmarks identified in the SPG. The proposal would entirely preserve the ability to recognise and appreciate St Paul's, strengthening the composition and coherent urban form of an existing tall building cluster and

would not obscure or detract from a landmark feature, in accordance with the visual management guidance SPG.

Summary of LVMF Impacts

- 277. There would be some minor enhancements to the London Panoramas through the proposal's consolidation of the northeastern edge of the City Cluster. During both day and night viewing experiences, the development will be perceived as a constituent element within the composition of the Cluster and would not command the focus within these views or distract unduly from other elements of their composition but be visually compatible with them after dark.
- 278. The proposal would not harm and would make some positive contributions to the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks (St Pauls and ToL), in accordance with , London Plan Policy HC4, Local Plan Policy CS13 (1), emerging City Plan Policy 2040 S13, and guidance contained in the LVMF SPG.
- 279. The proposal would not harm the characteristics and composition of strategic views and would preserve St Paul's Cathedral and the Tower of London as the Strategically Important Landmarks in LVMF views.

City of London Strategic Views

- 280. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new built development.

St Paul's

- 281. The proposal is not located within the St Paul's Heights grid, would not be visible and would be out of scope of many of the Viewing Points identified in the Protected Views SPD (fig. 3).
- 282. It would be visible to minor degrees in the kinetic riparian sequences along the South Bank and from the Thames bridges, where its impact would be as described in the sections above on Waterloo Bridge and Gabriel's Wharf. The proposal would appear between existing Cluster towers or be screened by them and is located on the other side of the Cluster to the Cathedral. It would be a comparatively marginal presence in these views and would not affect the sky space between the Cluster and Cathedral or intrude into its backdrop.
- 283. The proposal would be concealed by towers along Bishopsgate, including No.88 and No.110, such that it would entirely occluded in views from Fleet Street and Ludgate Hill and the Golden gallery of the Cathedral.

284. The proposal would cause no erosion of the setting of the Cathedral and would be consistent with Local Plan policy CS13 (2), draft City Plan 2040 policy S13 and associated guidance in the Protected Views SPD and LVMF SPG.

The Monument

285. The proposal site is outside the spatially defined views from the Monument which are protected under Local Plan policy. The proposal would be completely obscured in views from the north of the Monument viewing gallery; it would not be in the Monument's 'Immediate Setting' and would not therefore harm or obstruct important views from afar or locally.

Neighbouring Borough Views

London Borough of Tower Hamlets:

286. Adopted Tower Hamlets Plan 2031 Policy D.DH4 (c) and Figure 6 identifies designated local views. Two are of relevance here, first LBTH View 2 from the Wapping Wall bridge, and View 7 (towards ToL). The later corresponds with LVMF view 25A.1 and LSS View 10 – assessed at length above.
287. View 2 (HTVIA appendix view J) from the Wapping Wall bridge at the entrance to the Shadwell Basin provides a clear space over which the historic church spires of St Paul's Shadwell and St George in the East can be viewed. The City Cluster is visible to the west and left-hand side of the view, detached from the local context. In baseline and cumulative scenarios the proposed development would be visible beyond the buildings enclosing the basin, forming part of the northern periphery of the City Cluster, at a considerable distance to the south west of the churches identified in this view. While the proposals would mark a change in the composition of the view, with new built form being registered, it would wholly preserve the prominence of local designated landmarks and designated view 2, in accordance with LBTH Policy D.DH4.
288. London Boroughs of Camden, Islington, Hackney, and Southwark, were all consulted and have made no comment.
289. The proposal's appearance in views from neighbouring boroughs has been considered, and assessment on the proposals impact in views of heritage assets is detailed below.

Historic City Landmarks and Skyline features:

290. The proposal would have the potential to affect views of historic City Landmarks and Skyline Features which, in accordance with CS13, should be protected and enhanced. These are addressed individually below:

Port of London Authority

291. The proposal would be visible in views of the former PLA building, forming part of a backdrop of tall buildings of the Cluster when seen from various points,

including the South Bank, Queens Walk Trinity Square, Tower Hill and from Tower Bridge. Officers consider that the proposal would read as a discreet edge component from the Cluster, clearly set apart from the PLA Building. While visible in relation to PLA, due to the considerable distance between the buildings, the proposed development would not conflict, compete or detract from the PLA Building's silhouette and its skyline presence would be preserved.

St Botolph of Aldgate

292. As a component of the Cluster's eastern edge, the proposal would be visible in views of this church looking west and there would be intervisibility between the proposal and the brick tower and obelisk spire (HTVIA View 17). At some visual distance with high levels of sky space intact in between, the proposal would rise to the base of the spire and form a modern element behind and to the south of the church when viewed from the junction of Minories and Aldgate High Street. The proposal would clearly be read as part of the modern Cluster seen in the backdrop to the church, rather than appearing overly close or domineering. As such, the church's skyline presence would be preserved in its entirety.

Tower Of London

293. The proposal would be visible in views from and of the WHS, which have been discussed in greater detail above. Within these views, it has been found that the visual impact of the proposal would be acceptable and for the reasons set out in the paragraphs above, it is considered that views of this Landmark are considered preserved.

Tower Bridge

294. The proposal would be visible in relation to Tower Bridge along the South Bank of the River, from Butler's Wharf (HTVIA View 7). From this location, the proposal would be seen forming the northern edge of the City cluster, to the north of the Bridge, appearing on the northern periphery of the cluster in this view, where there would be a high degree of visual separation with Tower Bridge. Views of this landmark outside the City are considered preserved.

All Hallows by the Tower

295. The proposal would be visible in relation to the spire of the Church of All Hallows by the tower in views across the river at Queens Walk (HTVIA Views 4-6) and from Tower Bridge. However, in no instance, due to the developments sites location to the north and the considerable distance between the two, would the proposal alter the ability to appreciate the skyline presence of the spire. The church's skyline presence would therefore be preserved in its entirety.

Royal Exchange

296. The proposal would be seen together with Royal Exchange (HTIVA View 3) but almost entirely screened by tall buildings to the north east, with the exception of a small portion of the south eastern elevation. However, in both the baseline and cumulative scenarios, officers consider this change to be minor and consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. Thus, the skyline presence of this City Landmark is considered preserved.
297. The proposal would preserve views of all relevant City and non-City Landmarks and Skyline Features and comply with CS 13 (2) and emerging City Plan 2040 S13 and associated guidance in the Protected Views SPD and LVMF SPG.

Conclusion on Strategic Views

298. The proposal has been sited in an established nucleus of tall buildings of the north eastern periphery of the City Cluster, seeking to consolidate strategic growth in areas with the least impact on pan-London and strategic views. In doing so, the proposal would preserve strategic views of and from the Tower of London World Heritage Site and the Monument, and of St Paul's Cathedral and its setting and backdrop.
299. In its north-eastern peripheral role in consolidating the Cluster, the proposal would be a minor enhancement of the composition and characteristics of LVMF London Panoramas.
300. The proposal would preserve the characteristics and compositions of all relevant LVMF and other strategic pan-London views.
301. It would preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral would preserve neighbouring borough views and would preserve views of relevant City Landmarks and Skyline Features.
302. Following rigorous assessment, the proposal would preserve all relevant strategic views in accordance with Local Plan policy CS13, emerging City Plan Policy S13, London Plan Policy HC2, HC3 and HC4, GLA LVMF SPG, City of London Protected Views SPD and neighbouring local view policies and guidance.

Heritage

303. Objections to and comments on the impact of the scheme on settings of heritage assets have been received from Historic England, as well as other third parties. Officers have considered these representations carefully and afforded them considerable importance and weight. Where officers disagree with views expressed by statutory consultees, clear reasoning has been provided in this report.

Direct and Indirect Impacts

Churchyard of St Augustine Papey (non-designated heritage asset)

Significance and contribution of setting

304. All churchyards in the City are considered to be non-designated heritage assets. The former churchyard of St Augustine Papey has been assessed against the criteria in Historic England's Advice Note 7 'Local Heritage Listing'.
305. The churchyard is of a significant asset type which provides a direct and tangible connection with past City communities as well as forming evidence for the extent of medieval piety within the City. The churchyard is of comparative rarity as one of a number of surviving ancient burial grounds in the City of London. It is of extraordinary age, first recorded in 1348.
306. The churchyard is of very clear and significant archaeological interest as likely harbouring an intact set of burials from the medieval period – possibly earlier – until the nineteenth century. In this it has deep historic interest, not just through this direct connection with past City communities, but also for its associations with two lost medieval churches, for which it now forms the only physical evidence in the townscape: St Augustine Papey, for which it was laid out, and St Martin Outwich, which acquired the churchyard after the Reformation, the former church being dissolved by and then demolished after the Reformation, and the latter church being demolished in 1874. It also possesses historical interest as one of a small number of burial grounds located on the City wall.
307. The churchyard derives minor architectural and artistic interest only from its ancient spatial dimensions (including its raised level) and lone, re-set tombstone; its lacklustre modern re-landscaping being otherwise devoid of interest; this also results in limited landmark status, though churchyards are traditionally focal points of openness and respite in the street scene.
308. As such, it is considered that there is an opportunity for the enhancement of its architectural and artistic interest and landmark status and in so doing, enhancement of its group value with the extent collection of City churchyards, which have group value with one another; even when there is no specific intervisibility with others, there is a sense of group value as they are experienced by the pedestrian moving through the City.
309. The buildings in the setting of the churchyard are wholly modern and these make no contribution to its significance. However, a very important part of its setting is the churchyard's ancient relationship to Camomile Street and the wider street network. It is considered that there will be enhancement here, too, through reviving and better strengthening the spatial definition and aesthetic of the churchyard.

Impact

310. The proposals would involve the excavation and relandscaping of the churchyard and development within its setting; both direct and indirect impacts. The following assessment considers both the above-ground traits of the churchyard and impact upon its archaeology.
311. Historic England consider that the proposal would cause the total loss of the non-designated heritage asset. As set out in the following assessment, officers strongly disagree with this conclusion, which fails to recognise that the churchyard consists of two distinct components: its below-ground archaeology and its above-ground form, spatial delineation and ancient presence in the streetscape. While the former component would be removed by the proposals, the latter would not only remain but also have its legibility, appearance and accessibility enhanced.
312. The proposals would involve cantilevering over the churchyard at level 6. Floating, lightweight walkways and galleries would be located below this, though a triple height space would still be maintained above the churchyard. The significant distance above the churchyard of this cantilevering, together with the general sense of openness that it would create in relation to Camomile Street more generally, would ensure that the churchyard retains an openness and airiness; it would also gain a greater sense of seclusion and shelter, appropriate in view of the quality and character of churchyards as havens from the modern world.
313. Currently the level of the churchyard is raised above ground floor level, and the proposals would reduce its level to be flush with the street, framed and delineated by low masonry walls, its formerly raised level maintained and evoked by the two raised beds facing Camomile Street. This reduction in level would make the churchyard more accessible while preserving (and slightly regularising) its ancient footprint and extent; the distinctive angled profile to Camomile Street would be maintained. The low masonry walls would better define the extent of the churchyard and this would result in a low level of enhancement to its significance.
314. As set out in the section on archaeology below, the proposals would involve the excavation of the churchyard and so the complete loss of its archaeological component. This is discussed and assessed in more detail in the archaeology section below. Importantly, this impact would be mitigated through the use of conditions to extract the maximum possible learning, outreach and opportunities for interpretation from the discoveries therein.
315. Within the churchyard, the two raised beds facing Camomile Street would incorporate trees and other planting, while the rest of the space would incorporate seating and an artwork reflected in a striking plane of mirrored steel above. Details of all these features, and elements of historical interpretation would be secured via condition, but it is anticipated that the artwork would incorporate themes and motifs to reflect the churchyard's ancient history and function. In so doing, this would result in a low level of enhancement of the ability to appreciate the churchyard's significance, through the provision of much greater and more accessible historical interpretation and information.

316. In the north-east corner, the remains of the Roman and medieval City wall would be revealed and exposed to view, reinstating a visual connection between the churchyard and the wall and a very important part of its setting, albeit in a way which is new and clearly modern. Nevertheless, this would represent a low level of enhancement to the setting and significance of the churchyard.
317. The proposals would represent a striking and entirely sympathetic reimagining of this important non designated heritage asset, one that would, most importantly, enhance its relevance to the modern City by increasing its usability and accessibility and better revealing its significance.
318. The proposals would involve the removal of the archaeology, but this impact would be mitigated by the use of conditions to secure learning, outreach and recording and various enhancements to its significance through its relandscaping, stronger definition and reinstatement of its relationship with the Roman and medieval City wall.
319. NPPF para 216 requires that the effect of an application on the significance of a non-designated heritage asset be taken into account, with a balanced judgement required, having regard to the scale of any harm or loss and the significance of the heritage asset.
320. It is considered that the loss of the archaeology, would be mitigated in the customary way through conditions, and that overall there would be a moderate level of enhancement to the non-designated heritage asset, because the proposals would enhance its architectural and artistic interest through the new, more contextual landscaping treatment and its landmark status through the strengthening of its visual and spatial relationships with Camomile Street and the Roman wall SAM.

London Wall: remains of Roman wall and bastion, Camomile Street (Scheduled Ancient Monument (SAM))

Significance

321. The SAM is located beneath 63 St Mary Axe and comprises, as the scheduling record makes clear, a section of the Roman and medieval City wall and bastion. However, it is known from previous excavations that much of this section of the wall and bastion has been previously removed through excavation. Nevertheless, as a part of a defining feature of the City of London, of ancient Roman origins and incorporating medieval fabric, the monument is of outstanding architectural, historic and archaeological interest.

Setting

322. The SAM at present is completely concealed within the basements of the existing building on the site, as though hermetically sealed off from the rest of the City; it therefore presently draws no contribution to its significance from its setting, nor is it visible at all for its significance to be in any way appreciated.
323. There is a clear opportunity for a redevelopment of this site to remedy and enhance this situation. The SAM was erected as a highly conspicuous and defining feature of the City's urban structure and would have had a clear relationship with various buildings, streets and spaces – most pertinently the streets immediately adjoining the site and the burial ground since it was founded – over the centuries of its above-ground existence. There is a clear opportunity to re-establish at least some of these ancient relationships.

Impact

324. The proposals would involve direct works to the SAM and indirect impacts on its setting: the revelation, conservation and public display of the wall in-situ. As the precise nature and extent of the wall, its state of preservation/conservation and general condition are unknown, these aspects of the proposals will be developed in detail through the use of conditions at the appropriate stages of the demolition and construction process.
325. Historic England consider that harm could directly be caused by exposing the wall to the wider environment, though this harm could be 'adequately limited' through appropriate conservation, suitable environmental controls and ongoing management; they consider that in these circumstances the significance of the monument could be enhanced. Officers concur that the revealing of the wall, suitably conserving it and creating a stable environment in which it may be viewed and appreciated would be an enhancement.
326. Historic England further perceive that the scheme would result in the 'complete removal' of the churchyard and that this would cause harm to the setting of the SAM. For the reasons set out above in the section on the churchyard, officers disagree with this conclusion, failing as it does to acknowledge that overall the churchyard would be enhanced.
327. Officers further consider that the proposals would revive the ancient visual relationship between the SAM and the churchyard – albeit in a new and clearly modern way – and that, in turn, each would enhance the setting of the other. This would represent a low level of enhancement to the setting and significance of the SAM.
328. Overall, subject to the conditions set out below, the proposals would preserve, and result in an overall low level of enhancement to, the setting and significance of the SAM.

Indirect impacts

38 St Mary Axe (The Baltic Exchange): Grade II

Significance

329. The Baltic Exchange has historic interest as an inter-war office building (1922) in the City designed by noted British architect Sir Edwin Cooper. This stone-faced building of four storeys with two additional attic storeys illustrates an important phase of office development in the City, characterised by grand, classically enriched stone facades and Classical proportions to St Mary Axe, with a plainer stone elevation to Bury Court.
330. Architectural and artistic interest derives from an appreciation of the Classical style and ornamentation of the building, including a Doric entablature at the ground floor and an enriched frieze and dentil cornice at the fourth floor.

Setting

331. The setting of the listed building is defined by its prominent corner location, addressing both St Mary Axe and Bury Court. Its immediate setting includes office buildings of similar scale, adjacent to the north and to the west side of St Mary Axe, of a later date that make a neutral contribution to the setting of the listed building, as well as significantly larger and taller modern commercial buildings in contrasting materials and architectural styles.
332. Due to its location in the City Cluster, the setting of the listed building is mainly characterised by large-scale, tall modern commercial buildings that make a neutral contribution to the asset's significance. These include 30 St Mary Axe, directly to the south of the asset, but also the Aviva Tower and 22 Bishopsgate, to the south-east. Additional tall buildings in the visible setting include 70 St Mary Axe to the north, as well as 90 Houndsditch and 100 Bishopsgate to the north-west.

Impact

333. In views looking north-west from Bury Street the proposed building would be highly visible above the listed building. However, the background of the listed building is at present characterised by the distinct presence and visibility of both 100 and 110 Bishopsgate towers. In views north along St Mary Axe the proposed building would be highly prominent, infilling a sky gap between 70 St Mary Axe and 100 Bishopsgate.
334. Although of a closer proximity and prominence, the proposed development would be consistent with the much-altered setting of the listed building which is characterised by tall, modern development. As such, the listed building would not be impacted by the proposed development, which would preserve the setting and significance of the listed building and the ability to appreciate it.

Church of St Helen Bishopsgate (Grade I)

Significance

335. The Church of St. Helen's at Bishopsgate (Grade I) is a rare survival of a medieval building in the City of London. Uniquely, it combines a nunnery church and a parish church side by side. The Church dates back to a Benedictine priory for nuns which was founded in 1210. While most of the outer structure dates from the 13th century, there are elements from the 12th, 14th, 15th, and 16th centuries. The church is of outstanding architectural, historic and archaeological significance. It is one of the City's few surviving pre-Fire buildings.
336. It is built of partly rendered rubble, brick and ashlar. In 1992 and 1993 IRA bombs caused damage to the church. Despite some reordering of the interior, many internal fixtures and decorative elements installed in the 15th to 19th centuries have survived and contribute to the building's historic interest and significance.

Setting

337. The churchyard to the west contributes positively to the significance of the listed building. From the west, the church's immediate setting comprises a group of 19th and 20th century buildings, with the tall buildings of the City Cluster providing a long-established, dramatic contrast in scale and materiality immediately to the south and west. The Gherkin is prominent behind the church in views looking east. There is a narrow slice of clear sky above the church between the Gherkin and No. 1 Undershaft obscured by a prominent tree in the churchyard.
338. Due to its location within the City Cluster, the setting of the church has changed considerably over the last 50 years. There is a pronounced contrast between St Helen's Church and the modern tall buildings of the City's Eastern Cluster, which lie in close proximity to the church. This includes the St Helen's Tower (formerly Aviva), the Leadenhall Building, 30 St Mary Axe, Tower 42, 100 Bishopsgate and 22 Bishopsgate, to the north and south. The setting of the church today is characterised by these long-established contrasting modern buildings that characterise this part of the City of London townscape. The juxtaposition between the historic church and the surrounding tall commercial buildings emphasises the venerable historic character of the church, albeit in a way unrelated to heritage significance and setting.

Impact

339. The GLA has identified a very low, less than substantial degree of indirect harm to the setting of the Church of St Helen's.
340. In HTVI view 22, looking north-east to the church from Great St Helen's, a segment of the proposed building would appear layered behind the mid-rise and modern rear façade of the St Helen's Place buildings and behind and to the side of the existing 100 Bishopsgate Tower. The view, and church setting here is framed to the south by the tall and assertive presence of the Gherkin - 30 St Mary Axe. Views of the proposal would be partially occluded by the churchyard trees when in leaf but would have greater visibility in winter months. The setting of the church in this view is predominantly of much taller,

modern forms and the proposed building would be an augmentation of this. As such, officers disagree with the GLA's position and conclude that the elements of the setting that contribute to the significance of the listed building would not be negatively affected by the proposed development. The proposed development is therefore not considered to harm the setting nor the significance of St Helen Bishopsgate.

46 Bishopsgate (Grade II) and 48 Bishopsgate (Grade II)

Significance

341. 46 Bishopsgate is a 5-storey mid-18th century narrow-fronted townhouse, refaced in the 19th century and with timber shopfront. Notable historic interior elements survive. Its significance lies in its rarity of age and typology along Bishopsgate which has since undergone huge evolution in building styles, types and ages.
342. 48 Bishopsgate, adjoining to the north is a stone-faced, highly ornate late-19th century purpose built commercial building. The building is architecturally significant for its rich façade, standing as a flamboyant, yet relatively small-scale example of the Second Empire architectural style.

Setting

343. Both buildings sit within a row of greatly contrasting built elements. 42-44 to the south is a 6-storey mid-20th century concrete tile and mirrored glass faced office development. To the north is a small scale c19th century infill building, which complements no. 46 in scale, style and materials. Adjoining further north is the vast classical-styled Portland stone expanse of Hasilwood House. Framing the row is a context of tall modern buildings in both the foreground and background and wider setting. These include 22 and 100 Bishopsgate either side, with Tower 42 and 99 Bishopsgate also providing a visible presence. As such, the existing setting is considered to be characterised by both the buildings' component nature as part of this row of contrasting building facades, and by the presence of very tall modern development. As part of this townscape group, the contribution of setting to the appreciation of significance of the listed buildings is limited to a neutral degree. Furthermore, the existing site building is not visible and does not contribute to the setting at present.

Impact

344. The proposed development would have limited visibility in the backdrop of 46 and 48 Bishopsgate, visible only when looking north up Bishopsgate from the junction with Threadneedle Street. Here a segment of the proposal would appear above the listed buildings in between the flanks of 22 and 100 Bishopsgate, before quickly disappearing when moving in any direction. The proposal would not affect the composition of the row of which the listed buildings form part and would accord with the component of character relating to the presence of tall buildings. The proposal would not occlude views of the listed buildings at any point. In conclusion, there would be no harm to the setting or significance of the listed buildings, preserving the extent to which setting contributes to an appreciation of their significance.

Bishopsgate Institute and Library (Grade II*)

Significance

345. The building provides a prominent and distinctive frontage onto Bishopsgate with twin turrets faced in highly decorative buff terracotta. The remainder of the building sits behind the adjoining buildings with a red brick and terracotta trim side elevation and secondary entrances along Brushfield Street and Fort Street. Completed in 1895 by Charles Harrison Townsend, the building retains rarity value as a more unusual typology within the city, through its civic and educational function. The use of free gothic elements and terracotta detailing are typically eclectic, making a high-quality example of turn of the century design. The building has high architectural and historic significance.

Setting

346. The building derives a degree of significance from its setting on the south side of Brushfield Street, where it forms a group with two eighteenth century grade II listed buildings, and from its street frontage along Bishopsgate, where in close to mid-range views the building's turrets and ornate frontage are best appreciated. In longer range views from the north the institute is experienced obliquely, with the turrets of the main frontage almost entirely backdropped by tall buildings within the City cluster. The existing buildings on the development site are not visible from or with the listed building and therefore make no contribution to setting.

Impact

347. In views looking southward along Bishopsgate the proposed building would be visible some distance away adding to and complementing the established backdrop of the City Cluster. In views looking south along Bishopsgate. The Institute turrets are currently backdropped by other tall buildings such that the proposed building would not interfere with views of the turrets against open sky. The proposal is considered to preserve the overall character of the view, and the extent to which it contributes to the building's significance. It is noted that more immediate views of the Institute, which best reveal the building's prominence on the street front, and group value with neighbouring buildings would be preserved.
348. In conclusion, there would be no harm to the setting or significance of the listed building, preserving the extent to which setting contributes to an appreciation of its significance.

10 Brushfield Street (Grade II) and 14 Brushfield Street (Grade II)

Significance

349. The listed buildings at 10 and 14 Brushfield Street, both have historic and architectural interest as late 18th century townhouses with stock brick symmetrical facades and timber shopfronts and sash windows at the upper floors.

Setting

350. The buildings derive a degree of significance from their setting. The development which surrounds the listed buildings is mixed in terms of age,

style and scale. Both buildings form part of a terrace (nos. 8 to 14) on the southern side of Brushfield Street, with buildings of similar style and appearance. The unlisted buildings of this terrace at nos. 8 and 12 make a positive contribution to the setting of these listed buildings.

351. Modern development in the immediate setting of the assets include the 11-storey building at 250 Bishopsgate, to the north of Brushfield Street. This development does not contribute to the significance of the assets.
352. The wider setting of the listed buildings includes the presence of tall buildings in the City Cluster, partly visible in views of the assets looking from the north to the south-west. These buildings do not contribute to the significance of the assets. There is currently no intervisibility between the existing building on the application site and the listed buildings on Brushfield Street.

Impact

353. The proposed development would be partially visible in some views of the assets, when looking south towards the Cluster. When visible, the proposed development would align with the existing character of these views, which already include tall modern buildings. The immediate short-range views along Brushfield Street where the listed buildings are mainly appreciated would not be negatively affected by the proposed development. The relationship of the assets with the elements of their setting that contribute positively to their significance would be retained. The proposals would preserve the setting and significance of the listed buildings and the ability to appreciate them.

Devonshire Square group including: Port of London Authority's Warehouses and boundary Walls to Middlesex Street and New Street (Grade II); 12 and 13 Devonshire Square Grade (II); Pair of houses north of entrance to Port of London Authority's Warehouses (Grade II); House to east of entrance to Port of London Authority's Warehouses (Grade II); Gatepiers at entrance to Port of London Authority's warehouses (Grade II)

Significance

354. This group is centred around the late 18th century Port of London Authority warehouse buildings surrounding a now-enclosed central courtyard space and including listed gate piers. The listed houses surrounding the warehouses are four-storey terraced townhouse type, all constructed of stock brick. Significance of the warehouse complex is considered to derive from it being an extensive yet rare example of 18th century purpose-built warehousing within the City, although much altered internally preserving distinctive built forms and facades. It has historic significance with its links to the shipping industry and the East India Company. The warehouse interiors have been much altered following conversion to office space in the late-1970s. The houses are all surviving examples of flat-fronted 18th century City townhouses, typical of the Georgian style, and rare within this portion of the City. Devonshire Square itself is the name of the space to the south of the warehouses and contains Grade II Listed nos 12 and 13 on its north side, which are significant as examples of remaining Georgian townhouses with well-preserved facades.

Setting

355. This group of grade II listed buildings is located approximately 90m north of Devonshire Square and derives a moderate degree of significance from their setting. The warehouse complex itself is irregular in plan, partly formed around a large central courtyard which was enclosed by a roof in 2006. Other external courtyards exist to the north of the main warehouse building, covered with flagstones and tree planting, and allowing views and appreciation of the altered, but distinctive brick faced warehouse facades. The spatial arrangement of the warehouses seen together with the enclosed, and now landscaped open spaces surrounding them, allow an appreciation of the buildings' scale, forms and historic purpose as part of London's port and trading history. The entrance townhouses form a characterful and historic framing and lead into the warehouse grounds, contributing positively to the setting of the warehousing. The redeveloped warehouse complex includes smoked glass and marble clad 1970s office blocks in direct proximity to the historic facades of the original warehouse structures. These are of a larger massing, height and contrasting architectural style to the historic elements and are not considered to make a positive contribution to setting. Tall modern office development is a feature of the wider setting of all these listed buildings and forms an intrinsic part of its current day setting. The existing building on the proposal site is not visible and does not contribute to the setting of the group.

Impact

356. The proposed development would be visible in views looking south across Devonshire Square, and although not visible in views northwards towards nos 12 and 13, would be a prominent addition to the wider setting. The setting of nos 12 and 13 within the square is currently characterised by the visibility of the tall modern towers of the City Cluster, including 55 Houndsditch in close proximity as well as 100 Bishopsgate, 30 St Mary Axe and elements of a number of other towers. As such the addition of the proposal would accord with this wider context of modern towers and would not change the character of the setting beyond that of the existing. Likewise, the visibility of the proposal from the northern courtyards and outside the entrance houses and gate piers would not result in a change to the existing setting where the distinct presence of tall, modern buildings is characteristic.
357. The relationship of the assets with the elements of their setting that contribute positively to their significance would not be altered. The proposal would preserve the setting and significance of the listed buildings and the ability to appreciate them.

Bevis Marks Synagogue (Grade I)

Significance

358. Synagogue of 1699-1701 by Joseph Avis. This is the oldest Synagogue in the country and survives to a remarkably little-altered degree. Avis had links to Wren's office and, architecturally, the building reflects the simple vernacular of some contemporaneous City churches and nonconformist chapels. Of a simple, rectangular plan form with simple red brick and Portland stone elevations with a pitched, slated roof behind a plain parapet. The principal, west elevation is symmetrically composed around the centred, main entrance

door, flanked by two tiers of windows which run around the building, with the upper tier being large, round-arched windows to optimise daylight to the interior in what has always been a dense urban location. Above the entrance door is a tablet with the Synagogue's name etched in Hebrew: 'The Gate of Heaven/Sky'.

359. The interior is a single, double-height volume, galleried on three sides, with a flat plaster ceiling from which hang seven original chandeliers. The plan form, fixtures and fittings are largely of 1701, barring some minor later additions such as early C20 electric lighting. This place plays host to the religious traditions of the Sephardi Jewish community in Britain, known as minhag. Whilst practice here shares common worship and liturgical practice with other Jewish communities, for example reading from the Torah, there are particular rituals unique to this Synagogue (the mitzvot), such as the use of specific sung melodies by the Hazan in the reading of the Torah, which have been passed from generation to generation of the Synagogue's community.
360. It is a rich and intricate manner of worship, which cannot be experienced anywhere else, in a building of great age and rarity in a national context. Accordingly, this very old and rare intangible inheritance is considered to be of exceptional historical and communal interest; the building is of outstanding architectural, artistic and historic interest.

Setting

361. The building retains its original setting, albeit with more recent buildings on some of the surrounding plots, located in an undemonstrative, off-street location in a private courtyard. It has no direct street presence except its south-east elevation to Heneage Lane, a quintessential city alley, on which the Synagogue manifests as a plain brick elevation pierced with three prominent, round-arched windows. This forms the centrepiece of a characterful ensemble of brickwork elevations including the former Vestry and Beadle's House fronting the north side of Heneage Lane and seen obliquely from Bevis Marks.
362. The inspector who reported on the Tulip proposal stated (at paragraph 14.52 of his report, with which the Secretary of State agreed): "Bevis Marks Synagogue (Grade I) is listed largely for its age, rarity and internal features. This does not mean that its setting is necessarily unimportant, but in this case it is largely limited to what can be experienced from within its courtyard."
363. Otherwise, the principal approach to the Synagogue is through a gateway in a modern building fronting Bevis Marks which provides access to the courtyard, consisting of two narrow rectangles of paved area flanking the Synagogue's northeast and north-west elevations. Within the tight confines of this space, the Synagogue is a massive, commanding presence. The courtyard acts as an extension of the Synagogue, a place where people can gather before and after services (and indeed the last place males and females can interact before entering for worship). There have been recent alterations to the courtyard including the construction of a ramp and steps to the new museum in the western arm and two booths, for ticketing and security, inside

the entrance and in the eastern arm. Seen from the courtyard, the Synagogue is hemmed in by other buildings of a similar historic scale and mostly of the same brickwork materiality, including the former Vestry and Beadle's House which directly adjoins it to the east. There is a specific sense of an architecturally reserved and deliberately secluded setting.

364. Bevis Marks was the first purpose-built Synagogue in Britain following the formal resettlement of the Jewish community after centuries of exclusion. Its discreet, secluded setting is considered to be powerfully representative of this, making a strong contribution to the building's significance; the importance of the relationship between the Synagogue, its courtyard, Heneage Lane and Bevis Marks cannot be overstated. Consequently, it is proposed that these elements of setting form part of a bespoke Immediate Setting policy area in the City Plan 2040 to recognise and help preserve these qualities. For clarity, the application site is not within this proposed Immediate Setting policy area.
365. The sense of privacy, seclusion and reservation, coupled with the tight urban grain of this area of setting, means that the Synagogue is experienced through a series of informal vistas and closeups, rather than formally recognised views.

Impact

366. The proposal would just be glimpsed from the courtyard, with the viewer looking away from the Synagogue, in a way which would be clearly marginal and thoroughly disassociated from the Synagogue. As such the significance and contribution of setting of this important heritage asset would be preserved.

Church of St Andrew Undershaft (Grade I) and Iron Gates and Railings to Entrance of Church of St Andrew Undershaft (Grade II)

Significance

367. The Church of St Andrew Undershaft is located at the intersection of Leadenhall Street and St Mary Axe, to the south-east of the site. A rare survival, dating to the 12th century, rebuilt in the 16th century, of squared rubble and stone incorporating an 15th century tower with a polygonal stair turret, which is partially rendered. Inside, there are several notable monuments and fittings.
368. Similarly to the Church of St Helen, the church is of very high historic interest as a rare medieval church that survived the Great Fire of London and the Second World War. Damage from an IRA bombing in 1992 resulted in the loss of its remaining 16th-century windows.
369. Architectural interest survives from the appreciation of its medieval architectural style and materials including the distinctive silhouette of the tower. It is a fine example of its kind and a particularly good, and now rare, example of a City church that predates the Great Fire.

Setting

370. St Andrew Undershaft is located at the southern end of St Mary Axe, just before it meets Leadenhall Street. Both streets are historic and originally developed on all sides – Leadenhall, an ancient route connecting Cornhill to Aldgate and St Mary Axe reflecting part of the City’s medieval layout.
371. The setting of the Church was originally densely developed and has changed dramatically over the years, with the most drastic changes in the 20th century. It is now characterised in the main by modern, tall commercial developments which make a neutral contribution to its significance.
372. The small surviving churchyard to the north, including its walls and railings, make a strong contribution to the building’s setting and significance. A group of small and medium sized 19th and 20th century buildings adjacent to the church on Undershaft and Leadenhall Street provide an appropriate townscape setting, with tall buildings of the City Cluster in close proximity to the north, south and west. These elements make a neutral contribution to the asset’s significance.
373. Modern office buildings and tall towers of the City Cluster, such as the Leadenhall Building, 30 St Mary Axe, 52 Lime Street, and 40 Leadenhall Street are some of the tall buildings in the immediate vicinity of the Church. The relationship of the asset and 30 St Mary Axe which is visible directly behind of the Church tower in views from Leadenhall Street has become an iconic and frequently photographed one, joined recently (in the cumulative scenario) by the form of 100 Leadenhall Street directly to the east of the church. Apart from the juxtaposition in terms of height, the contrast of the design and materiality of these buildings add further interest to this view, amplifying the historic character of the masonry church, albeit in a way unrelated to heritage significance, setting and provide a focused appreciation of it.

Impact

374. The GLA has identified a low level, less than substantial degree of indirect harm to the setting of the Church of St Andrew Undershaft.
375. In HTVIA view 21 the proposed building would appear prominently in views north along St Mary Axe, although at some considerable distance behind 30 St Mary Axe and above the existing mid-rise buildings as the street curves to the right. In the cumulative scenario, which includes both One Undershaft and 100 Leadenhall Street, a much smaller segment of the proposal would be visible, tapering down acutely above St Mary Axe and towards the Church.
376. As with St Helen’s, the church is already seen in dynamic contrast to the taller buildings of the City Cluster. Officers therefore do not agree with the observations of the GLA.
377. While visible, the proposals preserve views towards the church tower across the Lime Street to Leadenhall Street junction and from the immediate locality. Similarly, the proposal is considered in keeping with the existing backdrop character within these views, and its tapering allows an element of sky view to remain in mid-range views.

378. Overall, in both baseline and cumulative scenarios, while the proposed development would introduce changes to the Church's setting, it would clearly preserve the setting and significance of the church and the ability to appreciate it. The proposal would form another addition to the highly distinctive setting of modern high-rise buildings which both surround and frame the church, and its contrasting medieval character and presence would not be harmed.

Lloyd's Building (Grade I and Grade II)

Significance

379. The Lloyd's Building, designed by Richard Rogers Partnership (RRP) with engineers Ove Arup and Partners is a purpose-built office tower opened in 1986 and Grade I Listed in 2011. The original stone façade, designed by Sir Edwin Cooper between 1925-1928 and previously listed at Grade II in 1977 was integrated into the RRP building's design in the 1980s redevelopment.
380. The Lloyd's building has historic interest as a highly inspirational late 20th century building by one of Britain's most significant modern architects for an internationally important organisation that successfully integrates the traditions and fabric of earlier Lloyd's buildings (including the Adam Room, originally from Bowood House and the 1925 Cooper façade).
381. The building has architectural interest as a prominent and high-quality example of high-tech architecture, with its design exemplifying architectural innovation, high quality materials and flexibility of plan throughout its impressive interior and exterior. The building's futuristic appearance and the clear architectural expression of different functional elements contribute to a bold aesthetic.
382. Situated in the heart of the City, the Lloyd's Building forms a strikingly incongruous backdrop to many listed neighbouring buildings. It has notable group value with the nearby Grade II* Leadenhall Market, an important Victorian commercial building to which Lloyd's nods with its glazed atrium. To its neighbouring buildings it presents a strikingly original aesthetic which has never been replicated in quite the same way within the Cluster. Its high-tech facades, shining metalwork panels and complex elevational design consistently draw the eye and make it one of the most standout buildings in the heart of the Cluster.

Setting

383. Such is its architectural singularity that the significance of Lloyd's relies very little on its setting, other than as a point of contrast. Tall commercial buildings define its immediate context, the Leadenhall Building, 8 Bishopsgate, and 22 Bishopsgate to the north, the Willis Building and 52 Lime Street to the east, and 1 Leadenhall to the west. Most of these buildings make a neutral contribution to the significance of the Lloyd's Building. However, the Leadenhall Building, also designed by the Richard Rogers Partnership, with

similar architectural elements such as exposed circulation and services is considered to make a low contribution to the Lloyd's Building's significance.

384. The existing buildings on the application site make no contribution to the significance of the Lloyd's Building, with no intervisibility between the two.

Impact

385. The proposed building would be seen as a new skyline element in the background and to the west of 30 St Mary Axe when viewed north along Lime Street. It would appear as a complementary, although relatively distant, new addition to the existing cluster of towers which currently create the setting of the listed building.
386. Dramatic contrasts in scale, and between old and new are characteristic of the Lloyd's Building's setting. The relationship and juxtaposition of the Lloyd's Building with both historic and modern buildings that contribute to its significance would remain unaffected. As such, the proposal would preserve the setting and significance of the listed building and the ability to appreciate it.

13 Bishopsgate (Grade I)

Significance

387. Westminster Bank, 13 Bishopsgate, was completed in 1865, and designed by J Gibson. The building was constructed as the new head of office by the direction of the National Provincial Bank of England. The Bank is constructed in Portland stone in a Neo-Classical style with arched windows and Corinthian columns.
388. The building derives a high degree of historic interest as a mid-19th century purpose-built headquarters of a national bank. Commercial development of this period in this area of the City was defined by the design and use of buildings for banking and associated commercial activities. It also derives historic interest for its association with a prominent 19th century architect, John Gibson, who worked with Sir Charles Barry on the Houses of Parliament. The bank draws a very high degree of architectural interest from its principal elevations that present a rich Neo-Classical façade with figures in high relief to Bishopsgate. Architectural and historic interest is also derived from the townscape group value of the Grade II listed buildings directly to the south which includes British Linen Bank, nos 37 and 38 Threadneedle Street, which are also fine examples of classical Portland stone buildings from the early 1900s.

Setting

389. The immediate setting of Westminster Bank is the junction of Threadneedle Street and Bishopsgate. Bishopsgate is an ancient routeway and the surviving historic street pattern contributes to the historic heritage value of the Bank. The development which surrounds the heritage asset is mixed with Victorian,

Edwardian and inter-war buildings as well as modern tall buildings that show the historic evolution of this area of the City.

390. Overall, it is considered that the existing setting makes a neutral contribution to the understanding of the receptor's heritage value, in the way the building responds to the curvature of the street and creates a strong neoclassical group with the listed buildings to the south. There is currently no intervisibility with the application site, and as such, it makes no contribution to the setting of the heritage asset.

Impact

391. The GLA has observed a very low level of less than substantial harm to the indirect setting of the Bank group of buildings, to which 13 Bishopsgate has been assigned. City Officers disagree with this assessment, noting that very limited glimpses of the proposed building would be possible in views looking north from the corner of Threadneedle Street and Bishopsgate, with the proposal appearing only behind the tall flanks of 22 Bishopsgate and 100 Bishopsgate, and at greater distance. Equally, given this existing character context of tall, modern buildings, together with the limited intervisibility to the proposal, the development is not considered to harm the significance, appreciation nor setting of the heritage asset.

Church of All Hallows, London Wall (Grade I)

Significance

392. The church was designed by George Dance the Younger, built in 1765-7 to replace a medieval church built up against the City wall. While the church's exterior is generally restrained, it features an ornate west tower that culminates in a circular cupola. The visual prominence of the tower, which is generally of small scale, is accentuating by the use of contrasting Portland stone to the stock brick of the main part of the church. The interior is particularly noteworthy and had a later influence on Dance's pupil, Sir John Soane.
393. The church has great historic and architectural interest as an 18th-century place of worship designed by George Dance the Younger. The unconventional aisleless floorplan of the church, its prominent tower made of Portland stone, and the grand arcade on its southern façade contribute to the significance of the Church. The church also holds additional historic and archaeological interest deriving from the foundations and remains of the Roman London Wall that it incorporates. The interior is of interest and further contributes to the significance of the church.
394. An above-ground section of the medieval London Wall acts as the western boundary of the churchyard, and this segment is designated as a Scheduled Monument.

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Setting

396. The church is located on London Wall, a busy City thoroughfare, to the west of the proposed development site. Its setting is defined by its location sitting alongside the road, rather than facing onto it. Set within dense urban surroundings, and appearing as a relatively small-scale building in comparison to those neighbouring. The location of the church by the foundations of the Roman London Wall upon which it stands makes a significant contribution to its significance. The small Churchyard, to the west of the Church is also an important and positive element of its setting. Tall buildings within the Cluster form part of the setting of the church appearing as a highly distinctive backdrop in views from the west. These include 100 and 110 Bishopsgate which form the backdrop in views of the Church from London Wall looking east. These tall buildings, as well as the existing modern development on the application site, do not contribute to the significance of the Church.

Impact

397. The proposed development would have partial visibility in the backdrop of the church when looking east along London Wall towards the City Cluster. The proposal would appear in the current gap existing between 100 and 110 Bishopsgate, but at a significantly lower height and presence than either of those tower masses. A cumulative scenario would see visibility of the proposal reduced still further through the consented schemes of 55 Old Broad Street and 99 Bishopsgate appearing in the foreground.
398. Given the much-altered context of the Church and the presence of tall buildings in and around the site that already characterise views of the church and its tower, it is not considered that the proposed development would affect the prominence of the church or diminish further its ability to act as a focal point along London Wall. The development would be seen as an addition to the existing and emerging tall building context along Bishopsgate and Wormwood Street which at present make a neutral contribution to this asset. Whilst the proposed development would have a moderate degree of visibility, it would be consistent with existing tall development within the setting of the church, which is characteristic of this part of the City and is not a new element or disruptive feature out of context. In terms of its height and scale but also its architecture and materiality, officers consider that it would not act to detract from the Church of All Hallows and its prominence. As such, officers do not consider that the proposal would adversely affect any elements of the setting that make a positive contribution to the church. The proposed development, in both baseline and cumulative scenarios, would not affect the ability to understand or appreciate the Church and would preserve its significance and the contribution of setting.

Royal Exchange (Grade I)

Significance

399. The Royal Exchange is one of the most recognisable buildings within the City, located prominently at Bank junction. Designed by Sir William Tite, the building possesses a richness of style which exemplified the wealth of Empire as well as the end of the Georgian Neoclassical revival period. It replaces three royal exchanges previously built on the site and is symbolic as symbolising the centre of commerce for the City of London.
400. It is of exceptional historic and architectural interest as “the greatest of the City’s 19th century exchanges” and remains as the only survivor. Its exceptional architectural composition, prominent site location and historical association all suggest a public role. It is historically symbolic as the centre of the commercial life of the City and the financial role of the surrounding development.

Setting

401. The setting of the listed building comprises the grand Cluster of Portland stone buildings facing Bank junction, including the Bank of England and No 1 Cornhill. The alignment of the group towards the junction contributes to a sense of arrival which compliments the richness of their architectural detail and contributes to an understanding of the former function in this financial district of the City. In HTVIA View 3 the Royal Exchange appears centrally within this composition, drawing the eye towards its grand porticoed frontage. Views east from the junction take in the tall buildings of the City Cluster seen in the backdrop. The contrasting architectural languages of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building’s setting.

Impact

402. The proposal would be partially visible in the backdrop of the Royal Exchange in views east from Bank Junction, looking up Threadneedle Street, as shown in HTVIA view 3. The tapered edge of the proposed building would drop down across the Threadneedle Street Gap, appearing as a more distant layer with Tower 42 and 100 Bishopsgate sitting as closer layers.
403. The minor intervisibility with the building in this way would not affect the value of the heritage asset and only serve to reinforce these positive juxtapositions between the Royal Exchange and the commercial centre of the Cluster. As such the proposals would appear consistent with the existing tall building backdrop setting and would reinforce this part of the townscape character. Officers consider that while visible in part, the proposals would not diminish an appreciation of the listed building’s silhouette or decorative detail. It is considered there would be no harm to the significance of this listed building or to its setting in both baseline and cumulative scenarios.

Finsbury Circus Registered Historic Park and Garden (Grade II)

Significance

404. The Finsbury Circus Registered Historic Park and Garden sits at the centre of the Finsbury Circus Conservation Area. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance’s successor as City Surveyor, William Montague, although its design dated from 1775-1800. The

significance of the Garden together with the Conservation Area as a group is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus.

Setting

405. The Registered Historic Park and Garden is bounded by the significant buildings which sit around the oval shaped garden, with London Wall to the south, Moorgate to the west, Blomfield Street to the east and South Place and Eldon Street to the north. The residential towers of the Barbican are visible to the west of the Gardens, with other, contemporary, taller buildings visible within its immediate setting particularly to the south and east. Owing to the imposing buildings containing this tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited. Tall buildings set beyond the gardens within the City Cluster are a characteristic of the wider surrounding vicinity in which the asset is situated.

Impact

406. The circus gardens contain mature trees and long-range views across the space are limited when there is leaf cover. Without leaf cover, a narrow segment of the proposed development would be visible in a skyline gap when appreciated in some views across the garden looking east, appearing behind the 100 and 110 Bishopsgate towers as shown in HTVIA view 24. The addition of the building, as a distant background element in these views is in keeping with the established height and massing of the commercial centre of the City Cluster and does not challenge an appreciation of the formally planned landscape of Finsbury Circus and its primary significance as a Registered Historic Park and Garden. The proposal would add to the varied Cluster of tall buildings which are clearly distinct from this historic space.
407. The proposed building would not result in harm to the setting or significance of the Finsbury Circus Registered Historic Park and Garden.

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

Significance

408. The Former Port of London Authority Building (Grade II*) was built 1912–22, designed by Sir Edwin Cooper. This Portland stone landmark building is in the Beaux Arts classical style and features a richly embellished tower. Its significance lies in its architecture and historic Port of London civic function and to a lesser degree its setting. It is of a high level of architectural, historic and artistic significance.

Setting

409. The setting of the listed building comprises open space to the foreground with Trinity Square Gardens and the Tower Hill War Memorial for Mercantile Marines, which contribute positively to its significance. The adjacent buildings

within its immediate setting are also constructed in Portland stone helping to form a small group of classical styled traditional buildings of a similar scale.

410. In the wider setting there is a broad range of buildings in terms of period, style, height and materiality. The building forms part of the setting of the Tower of London. The broad tower of the Former Port of London Authority is embellished with order of Corinthian pilasters, arched niche and colossal figure sculpture (Old Father Thames) is a clearly identifiable landmark feature in river prospect views. In longer north-westerly views the building's backdrop is dominated by the tall towers of the City Cluster.

Impact

411. View 16 of the HTVIA shows the proposed development in the context of the Former Port of London Authority Building. Visibility of the proposal is limited, with a small segment of the top appearing in the distance above the mid-rise foreground mass of 10 Pepys Street. The proposal would adjoin the edge of the City Cluster group, sitting at a height and presence which complements the cluster's ascending form.
412. The contemporary architecture and form of the proposed development would align it with the existing modern towers. Given the limited visibility, distance and separation from the listed building's silhouette the proposal is not considered to harm the appreciation of its form and facade. This would ensure that the distinctive architectural qualities and presence of the asset when compared to the Cluster buildings would retain its existing prominence in these views. As such, the proposal is considered to fully preserve the setting and significance of the listed building and the ability to appreciate it.

Tower Bridge (Grade I)

Significance

413. Tower Bridge was designed by the by the architect Sir Horace Jones, for the City of London Corporation in 1894 with engineering by Sir John Wolfe Barry. It represents a triumph of Victorian engineering as a low, hybrid suspension and bascule bridge with a steel frame, clothed in revivalist French gothic towers, turrets 283 and pinnacles. The dramatic symmetrical composition acts as a 'portal' to central London from the River and has become an iconic and internationally recognised landmark of London.
414. The structure possesses very high architectural and artistic interest for its iconic silhouette, refined Victorian revivalist gothic stylings and marriage of technical functionality with High Victorian aesthetics. It possesses very high historic significance for its associations with the aforementioned architectures, of national repute, and for its iconic, worldwide fame as a symbol of London. The dramatic setting of the building astride the Thames, its approaches to the north and south, and its juxtaposition with the Tower of London nearby make a significant contribution to significance, in particular an appreciation of it.

Setting

415. There are a number of elements which are considered to make important contributions to the significance and appreciation of Tower Bridge as a heritage asset.

416. The broad riparian views from the River Thames, its embankments and Bridges, including from London Bridge, Southwark Bridge, the Queen's Walk, the North Bank and Butler's Wharf allow the bridge to be seen for its commanding, strategic siting, architecture and silhouette. In these views the bridge stands sentinel, guarding the entrance to historic London from the sea and as both a City, London and even nationally important landmark.
417. That strategic siting and historic intrinsic connection with the operational River Thames is accentuated when appreciated in a 360-degree panoramic context with those other defining landmarks and features of the historic London Pool, including City Hall, the Tower of London, the Monument, St Paul's Cathedral, Old Billingsgate and the London Custom House. In addition to those, the remains of the quays, wharfs and warehouses of the historic Pool contribute to a wider familial shared setting. These collectively make a substantial contribution to significance and an appreciation of Tower Bridge.
418. The local and wider townscape views and approaches, many of which are coincidental and fortuitous, perhaps the most important from in and around the Liberties of the Tower of London, from main vista at 'More London' on the South Bank and others which are more fortuitous, even incidental, townscape moments/glimpses where its inspiring architectural form makes an unexpected announcement. This includes broad panoramas such as from Greenwich Park (where it is seen alongside St Paul's), where the strategic role of the Pool of London is announced by its towering and dramatic architectural form and silhouette. These also make an important contribution to significance and an appreciation of it.
419. The existing setting of Tower Bridge is also highly influenced and characterised by the presence of tall buildings, including those of the existing City Cluster in views from the south but also the likes of the Shard and Guys Hospital in views from the north bank westwards from St Katherine's Dock. This contribution of tall buildings builds the appreciation of the bridge as an iconic structure that is a constituent part of a modern and evolving metropolis.

Impact

420. The proposed development would be visible, seen from and in the backdrop of the bridge from the south-east, from Butlers' Wharf in HTVIA view 7 with occasional glimpses along the Queens Walk adjacent to the former City Hall shown in views 5 and 6. In these views the proposed building would be seen as a high-quality architectural addition, experienced as a subservient element of the established City Cluster of modern towers to the north of the bridge, according with the height build up and massing of the cluster formation. In all views the tower would remain the commanding foreground landmark guarding the Pool of London. While partly visible in the backdrop, the overall

contribution of setting to an appreciation of the listed building's significance is considered to be preserved within its setting.

421. In both the baseline and cumulative scenarios, the proposal would not change the existing composition of the views, nor the visual focus in the view; it would read, like the rest of the Cluster to the north of the bridge, as disassociated from the heritage asset but according with the existing character and makeup of its setting. The proposed development would preserve and not harm those elements of setting identified above and as such the significance of the listed building and the appreciation of it.

Conservation Areas

Bishopsgate Conservation Area

Significance

422. Bishopsgate Conservation Area was designated in 2007 and included the former Middlesex Street Conservation Area, designated in 1981. The Conservation Area is located to the north of the development site. The Conservation Area extends from Wormwood Street on its southern boundary, to Brushfield Street in the north. Bishopsgate was originally a Roman route travelling north out of the City.
423. The heritage value of the Conservation Area is defined by its staggered, more piecemeal redevelopment that occurred in the 19th and 20th centuries. This is in contrast to other areas of the City, which saw dramatic and transformative commercial development. This, combined with the Conservation Area's variety of uses (industrial, residential, commercial and transport) has led to a diverse character. The historic street layout and orientation of alleyways and squares is still visible, despite few houses remaining from this period. A significant townscape feature within the Conservation Area is Liverpool Street Station.

Setting

424. The immediate setting of the Conservation Area is much changed with the recent expansion of the Eastern Cluster and large complexes such as the Broadgate Estate. The southerly setting of the Conservation Area is dominated by tall modern buildings at the northern edge of the City's Eastern Cluster including Dashwood House and the Heron Tower.

Impact

425. The Bishopsgate Conservation Area is located in the heart of the Square Mile's commercial district. The area is well contained with a collection of historic Victorian and Edwardian buildings which sit beyond the original City Walls and is read as separate to the tall buildings on its boundaries.
426. Views of the proposed building from within the tightly knit streets within the Conservation Area itself would be largely limited to the north-south section of New Street and southwards across Devonshire Square. Here there exists

visibility of a number of the City Cluster tall buildings including 30 St Mary Axe, the Leadenhall Building, 80 Houndsditch and 110 Bishopsgate. The proposed building would form the foreground of the City Cluster massing.

- 427. The proposed development would be a prominent addition to the skyline to the south of the Conservation Area which would be readily visible in views from within and at the boundary of the Conservation Area. The scale and appearance of the building reflects the established townscape forming part of the City Cluster which forms a significant part of the Conservation Area's setting.
- 428. Within views looking southward along Bishopsgate, as depicted within HTVIA View 29, the development would add to and sit within the existing massing and presence of the established City Cluster.
- 429. Views south, from outside but towards and across the Conservation Area from Brushfield Street would likewise see the proposed building as an addition to the existing cluster of tall buildings sitting in its backdrop.
- 430. In the cumulative scenario when viewed from Brushfield Street, the proposed development would form part of a stepping up of buildings within the City Cluster with 1 Undershaft in the background, and 55 and 99 Bishopsgate to the west in the foreground. This enhances the legibility and coherence of the Cluster with the stepping up being clearly defined in the layering of new tall buildings.
- 431. Officers consider that the proposed development within the conservation area's wider setting would have no adverse impacts on the setting of the Bishopsgate Conservation Area nor its significance.

Creechurch Conservation Area

Significance

- 432. The historic and architectural interest of the Conservation Area derives from a varied townscape and history with strong and visible connections to the Roman and medieval City. Anchored in three diverse and architecturally significance places of worship Bevis Marks Synagogue, St Katherine Cree, and St Botolph Aldgate, the area is closely associated with the Holy Trinity Priory, still evident in the modern street pattern, including historic open spaces of different scales and functions.
- 433. At the heart of the Conservation Area, is a characterful group of late 19th and early 20th century warehouses on Creechurch Lane and Mitre Street which are fine examples of a now rare building type in the City, with a number considered to be non-designated heritage impacts.

434. The historic interest of the area is strengthened due to its enduring associations with the Jewish community since their resettlement in London in the 17th century, highlighted by Bevis Marks and the sites of the First and Great Synagogues. The area juxtaposes contrasting architectural scales against the backdrop of the City Cluster's tall buildings.

Setting

435. The immediate setting of the Conservation Area comprises a variety of scales and styles of buildings with modern development being prevalent. Tall buildings of the City Cluster including 70 St Mary Axe, 30 St Mary Axe, 100 and 110 Bishopsgate form part of the immediate and wider setting of the Conservation Area to the west. In general, this juxtaposition of contrasting architectural scales of the Conservation Area against the backdrop of the City Cluster's tall buildings, defines the setting and contributes to the significance of the Conservation Area. The existing Camomile Court building itself is not clearly visible, being set behind 70 St Mary Axe, and is not considered to make any contribution to the significance of the conservation area.

Impact

436. The proposed development would be located to the north-west of the Conservation Area. It would introduce a building of additional height and scale, when looking north-west along both Bevis Marks and Houndsditch and as seen in views 18 and 19 of the HTVIA. In these views, only the development would be partially visible, situated behind the distinctive curved form of 70 St Mary Axe. The scale, form, and appearance of the proposed development would accord with the existing character of the Conservation Area's local and wider setting. In the cumulative scenario the proposed development would be almost entirely occluded by other proposals. In either event the proposal would remain consistent with the striking backdrop of modern tall buildings in the City Cluster. Given its separation distance, and the layer of buildings in the foreground, it would remain distinct and separate from the Conservation Area, aligning with the existing character of its setting. As such, the proposals would not harm the setting, significance, character or appearance of the Conservation Area.

St Helen's Place Conservation Area

Significance

437. St. Helen's Place Conservation Area is a small, tightly defined area on the east side of Bishopsgate in close proximity to the Bank Conservation Area and the heart of the City. It is the sole survivor of an intricate pattern of spaces and alleys which once connected Bishopsgate and St Mary Axe. The heritage value of St Helen's Place CA is derived from its historic, if constrained, character, articulated by its tight-knit urban grain, medieval layout of streets and alleyways, and inclusion of two nationally important pre-1666 churches. St Helen's Church in particular remains as one of the most important pieces of medieval fabric surviving in the City. Its 13th century origins are still evident, as well as the physical manifestation of the building's organic history. There is

considerable 276 archaeological potential for the extensive precinct of the Priory of St Helen which for centuries influenced the form of the area.

438. The area continues to have deeply rooted associations with the Leathersellers Company whose architectural patronage from the reformation onwards exerted a massive influence on the area and continues to shape its development. Associations with Canadian exploration through the Hudson's Bay company and St Ethelburga's church. The development along St Helens Place is Edwardian, and a formally planned enclosure which is unusual in the City. It provides a quiet and delightful contrast to the surrounding City Cluster and activity of Bishopsgate. There is an important group of three buildings with narrow plot widths (nos. 46, 48 and 50) that are the only survivors of the finely grained appearance of Bishopsgate before the combination and redevelopment of building plots from the 20th century onwards. They give an indication of how Bishopsgate would have looked in the 19th century and with the larger buildings elsewhere illustrate the development of the street. Accordingly, they are significant components of the conservation area. They offer important contrasts to the ongoing planning and development of tall buildings along Bishopsgate as part of the Eastern City Cluster. Hasilwood House provides an arched public entrance and enclosure to St Helens Place a discreet enclave of a type that is unusual in the City.

Setting

439. The Conservation Area has, uniquely in a nationwide context, a dramatic setting among the tall buildings of the City Cluster. The Conservation Area's current setting contributes very little to an appreciation of its heritage value. The proposed development is located to the north-east of the Conservation Area and already includes a tall building that does not contribute to the significance of the Conservation Area. The published Character Summary for St Helen's Place CA does not note specific views, but the views into and within St Helen's Place are clearly of importance; here, again, the backdrop of the tall buildings of the Cluster makes for a dramatic juxtaposition with the Edwardian CA buildings in the foreground. Views up and down Bishopsgate and looking east at St Helen's Church share this quality; nowhere in the conservation area are the presence of tall buildings not felt to some degree, and this is intrinsic to its existing setting.

Impact

440. The Conservation Area lies within the Eastern City Cluster policy area for tall buildings. The dramatic setting among the tall buildings of the City Cluster is identified as a key characteristic which contributes to its special interest. The proposed development would have no visibility from within St Helen's Place itself but would be partly visible in views from the south from Great St Helens and Undershaft.
441. The proposed development would introduce an additional tall building element to the north of the Conservation Area, adding further to the existing setting established by the presence of modern skyscrapers contrasting with the smaller-scale historic built environment. As such, it would be consistent with the existing setting and the experience of the commercial centre and

juxtapositions of old and new. The proposed development is not considered to result in harm to the setting, significance, character or appearance of the Conservation Area.

Bank Conservation Area

Significance

442. The area comprises the commercial heart of the City of London around Bank Junction. The prevailing character of the Conservation Area is comprised of a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing a sense of an intact historic townscape. The contrast of medieval street plan, ornate 18th and 19th century commercial buildings interspersed with modern office development forms the quintessential character of the City of London.
443. High historic interest stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic connection of financial power with its high historic associative interest. This is expressed through the sense of dramatic arrival at Bank Junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction. The Bank Conservation Area combines architectural, historic and social heritage value.

Setting

444. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate and Gracechurch Street. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east providing a strong contrast between old and new.
445. Bank Conservation Area is also bordered by Finsbury Circus Conservation Area to the north, Guildhall Conservation Area to the West and Leadenhall Market Conservation Area to the east which all form an important contribution to its setting.
446. The Thames and London Bridge also contribute to its setting providing significant views of buildings within the conservation area including those of the Wren churches. The character of Bank Junction as a historic centre is presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive.

Impact

447. There would be limited visibility of the proposed development from within Bank Conservation Area, largely confined to glimpses along Threadneedle Street looking north-east, and as far west as Bank Junction. In these views, only a partial, tapered segment of the tower would be visible being mostly screened by and seen in the context of existing tall buildings in the City Cluster, including 8 and 22 Bishopsgate, Tower 42 and 110 Bishopsgate. Where visible, the proposed development would accord with the City Cluster's character, which is distinct and contrasting from the Conservation Area in the foreground.
448. Overall, the scale, form, and appearance of the proposed development would align with the existing character of the Conservation Area's wider setting. In both baseline and cumulative scenarios, the proposed development would be only partially visible in the context of the established City Cluster. As such, the proposals would not harm the setting, significance, character or appearance of Bank Conservation Area.

New Broad Street Conservation Area

Significance

449. New Broad Street Conservation Area was designated in December 1981. The Conservation Area lies to the east of Finsbury Circus and south of Broadgate in the north-eastern part of the City. The heritage value of the Conservation Area is derived in its uniformity in building scale along New Broad Street, coupled with the historical character of similarly scaled 19th century commercial buildings, many in Portland stone with a variety in ornament. Further historic and architectural interest is derived from All Hallows on the Wall (Grade I), which is considered a significant listed building within the Conservation Area along with the remains of the City Wall beneath the church and churchyard, nos. 82 and 83 London Wall and the junction of London Wall and Blomfield Street which are designated Scheduled Ancient Monuments.

Setting

450. The Conservation Area is surrounded by a number of other Conservation Areas including Bank, Finsbury Circus, and Bishopsgate. The proximity of the Conservation Area to Finsbury Circus, comprising a formal area of green space with a surrounding high quality architectural, forms an attractive feature within the immediate setting of the New Broad Street Conservation Area. The Conservation Area is located within close proximity to the tall buildings which form the City Cluster. There are also a number of modern buildings including those along Bishopsgate and London Wall which illustrate the extent of post war change that has occurred within the City around the Conservation Area.

Impact

451. The New Broad Street Conservation Area is located at the heart of the Square Mile's commercial district and its setting is characterised by tall development in the surrounds.

452. The proposed development would have only limited visibility when looking east along New Broad Street sitting largely behind the existing tower of 110 Bishopsgate. In the cumulative scenario when viewed here, the proposed development would no longer be visible, sitting entirely behind the consented redevelopment of 55 Old Broad Street. When looking east along London Wall, along the southern boundary of the Conservation Area the proposal would be partly visible in the gap between 110 and 100 Bishopsgate.
453. The scale and appearance of the building accords with the established City Cluster townscape, which forms a significant part of the Conservation Area's setting. The development would form part of a more distant, background layer of buildings within the City Cluster with 55 Old Broad Street in the foreground, 99, 100 and 110 Bishopsgate in the background and Tower 42 to the edge.
454. By reason of its limited visibility, distance and complementary character to that of the surrounding City Cluster, officers consider that the proposed development would have no adverse impacts on the character, significance and setting of the New Broad Street Conservation Area.

Finsbury Circus Conservation Area

Significance

455. The Conservation Area is a small area comprising the registered park and garden of Finsbury Circus and its surrounding development. The laying out of Finsbury Circus was implemented in 1815-17 by George Dance's successor as City Surveyor, William Montague, although its design dated from 1775-1800. The significance of the CA is derived from its inclusion of buildings of a high architectural quality and composition, strategically situated around the formal planned development of Finsbury Circus, which is considered to be an unusual feature within the City of London.
456. The oval shape of the gardens, built in conjunction with the original layout of the square, provides a characterful perimeter to the green open space. The mature trees and garden layout contributes to the leafy character central for the Circus. It features large 19th and 20th century commercial buildings with extensive ornamental detail and a generally uniform roofline. Buildings are of particular historic and architectural interest as impressive 19th and 20th century commercial buildings with extensive detailing, modelling, uniform height and varied rooflines.
457. There are a number of listed buildings in the Conservation Area: London Wall (Scheduled Ancient Monument), Lutyens House (GII*), Park House and Gardens (GII), Finsbury House (GII), London Wall Buildings (GII), Salisbury House (GII), Business School, London Metropolitan University (GII), Drinking fountain and shelter, north side of gardens (GII). The Finsbury Circus Registered Historic Park and Garden (Grade II) sits at the centre of the Conservation Area.

Setting

458. The Conservation Area is bound by London Wall to the south, Moorgate to the west, Blomfield Street to the east and South Place and Eldon Street to the north. To the south the Conservation Area shares a boundary with the Bank Conservation Area and to the south, and New Broad Street to the east. The residential towers of the Barbican are visible to the west of the Conservation Area, with other, contemporary, taller buildings visible within its immediate setting. Owing to the imposing buildings contained within such a tightly planned space, the sense of enclosure is extensive, meaning that long vistas outwards are limited.
459. Due to the considerable distance and extent of interposing development, there is no visual relationship with the Conservation Area and the existing building on the development site.

Impact

460. In views from the western side of the gardens within the Conservation Area looking east, the upper levels of the proposed tower would be visible alongside and behind 110 Bishopsgate. The proposal would largely infill the current skyline gap between 110 and 100 Bishopsgate but it is noted that this view would be obscured by leaf cover for part of the year. The visibility of the proposed development would be limited and fleeting, quickly moving out of view from within the central gardens, with the buildings lining its edges retaining their dominant, enclosing presence. The addition of the proposal here would not challenge the appreciation of the formally planned landscape of Finsbury Circus and its primary significance as a Conservation Area and would make an additional, but recessive contribution to the varied Cluster of tall buildings which are clearly distinct from this historic space.
461. There would be no harm to the setting or significance of the Finsbury Circus Conservation Area.

Wentworth Street Conservation Area (London Borough of Tower Hamlets)

Significance

462. The area's significance derives from the architectural interest of constituent buildings as well as its history as a mixed-use residential and commercial location. Originally sitting outside the city walls, but long since developing a strong and enduring association with the clothing industry which remains apparent today.

Setting

463. The conservation area is split into two character areas – east and west. The western area, closest to the proposed development is a regular grid structure

of streets with medieval origins, and a fine grain of low-rise 19th century buildings. The eastern area includes Commercial Street which includes many mid-late Victorian buildings of architectural and historic merit.

464. The conservation area is set within a surrounding of tall buildings, including the re-clad 1960s tower block Denning Point immediately to the south, 9 Frying Pan Alley to its north and Petticoat Tower within the City boundary. Tall buildings of the city cluster form an established background setting in views looking south-west along Cobb Street and Wentworth Street. This juxtaposition of the low-rise, close-knit buildings of the conservation area with the height and massing of the City Cluster towers creates an important understanding of its distinction from the historic banking and white collar commerce of the City with the CA's historic identity as a place of manufacturing, clothing retail and housing.

Impact

465. The proposed development would be visible in views along the conservation area's principal cross-route, Wentworth Street, and from the eastern end of Cobb Street when looking south-west. The proposal would be prominent, owing to the long axial views which are oriented towards the City Cluster. However, it would be seen set amongst the existing Cluster towers and in this context it would accord with the modern built character and appearance of the towers, forming a complementary addition to this element of the area's setting. The proposal would further add to the contrasting setting of the city cluster which enables a legible understanding of the conservation area's history and difference to that of the financial heart of the City. As such there would be no harm to the setting or significance of the Wentworth Street Conservation Area.

Non-designated Heritage Assets

30 St Mary Axe (Non-designated heritage asset)

Significance

466. Completed in 2003, 30 St Mary Axe is regarded as a Non-Designated Heritage Asset due to its striking architectural contribution and impact on the skyline. Since completion, the building has caught the public imagination and arguably developed an architectural iconic status, frequently used to symbolize the City of London and London as a whole, both to the UK and globally (for example, publicizing the London Olympics) and enshrining its nickname as the Gherkin. The building has won numerous architectural awards including the Stirling Prize in 2004. As one of the earlier towers in an area subsequently earmarked for a cluster of towers, 30 St Mary Axe has been subsumed in the emerging cluster by both taller and bulkier towers. As such its distinctive appearance on the skyline of London has significantly diminished, particularly in views from the west. Despite its reduced visual prominence in many views, its striking appearance, profile and prominence means it retains a high architectural significance worthy of being identified as a Non-Designated Heritage Asset.

Setting

467. 30 St Mary Axe draws a moderate degree of significance from setting, principally through its position on the eastern edge of the cluster which it has come to define, both in local and longer-range strategic views of the City.

Impact

468. Within the immediate setting of 30 St Mary Axe the proposal would form an additional tall element to complement the existing character of tall buildings in the Cluster. The proposed development would introduce a further element of comparable scale to the arrangement of tall buildings of which 30 St Mary Axe forms part but retain a fair degree of separation.
469. In longer-range views from the south, east and west there would be no additional occlusion of views of the asset resulting from the development. From directly north the proposal would fully occlude visibility of 30 St Mary Axe in views south along Bishopsgate. Along Bishopsgate as far north as Folgate Street, 30 St Mary Axe forms a distinctive skyline feature, but seen as a component of the City Cluster. It is only in part occluded to the side by 80 Houndsditch, but its characteristic 'gherkin' shape and top can be discerned.
470. While the asset would be occluded by the scheme in views along Bishopsgate, its architectural significance would be legible and appreciable in many other viewing experiences. Further, that architectural interest would be unchanged by the proposals directly. As such, there would be no harm to the setting or significance of the non-designated heritage asset.

Other Heritage Assets

471. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of an enormous amount of heritage assets, and it would be disproportionate and unrealistic to assess them all.
472. Officers have undertaken a scoping exercise to explore the intervisibility quality of association/disassociation of the proposals with designated heritage assets in the surrounding locality, to discern the potential for impacts. This assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact of the proposal on its significance.
473. Some assets were scoped in and these have been fully assessed above. In accordance with paragraph 201 of the NPPF a number of heritage assets were scoped out of further assessment, accounting for their significance and contribution of setting to that significance.
474. This is because they either would have nil to very limited intervisibility with the proposals, with any perceptible visual change amount to a *de minimis* visual

effect, or because there would be clear visual disassociation between the asset and the proposal, with the latter being, while visible, clearly belonging to background layers of modern city development – a presence that might be seen but crucially not *felt* as part of the experience of the significance or setting of that asset.

475. In all cases it was, for these reasons, judged by officers that the proposals would have no potential impact. In some cases, these include assets which the GLA consider would be harmed by the proposals; but officers for the aforementioned reasons take a different, proportionate view. The assets scoped out include:

Listed Buildings

- St Katherine Cree (Grade I)
- 27 Creechurch Lane No's 2-16 (Grade II)
- Church of St Botolph, Aldgate (Grade I)
- Guild Church of St Ethelburga the Virgin (Grade I)
- The Monument (Scheduled Monument and Grade I)
- Museum of the Home (formerly The Geffrye Museum Grade I)
- Holland House (Grade II*)
- 33 Leadenhall Market (Grade II*)
- Lloyd's Registry, 71 Fenchurch Street (Grade II*)
- Gateway in yard of Church of St Katherine Cree (Grade II)
- Liverpool Street Station (Grade II)
- Hasilwood House 52-68 Bishopsgate (Grade II)
- Park House and Garden House (Grade II)
- 20 and 21 Billiter Street (Grade II)
- 2-16 Creechurch Lane (Grade II)
- Whitehall Court (Grade II*)
- Horse Guards (Grade I)
- War Office (Grade II*)
- Ministry of Defence (Grade I)
- New Street Group
- Bunhill Burial Ground Registered Historic Park and Garden (Grade I)
- St James Park Registered Historic Park and Garden (Grade I)
- Church of St Botolph Without Bishopsgate (Grade II*)
- 139-144 Leadenhall Street (Grade II)
- 147-148 Leadenhall Street (Grade II)
- Tower and remains of Church
- 162 & 164 Bishopsgate (Grade II)
- Finsbury House (22 & 23 Blomfield Street) (Grade II)
- St Paul's Cathedral (Grade I)

Conservation Areas

- Bunhill Fields and Finsbury Square Conservation Area (LBI)
- Leadenhall Market Conservation Area
- New Broad Street Conservation Area

Non-designated Heritage Assets

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

Conclusion on Heritage

476. The proposals place heritage at the heart of placemaking, in line with emerging City Plan 2040 policy S11. The design has been developed from consideration of the heritage assets on the site (and beyond, in the case of the WHS) and would result in a moderate enhancement to the significance of the Churchyard of St Augustine Papey, a non-designated heritage asset, and a low level of enhancement to the significance of the London Wall Scheduled Ancient Monument.
477. The proposals would preserve the settings and significance of all relevant designated and non-designated heritage assets and comply with Local Plan policies CS7, CS12 and DM12.1, emerging City Plan 2040 S11, HE1 and HE2, London Plan policies HC1 and HC2 and all relevant sections and paragraphs in the NPPF.

Archaeology

478. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest. An Environmental Statement and Archaeological Desk-Based Assessment accompanies the planning application.
479. The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago, and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London states that all of the City is considered to

have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.

480. In this case, there is a single-depth basement under Camomile Court and it is likely that archaeological remains still survive below this relatively shallow basement, including the remains of the later medieval defensive ditch associated with the City wall; and a double-depth basement under 63 St Mary Axe, with much less potential for remains surviving below due to the greater depth of the basement. There is high potential for later and post-medieval burials and other remains in the former churchyard and possibly for Roman and early medieval remains below it. For clarity, these potential remains are not considered to be of equivalent significance to scheduled monuments (NPPF fn 75).
481. Historic England, the City of London Archaeological Trust (CoLAT) and the Council for British Archaeology (CBA) have all voiced concerns about the methodology employed to assess the archaeological potential of the application site, including that because no physical evaluation works (e.g. trial pits) have been undertaken, the potential intactness of the former churchyard has been downplayed, and that the potential for Roman remains has been downplayed or overlooked.
482. To address these concerns, officers consider it reasonable, in the absence of definitive evidence to the contrary, to assume that the site has the highest level of intactness and survival of the aforementioned remains; with a correspondingly maximal level of impact assumed; and to assess the proposals on this basis. With this in mind, the proposals would have an impact on and would remove all archaeological remains on the site. At the fullest extent of archaeological survival, this would include all the burials in and other contents of the churchyard, and any pre-medieval deposits, including Roman, beneath the burial ground.
483. Historic England are of the view that this would cause the total loss of the burial ground as a non-designated heritage asset, a position with which officers, as stated in the preceding sections, do not agree, its above-ground form not only surviving but being enhanced and reunited, visually, with the section of the London wall SAM. The Council for British Archaeology (CBA) considers that the proposals would cause substantial harm to the archaeology and that permission be refused for this reason.
484. Officers disagree with these conclusions, in part at least for the reasons set out in the assessment of the impact on the former churchyard above. While officers acknowledge that the proposals could have an impact on the archaeology, if it survives, and that this would be mitigated by the proposed conditions. Officers consider that when the impact on the non-designated

heritage asset is considered overall, there will be a moderate level of enhancement.

485. The recording, excavation and analysis of a potentially high number of burials has the potential to provide new data, including evidence of burial practices over time, details of individuals and family groups, and characteristics such as how changing environments, health, impact of urbanisation, mobility and migration affected the lives of past City communities. It would advance knowledge of an entire City parish and supplement documentary evidence. The analysis, publication and archiving of this programme of archaeological work would augment and enhance existing knowledge and data from excavations of the small number of burial grounds in the City and in London, as well as informing the artwork and final designs of the relandscaped churchyard.
486. As part of the proposals, in the event of the burial ground being found to be intact, a PhD placement would be funded by the applicant to participate in the aforementioned work of recording and carry out the excavation analysis, recording, publication and archiving. It is anticipated that this would be in partnership with the London Museum and/or another Arts and Humanities Research Council (AHRC) body. This would go beyond the usual archaeological requirements and would represent an enhancement of the usual archaeological processes required post-permission.
487. As such, any potential impact on archaeology is considered to be satisfactorily weighed against and counterbalanced by the considerable potential for learning that this site and the proposals represent. Conditions are attached to cover site investigation and archaeological evaluation and a programme of archaeological work. Subject to these, the proposal would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

Accessibility and Inclusivity

488. Accessible and inclusive design is covered by NPPF paragraphs 96 and 135, London Plan policy D5, Local Plan policy DM10.8 and emerging City Plan 2040 policy HL1. These policies seek to ensure that the City is inclusive and welcome for all, with no disabling barriers that is its responsive to the requirements of all users.
489. London Plan policy D5 sets out how development should be informed by an inclusive design statement and detail engagement with relevant user groups. An Inclusive Design Statement has been prepared by Lord Consultants Limited, and this is appended to the Design and Access Statement. The proposals were presented to and reviewed by the City of London Access Group (CoLAG) on the 1st June 2023, 8th May 2024 and 12th November 2024.

490. The site is well served by public transport, noting that public transport is not accessible for all people. Key step-free points of arrival are at distances greater than 50m from the building entrances. As part of the Inclusive Access Management Plan (IAMP) that would be secured by condition, details and the mapping of resting points from points of arrival by public transport the entrances to the building would be reserved. As public transport is not accessible for all people, details of informal setting down points in the vicinity have been included in the submission, the details of these would be required to be included in the IAMP that is secured by condition.
491. London Plan policy T6.5 states that all developments should be car free except for at least one on, or off-street disabled persons parking bay. There are four existing on-street parking bays and these would be retained, it is noted that Blue Badge holders are restricted to four hours stay in the on-street spaces. The City of London runs the Red Badge scheme and the same constraints on time are not applicable. As part of the proposed development, two accessible spaces are proposed at ground floor level, within the open servicing area. These spaces would be available for use between 7am and 7pm when the servicing area is not in use for servicing (it is highlighted that delivery and servicing on the site is restricted and cannot take place between 7am and 7pm, this is discussed in the Highways and Transportation section below). As the spaces would only be available between 7am and 7pm, details of the booking and management of these spaces would be provided in the Car Parking Management Plan secured within the S106 agreement. Conditions are also attached to ensure that these spaces are free for users and available for the lifetime of the development.
492. Standards for inclusive cycling are in the London Cycle Design Standards (LCDS). The LCDS states that 5% of long and short-term spaces should accommodate larger and adapted cycles with associated facilities. 73 larger and accessible cycle storage spaces are proposed, which represents 5% of the spaces provided. Two cycle lifts and stairs with cycle channels would be provided with the accessible long stay storage on basement levels 2-4. Full details of the accessible cycle parking including details of the cycle lifts, corridor widths, door automation and setting out of larger cycle storage spaces and end of trip facilities would be secured by condition. In respect of the short stay cycle parking, this is proposed both on basement level and within the public realm and is in line with policy. 5% of the short stay spaces would be accessible. The accessible cycle spaces within the public realm should be located at the ends of the on-street Sheffield stands and would be secured by condition. In addition to the details being secured by condition, the details of the cycle parking and end of trip facilities would also be required to be included in the IAMP so that users of the building can have information about the facilities prior to arriving at the building.
493. London Plan policy D5 states that entrances into buildings should be easily identifiable and should allow everyone to use them independently without additional effort, separation or special treatment. Revolving doors are not inclusive of a range of people and require the use of pass doors, which

reinforce separation. All of the main entrances to the building would be either sliding door or barrel doors which provide a more inclusive development. The full details of the entrances would be secured by condition to ensure that the entrance strategy is inclusive and the details of the entrances would also be required to be included in the IAMP so that building users can preview the entrances prior to arriving at the building.

494. The vertical access through the building is achieved through a mix of passenger lifts and stairs which would adhere to Building Regulations. In regard to horizontal movement, the proposed corridor widths are consistent with Building Regulations and include sufficient passing room or sightlines to support ease of use. It is noted that where there are doors on access routes these will be required to be automated or power assisted for ease of movement within the building. These details along with details of the speed gates and opening mechanisms would be secured by condition.
495. Details of the materials requiring details of slip resistance and contrast to be submitted would be secured by condition.
496. A range of sanitary facilities is proposed. A Changing Places facility is proposed at basement level 1, which is suitable for use by people with multiple and/or complex impairments and up to two carers. This facility would be accessible to the public and the details of this facility would be via an obligation within the S106 agreement. Full details of the Changing Places facility would also be secured by condition, including the layout and route to and from the facility. The details of the Changing Places facility would also be required to be included as part of the IAMP. Wheelchair accessible toilets (AWC) are proposed across the development, including an externally accessible toilet at street level. The AWC's would provide options for both right- and left-handed transfer and it is welcomed that that space in the AWC's exceeds Building Regulations. Toilet facilities will be designed to be consistent with update Building Regulations and best practice with male, female and universal facilities, noting that suitably sized ambulant accessible toilets have been considered. Assistance animals may also visit the building and options for spend areas needs to be considered, as part of the IAMP secured by condition appropriate areas would need to be identified including both grass and hard surfaces.
497. The proposed multi-function space as part of the cultural offer includes the potential to include auditorium style seating. The details of this would be secured by condition to ensure that there is provision for the greatest range of people including options for wheelchair users, and people who need arm supports or back-rests. Further to this, the Multifunctional Cultural Space Management Plan and Social Enterprise Space Management Plan would need to demonstrate how these spaces would be inclusive in terms of procurement, programming, provision of opportunities and layout.

498. The proposed public realm and private terraces would have accessible step-free access and would include a range of planting and seating. The full details of the seating would be secured by condition to ensure that options for seating would be provided including single, aligned and group facing seating, seating at a range of heights, and with options for backrests and arms for support when rising, and for wheelchair users to transfer, or sit alongside companions. Details of the contrast of the materials within the public realm would be secured by condition. Full details of planting and landscaping proposed within the development would be secured by condition and the IAMP is also required to include details on planting. The IAMP secured by condition will also include details on how the lighting strategy would be inclusive.
499. The proposals include external terraces and walkways on the lower levels of the building (levels 1 to 3), these would be accessed by an external stair or for those who need step-free access 'Camomile Park' lift which would be situated adjacent to the external stair is proposed. The lift is large enough to accommodate a wheelchair or mobility scooter user. The external stair will connect the walkways with the intention of allowing people to 'wander down' between levels and the lift would be used to provide step-free access between the levels. The thresholds are shown as being step-free and this would be secured by condition to ensure that they are constructed as such. It is noted that there is a pinch point at the top of the stairs at the junction of the south and western terraces, and as such, notwithstanding the submitted drawings, full details of the routes through between the south and western terraces on levels 1 to 3 would be secured by condition to ensure that there is sufficient room for a wheelchair or mobility scooter use, or person using crutches or with an assistance animal to be able to move comfortably between the terraces, without conflict with people using the stairs.
500. An inclusive wayfinding strategy would be secured by condition to ensure that wayfinding is legible and intuitive.
501. In respect of emergency evacuation, two firefighting/evacuation lifts would be provided in the central core and two-way communication points, and audible and visual alarm systems are proposed. It is highlighted; the Fire Safety section of this report discusses that no objection is raised to the submitted Fire Statement. The IAMP secured by condition is required to include details of training frequents and issue of Personal Emergency Evacuation Plans.
502. Overall, the proposals accord with the aims of the relevant policies and subject to the imposition of the aforementioned conditions and S106 obligations, the proposed development accords with policy D5 of the London Plan, policy DM10.8 of the Local Plan and policy HL1 of the emerging City Plan 2040.

Highways and Transportation

503. The site is located at the eastern periphery of the City of London (CoL), 63 St Mary Axe occupies a fundamental position within the urban fabric, serving as a conduit between the historic core of the City and its adjacent neighbourhoods. Bounded by Camomile Street, Houndsditch, Outwich Street and St Mary Axe, the site functions as a natural route between the dense commercial district, residential communities, and cultural hubs.
504. The immediate surroundings are characterized by a blend of commercial, retail, and public uses. To the west, prominent edifices such as Salesforce Tower and 100 Bishopsgate contribute to the contemporary skyline, while smaller-scale developments to the north and east reflect the area's historical grain. Retail and dining establishments along nearby streets enhance the vibrancy of the area, supporting substantial foot traffic during the day.
505. The site is relatively level, featuring a compact urban grain typical of the City of London. Streets around the site are well-defined by built form, creating a sense of enclosure. Camomile Street and Houndsditch are slightly wider thoroughfares, whereas Outwich Street provides a quieter, more intimate frontage.
506. Public Transport Accessibility Level (PTAL) for this development is 6b which is the highest PTAL level. This score was derived using TfL's WebCAT service.
507. The site benefits from excellent transport connections, with Liverpool Street Station at approximately 250 meters to the west, offering national rail, underground, and Elizabeth Line services. It also has high level access to several underground stations, including Aldgate, Aldgate East, and Bank. Fenchurch Street station is also a short walk to the southeast. Several bus routes traverse Houndsditch and Camomile Street, further enhancing accessibility. The area is highly pedestrianized, with surrounding streets forming part of key walking routes through the City.
508. Camomile Street, Outwich Street and Houndsditch forms part of a one-way gyratory around the site, with a two-way section on Camomile Street to the southwest of the site. Camomile Street has an advisory cycle lane.
509. Parking restrictions operate on the nearby streets from Monday to Friday, 7AM to 7PM, and Saturday, 7AM to 11AM (except Christmas Day, Good Friday or Bank Holiday).
510. A section of the Camomile Street that is adjacent to the site, has double yellow lines restricting parking and stopping. Outwich Street has zigzags that are required for the pedestrian crossings and loading restrictions. The section of the Houndsditch which is adjacent to the site has 4 on-street car parking

spaces and e-scooter bay, and a lengthy bus stand opposite and the rest includes double yellow lines with waiting restrictions.

511. This application is supported with Transport Assessment (TA) that includes the Active Travel Zone (ATZ) assessment. The TA states that this assessment was carried out in line with TfL Transport Assessment guidance to support Vision Zero and the Healthy Streets approach. Three key routes were assessed to cover a number of key destinations. Key Route One: to Bank Station via Camomile Street (A1211) bus stops, Bishopsgate (A10) bus stops. Key Route Two: to Liverpool Street Station via Jubilee Gardens; Key Route Three: to Aldgate East Station via Houndsditch (A1211) bus stops. The worst part of each key route was reviewed and assessed against eight of the 10 healthy streets criteria with details contained in the TA.
512. It is noted that Network Rail have encourage the City to consider the potential allocation of CIL to address the collective infrastructure challenged created by cumulative growth. It is highlighted that the City of London addressed cumulative impacts of approved development sites via securing public realm improvements through Section 278 Agreements. These are mainly delivered in the vicinity of the sites, than in areas located further away, such as in this instance the LSS.
513. Vision Zero assessment was undertaken within a 250m radius of the site over the past three years (2020-2022). No fatal collisions were recorded on this zone, 17 were serious collisions and 37 slight collisions. Among the 17 serious collisions, five collisions took place at the Bishopsgate (A10)/ Wormwood Street (A1211)/Camomile Street (A1211) junction.
514. In August 2020, TfL introduced several changes along the Bishopsgate (A10), part of the corridor improvement scheme, designed to improve safety for walking, cycling and public transport use, in line with Vision Zero. New restrictions for vehicles using the road on weekdays between 07:00am to 19:00pm, wider footways and a number of banned turns were part of the scheme at the time, and other interventions to improve safety are work in progress.
515. The City of London (CoL) is developing proposals for a London Wall Corridor (LWC) scheme aimed at improving safety and enhancing the public realm, which will impact the highway network surrounding this development. The LWC scheme is considering changes to the highway layout along London Wall, between Finsbury Circus and Aldgate Square, including potential carriageway width reductions, the introduction of new segregated cycle lanes, timed closures for vehicular traffic in certain sections, and improvements to public realm areas such as widened footways, new seating, and landscaping. Although the LWC scheme is currently at the feasibility/design stage and subject to public consultation, the applicant has been engaged early and encouraged to consider potential changes and develop their proposal in a way that complements the LWC scheme

Trip Generation (All Modes)

516. The trip generation methodology is based on the TRICS database using comparable sites, with some adjustments to the mode shares after considering 2011 Census 'Method of Travel to Work' data and applicable MSOA layer to reflect the local characteristics and high provision of public transport and the fact that this is a car free development.
517. The net change in trips generated from existing to proposed, during AM and PM peaks for all travel modes, is shown on the table below (extract from the submitted TA Table 5-18).

MODE OF TRAVEL	AM PEAK (08:00 – 09:00)			PM PEAK (17:00 – 18:00)		
	ARRIVALS	DEPARTURES	TOTAL	ARRIVALS	DEPARTURES	TOTAL
Underground	551	12	563	49	538	587
Train	796	18	814	71	780	851
Bus	242	5	247	42	235	276
Taxi	7	1	8	1	4	5
Motorcycle	-5	-1	-6	0	-3	-4
Car or van	-7	-1	-8	0	-4	-5
Passenger	-1	0	-1	0	-1	-1
Bicycle	317	18	335	15	251	266
On foot	284	185	469	74	109	183
Total	2184	236	2421	249	1909	2158

Table 1.2 Trip generation for the proposed development

518. The Proposed Development is expected to generate 2,421 trips (All modes) during the AM peak and 2,158 trips (All modes) during the PM peak.
519. To estimate the impact on the public transport network, development trips were assigned to the network using Census origin-destination data, (method of travel to work CoL location of usual residence and place of work by method of travel to work). For each travel mode an assessment was presented on the TA and concludes that the highest proportion of trips to and from this development is expected from Liverpool Street Station.

Trip Generation for Deliveries and Servicing

520. The CoL's Transport Strategy and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, state that:

The City's transport infrastructure will be maintained and improved by minimizing road danger, congestion, and reducing vehicle emissions by:

- Designing and managing streets in accordance with the City of London street hierarchy;
- Minimizing the impact of freight and servicing trips through measures such as the provision of on-site servicing facilities, timing deliveries outside peak

- hours, adopting area-wide solutions, freight consolidation, and promoting deliveries by foot or bicycle;
 - Facilitating essential traffic, including emergency service vehicles, buses, freight, and private transport for people with particular access needs, while minimizing the environmental impact of these modes;
 - Requiring the provision of infrastructure for alternative-fuel vehicles and zero-emissions vehicles, such as off-street vehicle charging points.
521. In addition, Part H of this Policy states that developers must demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans, and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimized as a result of their development. This includes promoting best practices such as direct vision standards and zero-vision policies to minimize the danger of travel and servicing, including through the use of river transport. This aligns with the adopted policies of the Local Plan 2015, Strategic Policy CS16.
522. The Transport Assessment analysed the current deliveries and servicing trips for 22 Bishopsgate (22 BG), acknowledging similarities to the proposed albeit this development is much smaller in size. The 22 BG is a mixed-use development office-led with ancillary food and beverage, community use, and retail. It is accepted that the proposed development is likely to generate similar trips per land use to that of 22 Bishopsgate for each 100 sqm therefore, data from 22BG can assist in predicting future trips for this development.
523. Based on the comparison of two developments the proposed development is expected to generate 22 servicing trips per day, using the same consolidation strategy as the 22 BG building. Accounting for the fact that 22 BG was operating at 62% of its full capacity at the time, the servicing trip number was extrapolated to 35 vehicles per day to cover the full occupation.
524. If office floor area and sui generis floor areas are combined, using the office rate of 0.22 then the area with 93,663 sqm is predicted to generate 206 trips, and for the rest 4,242sqm combined floorspace using the rate 1.35 it generates 57 trips. Total trip generation for this development is 263.
525. The applicant is targeting a higher than 50 % rate of consolidation requiring a higher proportion of the LGV and HGV trips.
526. The proposed modal split (office) for the 85% targeted consolidation is: 5% MC; 10% car; 45% LGV and 40% HGV's (3 axle), generating 30 trips (office) (2 MC; 3 car; 13LGV and 12 HGV's (3 axle)), whereas for the modal split (retail) is 0% MC; 25% car; 25% LGV and 50 % HGV's (3 axle), generating 8 trips (0 MC; 2 car; 2 LGV and 4 HGV's (3 axle)).

527. The table 1.3 below shows trips generated with and without consolidation and mode split. It also shows the target of 40 deliveries a day which applicant is aiming to achieve with higher consolidation rate.

Mode	% Modal split office	Trips No consoli dation	Trips With 50% conso lidatio n	% Modal split retail	Trips No consolid ation	Trips With 50% consoli dation	Deliveries development* With 50% Consolidation	Deliveries development* Target Consolidation
Moto rcycle /scoot er	4	8	4	0	0	0	2	2
Car	34	70	35	25	14	7	20	4
LGV	53	109	54	25	14	7	30	18
Rigid 3 axle (HGV)	9	19	10	50	29	14	12	16
Rigid 4 axle (HGV)	0	0	0	0	0	0	0	0
Total	100	206	103	100	57	28	64	40

*numbers adjusted in columns to make even numbers

Table 1.3 trips generated and mode split (with and without consolidation)

528. The number of deliveries/servicing trips is capped at 64 per day (with 50% consolidation) with the proposed mix as shown on the table 1.3. secured though the s106 Delivery and Servicing Management Plan (DSMP). Deliveries by cargo bikes are permitted at all times in the areas dedicated and managed by the facilities management. This 50% consolidation will be secured by condition.
529. The flexible servicing area includes two servicing bays that will function as public realm space during the day and facilitate deliveries and serving from 7PM to 7AM. Swept Path analysis was included in TA and show manoeuvring in and out of the servicing area. Servicing bays can accommodate the 6 proposed deliveries per hour for overnight servicing, thus providing sufficient capacity for all activities associated with deliveries /servicing /refuse/ recycling to facilitate this development.

530. In addition, a booking system is required to manage and allocate delivery/servicing slots for all land uses of this development and secured via S.106. The reason is, to ensure safety is maintained on the public highway at the allocated times and no queuing in and around the vicinity. The booking system must keep records of all trips generated following the occupation and data kept thereafter. The trip records to be presented to the CoL upon request to ensure compliance.
531. To ensure no conflicts with delivery/ servicing activities and to comply with the criteria on hours of use, it is recommended that collection of refuse/recycling is part of the same system that manages the delivery and servicing slots. Allocated slots for refuse/recycling can then be reviewed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development. This ensures that loading/parking area is managed within the allocated times, and it facilitates different requirements. It is highlighted and as discussed in the Noise and Vibration section of this report, as to protect neighbouring amenity refuse collection including glass would need to take place between 8pm and 11pm.
532. All of the terms above would be secured through a S106 obligation in respect of the Delivery and Servicing Management Plan.

Pedestrian Comfort Levels

533. The Pedestrian Comfort Level (PCL) assessment was provided on a Technical Note (TN), supplementary to the TA, to determine the existing and proposed levels in the vicinity of this development. TfL guidance 'Pedestrian Comfort Level Guidance v2' (2019) was followed. PCL levels range from A to E to represent differing levels of suitability on different areas of pedestrian movements and are categorised as: comfortable, acceptable, at risk and unacceptable /uncomfortable. For the areas (office and retail development) where the PCL level is C, this is considered at risk, whereas PCL below level C is unacceptable and require highways improvements and widening of the footways or crossings.
534. Eight points were selected as shown on the figure 1.1 below. The assessment of the existing, baseline scenario, does not include points 7 and 8 because they represent the new public routes created as part of this development. The public routes through the building will be accessible to the public between 8am and 8pm, and this would be secured within the Management Plan secured within the S106 agreement.

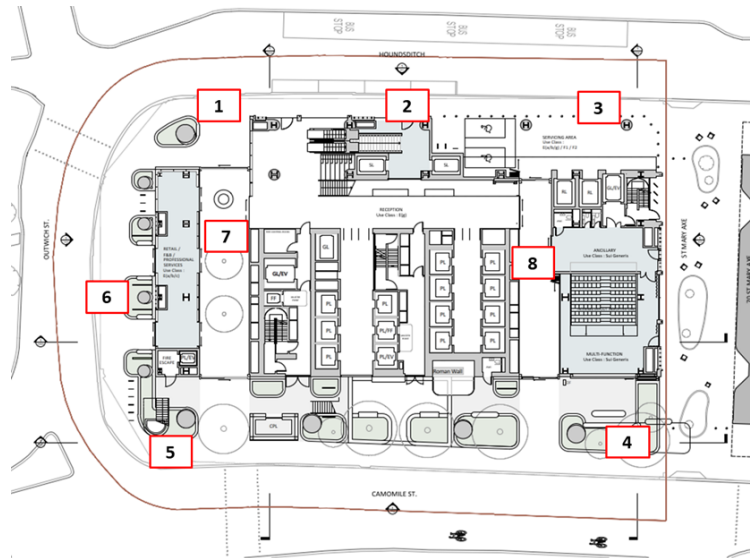


Fig. 1.1 Selected sites for PCL assessments (proposed scenario)

535. To obtain the PCL's data used is from AM pedestrian counts taken on the footways surrounding the site on the 30 April 2024 conducted for the London Wall Corridor Scheme. (LWCS). Section of St Mary Axe between the site and 70 St Mary Axe was not captured therefore not included in this assessment. Also, only the AM peak hour pedestrian flow data 08:00-09:00 was captured as part of the LWSC, nevertheless as this hour represents the highest peak for development trips, in this case, is considered acceptable.

Assessment Site	PCL Width (m)	AM peak
1	1.85	A-
2	1.75	A-
3	1.92	A-
4	2.16	A+
5	2.9	A+
6	2.53	A+

Table. 1.4 Existing PCL's, site (1-6)

Assessment Site	PCL Width (m)	AM peak
1	8.4	A
2	2.2	A-
3	8.4	A+
4	2.16	A
5	3.15	A
6	3.4	A+

7	5.2	A
8	3.1	A

Table. 1.5 Proposed PCL's, site (1-8)

536. The proposed development pedestrian trips have been assigned based on the public transport availability and proportionately distributed based on probability of such movements taking place. PCL scores for the streets of this type (for Office and Retail streets) are classified, as follows: for level A to B is Comfortable; level B- to C+ is Acceptable. Further information that relates to the proposed trip distribution, assumptions on the future base 2040 scenario and reasoning, can be found on the TN.
537. For the proposed scheme, all PCL's are acceptable; however they rely on future footway widening, as part of the LWCS. The applicant has agreed to make a substantial contribution towards the LWCS, or any other City of London project under a different name, to ensure that footways are widened as assessed and shown on the table 1.5.

Cycle Parking

538. Policy DM 16.3 of the Local Plan requires applicants to provide on-site cycle parking spaces in accordance with the London Plan standards and exceed the standards when feasible.
539. The London Plan, Policy T5 Cycling indicates that development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle, through:
- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.
 - securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.
540. The level of the required cycle parking provision is dependent on the location of the proposed development. The City of London (CoL) is within the area where higher minimum cycle parking standards apply.
541. This proposal includes a total of 1,463 (long stay) and 101 (short stay) cycle parking spaces. Policy T5 of the London Plan has cycle parking standards for different land uses. The table 1.6 below, shows the standard requirements in compliance with the London Plan and the provision.

Use Class	Floor Area sqm (GEA)	Long Stay	Short Stay
Former B1 business offices	108,872	1 space per 75 sqm (GEA) 1,452	First 5ksqm=1 spaces per 500sqm; thereafter 1 space per 5k sqm (GEA) 31
Café (Class Ea), restaurant and drinking establishment	1,063	1 space per 175 sqm (GEA) 7	1 space per 20sqm 54
Former A2 -A5 Retail / Café (Class Ea) / E(b)) 205 sqm;	134	1 space per 175 sqm (GEA) 1	areas with higher cycle parking standards: 1 space per 20 sqm (GEA) 3
Learning and non- residential institution	644	1 space per 8 FTE staff 2	1 space per 100 sqm (GEA) 7
Sui Generis (SG) (close to former SG- D2 sports hall swimming gym)	501	1 space per 8 FTE staff 1	1 space per 100 sqm (GEA) 6
Total	111,179	1,463	101

Table 1.6 Cycle parking provision

542. The location of the long cycle parking and facilities is across four basement levels with two lifts and dedicated stairs to ensure access at each level. The proposed long stay cycle parking by type is: 146 Sheffield stands (10%); 1,098 two tier racks (75%); 146 locker type (10%) and 73 accessible spaces (5%).
543. It is recommended that some of the cycle parking spaces to be made larger for the cargo bikes, facilitating the deliveries/servicing. The full details would be secured by condition.
544. The location of the short stay cycle parking is proposed at the B1 level facilitating the office use. 44 spaces are located at the B1 level for visitors, who will gain access through barcode given by the facility management, 30 of the cycle parking spaces are scattered on the ground level with easy access from the street, leaving with a shortfall of 27 spaces which are proposed to be provided on the public highway as part of the s278 agreement. Due to the limited availability within the public highway, the applicant is instead required to provide a contribution towards cycle infrastructure.
545. The applicant proposed a dropped kerb on Houndsditch to provide step-free access to the cycle storage facilities, which will be considered as part of the

s278 works. Nevertheless, cyclists are expected to dismount on-street for safety reasons in order to minimise conflicts with pedestrians, thus do not require dropped kerb to reach cycle facilities.

- 546. Cycle parking facilities are provided in this proposal with the total of 1,463 lockers and 147 showers, in line with the London Plan requirements. The entrances and lifts used by cyclists must be large enough to ensure that cyclists can be fully accommodated. Full details would be secured by condition to ensure that facilities comply with the LCDS standards.
- 547. Further details are required to understand cyclists journey from entering this development to the areas dedicated for cycle parking. There was limited information on the how visitors are able to access the spaces provided and how the developer is proposing to encourage they come using cycling as a mode of transport. Nevertheless, such details to be covered and part of the Travel Plan (TP), part 2, promoting cycle parking and its facilities. The TP Cycle Promotion Plan to contain initiatives in form of the action plan with SMART targets. The targets for the cycle parking to be agreed with the CoL and are expected to be achieved within the 5 years. The applicant is required to submit the annual report for review, as part of the TP secured via the S106 agreement.

Car Parking

- 548. The existing site does not have off-street parking spaces or vehicular access.
- 549. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. The disabled persons parking for Blue Badge holders must be provided in accordance with, Policy T6.5 for Non-residential elements of the development. The policy indicates the levels of provisions to be in accordance with the Table 10.6, to ensure that all non-residential parts of a development provide access to at least one, on or off-street, disabled parking bay. A car-free development has no standard parking but must provide parking for the disabled people.
- 550. This proposal is car free development with two disabled car parking spaces on the ground level within the service yard, accessed through Houndsditch, and available after 7AM until 7PM. Some flexibility beyond 7PM was factored in, for example, if an employee requires the use of a parking space until 11PM. This arrangement will be managed by the building management company who will adjust the bookings of the deliveries to take place from 11PM till 7AM. The full details of the management of these spaces would be secured via Accessible Car Parking Space Management plan which is secured via the S106 agreement.
- 551. The proposed ground floor plan, ref 1864 -FPA-XX-GF-DR-A-16108, shows the location of the two disabled car parking spaces, with additional 1.2-meter

strip on two sides to ensure that disabled drivers can get in and out of the car easily.

- 552. Swept path analysis for the parking bays was carried out and presented within the transport assessment, drawing ref:22-166-T-037 rev E. The analysis has shown that vehicles can drive in and out in forward gear.
- 553. The management company will monitor the demand for blue badge car parking spaces through a record of those tenants that are Blue Badge holders. Blue Badge spaces will be identifiable through the introduction of appropriate signage. Any parking outside of designated bays, or without valid permit / Blue Badge, will be enforced by the on-site management team.
- 554. On Houndsditch there are four parking bays, which are pay-by-phone allowing a maximum stay of four hours, with no returns within one hour. In addition, there are two existing disabled parking bays located adjacent to 70 St Mary Axe. The current demand and occupancy levels for spaces mentioned was not surveyed.
- 555. Vehicle access is proposed from Houndsditch to facilitate disabled parking and activities related to deliveries, servicing, waste, and recycling. To accommodate the new vehicle access and site layout, one on-street car parking space is proposed to be removed and reallocated, along with the e-scooter and e-cycle hire parking bay.
- 556. It is likely that parking demand on public streets nearby will increase as a result of this development. A proposal with two disabled parking spaces for a mixed-use development, fulfils the policy requirement for the disabled parking, and on-street parking may not be suitable for some staff/and or visitors of this development, due to restrictions on the use of the Blue/Red badge permits.
- 557. Having accepted that the demand for disabled car parking coming from this development is not known until full occupation, and that it can vary considerably during days/months/years, in order to bring this proposal fully in line with the adopted policies a Travel Plan (TP) is required and recommended to be secured through the s106 Agreement.
- 558. The first principle of TP is to support disabled people (staff and visitors) of this development through different measures, in order to make to make this development inclusive. Each disabled staff to have a tailored travel plan when they join any occupiers of this development, followed by supporting them on how to get to/from work with different initiatives.
- 559. Similarly, disabled visitors of this development could request support to get to/and from this site, if the public transport is lacking to meet their needs. Not

all nearby underground stations have step-free access, which means that some users of this development may require additional support. Measures such as arranging a pick-up from a nearby underground station with step free access, or pre-arranged locations must be considered and could form part of travel plan measures to support the disabled people.

560. The applicant is required to keep records and manage the demand for the disabled car parking spaces. In addition, details on facilitating alternatives to car parking for disabled users (staff and visitors) for all land uses included in this development, will form part of the TP. The action plan with initiatives is to be submitted for review to the LPA annually.

Refuse/Recycling Strategy

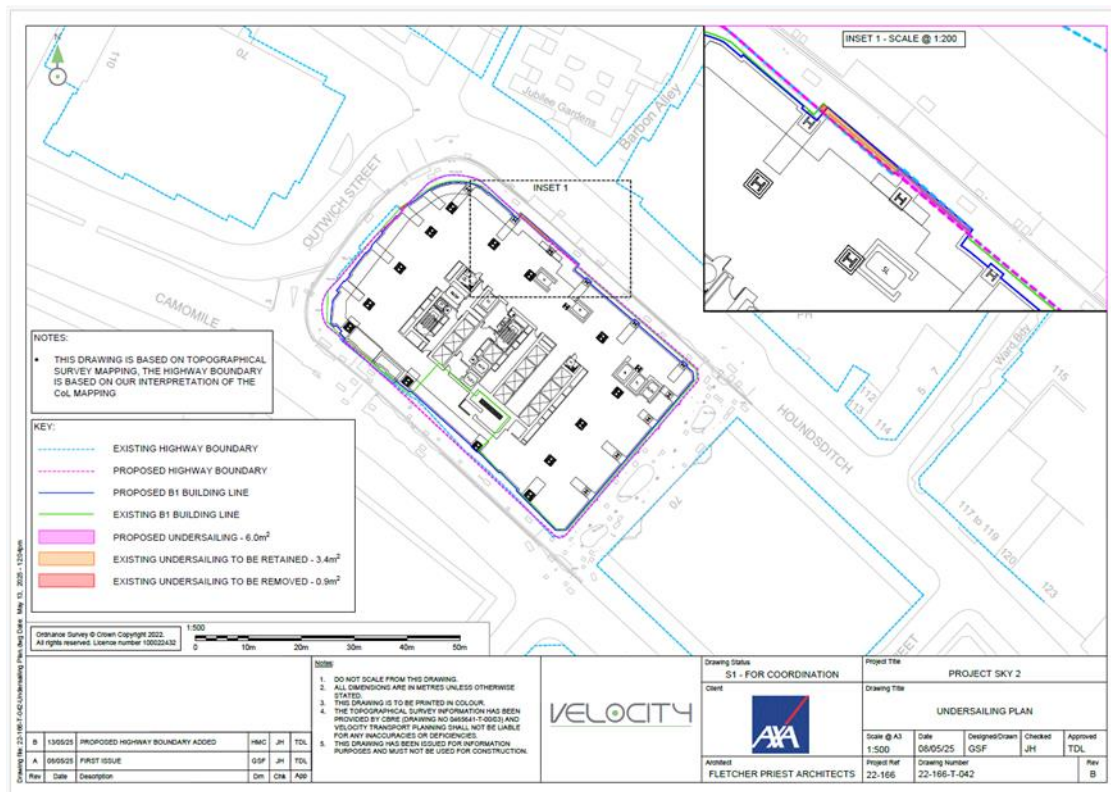
561. Under the current City's Transport Strategy and its proposals and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions. Refuse and recycling vehicle trips to be made outside of peak hours: 7:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00. For proposals near residential areas, further restrictions are applicable, for example during evenings and early morning hours.
562. The existing servicing arrangement is currently carried out on-street at Camomile Street and Houndsditch.
563. The servicing strategy is to carry out the deliveries and servicing within the service yard, also known as the flexible servicing area. The servicing times are to occur during overnight hours between 7pm to 7am when accessible parking is not available for use. Some flexibility was allowed to park until 11pm in such case, facilities management will review and re-arrange booking slots. It is highlighted and as discussed in the Noise and Vibration section of this report, as to protect neighbouring amenity refuse collection including glass would need to take place between 8pm and 11pm.
564. Swept paths showing movements for vehicles up to 8m associated with refuse/recycling are included on the TA, appendix B. Drawing Reference: 22-166-T-025 Rev D.
565. To ensure refuse/recycling collections do not conflict with delivery/ servicing activities, it is recommended that timings of the collections become part of the system that is managing the delivery/ servicing slots, therefore include in the S106 DSMP. Facilities Management can allocate available slots to each land use and review timings to suit different land users. This ensures that such activities are managed and are not done on the public highway and are not in conflict with deliveries and servicing.

Oversailing

566. Structures that permanently oversail the public highway must be licensed by the City of London Highway Authority, in accordance with Section 177 of the Highways Act 1980.
567. The proposed development proposes to oversail the street-level public realm in several locations around the building, drawing numbers:
- 1864-FPA-XX-XX-DR-A-22100 entitled 'Highway Sections Outwich Street Section AA';
 - 1864-FPA-XX-XX-DR-A-22101 entitled 'Highway Sections St Mary Axe Section BB';
 - 1864-FPA-XX-XX-DR-A-22102 entitled 'Highway Sections Camomile Street Section CC';
 - 1864-FPA-XX-XX-DR-A-22103 entitled 'Highway Sections Houndsditch Street Section DD',

illustrates the highway cross-sections that will oversail the public highway.

568. The total area of the proposed oversail is 429.6m² at oversailing height of 20.6m, and a maximum oversailing projection between 1.4m and 3.6m throughout the building design in Houndsditch, Outwich and Camomile Street sections. There are minimal oversail projection of 0.6m of the building facade on St Mary Axe.
569. Drawing number 22-166-T-039 Rev E entitled 'Oversailing Plan' has been prepared to illustrate the proposed oversailing area shade in pink.

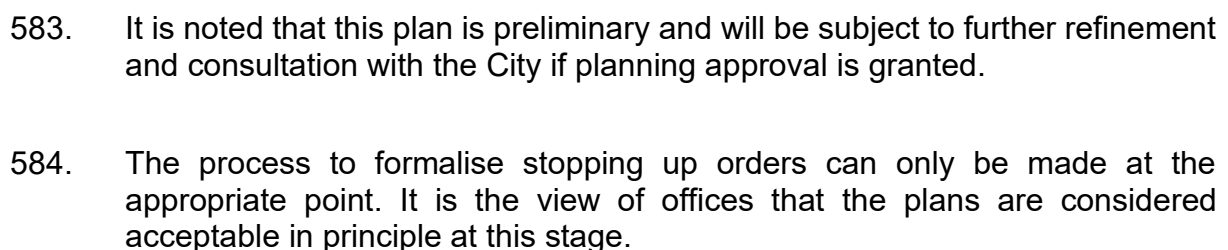


575. The total area of the proposed undersail is 6.0m², shaded in pink. The existing undersail area to remain is 3.4 m², shaded in orange. The total area of the existing undersail to be removed is 0.9m², shaded in red.
576. Should planning permission be granted, an Approval In Principle (AIP) would be required. The AIP is a construction compliance certificate for all highway structures.
577. The details of the undersail are to be discharged through a planning condition however, the initial proposals are considered acceptable in principle.

Highway Boundary- Stopping Up and Adoption

578. As the highway authority, the City of London has the power to stop up areas designated as highway land by making orders known as 'stopping up' orders. The term 'stopping up' means that once such an order is made, the highway land ceases to be a maintainable highway at public expense and is extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent.
579. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway

580. Areas of privately owned land can alternatively be 'offered up' for adoption as public highway, for instance, for the creation of a new 'estate road' to be adopted and maintained by the local authority.
581. As a result of the proposals, sections of the highways within Camomile Street will need to be stopped up, and private areas within Outwich Street adopted, under a Section 38 Agreement of the Highway Act 1980.
582. The area to be stopped up is 17.4m² and to be adopted 21.9m². Drawing number 22-166-T-040 Rev C entitled 'Stopping Up' has been prepared to show the proposed area to be stopped up in red shading, and the proposed new highway area in green shading.



165

585. The London Wall corridor is a busy east-west route running across the eastern to central part of the City. It also forms part of a proposed cycle route under the Transport Strategy.
586. This busy transport corridor carries a high volume of traffic, which has resulted in a poor environment for people walking, wheeling, cycling, and using the public realm.
587. There are several developments planned or currently taking place close to or along this corridor. Some of these developments will or are likely to require highway improvements as a condition of planning permissions or through separate agreements for improvement with building owners.
588. Monitoring and surveys have shown that the number of motorised vehicles is decreasing in line with targets, now nearly a third of what it was in 1999. Meanwhile, footfall has increased, and walking, wheeling and cycling now account for three-quarters of observed travel activity.
589. Given this context, a holistic approach is needed to ensure that highway and public realm improvements associated with nearby developments and other projects along the corridor are fully integrated with development proposals and aligned with future aspirations for the wider area.
590. This development falls within the scope of the above proposals, and its Section 278/106 Agreements for highway improvement works will contribute to the delivery of the London Wall Corridor Scheme, LWCS, project, providing an accessible area for walking, cycling, and wheeling.
591. There will be an agreed contribution between the developer of the building and the City of London Corporation for any works being proposed for the London Wall Corridor (LWC) project, and not limited to, as well as any improvements deemed necessary to be carried out to benefit the area.
592. The scope of the Section 278 works will include (but not limited to):

Outwich Street/Houndsditch

- Reconstruction of the footways adjacent to the planning application
- Resurfacing of the carriageways adjacent to the planning application
- Renewing of road markings and associated traffic orders
- Improvements to the existing pedestrian crossing to suit the new site layout
- Reviewing the existing parking arrangement to suit new site layout and associated traffic orders

Camomile Street

- Reconstruction of the footways adjacent to the planning application
- Resurfacing of the carriageways adjacent to the planning application
- Renewing of road markings and associated traffic orders

593. The Section 278/38 of the Highways Act 1998 will be secured as part of the Section 106 Agreement as an obligation.
594. In addition to the above, this development proposes a Section 106 Highway Contribution to secure funding for the LWCS, including but not limited to improvements within the area, even if delivered under a different scheme.

Demolition/Construction Logistics Plan (CLP)

595. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that developments must address their impacts during the construction phase and following the occupation after the site is operational.
596. Policy D16.1 of the Local Plan supporting paragraph 3.16.11 and the emerging City Plan 2040 Policy VT1 state that Construction Logistics Plans (CLP) will be required for all major developments, or refurbishments and for any developments that would have a significant impact on the transport network during construction.
597. Although an outline document was submitted, CLP- detailed plan to be developed in accordance with TfL guidance and the latest standards once a Principal Contractor has been appointed. The submitted document must comply with measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines. The detailed plan to show how construction vehicles will be managed during the demolition and construction phase, and in line with the principles of three Rs, that is, Reduce, Re-time and Re-mode.

Conclusion

598. The scheme benefits from high levels of public transport accessibility, would be car-free and it promotes cycling and walking as sustainable modes of transport. The proposals are considered acceptable in transport terms, subject to conditions and S106 obligations.

599. Should planning permission be granted the following conditions and planning obligations along with the Section 278 and Section 38 to be secured:

- A planning condition requiring the provision of 1,463 long stay cycle parking spaces, 101 short stay cycle parking for the entire development, designed 317 to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.
- A planning condition to secure the detailed Construction Logistics Plan (CLP). The condition shall state that the detailed CLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the CLP has been approved by the planning authority.
- A S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The clause shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be adhered to.
- A S106 obligation to secure an Accessible Car Park Management Plan (ACPMP) including details of how the accessible parking spaces will be managed to accommodate the users and their requirements.
- A S106 obligation to secure a Travel Plan (TP) for the development with a cycle promotion plan. The obligation shall state that the TP shall be approved prior to the first occupation of the site and the approved travel plan shall be followed for 5 years, unless otherwise agreed with the Highway Authority.

600. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies, Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction.

601. It accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2. It also accords with the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. It accords with The London Plan 2021 Policies T1, T2, T3, T4, T5, T6 and T7. As such, the proposals are considered acceptable in transport terms.

Environmental Impacts of Proposals on Surrounding Area

602. Local Plan policy DM10.1 requires that all developments be of a high standard of design by ensuring that (amongst other things) the design, and materials avoid unacceptable wind impacts at street level or intrusive solar glare effects on the surrounding townscape and public realm. Policy DM10.1 also provides that the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby

dwellings and open spaces to unacceptable levels. Emerging City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort. London Plan policy D6D provides that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context. London Plan policy D8G requires consideration to be given to the local microclimate created by buildings and the impact of service entrances and facades on the public realm. Addressing environmental impacts in terms of wind, daylight, sunlight, penetration and temperature conditions around tall buildings is also a requirement of London Plan policy D9C(3)(a).

Wind Microclimate

603. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
604. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and buildings entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
605. A separate safety criterion is also applied to ascertain if there any safety risks to pedestrians or cyclists.
606. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as result of development. If wind conditions become windier but remain in a category suitable for the intended use, or if there is a negligible or beneficial effect, winds mitigation is not required.
607. The wind tunnel testing and CFD results broadly give the same assessment results. However, variance can occur as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

608. The City of London is characterised in part by a collection of tall commercial buildings of differing geometries and shapes. Tall buildings naturally create an obstruction to the strong upper-level winds and can increase the windiness in their surroundings. The magnitude of this impact depends on the design of a proposed scheme, in particular its size, shape, orientation, and architectural features.
609. The City of London Lawson criteria defines the safety limit as once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe.
610. There are four criteria for determining the sensitivity of a receptor:
- High: seating areas, entrances and terraces
 - Moderate: thoroughfares
 - Low: high pedestrian traffic thoroughfares
 - Negligible: roads and areas of no pedestrian activity
611. There are also four criteria for determining the magnitude of change/impact to a receptor:
- Large: safety exceedance
 - Medium: two categories above the criteria
 - Small: one category above the criteria
 - Negligible: within suitable criteria
612. The City of London Lawson Comfort Criteria are as follows:
- Frequent sitting
 - Occasional sitting
 - Standing
 - Walking
 - Uncomfortable
613. Assessments have been carried out for both the windiest and the summer season. It is noted that certain areas are more likely to be more frequently used in the summer, this includes amenity areas, public outdoor seating areas and café seating. It is noted that if an area is classified as suitable for occasional sitting in the summer, the windier conditions that occur during the winter season usually mean that the area would be classified as suitable for standing in the windiest season, unless additional shelter was provided. This is considered to be tolerable on the basis that such an area would be most frequently used for sitting during the summer months. At other times of the year, the expectation of usability is lower due to other factors such as temperature and precipitation

614. The wind microclimate across the site was tested for the following eight configurations:
- Configuration 1: The existing Site with existing surrounding buildings (the baseline);
 - Configuration 2: The Proposed Development with the existing surrounding buildings (without mitigation);
 - Configuration 3: The Proposed Development with existing surrounding buildings, proposed on-site landscaping and wind mitigation measures;
 - Configuration 4: The existing Site with Tier 1 (consented) cumulative schemes (Future Baseline);
 - Configuration 5: The Proposed Development with Tier 1 (consented) cumulative schemes (without mitigation);
 - Configuration 6: The Proposed Development with Tier 1 (consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures;
 - Configuration 7: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes (without mitigation measures); and
 - Configuration 8: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures.
615. Tier 1 schemes are schemes that have a planning consent or a resolution to grant and Tier 2 schemes are all the schemes in Tier 1 and all schemes submitted and pending determination. The table below sets out the schemes included in the Baseline and each of the Tiers.

Developments under construction considered as part of the Baseline
• 6-8 Bishopsgate (17/00447/FULEIA) • One Leadenhall Court (18/00740/FULEIA) • 40 Leadenhall Street (13/01004/FULEIA)
Tier 1 Schemes
• 1-14 Liverpool Street and 11-12 Blomfield Street (21/00726/FULEIA) • 1 Undershaft (16/00075/FULEIA) • 100 Leadenhall Street (18/00152/FULEIA) • 123 Houndsditch (21/00622/FULEIA) • Bevis Marks House (17/00330/FULMAJ) • 1-27 The Arcade Liverpool Street (22/00443/FULL) • 55 Bishopsgate (22/00981/FULEIA) • 55 Old Broad Street (23/00469/FULEIA) • 75 London Wall (23/01270/FULMAJ)
Tier 2 Schemes (plus the schemes in Tier 1)
• All schemes in Tier 1 • 1 Undershaft (23/01423/FULEIA) • Bury House (24/00021/FULEIA)

- | |
|--|
| <ul style="list-style-type: none"> • Liverpool Street Station (23/00453/FULEIA) • 99 Bishopsgate (24/00836/FULEIA) |
|--|

616. The table above shows that Bury House (24/00021/FULEIA) was included in the Tier 2 schemes, the Environmental Statement in Chapter 2 sets out prior to the submission of this application, application 24/00021/FULEIA received a resolution to refuse. The Wind Assessments within the Environmental Statement considered the scheme at Bury House and that the conclusions of the cumulative assessments would remain valid if the Bury House scheme did not come forward.
617. It is highlighted that the walkways on the levels 1 to 3 and ‘bastion’ style terraces on level 4 of the proposed development could only be tested in the CFD analysis due to the limitations of instrument placing in the wind tunnel testing due to the width of the walkway areas.

Configuration 1: The existing Site with existing surrounding buildings (the baseline)

Safety Criteria

618. The wind tunnel testing evidenced instances of strong winds that exceed safety criteria, posing a risk to pedestrians and cyclists, at the following locations:
- Within the roadway of Camomile Street (two locations within the roadway)
 - Within the Houndsditch thoroughfare
619. The CFD analysis evidenced instances of strong winds that exceed the safety criteria at the following locations:
- At the junction of Wormwood Street, Bishopsgate and Camomile Street
 - Southwest corner of 100 Bishopsgate
 - On the terrace of the Pan Pacific Hotel

Pedestrian Comfort

620. Overall, the wind tunnel testing demonstrates that conditions range between being suitable for occasional sitting, standing, walking and uncomfortable in the windiest season. In the summer, conditions are generally improved as they are suitable for frequent sitting, occasional sitting and walking. The conditions are windier to the west of the site on Camomile Street and Outwich Street, and calmer to the east on Bevis Marks, Houndsditch and St Mary Axe. The windiest conditions are recorded on Camomile Street, near the junction with Bishopsgate. Overall, the conditions identified in the CFD analysis align closely with the wind tunnel testing.

Thoroughfares

621. The wind tunnel testing demonstrates that all off-site thoroughfares range between being two categories calmer, one category calmer or satisfying the target condition in the windiest season, as they range between being suitable for occasional sitting, standing and walking, so therefore are suitable for their intended use. The CFD analysis shows similar results to the wind tunnel testing with thoroughfares being suitable for walking, standing and occasional sitting in the windiest season as such ranging between satisfying the target condition and being one and two categories calmer.

Entrances

622. The wind tunnel demonstrates in the windiest season, all off-site entrances would either be suitable for occasional sitting or standing so are either one category calmer than the target condition or satisfying the target condition, so are suitable for their intended use. The CFD analysis shows similar results to the wind tunnel testing with entrances being suitable for standing and occasional sitting in the windiest season, so either satisfy the target condition or are one category calmer than the target condition.

Bus Stops

623. The wind tunnel testing demonstrates in the windiest season, all bus stops are suitable for standing so satisfies the target condition and are therefore suitable for their intended use. The CFD analysis similarly shows that bus stops would be suitable for their intended use in the windiest season.

Pedestrian Crossings

624. The wind tunnel testing demonstrates in the windiest season, all pedestrian crossings are suitable for standing or walking which is either one category calmer than the target condition or satisfying the target condition and therefore suitable for their intended use. The CFD analysis shows that the pedestrian crossings would be suitable for their intended use.

Mixed Use Ground Level Amenity (off-site)

625. The wind tunnel testing demonstrates that Jubilee Gardens which are situated to the north of the site is suitable for occasional sitting in both the windiest season and summer and therefore satisfies the target condition. The results from the CFD analysis are consistent with the wind tunnel testing for both the windiest season and the summer.
626. The mixed amenity space by 100 Bishopsgate to the southwest of the site is suitable for standing in both the windiest season and summer and is therefore one category windier than the target condition. The results from the CFD

analysis are consistent with the wind tunnel testing for both the windiest season and the summer.

Benches (off-site)

627. The benches in Bishopsgate Plaza to the northwest of the site are suitable for standing in both the windiest season and the summer and are therefore one category windier than the target condition. The CFD analysis shows that they would be suitable for standing in both the windiest season and the summer and are therefore one category windier than the target condition.
628. The wind tunnel testing demonstrates that the benches within Jubilee Gardens, in the windiest season are suitable for standing or occasional sitting, therefore ranging between being one category windier than the target condition and meeting the target condition. In the summer, they would be suitable for occasional sitting and therefore being suitable for the target condition. The CFD analysis shows that they would be suitable for occasional sitting in both the windiest season and the summer, satisfying the target condition.

Cafe Style Seating (off-site)

629. The wind tunnel testing demonstrates that the cafe style seating situated by 110 Bishopsgate to the west of the site is suitable for standing in the windiest season, which is two categories windier than the target condition. In the summer, this seating would be suitable for a mix of standing and occasional sitting, which ranges between being one and two categories windier than the target condition. The CFD analysis shows that this area would be suitable for standing in both the windiest season and the summer, which is two categories windier than the target condition.
630. The wind tunnel testing demonstrates that the cafe style seating by 22 Bevis Marks to the east of the application site would be suitable for occasional sitting in both the windiest season and summer and is therefore one category windier than the target condition. The results from the CFD analysis are consistent with the wind tunnel testing for both the windiest season and the summer.
631. The wind tunnel testing demonstrates that the cafe style seating at 70 St Mary Axe to the immediate east of site is suitable for occasional sitting in both the windiest season and summer and is therefore one category windier than the target condition. The results from the CFD analysis are consistent with the wind tunnel testing for both the windiest season and the summer.
632. The wind tunnel testing demonstrates that the cafe style seating at 123 Houndsditch to the northeast of the site is suitable for standing in the windiest season, therefore two categories windier than the target condition. In the

summer, this would be suitable for occasional sitting and therefore one category windier than the target condition. The CFD analysis shows that this would be suitable for occasional sitting in the windiest season and the summer, which would be one category windier than the target condition.

Terrace Level Amenity (off-site)

633. The wind tunnel testing demonstrates that the roof terrace at 100 Bishopsgate to the southwest of the site is suitable for standing in both the windiest season and the summer and is therefore one category windier than the target condition. The CFD analysis shows that in the windiest season this is primarily suitable for standing with instances of walking and occasional sitting, ranging between being one and two categories windier than the target condition and satisfying the target condition. In the summer, the terrace would primarily be suitable for standing and with instances of occasional sitting, ranging between being one category windier than the target condition and satisfying the target condition.
634. The wind tunnel testing demonstrates that the roof terrace(s) at Bishopsgate Plaza to the northwest of the site are suitable for standing and walking in the windiest season, this ranges between being one and two categories windier than the target condition. In the summer, they would be suitable for standing, therefore one category windier than the target condition. The CFD analysis shows that in the windiest season, the terrace(s) would range between being uncomfortable, and suitable for walking and standing and in the summer, the extent of uncomfortable is reduced, ranging between being one, two and three categories windier than the target condition.
635. The wind tunnel testing demonstrates that the roof terrace(s) at 2 Devonshire Square to the north of the site are suitable for occasional sitting in both the windiest season and the summer and therefore satisfies the target condition. The CFD analysis shows that the terrace(s) would be suitable for a mix of standing and occasional sitting in the windiest season and in the summer the extent of standing would be reduced, ranging between being one category windier than the target condition and satisfying the target condition.

Demolition and Construction Effects

636. It is expected that wind conditions during demolition would be suitable for a working construction site and pedestrian thoroughfares around the site (with hoarding in place). Therefore, the likely effect is expected to be Negligible (not significant), and no specific wind microclimate mitigation or management procedures are considered necessary during demolition.
637. As the construction of the Proposed Development progresses, wind conditions at the site would gradually adjust from those of the existing site to those of the completed development. The effects would range from direct, local, short-term

(temporary), Major Beneficial (not significant) to Moderate Adverse (significant) pre mitigation at on and off-site receptor locations.

638. The significant effects which are identified in the 'completed development scenarios' occur at receptors which would not become active until the proposed development is fully operational. As such, these would not cause unsuitable conditions during construction works and all construction wind effects would be Negligible (not significant).

Configuration 2: The Proposed Development with the existing surrounding buildings (without mitigation);

Safety Criteria

639. The wind tunnel testing evidenced that there would be no instances of winds exceeding the safety threshold within the site. This was also evidenced by the CFD analysis.
640. The wind tunnel testing evidenced that the three instances of strong winds that persist in Baseline scenario are eradicated in this Configuration due to the inclusion of the development. This is a Major Beneficial (not significant) wind effect. The CFD analysis demonstrates that the strong winds would be similar to those in the Baseline scenario and that the inclusion of the development would not adversely affect these conditions.

Pedestrian Comfort

641. Overall, the wind tunnel testing demonstrates that conditions range between being suitable for frequent sitting, occasional sitting, standing and walking in all seasons. Conditions are generally consistent with the Baseline but would be windier than the Baseline on Outwich Street immediately to the northwest of the site and on Goring Street to the southeast, and calmer on Camomile Street to the west and Houndsditch to the north. Overall, the conditions identified in the CFD analysis align closely with the wind tunnel testing.

Thoroughfares

642. The wind tunnel testing demonstrates that on-site thoroughfares would range between being one and two categories calmer than the target condition and meeting the target condition in the windiest season, as they range as being suitable for occasional sitting, standing and walking, so therefore suitable for their intended use. The CFD analysis shows that the on-site thoroughfares would be suitable for frequent sitting and occasional sitting in the windiest season, ranging between two and three categories calmer than the target condition and therefore suitable for their intended use.

643. The wind tunnel testing demonstrates that in respect of off-site thoroughfares some range between being two categories calmer than target condition or satisfying the target condition, these are either consistent with the Baseline (Configuration 1) or calmer than the Baseline. There are some off-site thoroughfares which are windier than in the Baseline, but the conditions would be one category calmer than the target condition or would meet the target condition. All off-site thoroughfares are suitable for the intended use. The CFD analysis demonstrates that off-site thoroughfares would be suitable for walking, standing, occasional sitting and frequent sitting and therefore suitable for their intended use.

Entrances

644. The wind tunnel testing demonstrates that the on-site entrances would be suitable for frequent and occasional sitting in the windiest season; this would be one and two categories calmer than the target condition. The on-site entrances are therefore suitable for their intended use. The CFD analysis shows that the on-site entrances would be suitable for standing and occasional sitting in the windiest season and therefore suitable for their intended use.
645. The wind tunnel testing demonstrates that the majority of off-site entrances are suitable for occasional sitting and standing in the windiest season, which would be consistent with the Baseline (Configuration 1), these are either one category calmer than the target condition or would satisfy the target condition. The entrance at 120 Houndsditch would be suitable for standing in the windiest season, whilst this would be one category windier than the Baseline, this would satisfy the target condition. The CFD analysis shows that off-site entrances would be suitable for standing and occasional sitting in the windiest season and therefore suitable for their intended use.

Bus Stops

646. The wind tunnel testing demonstrates that in the windiest season, all bus stops would be suitable standing, this would satisfy the target condition and would be consistent with the Baseline (Configuration 1). The CFD analysis evidenced similar results.

Pedestrian Crossings

647. The wind tunnel testing demonstrates that all pedestrian crossings would either be suitable for standing or walking, this would either be one category calmer than the target condition or would satisfy the target condition and would be consistent with the Baseline. The CFD analysis evidenced similar results.

Mixed Use Ground Level Amenity (off-site)

648. The wind tunnel testing demonstrates that Jubilee Gardens would be suitable for occasional sitting in both the windiest season and summer, this would satisfy the target condition and is consistent with the Baseline. The CFD analysis evidenced similar results.
649. The wind tunnel testing demonstrates that the mixed amenity space by 100 Bishopsgate would be suitable for standing in both the windiest season and summer, this would be one category windier than the target condition but would be consistent with the Baseline. The CFD analysis evidenced similar results.

Benches

650. Benches are proposed on-site within the public realm; the wind tunnel testing demonstrates that these would be suitable for suitable for occasional sitting in the windiest season and would satisfy the target condition. In the summer, the benches would be suitable for either frequent sitting or occasional sitting and would either be one category calmer than the target condition or would satisfy the target condition. The CFD analysis evidenced similar results.
651. The wind tunnel testing demonstrates that the benches in Bishopsgate Plaza would be suitable for standing in both the windiest season and the summer, this is one category windier than the target condition but would be consistent with the Baseline. The CFD analysis evidenced similar results.
652. The wind tunnel testing demonstrates that the benches within Jubilee Gardens in the winter would either be suitable for standing or occasional sitting, this would range between meeting the target condition or being one category windier than the target condition; these conditions are consistent with the Baseline. In the summer, these benches would be suitable for occasional sitting and would satisfy the target condition, this is also consistent with the Baseline. The CFD analysis shows that this would be suitable for occasional sitting in both the windiest season and the summer, consistent with the Baseline.

Café-style seating (off-site)

653. The wind tunnel testing demonstrates that the cafe style seating situated by 110 Bishopsgate would be suitable for occasional sitting and standing in the windiest season, this would range between being one and two categories windier than the target condition; one of the receptors is consistent with the Baseline and the other is improved by one category compared to the Baseline. In the summer, they would be suitable for a mix of occasional sitting and standing, which would be one and two categories windier than the target condition, but this would be consistent with the Baseline. The CFD analysis shows that this area would be suitable for standing in both the windiest season

and the summer, which would be two categories windier than the target condition but would be consistent with the Baseline.

654. The wind tunnel testing demonstrates that the cafe style seating by 22 Bevis Marks to the east of the application site would be suitable for occasional sitting in both the windiest season and the summer, this would be one category windier than the target condition but is consistent with the Baseline. The CFD analysis evidenced similar results.
655. The wind tunnel testing demonstrates that the cafe style seating at 70 St Mary Axe would be suitable for standing in the winter, which would be two categories windier than the target condition; this would also be one category windier than the Baseline; the exceedance would be 1.9% over the 5% target. In the summer, this would be suitable for occasional sitting, which is one category windier than the target condition but is consistent with the Baseline. Whilst it is noted that the conditions would be windier than the Baseline in the windiest season, given the extent of the exceedance, this is not considered to be of a sufficient magnitude that would require mitigation. The CFD analysis evidenced similar results.
656. The wind tunnel testing demonstrates that the cafe style seating at 123 Houndsditch would be suitable for occasional sitting in the windiest season, this is one category windier than the target condition and compared to the Baseline conditions would be improved as they would be one category calmer than in the Baseline. In the summer, these would be suitable for occasional sitting, and this is one category windier than the target condition but would be consistent with the Baseline. The CFD analysis evidenced similar results.

Terraces, Balconies and Walkways

657. The wind tunnel testing demonstrates that the proposed Level 27 and 28 Terraces on the proposed development would be suitable for standing in both the windiest season and the summer, this is one category windier than the target condition. The CFD analysis demonstrates that in the windiest season that the terraces would be suitable for a mix of walking, standing and occasional sitting in the windiest season, with a minor instance of uncomfortable, which range between being one, two and three categories windier than the target condition and satisfying the target condition. In the summer, the CFD analysis shows that conditions would be improved as the suitability for standing and occasional sitting increased, walking reduced and uncomfortable omitted. The Environmental Statement concludes that mitigation would be required, and this is discussed in Configuration 3.
658. Balconies are also proposed on the southeastern and southwestern corners of the proposed development, the wind tunnel testing demonstrates that in the windiest season and summer, these would range between being suitable for frequent sitting, occasional sitting and standing, this would range between

being one category calmer than the target condition, satisfy the target condition and being one category windier than the target condition. The CFD analysis demonstrates that in the windiest season, the suitability of the balconies would range between being uncomfortable, walking, standing, and occasional sitting, ranging between being one, two and three categories windier than the target condition and satisfying the target condition. In the summer, conditions are improved as the instances of standing and occasional sitting are increased, walking reduced and uncomfortable omitted. The Environmental Statement concludes that mitigation would be required, and this is discussed in Configuration 3.

659. On Level 4 a low level 'Bastion' style terraces are proposed; these would be accessible for office occupiers only. As set out above, these terraces could only be tested by the CFD analysis. In the windiest season, these terraces would be suitable for a mix of occasional sitting and standing, ranging between satisfying the target condition and being one category windier than the target condition. In the summer, there would be increased area suitable for occasional sitting compared to the windiest season.
660. A series of publicly accessible walkways are proposed on levels 1 to 3 of the proposed development. As set out above, these walkways could only be tested by the CFD analysis. The CFD analysis shows that in the windiest season the walkways would be suitable for a mix of occasional sitting, standing and walking and in the summer season the extent of the suitability for walking would be reduced. Primarily these are walkways with viewing areas and benches are only proposed in the southwestern corner on level 3. The current CFD analysis shows that the benches would be situated in an area suitable for walking and standing in both the windiest season and the summer. The applicant has highlighted that once hedged planting is introduced that the area would be suitable for occasional sitting. Prior to the benches being installed the applicant would need to demonstrate that they are being in an area that microclimate testing demonstrates is suitable for occasional sitting in the windiest season and the summer, this would be secured by condition.
661. The wind tunnel testing demonstrates that the roof terrace at 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition but is consistent with the Baseline (Configuration 1). The CFD analysis demonstrates that in the windiest season, the terrace is primarily suitable for standing with instances of walking and occasional sitting, ranging between meeting the target condition and being one and two categories windier than the target condition; the categories are consistent with the Baseline (Configuration 1). In the summer, the conditions would primarily be suitable for standing with instances of occasional sitting, ranging between being one category windier than the target condition and satisfying the target condition; the categories are consistent with the Baseline (Configuration 1).

662. The wind tunnel testing demonstrates that the roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season which would range between being one and two categories windier than the target condition, but this would be consistent with the Baseline (Configuration 1). In the summer, they would be suitable for standing which would be one category windier than the target condition, but this would be consistent with the Baseline (Configuration 1). The CFD analysis demonstrates that in the windiest season, the terraces would range between being uncomfortable, walking and standing and in the summer the extent of uncomfortable is reduced, ranging between being one, two and three categories windier than the target condition; the categories are consistent with the Baseline (Configuration 1).
663. The wind tunnel testing demonstrates that the roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and the summer, this would meet the target condition and is consistent with the Baseline (Configuration 1). The CFD analysis shows that the terraces would be suitable for a mix of standing and occasional sitting in the windiest season, and in the summer the extent of standing would be reduced, ranging between satisfying the target condition and being one category windier than the target condition; this is consistent with the Baseline (Configuration 1).

Configuration 3: The Proposed Development with existing surrounding buildings, proposed on-site landscaping and wind mitigation measures

664. Configuration 2 identified that there would be significant wind effects on site that would require mitigation. The proposed mitigation includes:
- The inclusion of proposed landscaping scheme at ground level, terrace level and balcony levels
 - The inclusion of 1500mm tall evergreen hedges within the planter on the mid-level terraces
 - The inclusion of double height glazed screens up the southwest elevation of the balconies at the western corner of the proposed development, from level 28 to 40.
665. This section focuses only on the areas that require mitigation as all other results are consistent with Configuration 2 discussed above. This scenario was tested in the wind tunnel testing only.

Terraces and Balconies

666. The terraces on Levels 27 and 28 with the inclusions of the landscaping and mitigation would be suitable for standing and occasional sitting in the windiest season, ranging between one category windier than the target condition and satisfying the target condition. In the summer, these terraces would primarily be suitable for occasional sitting with instances of frequent sitting, ranging

between satisfying the target condition and being one category calmer than the target condition.

667. Balconies are also proposed on the southeastern and southwestern corners of the proposed development. In the windiest season these would range between being suitable for standing, occasional sitting and frequent sitting, this would range between being one category windier than the target condition, satisfying the target condition and being one category calmer than the target condition. In summer, these would range between being suitable for occasional sitting and frequent sitting, this would range between satisfying the target condition and being one category calmer than the target condition.

Configuration 4: The existing Site with Tier 1 (consented) cumulative schemes (Future Baseline)

668. This Configuration is the Future Baseline, and this configuration was only tested in the wind tunnel testing.

Safety Criteria

669. The wind tunnel testing evidenced instances of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists, at the following locations:
- Within the roadway of Camomile Street (three locations within the roadway)
 - At the pedestrian crossing within Camomile Street

Pedestrian Comfort

670. Overall, the wind tunnel testing demonstrated that conditions are generally of the same level and distribution as for the Baseline (Configuration 1). The windiest conditions recorded (on Camomile Street, near the junction with Bishopsgate) have been made windier by the inclusion of Tier 1 Cumulative Schemes and show a greater extent which is uncomfortable in the windiest season.

Thoroughfares

671. The wind tunnel testing demonstrates that all off-site thoroughfares range between being one and two categories calmer and meeting the target condition in the windiest season, as they would range between being suitable for occasional sitting, standing and walking, so therefore suitable for their intended use. This is consistent with Configuration 1 (Baseline).

Entrances

672. In the windiest season, all off-site entrances would be suitable for standing in the windiest season so would satisfy the target condition and therefore suitable for their intended use. Whilst conditions are windier at some off-site entrances compared to the Baseline, the conditions are suitable for the intended use.

Bus Stops

673. In the windiest season, bus stops would be suitable for standing and this satisfies the target condition and therefore suitable for the intended use. This is consistent with the Baseline.

Pedestrian Crossings

674. In the windiest season, the majority of pedestrian crossings would be suitable for standing, this is one category calmer than the target condition and is suitable for their intended use. The pedestrian crossing to the west of the application site on Camomile Street (probe 28) would be rated as uncomfortable, this is one category windier than the target condition. The conditions at probe 28 on Camomile Street are windier than in the Baseline.

Mixed-use Ground Level Amenity (off-site)

675. Jubilee Gardens would be suitable for occasional sitting in both the windiest season and the summer, this would satisfy the target condition. This is consistent with the Baseline.
676. The mixed-use amenity space by 100 Bishopsgate would be suitable for standing in the windiest season and the summer, this would be one category windier than the target condition. This is consistent with the Baseline.

Benches (off-site)

677. The benches in Bishopsgate Plaza are suitable for standing in both the windiest season and the summer and are therefore one category windier than the target condition. This is consistent with the Baseline.
678. The benches within Jubilee Gardens would be suitable for occasional sitting in the windiest season, satisfying the target condition and in the summer would be suitable for a mix of occasional sitting and frequent sitting, ranging between meeting the target condition and being one category calmer than the target condition. The conditions at some receptors are calmer compared to the Baseline.

Café Style Seating (off-site)

679. The café style seating by 110 Bishopsgate would be suitable for a mix of standing and occasional sitting in the windiest season, which would be one and two categories windier than the target condition. In the summer, they would be suitable for occasional sitting which is one category windier than the target condition. The conditions at some receptors are calmer compared to the Baseline.
680. The café style seating by 22 Bevis Marks would be suitable for occasional sitting in the windiest season, which would be one category windier than the target condition. In the summer, this seating would be suitable for occasional sitting which is one category windier than the target condition. This is consistent with the Baseline.
681. The café style seating at 70 St Mary Axe would be suitable for standing in the windiest season, which would be two categories windier than the target condition. In the summer, this seating would be suitable for occasional sitting, which is one category windier than the target condition. In the windiest season, conditions would be windier than in the Baseline.
682. The café style seating at 123 Houndsditch would be suitable for standing in the windiest season, this would be two categories windier than the target condition and, in the summer, would be suitable for occasional sitting which would be one category windier than the target condition. This is consistent with the Baseline.

Terrace Level Amenity (off-site)

683. The roof terrace at 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, and therefore one category windier than the target condition. This is consistent with the Baseline.
684. The roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season, which would be one and two categories windier than the target condition. In the summer, these would be suitable for standing therefore one category windier than the target condition. The windiest season and summer are consistent with the Baseline.
685. The roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and the summer and would therefore satisfy the target condition. This is consistent with the Baseline.

*Configuration 5: The Proposed Development with Tier 1 (consented)
cumulative schemes (without mitigation)*

Safety Criteria

686. The wind tunnel testing evidenced that there would no instances of winds exceeding the safety threshold within the site. This was also evidenced by the CFD analysis.
687. The Wind Tunnel Testing evidenced that two of the instances of strong winds present in the future baseline scenario (Configuration 4) on Camomile Street (probes 27 and 30) would be eradicated in this scenario. The following instances of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists would be consistent with the Future Baseline:
- Within the roadway of Camomile Street (probe 29)
 - At the pedestrian crossing on Camomile Street
688. The CFD analysis evidenced instances of strong winds that the exceed the safety criteria at the following locations and these are consistent with the Baseline Scenario (Configuration 1).
- At the junction of Wormwood Street, Bishopsgate and Camomile Street
 - Southwest corner of 100 Bishopsgate
 - On the terrace of the Pan Pacific Hotel

Pedestrian Comfort

689. Overall, the wind tunnel testing demonstrated that the conditions would generally be consistent with the Future Baseline (Configuration 4) but would be windier than the Baseline (Configuration 1) on Outwich Street immediately to the northwest of the site and on Goring Street and St Mary Axe to the southeast, and conditions would be calmer on Camomile Street to the west and Houndsditch to the north. The CFD analysis demonstrated that the introduction of the Tier 1 schemes would increase the uncomfortable conditions predicted at the southwest corner of 110 Bishopsgate, compared to Configuration 2, these conditions are caused by the Tier 1 schemes and not the proposed development. The CFD analysis also demonstrates that for off-site locations, the results are similar or calmer than the Baseline Scenario (Configuration 1).

Thoroughfares

690. The wind tunnel testing demonstrates that all on-site thoroughfares would range between being one and two categories calmer than the target conditions in the windiest season, as they range between being suitable for standing and occasional sitting, so therefore suitable for their intended use. The CFD analysis demonstrated similar results to the wind tunnel testing.
691. The wind tunnel testing demonstrates that in respect of off-site thoroughfares some range between being one and two categories calmer than the target condition or satisfying the target condition, these are either consistent with the Future Baseline (Configuration 4) or calmer than the Future Baseline. There

are some off-site thoroughfares that are windier than in the Future Baseline, but the conditions would either be one category calmer than the target condition or would satisfy the target condition. All off-site thoroughfares are suitable for their intended use. The CFD analysis demonstrated similar results to the wind tunnel testing.

Entrances

692. The wind tunnel testing demonstrates that the on-site entrances would be suitable for frequent sitting in the windiest season this would be two categories calmer than the target condition. The on-site entrances are therefore suitable for their intended use. The CFD analysis demonstrated that on-site entrances would be suitable for occasional sitting and standing and therefore suitable for their intended use.
693. The wind tunnel testing demonstrates that some off-site entrances would be suitable for occasional sitting in the windiest season, which would be one category calmer than the target condition and is also one category calmer than the Future Baseline (Configuration 4). The majority of off-site entrances would be suitable for standing in the windiest season which would satisfy the target condition and is consistent with the Future Baseline. The CFD analysis demonstrated similar results to the wind tunnel testing.

Bus Stops

694. The wind tunnel testing demonstrates that in the windiest season, all bus stops would be suitable for standing which would satisfy the target condition and is consistent with both the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis also demonstrated that the bus stops would be suitable for standing and therefore suitable for the intended use.

Pedestrian Crossings

695. The wind tunnel testing demonstrates that in the windiest season, the majority of pedestrian crossings would be suitable for standing, this is one category calmer than the target condition and is consistent with the Future Baseline (Configuration 4). The pedestrian crossing to west of the application site on Camomile Street, would be suitable for walking which satisfies the target condition. The CFD analysis demonstrated that most crossings would be suitable for standing in the windiest season which is one category calmer than the intended use. The crossing to the west of the application site on Camomile Street would be suitable for walking, which would satisfy the target condition.

Mixed Use Ground Level Amenity (off-site)

696. The wind tunnel testing demonstrates that Jubilee Gardens would be suitable for occasional sitting in both the windiest season and summer season, this

would satisfy the target condition and would be consistent with the Baseline (Configuration 1) and Future Baseline (Configuration 2). The CFD analysis demonstrates that in the windiest season would be suitable for occasional sitting, satisfying the target condition and in the summer would be suitable for frequent sitting, one category calmer than the target condition.

697. The wind tunnel testing demonstrates that the mixed-use amenity space by 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition, but this would be consistent with the Baseline (Configuration 1) and Future Baseline (Configuration 2). The CFD analysis demonstrated similar results to the wind tunnel testing.

Benches

698. Benches are proposed on site within the public realm; these would be suitable for either frequent sitting or occasional sitting in both the windiest season and the summer. This would either be one category calmer than the target condition or meeting the target condition. The CFD analysis demonstrated similar results.
699. The benches in Bishopsgate Plaza would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to the wind tunnel testing.
700. The benches within Jubilee Gardens would be suitable for standing in the windiest season which would be one category windier than the target condition; this would not be consistent with the Future Baseline (Configuration 4) as conditions would be one category windier. In the summer, the benches would be suitable for occasional sitting, this meets the target condition; it is noted that one of the receptors is windier than in the Future Baseline. The exceedances are 2.3% and 1% respectively. Whilst it is noted that conditions would be windier than the Future Baseline, given the extent of the exceedances and as in the summer the benches would be suitable for occasional sitting, these are not considered to be of a sufficient magnitude that would require mitigation. The CFD analysis demonstrates that the in both the windiest season and the summer the benches would be suitable for occasional sitting, satisfying the target condition.

Café Style Seating (off-site)

701. The café style seating by 110 Bishopsgate would be suitable for a mix of standing and occasional sitting in the windiest season, which would be one and two categories windier than the target condition; this would be consistent

with the Future Baseline (Configuration 4). In the summer, this seating would be suitable for occasional sitting which would be one category windier than the target condition; this would be consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to the wind tunnel testing.

702. The café style seating by 22 Bevis Marks would be suitable for occasional sitting in both the windiest season and the summer, which would be one category windier than the target condition; this would be consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results.
703. The café style seating at 70 St Mary Axe would be suitable for standing in the windiest season, which is two categories windier than the target condition and, in the summer, would be suitable for occasional sitting which would be two categories windier than the target condition. This is consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrates that the seating would be suitable for occasional sitting in both the windiest season and the summer; this would be one category windier than the target condition.
704. The café style seating at 123 Houndsditch would be suitable for standing in the windiest season, which is two categories windier than the target condition and, in the summer, would be suitable for occasional sitting which would be one category windier. This is consistent with the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to the wind tunnel testing.

Terraces, Balconies and Walkways

705. The proposed terraces at Levels 27 and 28 of the proposed development would be suitable for a mix of standing and occasional sitting in the windiest season and the summer, which ranges between being suitable for the target condition and being one category windier than the target condition. The CFD analysis demonstrates that in the windiest season, the terraces would be suitable for walking, standing and occasional sitting, ranging between one and two categories windier than the target condition and satisfying the target condition. In the summer, the terraces would mainly be suitable for standing and occasional sitting with very minor instances of being suitable for walking. The Environmental Statement concludes mitigation would be required, and this is discussed in Configuration 6.
706. In the windiest season and summer, the balconies on the southeastern and southwestern corners of the proposed development would be suitable for a mix of standing, occasional sitting and frequent sitting, this would range between being one category calmer than the target condition, satisfying the target condition and one category windier than the target condition. The CFD analysis demonstrates that in the windiest season the balconies would be

suitable for a mix of walking, standing and occasional sitting, ranging between being one and two categories windier than the target condition and satisfying the target condition. In the summer, the balconies would be suitable for a mix of standing and occasional sitting, ranging between being one category windier than the target conditions and satisfying the target condition. The Environmental Statement concludes mitigation would be required, and this is discussed in Configuration 6.

707. The 'Bastion' style terraces on Level 4 which are only accessible by officer occupiers, would primarily be suitable for occasional sitting with instances of standing in the windiest season, ranging between satisfying the target condition and being one category windier than the target condition. In the summer, the instances of standing are reduced further, so there would be only a very minor area suitable for standing.
708. In the windiest season the proposed publicly accessible walkways on levels 1 to 3 of the proposed development would be suitable for a mix of occasional sitting, standing and walking and in the summer the extent of occasional sitting is increased and there are no instances of being suitable for walking. Primarily these are walkways with viewing areas and benches are only proposed in with southwestern corner of level 3. Currently, the CFD analysis shows that location of the proposed benches would be suitable for walking and standing in the windiest season and for standing in the summer. The applicant has highlighted that once hedged planting is introduced that the area would be suitable for occasional sitting. Prior to the benches being installed the applicant would need to demonstrate that they are being installed in an area that microclimate testing demonstrates is suitable for occasional sitting in the windiest season and the summer, this would be secured by condition.
709. The roof terrace at 100 Bishopsgate would be suitable standing in both the windiest season and the summer, this would be one category windier than the target condition. This is consistent with both the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis demonstrates that that in the windiest season the terrace would primarily be suitable for standing with instances of occasional sitting, ranging between being one category windier than the target use and satisfying the target condition; the categories are largely consistent with the Baseline (Configuration 1) and Configuration 2, but conditions would be calmer as there are no longer instances of walking. In the summer, the terrace would be suitable for a mix of standing and occasional sitting, these categories are consistent with the Baseline (Configuration 1) and Configuration 2.
710. The roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season, this would range between being one and two categories windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). In the summer, they would be suitable for standing, which is one category windier than the target condition but is consistent with the Baseline (Configuration 1)

and the Future Baseline (Configuration 4). The CFD analysis demonstrates that in the windiest season, the terrace would range between being uncomfortable, walking and standing and in the summer the extent of uncomfortable is reduced and some instances of occasional sitting are introduced; the categories are consistent with the Baseline (Configuration 1) and Configuration 2.

711. The roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and would therefore satisfy the target condition. The CFD analysis demonstrates that the terrace(s) would be suitable for a mix of standing and occasional sitting in the windiest season, which is consistent with the Baseline (Configuration 1) Configuration 2. Conditions would be slightly calmer in the summer, as some instances of frequent sitting would be introduced.

Configuration 6: The Proposed Development with Tier 1 (consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures

712. Configuration 5 identified that there would be significant effects on site that would require mitigation. The proposed mitigation includes:
- The inclusion of proposed landscaping scheme at ground level, terrace level and balcony levels.
 - The inclusion of 1500mm tall evergreen hedges within the planter on the mid-level terraces.
713. It is noted that the double height glazed screens up the southwest elevation of the balconies proposed in Configuration 3 are not required as mitigation in this scenario.
714. This section focuses only on the areas that require mitigation as all other results are consistent with Configuration 5. This scenario was tested in the wind tunnel testing only.

Terraces and Balconies

715. The terraces on Levels 27 and 28 with the inclusion of the proposed mitigation and landscaping would be suitable for standing or occasional sitting in the windiest season, ranging between one category windier than the target condition and satisfying the target condition. In the summer, these terraces would primarily be suitable for occasional sitting with instance of frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition.
716. The balconies on the southeastern and southwestern corners of the proposed development would be suitable for a mix of standing, occasional sitting and

frequent sitting in the windiest season, this would range between being one category windier than the target condition, satisfying the target condition and being one category calmer than the target condition. In the summer, the balconies would be suitable for a mix occasional sitting and frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition.

Configuration 7: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes (without mitigation measures)

Safety Criteria

717. The wind tunnel testing evidenced that there would be no instances of winds exceeding the safety threshold within the site. This was also evidenced by the CFD analysis.
718. The wind tunnel testing evidenced the following instance of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists, this exists in both the Baseline (Configuration 1) and Future Baseline (Configuration 4):
- Within the roadway of Camomile Street (probe 29)
719. The CFD analysis evidenced instances of strong winds that the exceed the safety criteria at the following locations and these are consistent with the Baseline Scenario (Configuration 1):
- At the junction of Wormwood Street, Bishopsgate and Camomile Street
 - Southwest corner of 100 Bishopsgate
 - On the terrace of the Pan Pacific Hotel

Pedestrian Comfort

720. Overall, the wind tunnel testing demonstrated that conditions would generally be similar to those discussed in Configuration 5. Some locations would be windier than Configuration 5 but where this occurs the conditions would be suitable for the intended use. The CFD analysis demonstrated that the introduction of the Tier 2 Cumulative schemes would result in similar conditions to the CFD analysis results discussed in Configuration 5.

Thoroughfares

721. The wind tunnel testing demonstrates that all on-site thoroughfares would range between being suitable for walking, standing and occasional sitting in the windiest season, and therefore range between satisfying the target condition and being one and two categories calmer than the target condition. It is noted that the introduction of the Tier 2 schemes would result in windier

conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

722. The wind tunnel testing demonstrates that in respect of off-site throughfares range between being suitable for walking, standing and occasional sitting in the windiest season, and therefore range between satisfying the target condition and being one and two categories calmer than the target condition. It is noted that the introduction of the Tier 2 schemes would result in windier conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the use.

Entrances

723. The wind tunnel testing demonstrates that the on-site entrances would be suitable for occasional sitting and frequent sitting in the windiest season, this would range between being one and two categories calmer than the target conditions. It is noted that the introduction of the Tier 2 schemes would result in windier conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.
724. The wind tunnel testing demonstrates that the off-site entrances would be suitable for standing or occasional sitting in the windiest season, this would range between satisfying the target condition or being one category calmer than the target condition. It is noted that the introduction of the Tier 2 schemes would result in windier conditions in some locations compared to the Future Baseline with the Proposed Development (Configuration 5), but all conditions would satisfy the target condition so therefore suitable to their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Bus Stops

725. The wind tunnel testing demonstrates that in the windiest season, all bus stops would be suitable for standing which would satisfy the target condition and is consistent with the Baseline (Configuration 1) and the Future Baseline

(Configuration 4). The introduction of the Tier 2 schemes does not alter the suitability of the bus stops as the categories are consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Pedestrian Crossings

726. The wind tunnel testing demonstrates that in the windiest season, the majority of pedestrian crossings would be suitable for standing, this is one category calmer than the target condition and is consistent with Future Baseline (Configuration 4). The pedestrian crossing to the west of the application site on Camomile Street would be suitable for walking, this would satisfy the target condition and is one category calmer than the Future Baseline (Configuration 4) and is consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Mixed-use Ground Level Amenity (off-site)

727. The wind tunnel testing demonstrates that Jubilee Gardens would be suitable for occasional sitting in both the windiest season and the summer, this would satisfy the target condition and would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The introduction of the Tier 2 schemes does not alter the suitability of Jubilee Gardens as the category is consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.
728. The wind tunnel testing demonstrates that the mixed-use amenity space by 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The introduction of the Tier 2 schemes does not alter the suitability of this amenity space as the category is consistent with Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

Benches

729. The benches proposed on site within the public realm would be suitable for occasional sitting in the windiest season, this would satisfy the target condition. In this summer these would be suitable for either occasional sitting or frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition. Whilst the introduction of the

Tier 2 schemes would make conditions windier in the windiest season, the benches would be suitable for their intended use. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

730. The wind tunnel testing demonstrates that the benches in Bishopsgate Plaza would be suitable for walking and standing in the windiest season, this ranges between being one and two categories windier than the target conditions. The introduction of the Tier 2 schemes would make the conditions windier at one of the receptors, the exceedance over the standing threshold is 1.6% (this has been compared to standing as this what the receptor achieves in all other configurations); given the extent of the exceedance this is not considered to require mitigation. In the summer, the benches would be suitable for standing in the summer which is one category windier than the target condition but would be consistent with the Baseline (Configuration 1) and the Future Baseline (Configuration 4). The CFD analysis demonstrated similar results to Configuration 5.
731. The wind tunnel testing demonstrates that the benches within Jubilee Gardens would be suitable for standing in the windiest season which would be one category windier than the target condition; whilst the introduction of the Tier 2 schemes would not make conditions windier as the results would be consistent with Configuration 5, however, the results would not be consistent with the Future Baseline (Configuration 4). The reason for this is due to a degree of downwash from the northern elevation of the development when the wind is from the northeast; the exceedance would be 1.7% and 0.9% over the target, and given the extent is not considered to require mitigation when compared to Configuration 4. In the summer, the benches would be suitable for occasional sitting and would satisfy the target condition. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5 and therefore suitable for the intended use.

Café Style Seating

732. The wind tunnel testing demonstrates that the café seating by 110 Bishopsgate would be suitable for a mix of standing and occasional sitting in the windiest season, which would be one and two categories windier than the target condition; this would be consistent with the Future Baseline (Configuration 4) and Configuration 5. In the summer, the seating would be suitable for occasional sitting, which would be one category windier than the target conditions but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

733. The wind tunnel testing demonstrates that the café style seating by 22 Bevis Marks would be suitable for occasional sitting in the windiest season and the summer, which would be one category windier than the target condition. This would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.
734. The wind tunnel testing demonstrates that the café style seating at 70 St Mary Axe would be suitable for standing in the windiest season, which would be two categories windier than the target condition; this would be consistent with the Future Baseline (Configuration 4) and Configuration 5. In the summer, the seating would be suitable for occasional sitting which would be one category windier than the target condition but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.
735. The wind tunnel testing demonstrates that the café style seating at 123 Houndsditch would be suitable for standing in the windiest season which would be two categories windier than the target condition but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. In the summer, the seating would be suitable for occasional sitting which would be one category windier than the target condition but would be consistent with the Future Baseline (Configuration 4) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

Terraces, Balconies and Walkways

736. The wind tunnel testing demonstrates that the proposed terraces at Levels 27 and 28 of the proposed development would be suitable for a mix of standing and occasional sitting in the windiest season and the summer, which ranges between being one category windier and meeting the target condition. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5. Mitigation is required and this is discussed in Configuration 8.
737. The wind tunnel testing demonstrates that in the windiest season the balconies on the southeastern and southwestern corners of the proposed development would be suitable for a mix of walking, standing, occasional sitting and frequent sitting, this would range between one and two categories windier than the target condition, satisfying the target condition and being one category calmer than the target condition. In the summer, the balconies would be suitable for a mix of standing, occasional sitting and frequent sitting, which ranges between being one category windier than the target condition, satisfying the target condition and being one category calmer than the target condition. The CFD analysis demonstrates that the introduction of the Tier 2

schemes would result in similar results to the CFD analysis results discussed in Configuration 5. Mitigation is required and this is discussed in Configuration 8.

738. The 'Bastion' style terraces on Level 4 which are only accessible by officer occupiers, would primarily be suitable for occasional sitting with instances of standing in the windiest season, ranging between satisfying the target condition and being one category windier than the target condition. In the summer, the instances of standing are reduced further, so there would be only a very minor area suitable for standing.
739. In the windiest season, the proposed publicly accessible walkways on levels 1 to 3 would primarily be suitable for occasional sitting and standing, with a very minor instance of walking and in the summer the instance of occasional sitting would be increased. Primarily these are walkways with viewing areas and benches are only proposed in the southwestern corner of level 3. Currently the CFD analysis shows that the location of the benches would be suitable for walking and standing in the windiest season and standing in the summer. The applicant has highlighted that once hedged planting is introduced that the area would be suitable for occasional sitting. Prior to the benches being installed the applicant would need to demonstrate that they are being in an area that microclimate testing demonstrates is suitable for occasional sitting in the windiest season and the summer, this would be secured by condition.
740. The wind tunnel testing demonstrates that the roof terrace at 100 Bishopsgate would be suitable for standing in both the windiest season and the summer, this would be one category windier than the target condition. This would be consistent with the Baseline (Configuration 1), the Future Baseline (Configuration 2) and Configuration 5. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.
741. The wind tunnel testing demonstrates that the roof terrace(s) at Bishopsgate Plaza would be suitable for walking and standing in the windiest season, this range between one and two categories windier than the target condition, this would be consistent with the Baseline (Configuration 1), the Future Baseline (Configuration 4) and Configuration 5. In the summer, they would be suitable for standing and occasional sitting, conditions would range between being one category windier than the target condition and satisfying the target condition. The standing condition are consistent with the Baseline (Configuration 1), the Future Baseline (Configuration 4) and Configuration 5 and the occasional sitting would be an improvement of conditions. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

742. The wind tunnel testing demonstrates that the roof terrace(s) at 2 Devonshire Square would be suitable for occasional sitting in both the windiest season and summer and would therefore satisfy the target condition. The CFD analysis demonstrates that the introduction of the Tier 2 schemes would result in similar results to the CFD analysis results discussed in Configuration 5.

Configuration 8: The Proposed Development with Tier 2 (consented and non-consented) cumulative schemes, proposed on-site landscaping and wind mitigation measures

743. The wind tunnel testing evidenced instances of strong winds that exceed the safety criteria, posing a risk to pedestrians and cyclists, at the following location:
- A crossing on Camomile Street (probe 28)
 - Within the roadway of Camomile Street (probe 29)
744. It is noted that in Configuration 7, probe 28 for the crossing on Camomile Street was recorded as an exceedance, the difference is due a slight change in wind speed. It is highlighted that both Configurations 7 and 8 are improvements compared to the Future Baseline (Configuration 4).
745. Configuration 7 identified that there would be significant effects on site that would require mitigation. The proposed mitigation includes:
- The inclusion of proposed landscaping scheme at ground level, terrace level and balcony levels.
 - The inclusion of 1500mm tall evergreen hedges within the planter on the mid-level terraces.
746. This section focuses only on the areas that require mitigation as all other results are consistent with Configuration 7. This scenario was tested in the wind tunnel testing only.

Terraces and Balconies

747. The terraces on Levels 27 and 28 with the inclusion of the mitigation and landscaping would be suitable for standing or occasional sitting in the windiest season, ranging between being one category windier than the target condition and satisfying the target condition. In the summer, these terraces would primarily be suitable for occasional sitting with instance of frequent sitting, ranging between satisfying the target condition and being one category calmer than the target condition.
748. The balconies on the southeastern and southwestern corners of the development would be suitable for a mix of standing, occasional sitting and frequent sitting in the windiest season, ranging between being one category windier than the target condition, satisfying the target condition and being one

category calmer than the target condition. In the summer, the balconies would be suitable for a mix of occasional sitting and frequent sitting, ranging between satisfying the target condition and being one category windier than the target condition.

Wind Microclimate Conclusion

749. In terms of safety, the introduction of the proposed development does not result in any new safety exceedances or make any existing safety exceedances worse in any of the configurations.
750. In terms of suitability for the proposed uses on-site, the ground level uses are suitable for their intended uses. The proposed public walkways are generally suitable for their intended use and conditions would ensure that the proposed benches are sited in locations suitable for occasional sitting. Even with the introduction of the proposed mitigation and landscaping, not all areas of the proposed balconies and terraces would be suitable for at least occasional sitting in the windiest season. It is acknowledged that the balconies and terraces would be suitable for the intended use in the summer. Given that the balconies and terraces are private, and access can be restricted when conditions are unfavourable, this is acceptable.
751. In terms of the off-site receptors, nearly all receptors in all configurations are either consistent or calmer than either the Baseline or Future Baseline. There are some receptors that have slightly windier conditions than either the Baseline or Future Baseline but due to the extent of the exceedance, they would not require mitigation. It is noted that some conditions are windier with the introduction with the Cumulative Schemes (Tier 1 and/or Tier 2), and these windier conditions are not caused by the proposed development, rather they are caused by the cumulative schemes.
752. Overall, the wind microclimate impact of the proposed development with the proposed mitigation and landscaping is considered acceptable. The proposed development has taken measures to mitigate any significant effects and does not worsen any existing safety exceedances in the surrounding area.
753. A Wind Audit would be secured within the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Testing against the results of wind speed assessments carried out in the vicinity of the application site over a specified period, to identify if the completed development has material adverse impacts not identified in the Environmental Statement.
754. It is considered that subject to conditions, the microclimate in and around the site, with regard to wind conditions, would be acceptable and in accordance with London Plan policies S8, D8 (G), D9 C (3)(a), Local Plan 2015 policy DM10.1 and emerging City Plan policies S8 and DE2 and the guidance

contained within the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Daylight, Sunlight and Overshadowing

Policy and Context

755. 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.
756. Local Plan policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
757. Emerging City Plan 2040 policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking into account of the BRE guidelines.
758. Paragraph 3.10.41 of the Local Plan 2015 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 the development proposals.
759. The BRE guidelines 'Site layout planning for daylight and sunlight- A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where occupants have a reasonable expectation of natural light:
- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
 - **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines

consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

Interpreting results

760. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is proportionally a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-29.9% it is judged to be minor adverse, 30-39.9% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

Overshadowing

761. Overshadowing of amenity spaces is measured using transient overshadowing and sunlight hours on ground. The BRE guidelines recommends that the availability for open spaces including residential gardens and public amenity spaces.

Daylight and Sunlight Assessment

762. An assessment of the impact of the development on daylight and sunlight to the surrounding residential buildings and public amenity spaces has been undertaken by GIA in accordance with the BRE Guidelines and having regard to policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the emerging City Plan 2040. Policy D6 of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether daylight or sunlight levels may be adversely affected. Local Plan Policy DM10.7 states that development which would reduce noticeably the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of BRE guidelines, should be resisted. The emerging City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards taking account of its context.
763. When referring to the degree of impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Impact Statement when describing the degree or extent of adverse impacts. Officers agree with the judgements reached in the environmental statement and daylight/sunlight review when arriving at the assessment of the degree or extent of adverse impact. The criteria set out in the BRE Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the Environmental Statement in forming a judgement

on whether the proposed development provides for sufficient daylight and sunlight to surrounding housing and sensitive receptors and is appropriate for its context (Part D of London Plan Policy D6), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan Policy DM10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (emerging City Plan Policy DE7).

764. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the site have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same daylight/sunlight test requirements as residential properties. The dense urban environment of the city in and around the Cluster is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premisses, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in this respect.
765. The buildings (incl. residential, religious and hotels) to be considered are:
- One Bishopsgate Plaza, 80 Houndsditch (including the Pan Pacific Hotel and Sky Residences)
 - 16 New Street (residential)
 - 26 Wormwood Street (residential)
 - 25 Wormwood Street (residential)
 - 10 Wormwood Street (residential)
 - St Botolph Without Bishopsgate (religious)
766. The buildings set out above are considered in the Environmental Statement. In addition to the properties considered in the Environmental Statement, results were presented outside of the Environmental Statement for the Bevis Mark Synagogue (religious) and Petticoat Square, Middlesex Estate (residential). These buildings were not presented in the Environmental

Statement due to their distance from the application site, however GIA have undertaken an assessment for completeness.

767. In respect of Bevis Mark Synagogue, which is located approximately 120m southwest from the site, a total of 23 windows serving two rooms were assessed for daylight and eight windows (within 90 degrees of due south) were assessed for sunlight. All 23 windows comply with the BRE criteria for VSC, and both rooms comply with the BRE criteria for NSL. In addition, all eight window meets BRE's criteria for APSH and WPSH. Therefore, the daylight and sunlight effect of the proposed development is Negligible (not significant).
768. In respect of Petticoat Square, Middlesex Estate, which is located approximately 140m northwest of the site. The sensitive windows and rooms on the east facing elevation, which are lined with inset balconies along Harrow Place have been assessed, as this is the closest to the site. A total of 126 windows were assessed for VSC and 59 rooms were assessed for NSL. 125 of the windows would meet the BRE criteria for VSC; the one window that would not meet the BRE criteria serves a bedroom and would experience an alteration of 21.1% which is a minor adverse effect but is only slightly beyond the BRE criteria. Due the location of this window beneath a balcony the baseline value is 1.9% VSC and this window would see an absolute reduction of 0.4% which is likely to be imperceptible. In respect of NSL, one bedroom would experience a change beyond the BRE criteria, 22.5%, which is a minor adverse effect but is only slightly beyond the BRE criteria. Due to its location beneath balconies, the baseline is low (21.7% NSL), the percentage change is disproportionate to what the occupants would be likely to experience. The daylight effect is considered to be Negligible (not significant). For sunlight, all 18 windows (within 90 degrees due south) would meet the BRE criteria, so the effect is considered Negligible (not significant).
769. The rest of this section of the report will address the properties considered in the Environmental Statement.
770. The following scenarios have been assessed:
- Existing Baseline Scenario
 - Proposed Development Scenario
 - Cumulative Scenario
771. The cumulative schemes considered in the Cumulative Scenario are 115-123 Houndsditch (21/00622/FULEIA) and Bevis Marks House (17/0030/FULMAJ), this is because the Environmental Statement concludes that all other cumulative schemes are considered too far from the site to have a cumulative impact on surrounding sensitive receptors.

Daylight and Sunlight

772. Daylight has been assessed using both the Vertical Sky Component (VSC) and No Sky Line (NSL) tests these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assessed the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or NSL guidelines are not met (full details on the daylight tests are set out in appendix C to this report).
773. The BRE criteria states that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experience a 20% or more reduction). In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
774. Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:
- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
 - Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
 - has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.
775. To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).
776. The submitted Environmental Statement also includes an assessment of Winter Probable Sunlight to give a detailed analysis of winter conditions.
777. The BRE guidelines advises that if the available sunlight hours are both less than 25% APSH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.
778. Both the London Plan 2021 and emerging City Plan 2040 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

779. For information, it is noted that Building Research Establishment (BRE) Group were commissioned to undertake an independent review of daylight, sunlight, overshadowing, solar glare and light trespass assessment in terms of their scope, method of assessment and criteria used, and conclusions reached. The assessment comments received by the third-party reviewer are further discussed below in the relevant section of the report.

Results Overview

Existing Baseline Scenario

780. A total of six buildings have been considered as sensitive receptors (as detailed above) and assessed in the baseline scenario.
781. Within these six buildings there are 787 windows serving 216 rooms which were assessed for daylight and 634 windows assessed for sunlight. In the existing baseline scenario, of the 787 windows assessed for daylight, 175 (22.2%) meet the BRE target of 27%VSC and of the 216 rooms assessed for NSL, 130 (60.2%) would receive the BRE target of 80% NSL.
782. With regards to the 634 windows assessed for sunlight, 310 (60.2%) would meet the BRE criteria of 25% APSH of which 5% is during winter (WPSH).
783. As such, it is evident that the locality is affected by the existing dense urban environment of the City and the existing context of tall buildings.

Proposed Development Scenario

784. When comparing the proposed development to the baseline scenario, 393 of the 787 windows assessed would meet the BRE criteria of meeting the 27% VSC target or seeing reduction no greater than 20%. This equates to 49.9% compliance.
785. In this same scenario, of the 216 rooms tested for NSL, 171 would meet the BRE guidelines being a reduction no greater than 20%. This equates to 79.2% compliance.
786. Four of the six buildings assessed would meet the BRE criteria for both VSC and NSL and as such these would experience a negligible impact where the effect is not significant. These are buildings are:
- 10 Wormwood Street
 - 25 Wormwood Street
 - 26 Wormwood Street
 - St Botolph Without Bishopsgate

787. In the proposed scenario in respect of sunlight, of the 634 windows assessed for APSH and WPSH, 256 windows would meet the BRE criteria or would experience a negligible effect (less than 20% alteration). This equates to 40.37% compliance.
788. Three of the six buildings assessed would meet the BRE criteria for both APSH and WPSH and as such these would experience a negligible impact where the effect is not significant. These buildings are:
- 25 Wormwood Street
 - 26 Wormwood Street
 - St Botolph Without Bishopsgate

Cumulative Development Scenario

789. In the cumulative development scenario, 388 of the 787 windows assessed would meet the BRE criteria of meeting the 27% VSC target or seeing reductions not greater than 20%. This equates to 49.3% compliance.
790. In this same scenario, of the 216 rooms tested for NSL, 171 would meet the BRE criteria of meeting 80% NSL target or seeing reductions no greater than 20%. This equates to 79.2% compliance.
791. Four of the six buildings assessed would meet the BRE criteria for both VSC and NSL and as such these would experience a negligible impact where the effect is not significant. These are buildings are:
- 10 Wormwood Street
 - 25 Wormwood Street
 - 26 Wormwood Street
 - St Botolph Without Bishopsgate
792. In the cumulative development scenario in respect of sunlight, of the 634 windows assessed for APSH and WPSH, 245 windows would meet the BRE criteria or would experience a negligible effect (less than 20% alteration). This equates to 38.6% compliance.
793. Three of the six buildings assessed would meet the BRE criteria for both APSH and WPSH and as such these building would experience a negligible impact where the effect is not significant. These buildings are:
- 25 Wormwood Street
 - 26 Wormwood Street
 - St Botolph Without Bishopsgate

Assessment of affected properties

794. The assessment below focuses on those buildings with windows and rooms that would see a reduction in VSC and/or NSL and/or APSH and/or WPSH in the proposed development and cumulative development scenarios.

10 Wormwood Street

795. This is a mixed-use building situated to the west of the site. The building has commercial uses on the ground floor, with residential properties located on the first to third floors.
796. It is highlighted that this property complies with the BRE criteria in respect of daylight.
797. A total of 118 windows serving 39 rooms were assessed for sunlight.

Proposed Development Scenario

798. For APSH, 106, of the 118 windows assessed would meet the BRE criteria and would experience a negligible impact where the effect is not significant; this equates to 89.9% compliance. Of the 12 affected windows, 11 would experience alterations between 20-29.9% which is a Minor Adverse effect and one window would experience an alteration of 35.7% which is a Moderate Adverse effect. In the existing baseline, all of these windows fall outside of the BRE criteria for APSH. The BRE guidance notes that where the overall loss of APSH is 4% or less, "the loss of sunlight is small"; none of the affected windows would experience an absolute change of more than 5%, demonstrating that the absolute change indicates that the loss of sunlight is unlikely to be noticeable to the occupiers.
799. For WPSH, all of the 118 windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant.
800. Overall, in the proposed development scenario, the impact is considered to be Minor Adverse.

Cumulative Development Scenario

801. 97 of the 118 windows assessed would meet the BRE criteria for both APSH and WPSH so would experience a negligible where the effect is not significant. This equates to 82.2% compliance.
802. For APSH, 100 of the 118 windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 84.74% compliance. Of the 18 affected windows, 17 would experience a Minor Adverse effect and one would experience an alteration of 35.7% which is a Moderate Adverse effect.

803. For WPSH, 107 of the 118 windows assessed would meet the BRE criteria so would experience a Negligible impact where the effect is not significant. This equates to 90.67% compliance. Of the 11 windows affected, four would experience a Moderate Adverse effect and seven would experience a Major Adverse effect. It is highlighted that in absolute terms, the alterations would be 1%, which is unlikely to be noticeable by the occupiers.
804. Whilst there are additional impacts as result of the addition of the Cumulative schemes, the effect is still considered to be Minor Adverse as per the Proposed Development scenario.

16 New Street, Tapestry Building

805. This building is a mixed-use building situated to the north of the application site. The ground floor hosts a commercial unit and over the first to fifth floors are 14 residential units.
806. A total of five windows serving four rooms were assessed for daylight.
807. A total of five windows were assessed for sunlight.

Proposed Development Scenario

808. For VSC, three of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 60% compliance. Of the two affected windows, they both would experience of alterations between 20 to 29.9% which is considered to be a Minor Adverse effect. Both of these windows have existing low values, therefore the resulting percentage change is disproportionate; the absolute change would be 3.1% and 3.4%. These windows also serve bedrooms, which the BRE guidance suggests that the daylight distribution may be less important in bedrooms.
809. For NSL, two of the four rooms assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 50% compliance. Of the affected rooms, they both experience an alteration between 30 to 39.9% which is considered to be a Moderate Adverse effect. Both of these rooms are bedrooms which the BRE guidance suggested that the daylight distribution may be less important in bedrooms.
810. Overall, the effect of daylight levels is considered to be Minor Adverse. Given the number of impacted windows, the existing low values and as the rooms are bedrooms which the BRE guidance suggests are less important, in this context it is not considered that the proposal would result in an unacceptable impact.

811. For APSH, four of the five windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 80% compliance. The one affected window would experience an alteration of 25% which is a Minor Adverse effect. The BRE guidance notes that where there is an overall annual loss of APSH is 4% or less, “the loss of sunlight is small”, the affected window would experience an absolute change of 5%. The absolute change of 5% indicates the loss of sunlight is unlikely to be noticeable to the occupiers. It is also noted that this window serves a bedroom, which the BRE guidance suggests the sunlight provision to this room type is less important.
812. For WPSH, four of the five windows assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 80% compliance. The one affected window would experience a Major Adverse effect but the absolute change would be 3%, wherein the BRE guidance notes that where an absolute loss of winter PSH is 4% or less, “*the loss of sunlight is small*”, and therefore unlikely to be noticeable to the occupiers.
813. Overall, the effect on sunlight levels is considered to be Negligible to Minor Adverse.

Cumulative Development Scenario

814. For VSC, two of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 40% compliance. Of the three affected windows, two of these windows also did not comply in the Proposed Development Scenario, one of the windows would experience no further alterations compared to the Proposed Development scenario and would experience a marginal increase in alteration by 0.4% in absolute terms. The additional window that would experience alterations in the Cumulative Development Scenario, would experience an alteration of 20.9% which is just over the 20% criteria so is unlikely to be noticeable by the occupier.
815. For NSL, two of the four rooms assessed would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 50% compliance. The affected bedrooms are the same rooms as in the Proposed Development Scenario and they would both experience an alteration between 30 to 39.9%, which is considered to be a Moderate Adverse effect. One of these bedrooms, would experience the same alteration as in the Proposed Development scenario and the other bedrooms would experience a minor increased alteration from 34.3% to 35.8%. The BRE guidance suggests that the daylight distribution may be less important in bedrooms.

816. Overall, given the nature of the additional daylight impacts that occur as a result of the cumulative schemes, the effect is considered to remain Minor Adverse, as the additional reductions are unlikely to noticeably alter the retained levels.
817. For APSH, four of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 80% compliance. The one affected window would experience an alteration of 25% which is a Minor Adverse effect. The affected window serves a bedroom, which the BRE guidance suggests sunlight provision to these rooms is less important.
818. For WPSH, three of the five windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 60% compliance. Both of the affected windows would experience alterations in excess of 40% which is a Major Adverse effect. Both of these windows served bedrooms, the BRE guidance suggests sunlight provision to these rooms is less important.
819. Overall, given the nature of the additional sunlight impacts occur as a result of the cumulative schemes coming forward with the proposed development, the effect is considered to be Minor to Moderate Adverse compared to the Minor Adverse impact of the proposed development alone.

One Bishopsgate Plaza

820. This building is a mixed-use building comprising of the Pan Pacific Hotel up to the level 20 and levels 21 to 41 consist of residential properties, the Sky Residences. Of the sensitive receptors assessed, this building is the closest to the application site.

Pan Pacific Hotel

821. The Pan Pacific Hotel is a commercial receptor and the impact on their daylight and sunlight has not been assessed. Although the impact of the development on the existing non-domestic part of the building has not been assessed, it is considered that the loss of daylight and sunlight on hotels is not as harmful as on residential uses due to the temporary nature of the accommodation and transient nature of the occupiers. Local Plan Policy DM10.7 and London Plan Policy D6 require protection of daylight and sunlight to dwellings and housing. Emerging policy DE7 requires to demonstrate that the daylight and sunlight to nearby sensitive receptors, including hotels, is appropriate for their context. Although the impacts of the proposed development on the nearby hotel have not been assessed, and it cannot be demonstrated that the impacts are acceptable in accordance with policy DE7, as a matter of judgment, any impact would not have a material impact on the continued use of the building as a hotel.

Sky Residences

- 822. A total of 580 windows serving 150 rooms have been assessed for daylight.
- 823. A total of 454 windows serving 129 rooms have been assessed for sunlight.
- 824. In the existing baseline scenario, 175 of the 580 windows comply with the BRE criteria for VSC, 117 of the 150 rooms meet the BRE criteria for NSL, and 306 of the windows meet the criteria for both APSH and WPSH.

Proposed Development

- 825. For VSC, 188 of the 580 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 32.8% compliance. Of the affected windows, five would experience a Minor Adverse effect (20 to 29.9%) nine windows would experience a Moderate Adverse effect (30 to 39.9%) and a total of 378 windows would experience alterations in excess of 40%, which is a Major Adverse effect. In the existing baseline scenario, all of these windows have low values that fall below the BRE criteria; this is highlighted as existing low values can result in disproportionate percentage losses.
- 826. For NSL, 107 of the 150 rooms would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 71.33% compliance. Of the affected rooms, two would experience Minor Adverse effects (20 to 29.9%), three would experience Moderate Adverse effects (30 to 39.9%) and 39 would experience Major Adverse effects (40% or greater).
- 827. For APSH, 89 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 19.6% compliance. Of the affected windows, five would experience Minor Adverse effects (20 to 29.9%), five would experience Moderate Adverse effects (30 to 39.9%) and 355 would experience Major Adverse effects (40% or greater).
- 828. For WPSH, 141 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 31.05% compliance. The 313 impacted windows would all experience Major Adverse effects (40% or greater).

829. The impacted windows are primary living space LKDs (living, kitchen and/or dining rooms), bedrooms or studio apartments. An assessment of each room type is set out below.

Bedrooms

830. 96 bedrooms were considered as part of the assessment. 18 of the bedrooms assessed would meet the BRE criteria for both VSC and NSL so would experience negligible impact where the effect is not significant.
831. All of the bedrooms are served by more than one window, and as such, a weighted VSC average for the rooms has been calculated in accordance with the BRE guidance. When the weighted VSC average is considered, the 78 bedrooms that would not be compliant with the BRE criteria, would all experience a Major Adverse effect (40% or greater). All of the windows that experience an alteration greater than 40% have existing values that fall below the BRE criteria, with 85 windows possessing existing values of less than 10%; this is highlighted, as existing low values can result in disproportionate percentage losses.
832. Of these 78 bedrooms, 54 of these would be compliant with the BRE criteria for NSL so would experience a negligible impact where the effect is not significant. Of the affected bedrooms, two would experience a Minor Adverse effect, three would experience a Moderate Adverse effect and 37 would experience a Major Adverse effect. It is noted that the BRE guidance suggests that the daylight distribution may be less important in bedrooms.
833. For APSH, 229 windows serving the 96 bedrooms were assessed. None of these windows would comply with the BRE criteria. Of the affected windows, two windows would experience a Moderate Adverse effect (30-39.9%) and 227 windows would experience a Major Adverse effect (>40%). The BRE guidance suggests sunlight provision to these rooms is less important.
834. For WPSH, 229 windows serving 96 bedrooms were assessed. Seven would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, 221 would experience a Major Adverse effect (>40%). The BRE guidance suggests sunlight provision to these rooms is less important.

LKDs

835. 47 LKDs were assessed as part of the assessment. 26 of these would be BRE compliant with the BRE criteria for both VSC and NSL so would experience a negligible impact where the effect is not significant.

836. The LKDs are served by more than one window and as such a weighted VSC average for the rooms has also been calculated in accordance with the BRE guidance. When the weight VSC is considered 27 of the LKDs would be BRE compliant, 13 would experience a Minor Adverse effect, five would experience a Moderate Adverse effect and two would experience a Major Adverse effect.
837. Of the affected LKDs, 12 would retain room average VSC values in the mid-teens or higher; mid-teen values in dense urban locations can be considered acceptable. All of the windows that experience a Major Adverse effect, have existing values that fall below the BRE criteria, with 21 windows possessing existing values of 10%; this is highlighted, as existing low values can result in disproportionate percentage losses.
838. When NSL is considered, 46 of the LKDs would be compliant with the BRE criteria so would experience a negligible impact where the effect is not significant. The one impacted LKD in terms of NSL would experience a Major Adverse effect.
839. For APSH, 196 windows serving the 47 LKDS were assessed, and 85 windows would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, five would experience Minor Adverse effects (20 to 29.9%), three would experience Moderate Adverse effects (30 to 39.9%) and 103 would experience Major Adverse effects (>40%).
840. For WPSH, 196 windows serving the 47 LKDs were assessed and 126 would be compliant with the BRE criteria so would experience a negligible effect where the effect is not significant. Of the affected windows, 70 would experience a Major Adverse effect (>40%).

Studio Apartments

841. Seven Studio Apartments were considered as part of the assessment. The Studio Apartments are all served by more than one window and as such a weighted assessment has also been calculated in accordance with the BRE guidance.
842. When the weighted VSC is considered, all seven studio apartments would experience alterations beyond the BRE criteria. One would experience a Minor Adverse effect and six would experience a Major Adverse effect. All of the windows that experience alterations greater than 40%, have existing low values that fall below the BRE criteria, with 7 windows possessing existing values of less than 10% this is highlighted, as existing low values can result in disproportionate percentage losses.

843. All seven Studio Apartments would comply with the BRE criteria in respect of NSL so would experience a negligible impact where the effect is not significant.
844. For APSH, 29 windows serving the seven studio apartments were assessed. Four windows would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, 25 would experience a Major Adverse effect (>40%).
845. For WPSH, 29 windows serving the seven studio apartments were assessed. Seven windows would comply with the BRE criteria so would experience a negligible impact where the effect is not significant. Of the affected windows, 22 would experience a Major Adverse effect (>40%).
846. The overall impact on these residential properties is considered to be Major Adverse.
847. Whilst the Major Adverse impact on this property is acknowledged, taking into consideration the location of the application site and these residential properties within the City Cluster, the dense urban environment of the City and in particular the Cluster, and any reasonable increase in massing, done in order to meet the aims of the development plan and the priorities for the CAZ on delivery of office floorspace, the impact on these residential properties are considered to be acceptable in this instance.

Cumulative Development Scenario

848. For VSC, in the cumulative development scenario, four additional windows would fail to comply with the BRE criteria; all four windows would experience a Minor Adverse effect, and these windows all serve LKDs.
849. For NSL, in the cumulative development scenario, there would be no additional impacts compared to the proposed development scenario.
850. For APSH, 88 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates to 19.38% compliance (compared to 19.6% in the proposed development scenario). Of the affected windows, three would experience Minor Adverse effects, seven would experience Moderate Adverse effects and the remaining 324 would experience a Major Adverse effect.
851. For WPSH, 130 of the 454 windows would meet the BRE criteria so would experience a negligible impact where the effect is not significant. This equates

to 28.63% (compared to 31.05% in the proposed development scenario). All of the affected windows would experience Major Adverse alterations.

852. Representations have been received in respect of the daylight and sunlight impacts on these properties, as highlighted above, whilst the Major Adverse impact on this property is acknowledged, taking into consideration the location of the application site and these residential properties within the City Cluster, the dense urban environment of the City and in particular the Cluster, and any reasonable increase in massing, done in order to meet the aims of the development plan and the priorities for the CAZ on delivery on office floorspace, the impact on these residential properties are considered to be acceptable in this instance
853. Whilst there are additional affects as results of the cumulative schemes coming forward together with the proposed development, the effect is still considered to be Major Adverse as per the Proposed Development Scenario.

Conclusion on Daylight and Sunlight Impacts

854. In summary the above consideration demonstrates in respect of daylight, out of the six properties considered in the proposed development scenario:
- Four would experience Negligible effects (10 Wormwood Street, 25 Wormwood Street, 26 Wormwood Street and St Botolph Without Bishopsgate)
 - One would experience Minor Adverse effects (16 New Street, Tapestry Building)
 - One would experience Major Adverse effects (One Bishopsgate Plaza)
855. When cumulative development is introduced, in respect of daylight, the effects remain as above.
856. In respect of sunlight, out of the six properties considered in the proposed development scenario:
- Three would experience Negligible effects (25 Wormwood Street, 26 Wormwood Street and St Botolph Without Bishopsgate)
 - One would experience Minor Adverse (16 New Street, Tapestry Building)
 - One would experience Major Adverse effects (One Bishopsgate Plaza)
857. When cumulative development is introduced, in respect of sunlight, the effects remain as above.
858. Whilst officers to acknowledge that there are transgressions beyond the BRE criteria and some of these are Major Adverse (namely One Bishopsgate Plaza), taking into account the location of the application site and the impacted residential properties within the Cluster, the dense urban environment of the

City particularly the Cluster, and any reasonable increase in massing, done to meet the aims of the development plan and the priorities of the CAZ on the delivery of floorspace, the impact on the above mentioned residential properties are considered acceptable in this instance and the proposal is not considered to result in a reduction of daylight and/or sunlight to unacceptable levels considering its context and therefore in compliance with the relevant development plan policies in particular Local Plan policy DM10.7 and London Plan Policy D6(d). Although there is conflict with emerging City Plan policy DE7 in relation to the hotel use, due to the inability to demonstrate that the impacts of the development would be acceptable, the policy is complied with in respect to housing and for the purposes of the hotel it is considered that the development would not pose a threat in continuing being used for its purpose.. The daylight and sunlight available to the Pan Pacific Hotel has not been assessed; to that extent the proposals conflict with emerging City Plan policy DE7.

Overshadowing

859. In relation to overshadowing of amenity spaces this is measure using sunlight hours on the ground. The BRE guideline recommends that the availability of sunlight be checked for open spaces including residential gardens, and public amenity spaces. A total of eight outdoor spaces have been considered as sensitive receptors and have been tested for Sunlight Hours on the Ground (full details of the Sunlight Hours on Ground Test are set out in Appendix C to this report), these eight spaces are:
- St Botolph Churchyard
 - One Bishopsgate Plaza, 80 Houndsditch, Public Realm
 - One Bishopsgate Plaza, 80 Houndsditch, Terrace 01
 - One Bishopsgate Plaza, 80 Houndsditch, Terrace 02
 - Jubilee Gardens (public amenity just off the junction with Houndsditch and Outwich Street)
 - Devonshire Square A (public outdoor amenity off Devonshire Square and Devonshire Row)
 - Devonshire Square B (public outdoor amenity off Devonshire Square and Devonshire Row)
 - Devonshire Square C (public outdoor amenity off Devonshire Square and Devonshire Row)
860. For each amenity space, six scenarios were tested:
- Baseline Scenario
 - Proposed Development in Existing Baseline Scenario
 - Future Baseline Tier 1 Scenario
 - Proposed Development in Future Baseline Tier 1 Scenario
 - Future Baseline Tier 1 and Tier 2 Scenario
 - Proposed Development in Future Baseline Tier 1 and Tier 2 Scenario

861. In the Existing Baseline only four of the amenity spaces meet the BRE criteria of receiving at least two hours of sunlight on the 21st March for at least 50% of their area which could impact the comfort and enjoyment of these spaces as required by policy, and this is considered in the planning balance section of this report.

St Botolph Churchyard

862. In the Existing Baseline Scenario, 0% of this amenity space would see sunlight for at least two hours of the 21st March and therefore does not meet the BRE guidance of achieving at least two hours of sunlight on the 21st March for at least 50% of their area. This would also be the situation in all five other scenarios.
863. The sun exposure diagrams show that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios on both the 21st March and 21st June would result in similar conditions compared to the conditions without the proposed development.
864. In consideration of the above, the proposed development would not have an unacceptable impact on St Botolph Churchyard.

One Bishopsgate Plaza, 80 Houndsditch, Public Realm

865. In the Existing Baseline Scenario, 0% of this amenity space would see sunlight for at least two hours of the 21st of March and therefore does not meet the BRE guidance of achieving at least two hours of sunlight on the 21st March for at least 50% of their area. This would also be the situation in all five other scenarios.
866. The sun exposure diagrams show that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios on the 21st June would result in similar conditions to those without the proposed development. On the 21st March, in the Existing Baseline scenario, this area receives between 0 to 1.5 hours, and this would be slightly reduced to 0 to 1 hours when the proposed development is introduced. In both the Future Baseline Tier 1 and Future Baseline Tier 1 and 2 scenarios, this area receives between 0 to 1 hours, and this would be slightly reduced to 0 to 0.5 hours when the proposed development is introduced.
867. Given that in the Existing Baseline Scenario, the policy requirement of achieving at least two hours of sunlight on the 21st March is not met, combined with the extent of the alterations to the sun exposure (which is a

supplementary test), the impact on One Bishopsgate Plaza, 80 Houndsditch, Public Realm is considered acceptable.

One Bishopsgate Plaza, 80 Houndsditch, Terrace 01

868. In the Existing Baseline Scenario, 97% of this terrace would receive at least two hours of sunlight and therefore meets the BRE criteria of at least 50% of the area receiving at least two hours of sunlight. In the Proposed Development in the Existing Baseline Scenario, the terrace would experience a 1% reduction in the amount of area receiving at least two hours of direct sunlight. This a negligible (not significant) effect and the area would remain BRE compliant as a result of the proposed development.
869. In the Future Baseline Tier 1 Scenario, 96% of this terrace would receive at least two hours of sunlight, the introduction of the Cumulative Tier 1 schemes would result in a 1% reduction compared to the Existing Baseline. When the Proposed Development is introduced, there would not be an alteration, as 96% of the area would still receive at least two hours of sunlight and remain compliant with the BRE criteria. The Tier 1 cumulative schemes result in the Negligible (not significant) effect.
870. In the Future Baseline Tier 1 and Tier 2 Scenario, 96% of this would receive at least two hours of sunlight. The introduction of the Tier 2 schemes does not result in any further alterations beyond the Tier 1 schemes. When the Proposed Development is introduced, there would not be an alteration as 96% of the area would still receive at least two hours of sunlight and remain compliant with the BRE criteria.
871. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1, Future Baseline Tier 1 and Tier 2 scenarios on the 21st June would result in similar conditions to those without the proposed development. On the 21st March, in the Existing Baseline scenario, this area receives between 3 to 5 hours of sunlight, and this would be slightly reduced to 3 to 4.5 hours when the proposed development is introduced. In both the Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios, these areas would receive between 3 to 5.5 hours, and this would be slightly reduced to 3 to 5 hours when the proposed development is introduced.
872. Whilst the supplementary sun exposure tests shows that there would be a slight reduction in the number of sunlight hours, overall given that the terrace would remain BRE compliant in terms of the amount of area receiving at least two hours of sunlight, the impact on One Bishopsgate Plaza, 80 Houndsditch, Terrace 01 is acceptable.

One Bishopsgate Plaza, 80 Houndsditch, Terrace 02

873. In the Existing Baseline Scenario, 98% of this terrace would receive at least two hours of sunlight and therefore meets the BRE criteria of at least 50% of the area receiving at least two hours of sunlight. In the Proposed Development in the Existing Baseline Scenario, the terrace would experience a 2% reduction in the amount of area receiving at least two hours of direct sunlight. This a negligible (not significant) effect and the area would remain BRE compliant with the introduction of the proposed development.
874. In the Future Baseline Tier 1 Scenario, 97% of this terrace would receive at least two hours of sunlight, the introduction of the Cumulative Tier 1 schemes would result in a 1% reduction compared to the Existing Baseline. When the Proposed Development is introduced, there would be a 1% reduction in the amount of area receiving at least two hours of sunlight as 96% of the terrace would receive at least two hours of sunlight. This is a negligible (not significant) effect and would remain BRE compliant.
875. In the Future Baseline Tier 1 and Tier 2 scenario, 97% of this terrace would receive at least two hours of sunlight. The introduction of the Tier 2 schemes does not result in any further alterations beyond the Tier 1 schemes. When the proposed development is introduced, there would be a 1% reduction in the amount of area receiving at least two hours of sunlight as 96% of the terrace would receive at least two hours of sunlight. This is a negligible (not significant) effect and would remain BRE compliant.
876. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1, and Future Baseline Tier 1 and Tier 2 scenarios on the 21st June would result in similar conditions to those without the proposed development. On the 21st March, in the Existing Baseline scenario this area receives 6+ hours of sunlight , and this would be reduced to between 4 to 4.5 hours when the proposed development is introduced. In the Future Baseline Tier 1 scenario, this area receives between 5 to 5.5 hours of sunlight, and this would be reduced to between 4 to 4.5 hours when the proposed development is introduced. In the Future Baseline Tier 1 and Tier 2 scenario, this area receives between 5.5 to 6+ hours of sunlight and this would be reduced to between 4 to 5 hours when the proposed development is introduced.
877. Whilst the supplementary sun exposure tests shows that there would be a reduction in the number of sunlight hours, overall given that the terrace would remain BRE compliant in terms of the amount of area receiving at least two hours of sunlight, the impact on One Bishopsgate Plaza, 80 Houndsditch, Terrace 02 is acceptable.

Jubilee Gardens (public amenity just off the junction with Houndsditch and Outwich Street)

878. In the Existing Baseline Scenario, 0% of this amenity space would see sunlight for at two hours on the 21st March and therefore does not meet the BRE guidance of achieving at least two hours of sunlight on the 21st March for at least 50% of their area. This would also be the situation in all five other scenarios.
879. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and 2 scenarios would result in similar conditions to those without the proposed development on the 21st March. On the 21st June, in the Existing Baseline scenario, this area receives between 1-4 hours of sunlight, and this would be reduced to between 0 to 2 hours when the proposed development is introduced. In the Future Baseline Tier 1 scenario this area receives between 1 to 4 hours and this would be reduced to 0 to 2 hours when the proposed development is added. In the Future Baseline Tier 1 and Tier 2 scenario, this area receives between 1.5 to 4 hours, and this would be reduced to 0 to 1.5 hours when the proposed development is introduced.
880. Given that in the Existing Baseline Scenario, the policy requirement of at achieving at least two hours of sunlight on the 21st March is not met, combined with the extent of the alterations to the sun exposure (which is a supplementary test), the impact on Jubilee Gardens is considered acceptable.

Devonshire Square A (public outdoor amenity off Devonshire Square and Devonshire Row)

881. In the Existing Baseline Scenario, 62% of this public outdoor amenity space receives at least two hours of direct sunlight on the 21st March. The amenity space would see a reduction of 18% in the amount of area receiving at least two hours of direct sunlight with the proposed development in place. This reduction is less than 20% and as such in accordance with the BRE guidance, this would result in a Negligible (not significant) effect.
882. In the Future Baseline Tier 1 Scenario, 33% of this amenity space would receive at least two hours of sunlight on the 21st March. This reduction compared to the Existing Baseline is as result of the Tier 1 Cumulative Schemes. The introduction of the Proposed Development would result in a 100% alteration in terms of percentage of the area which would receive at least two hours of sunlight as 0% would receive at least two hours of direct sunlight. Overall, this is a Major Adverse effect.
883. In the Future Baseline Tier 1 and 2 Scenario, 33% of this amenity space would receive at least two hours of sunlight. The introduction of the Tier 2 schemes would not result in further alterations beyond the Tier 1 schemes. As like with

Tier 1, when the Proposed Development is introduced 0% would receive at least two hours of direct sunlight

884. The sun exposure diagrams demonstrate that in the Existing Baseline and Future Baseline Tier 1 and Tier 2 scenario on the 21st June this area receives between 3 to 6+ hours and when the proposed development is introduced the range of hours would be the same but there would be more areas towards the lower end of the range. In the Future Baseline Tier 1 scenario, on the 21st June, this area receives between 3.5 to 6+ hours and when the proposed development is introduced the range of hours would be the same but there would be more areas toward the lower end of the range. On the 21st March in the Existing Baseline scenario, this area receives between 0.5 to 6+ hours and this would be reduced to 0.5 to 3 hours when the proposed development is introduced. In the Future Baseline Tier 1 scenario on the 21st March this area receives between 0 to 3 hours and this would be reduced to 0 to 2.5 hours when the proposed development is introduced. In the Future Baseline Tier 1 and 2 scenario this area receives between 0.5 to 3.5 hours, and this would be reduced to 0 to 2.5 hours when the proposed development is introduced.
885. As set out above, this amenity area would experience a Major Adverse effect.

Devonshire Square B (public outdoor amenity off Devonshire Square and Devonshire Row)

886. In the Existing Baseline Scenario, 60% of this public outdoor amenity space receives at least two hours of sunlight on the 21st March, complying with the BRE criteria. The introduction of the proposed development would not result in any alterations as 60% of the area would still receive at least two hours of direct sunlight on the 21st March. This a negligible (not significant) effect and the area would remain BRE compliant as a result of the proposed development.
887. In the Future Baseline Tier 1 Scenario, 0% of this amenity space would receive at least two hours of direct sunlight. It is the introduction of the Tier 1 cumulative schemes that result in this impact compared to the Existing Baseline Scenario. When the Proposed Development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.
888. In the Future Baseline Tier 1 and Tier 2 Scenario, the introduction of the Tier 2 scheme would not result in any further alterations beyond the Tier 1 schemes. When the Proposed Development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.
889. The sun exposure diagrams demonstrate that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future

Baseline Tier 1 and Tier 2 scenarios on the 21st March would result similar conditions to those without the proposed development. In the Existing Baseline Scenario, Future Baseline Tier 1 and Future Baseline Tier 1 and 2, on the 21st June, the range of hours would be the same but there would be more areas towards the lower end of the range when the proposed development is introduced.

890. The proposed development in itself would not have an impact on the extent of this space would receive at least two of sunlight. It is the Cumulative Tier 1 schemes that result in the impact on this amenity area.

Devonshire Square C (public outdoor amenity off Devonshire Square and Devonshire Row)

891. In the Existing Baseline Scenario, 20% of this public outdoor amenity space would receive at least two hours of sunlight on the 21st March; this does not comply with the BRE criteria of at least 50% of the area receiving at least two hours of direct sunlight. The introduction of the Proposed Development would not result in any alterations as 20% of the area would still receive at least two hours of direct sunlight on the 21st March. This a negligible (not significant) effect.
892. In the Future Baseline Tier 1 Scenario, 6% of this this amenity space would receive at least two hours of direct sunlight. It is the introduction of the Tier 1 cumulative schemes that result in this impact compared to the Existing Baseline Scenario. When the proposed development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.
893. In the Future Baseline Tier 1 and Tier 2 Scenario, the introduction of the Tier 2 scheme would not result in any further alterations beyond the Tier 1 schemes. When the Proposed Development is introduced, there would be no further alterations beyond those caused by the Tier 1 schemes.
894. The sun exposure diagrams show that the introduction of the proposed development in the Existing Baseline, Future Baseline Tier 1 and Future Baseline Tier 1 and Tier 2 scenarios on both the 21st March and 21st June would result in similar conditions compared to the conditions without the proposed development.
895. The proposed development in itself would not have an impact on the extent of this space would receive at least two of sunlight. It is the Cumulative Tier 1 schemes that result in the impact on this amenity area.

Overshadowing Conclusion

896. Overall, the impact to five of the six amenity spaces as of the result of the proposed development is such they would not experience materially harmful overshadowing effects caused by the development and therefore comply with London Plan policy D9C (3)(a), policy DM10.7 of the Local Plan and policy DE7 of the emerging City Plan 2040. One amenity space, Devonshire Square A would experience a Major Adverse effect in the cumulative scenario, which could impact the comfort and enjoyment of this space being in conflict with the policy requirements and this is considered in the overall planning balance section of this report.

Transient Overshadowing

897. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify different times of day and year when shadow would be cast over a surrounding area.
898. In relation to overshadowing, all areas of public open space, such as parks, squares, neighbouring communal areas and private gardens, are considered highly sensitive. A total of eight outdoor spaces have been considered as highly sensitive, these eight spaces are:
- St Botolph Churchyard
 - One Bishopsgate Plaza, 80 Houndsditch, Public Realm
 - One Bishopsgate Plaza, 80 Houndsditch, Terrace 01
 - One Bishopsgate Plaza, 80 Houndsditch, Terrace 02
 - Jubilee Gardens (public amenity just off the junction with Houndsditch and Outwich Street)
 - Devonshire Square A (public outdoor amenity off Devonshire Square and Devonshire Row)
 - Devonshire Square B (public outdoor amenity off Devonshire Square and Devonshire Row)
 - Devonshire Square C (public outdoor amenity off Devonshire Square and Devonshire Row)
899. The Proposed Development scenario, Cumulative Tier 1 scenario and Cumulative Tier 1 and Tier 2 scenario have been assessed, and the results are set out below.

Proposed Development

Equinox (21st March/September)

900. On this day, shadow is cast from the Proposed Development from 08:00GMT, which moves in a clockwise direction throughout the day. At this time, the shadow is cast in the direction of St Botolph's Church Yard, which is already shaded due to the existing buildings, and so no additional overshadowing occurs. Between 10:00GMT to 11:00GMT, the Proposed Development causes

a small strip of overshadowing to One Bishopsgate Plaza, 80 Houndsditch Public Realm. As the shadow continues in an easterly direction, it passes over One Bishopsgate Plaza, 80 Houndsditch, Terrace 01 and 02, Jubilee Gardens and Devonshire Square A from 11:00 to 15:00GMT. No additional shading would occur to Devonshire Square B, with a very small period of additional shadow to Devonshire Square C would occur between 15:00 and 16:00GMT.

Summer Solstice (21st June)

901. On this day, shadow is cast from the Proposed Development from 07:00BST, which moves in a clockwise direction throughout the day. None of these areas are overshadowed at this time until 10:00BST, when a small strip of shadow is cast in the direction of St Botolph's Church Yard, which clears by 11:00BST. From 12:00BST to 17:00BST, the Proposed Development passes over One Bishopsgate Plaza, 80 Houndsditch Public Realm and Terraces 01 and 02, Jubilee Gardens and Devonshire Square A, B and C. The shadows move quickly across these areas and do not result in permanent shading for prolonged periods of time.

Winter Equinox (21st December)

902. On this day, shadow is cast from the Proposed Development from 09:00GMT, which moves in a clockwise direction throughout the day.
903. Due to existing buildings, no additional shading is caused by the proposed development.

Cumulative Tier 1 Scenario

Equinox (21st March/September)

904. On this day, St Botolph Churchyard would experience some additional overshadowing from 14:00 onwards. One Bishopsgate Plaza would experience some additional overshadowing around 09:00. Devonshire Square A would experience some additional overshadowing from circa 09:00 and the shadow moves in a clockwise direction and in turn affects Devonshire Square B and C up until 15:00. These areas remain in shadow for the rest of the day; however, this is a result of the existing context.
905. The additional shadowing in the Tier 1 Cumulative Scenario is mainly a result of 115-123 Houndsditch, 24 Bevis Marks, 100 Leadenhall and 55 Old Broad Street.

Summer Solstice (21st June)

906. On this day when the sun is higher in the sky, St Botolph Churchyard, Devonshire Square B and Devonshire Square C would experience some additional shadowing in the afternoon. Additional shadows are cast on St Botolph Churchyard from 14:00 onwards by 55 Bishopsgate and 55 Old Broad Street, as shadows move clockwise for the rest of the day. Devonshire Square B would see additional shadows for a short period of time between 12:00 to 13:00 mainly from 115-123 Houndsditch, and Devonshire Square C would see some additional shadows cast from the same building throughout the afternoon.

Winter Equinox (21st December)

907. On this day when the sun is lower in the sky, most areas are heavily shaded throughout the day, which is expected given the dense urban nature of the area. However, some additional shadows will be cast on St Botolph Churchyard and Devonshire Square C between 13:00 and 14:00.

Cumulative Tier 1 and 2 Scenario

908. Given the distance between the additional cumulative included in this scenario, the effects are largely the same as in the Cumulative Tier 1 scenario. However, there would be some additional shadow cast on St Botolph Churchyard by 99 Bishopsgate from 12:00 onwards on the 21st March and between 13:00 and 16:00 on the 21st June.

Transient Overshadowing Conclusion

909. In conclusion, the results show that there would be no materially harmful overshadowing effects caused by the development to any public amenity areas and therefore the proposal complies with policy D9 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the emerging City Plan 2040.

Solar Glare

910. Glare is discomfort or impairment of vision caused by excessive or large contrast in illuminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare: distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).
911. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause a serious problem, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun

usually presents the most problems), whether shading devices are already in use, and the way the space is use.

- 912. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.
- 913. A total of 49 road locations have been identified in the Environmental Statement. The potential effect of the impact of solar glare on road users has been assessed at the traffic junctions and pedestrian crossings.
- 914. The assessment concludes that the development is not considered visible at 39 viewpoints and no impact would occur. At the remaining ten viewpoints, solar reflections would be visible within 20° and 30° of the driver's line of sight or within 5-10 degrees on small portions of the façade and for short period of time. The Environmental Statement concludes that this would be a Minor Adverse (not significant) effect, and that no mitigation is necessary.
- 915. Overall, the potential impact from solar glare from the proposed development are considered at its worse minor adverse but the effects are not significant.
- 916. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of mitigation measures (if considered necessary). The proposed development would comply with Policy D9 of the London Plan, Local Plan policy DM10.1 and emerging City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar effects on surrounding buildings and public realm.

Light Spill

- 917. Local Plan policy DM15.7 and emerging City Plan 2040 policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
- 918. The potential light spillage impacts arising from the Proposed Development has been assessed on one building (One Bishopsgate Plaza, 80 Houndsditch), which the Environmental Statement identified within a 30m radius from the proposed development as sensitive to the impact of light pollution in accordance with the Institute of Lighting Practitioners (ILP) Guidance.
- 919. The assessment shows that pre-curfew (before 11pm), the level of light pollution would be limited and well within the 25-lux threshold out within the ILP guidance. The post curfew (after 11pm) assessment shows that the level

of light trespass would be below the 5-lux threshold set out within the ILP guidance. The impact on One Bishopsgate Plaza, 80 Houndsditch would be Negligible (not significant).

920. A condition has been included which requires a detailed lighting strategy to be submitted prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of any internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour, and associated management measures to reduce the impact on light pollution and residential amenity in line with the City's Lighting SPD.
921. Subject to the imposition of the condition, the proposed development would comply with Local Plan policy DM15.7 and emerging City Plan 2040 DE8 and has been designed to avoid light spill.

Third Party Review

922. For information, Building Research Establishment (BRE) Group were commissioned to undertake an independent review of daylight, sunlight, overshadowing, solar glare and light trespass assessment in terms of their scope, method of assessment and criteria used, and conclusions reached.
923. The review concluded that the overall scope is reasonable. They did state that the full set of window maps were missing, these were provided by the applicant team once requested. The review did highlight that the BRE guidance suggests that Pan Pacific Hotel could be assessed and noted that loss of light could be considered less of an issue compared to dwellings; this information was not requested by officers and this is set out in the assessment above.
924. In respect of the assessment methodology and assessment review, BRE Group were generally satisfied with the assessment methodology. They did, however, raise points of clarification and these are discussed below.

Environmental Impact Assessment

925. BRE Group disagree with the way in which Minor Adverse impacts have been categorised as 'Not significant effects' and suggest that Minor Adverse effects should be categorised as 'Significant effects'.
926. BRE Group also provided comments in relation to the discussion in the chapter based on a two-stage approach, as they state this approach is not based on the specific advice in the BRE report and would be considered part of the planning decision rather than the technical study. This is noted by Officers and Officers highlight this report has undertaken an assessment of the impacts.

Solar Glare

927. Overall BRE Group conclude that the assessment is based on an appropriate number of road viewpoints near to the site, however they did say a more detailed calculation could be undertaken in respect of two viewpoints that have small areas within the 10° line of site.

Light Pollution

928. BRE Group made a range of comments in relation to the submitted light pollution assessment, including: the assessment did not use a final internal lighting design or a notional design; it is not clear how the pre-curfew and post-curfew calculations have been carried out; and highlights that a further assessment would need to be prepared at detailed design stage.
929. The applicants provided updated information, and detailed post curfew assessment. BRE Group have confirmed that the assessment demonstrates compliance with the 5 lux post-curfew guideline and that agree that the impacts were properly assessed. It is highlighted though that a condition is proposed to be imposed to secure the submission of a lighting strategy on the detailed design. Officers are satisfied that the imposition of this condition would address the comments made by BRE Group.

Loss of daylight and sunlight to surroundings

80 Houndsditch- One Bishopsgate Plaza

930. BRE Group commented that there were some minor discrepancies between summary results in the appendices and the discussion within the Environmental Statement. The Applicant confirmed the correct figures.
931. BRE Group considered the Major Adverse impact to be appropriate.

16 New Street, Tapestry Building

932. BRE Group considered the Minor Adverse impact to be appropriate. As discussed above, they do not agree that a Minor Adverse impact would be a 'Not significant effect'.

10 Wormwood Street

933. BRE Group considered the Minor Adverse impact to be reasonable.

Gardens and Open Spaces

934. BRE Group commented that the presentation of the results did not include a presentation of the results for the existing baseline against any cumulative scenario. This information was provided by the Applicant and the assessment above is based on this information.

Thermal Comfort Assessment

935. London Plan policy D8 and D9 and policies S8, S12 and S21 of the emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
936. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared. The technique involves merging the effects of wind, air temperature, humidity and solar radiation data understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.
937. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort are set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description	Colour
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange
Transient	<25% in winter OR <50% in any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).	Red

938. A full assessment of the impact of the impact of the development on thermal comfort was undertaken in accordance with the City of London Thermal Comfort Guidelines and having regard to policies D8 and D9 of the London Plan and policies S8, S12 and S21 of the emerging City Plan 2040. The assessment has tested four configurations including:

- Configuration 1: Existing Site with existing surrounding buildings.
- Configuration 2: Proposed Development with existing surrounding buildings.
- Configuration 3: Proposed Development with Tier 1 cumulative surrounding buildings.
- Configuration 4: Proposed Development with Tier 1 and Tier 2 cumulative surrounding buildings.

Configuration 1: Existing Site with existing surrounding buildings

939. In the existing scenario, in the seasons of spring, summer and autumn, the UTCI values generally stay within the acceptable range for at least 90% of the time in most locations. In these seasons conditions are worse at the junction of Camomile Street and Bishopsgate and along Bishopsgate, as UTCI values generally stay within the acceptable range for at least 75% of the time. During the winter, due to lower air temperatures and reduced solar radiation combined with higher wind speeds, this results in a greater number of hours falling outside the acceptable range, as the UTCI values generally stay within the acceptable range for at least 80% of the time. In the winter, conditions are worse at the junction of Camomile Street and Bishopsgate and along Bishopsgate, as generally UTCI values stay within the acceptable range for at least 50% of the time.

940. When looking at comfort at ground level, the results show the ground level conditions are predominately categorised as being all season and all seasonal. These conditions are suitable for the intended uses. There are instances of short-term and short-term seasonal conditions at the junction of Wormwood Street, Bishopsgate and Camomile Street, which is associated with the pre-existing windy conditions at the junction.

941. When looking at the comfort on elevated levels, the results show that the raised off-site amenity terraces at 2 Devonshire Square and 100 Bishopsgate are categorised as being all season and seasonal. The terraces at Bishopsgate Plaza are categorised as being a mix of short-term and seasonal.

Configuration 2: Proposed Development with existing surrounding buildings

942. In the Proposed Development with existing surrounding buildings scenario, in the spring there would be alterations to the UTCI values, generally the UTCI values would stay within the acceptable range for at least 90% of the time in most locations (this is similar to Configuration 1), however, along Houndsditch, the UTCI values would stay within the acceptable range for at least 85% of the time. Conditions are worse in the spring at the junction of Camomile Street and Bishopsgate and along Bishopsgate, as UTCI values stay within the acceptable range for at least 80% of the time. In the summer, the UTCI values stay within the acceptable range for at 95% of the time. In the autumn, the UTCI vales generally stay within the acceptable range for at least 90% of time and the worse conditions are at the junction of Camomile Street and Bishopsgate and along Bishopsgate as UTCI values would stay within the acceptable range for at least 80% of the time. As like in Configuration 1, winter is the least comfortable season, the UTCI values generally stay within the acceptable range for at 75% of the time in most locations. Conditions are worse along Houndsditch as UTCI values would stay within the acceptable range for at least 65% of the time and at the junction of Camomile Street and along Bishopsgate UTCI values would stay within the acceptable range for at least 50% of the time.
943. When looking at comfort for off-site ground level conditions, conditions are not predicted to materially change compared to Configuration 1, with most ground level conditions being suitable for the intended use. The short-term seasonal and short-term conditions at the junction of Wormwood Street, Bishopsgate and Camomile Street are similar to those in Configuration 1.
944. There are amenity areas at ground level within the development to the south and west and these will have all-season conditions and therefore suitable for the intended use.
945. When looking at comfort on off-site amenity terraces at 2 Devonshire Square, 100 Bishopsgate and Bishopsgate Plaza, the conditions would either be similar or calmer than in the Configuration 1 and are therefore acceptable.
946. The proposed walkways on the lower levels of the proposed building would have an all season and seasonal comfort conditions and therefore suitable for the intended use. The proposed terraces at Levels 27 and 28 would primarily have a mix of all season and seasonal comfort conditions with a minor instance of short-term in an area that would be landscaped. The proposed balconies would primarily have an all-season comfort condition with instances

of seasonal and short-term. The terraces and balconies would largely be suitable for the intended use expect for the instances of short-term, however, as these are private terraces and balconies, and access can be restricted when conditions are unfavourable, this is considered to be acceptable.

Configuration 3: Proposed Development with Tier 1 cumulative surrounding buildings

947. In the Proposed Development with Tier 1 cumulative surrounding buildings scenario, in the spring and autumn the UTCI values stay within the acceptable range for at least 75% of the time and in the summer for at least 95% of the time. In the winter, conditions are worsened compared to Configuration 2 and this is due to the introduction of the Cumulative Tier 1 schemes, as generally UTCI values stay within the acceptable range for at least 65% of the time in most locations. The worse conditions are along Wormwood Street, at the junction of Camomile Street and Bishopsgate and along Bishopsgate as conditions are in the acceptable range for at least 50% of the time.
948. When looking at comfort for off-site ground level conditions, with the introduction of the Tier 1 cumulative schemes, conditions would generally be consistent with Configuration 2 and be acceptable for the intended use. There would be an increase in the short-term seasonal and short-term conditions along Wormwood Street. These categories are associated with the increase in windiness along Wormwood Street, and as demonstrated by the Future Baseline (Configuration 4) of the Wind Microclimate assessment, this increase in windiness is as a result of the wind interaction with the Tier 1 schemes and not the proposed development.
949. The onsite ground level amenity areas to the west and south would have all-season conditions as like in Configuration 2 and would be suitable for the intended use.
950. When looking at comfort on off-site amenity terraces at 2 Devonshire Square, 100 Bishopsgate and Bishopsgate Plaza conditions would be similar to those in Configuration 2 and are therefore acceptable.
951. The proposed walkways on the lower levels of the building, would have all season and seasonal comfort conditions same as in Configuration 2 and therefore suitable for the intended use. The conditions on the proposed terraces at Levels 27 and 28, as like in Configuration 2, would primarily have a mix of all season and seasonal comfort conditions with a minor instance of short-term in an area that would be landscaped. The proposed balconies would primarily have al all-season comfort condition with instances of seasonal of and short-term. The terraces and balconies would largely be suitable for the intended use expect for the instances of short-term, however, as these are private terraces and balconies, and access can be restricted when conditions are unfavourable, this is considered to be acceptable.

Configuration 4: Proposed Development with Tier 1 and Tier 2 cumulative surrounding buildings

952. In the Proposed Development with Tier 1 and Tier 2 cumulative surrounding buildings scenario, in the spring and autumn conditions are generally similar to Configuration 3, as the UTCI values stay within the acceptable range for at least 75% of the time and in the summer for at least 95% of the time. As like in Configuration 3, conditions in the winter are worsened compared to Configuration 2 and this is due to the introduction of the Tier 1 and Tier 2 cumulative schemes, as generally UTCI values stay within the acceptable range for at least 65% of the time in most locations. The worse conditions are along Wormwood Street, at the junction of Camomile Street and Bishopsgate and along Bishopsgate as conditions are in the acceptable range for at least 50% of the time.
953. When looking at comfort for off-site ground level conditions, with the introduction of the Tier 1 and Tier 2 schemes, conditions would generally be consistent with Configuration 3, and conditions would generally be suitable for the intended use. As like in Configuration 3, the short-term seasonal and short-term conditions along Wormwood Street are associated with the increased level of windiness along Wormwood Street that is as result from the interaction with the Tier 1 schemes and the proposed development.
954. The on-site ground level amenity areas to the west and south would have all season conditions as like in Configurations 2 and 3 and would be suitable for the intended use.
955. When looking at comfort on off-site amenity terraces at 2 Devonshire Square, 100 Bishopsgate and Bishopsgate Plaza the conditions would be similar to those in Configuration 3 and therefore acceptable.
956. The proposed walkways on the lower levels of the building, would have all-season and seasonal comfort conditions as like in Configurations 2 and 3 and therefore suitable for the intended use. The conditions on the proposed terraces at Levels 27 and 28, as like in Configurations 2 and 3, would primarily have a mix of all season and seasonal comfort conditions with a minor instance of short-term in an area that would be landscaped. The proposed balconies would primarily have an all-season comfort condition with instances of seasonal and short-term. The terraces and balconies would largely be suitable for the intended use except for the instances of short-term, however, as these are private terraces and balconies, and access can be restricted when conditions are unfavourable, this is considered to be acceptable.

Thermal Comfort Conclusion

957. It is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan policy D8 and D9 and policies S8, S12 and S21 of the emerging City Plan 2040.

Overlooking, Privacy and Overbearing Impact

958. Local Plan policy DM21.3 and emerging City Plan policy HS3 of the emerging City Plan 2040 seek to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and emerging City Plan assess residential amenity and not the amenity of commercial occupiers. Policy D3 of the London Plan requires all new development proposals to deliver appropriate outlook, privacy and amenity.
959. 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 properties.
960. Consideration has to be given to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.
961. The proposed balconies on the southeastern and southwestern balconies, due to their siting and the separation distance to the nearest residential properties, would not result in overlooking and loss of privacy to nearby residential properties.
962. The proposed terraces on levels 27 and 28 would be situated on the northern side of the proposed building. The closest residential properties are those situated on levels 21 to 41 at One Bishopsgate Plaza; the proposed terraces correspond to approximately to levels 31 to 34 in One Bishopsgate Plaza, 80 Houndsditch. The proposed terraces are for office occupier amenity only rather than being publicly accessible and therefore, it is expected that smaller crowds would occupy them. A condition is also imposed restricting hours of use between 7am and 11 pm. Due to the combination of the siting of the proposed terraces, the usable area of the terrace being set back within a green roof and the proposed landscaping (which would be secured by condition), the proposed terraces at levels 27 and 28 would not result in undue overlooking and loss of privacy to the occupiers of the residential properties at One Bishopsgate Plaza, 80 Houndsditch. Representations have been received in respect of overlooking towards this property, for the combination of reasons set out in this paragraph, it is considered that the development has been designed to avoid overlooking and seek to protect privacy. On that basis, it is considered that the development would be compliant with policy DM21.3(1).
963. The proposed development would result in an increased massing and height on the application site compared to the existing building. Although the proposed development would be located in close proximity to residential

properties (the closest being the residential properties at One Bishopsgate Plaza), it is considered that the nature of the development in the Eastern Cluster, incorporating tall buildings, the proposal would result in no greater impact than that already cause by neighbouring existing tall buildings. It is therefore considered that the proposed development is not considered to cause an undue overbearing impact to nearby residential properties. Representations have been received in respect of the development resulting in an uncomfortable sense of enclosure, for the reasons set out in this paragraph, the proposed development is not considered to result in an overbearing impact to nearby residential properties.

964. The proposals have been designed to avoid overlooking and seek to protect privacy. As such, it would comply with Local Plan policy DM21.3 and CS5 and policy HS3 of the emerging City Plan 2040.

Air Quality

965. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the emerging City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof of the height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by Policy SI1 of the London Plan.
966. The Environmental Statement at Chapter 6 and 'Appendix: Air Quality' include an assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development. Due to being an EIA, in addition to an Air Quality Neutral Assessment an Air Quality Positive Statement has also been submitted as part of the application.
967. The development has proposed the installation of a single backup diesel generator. The generator is for life-safety emergency operation only and cannot be used for any level of business continuity, and the applicant has confirmed there is no provision to provide any further generator(s) for tenant use. Alternatives to the diesel generator for emergency power supplies have not been explored, therefore an assessment of alternatives will need to be completed. If installed, the generator should be fitted with mitigation, such as SCR, to reduce NOx emissions to comply with the City of London Air Quality SPD and only tested only in-line with manufacture guidance.
968. The development is Air Quality Neutral, as per GLA guidance, with two blue-badge car parking spaces and the heating demand provided by air source heat pump technology. It should be noted that emissions from the proposed

emergency life-safety generator and service and delivery vehicles are exempt from Air Quality Neutral.

969. The initial Air Quality Positive Statement submitted was generic and did not include any measures, that were not already required through local or London Plan policy, to ensure the development pushed beyond compliance. A revised document was submitted, and a condition has been included to ensure successful implementation and monitoring of the proposed measures.
970. The City's Air Quality Officer has no objections subject to conditions in relation to Emergency Power Supply, combustion flues, Air Quality Positive Assessment, and Non-Road Mobile Machinery.
971. Subject to the imposition of these conditions, the proposed development would accord with Local Plan Policy CS15, Policy DE1 of the emerging City Plan 2040, and Policy SI1 of the London Plan which all seek to improve air quality.

Noise and Vibration

972. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
973. Chapter 7 of the Environmental Statement and 'Appendix: Noise and Vibration' assess the impact from noise and vibration associated with the proposed development, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in traffic which could be attributed to the proposed development.
974. Noise and vibration resulting from demolition and construction activities has the potential to cause temporary disturbance to surrounding sensitive receptors (SRs), particularly during the course of any below-ground excavation and construction works. Once the Proposed Development is complete and operational, noise associated with new building services plant, changes in road traffic and ancillary servicing areas all have the potential to change the noise levels, which could affect occupants at neighbouring properties.
975. The Environmental Statement identifies the following receptors that would be sensitive to noise and vibration from the proposal (the sensitive receptors):
- SR1 - Commercial (South Façade, 106-107 Houndsditch);
 - SR2 - Commercial (North-West Façade, 70 St Mary Axe);

- SR3 - Commercial with rooftop amenity space (North Façade, 100 Bishopsgate);
- SR4 - Commercial with rooftop amenity space (South-East Facade, 110 Bishopsgate); and
- SR5 - Hotel & Private Residential (South Façade, Pan Pacific Hotel, 80 Houndsditch).

976. In most City redevelopment schemes the main noise and vibration issues occur during demolition and construction phases. In respect of construction noise levels and resultant effects the impact is deemed to be Not Significant at all receptors.
977. In respect of demolition and construction vibration, the assessment identifies that there is a possibility of experiencing a low magnitude of impact in relation to vibration resulting in a short-term, Minor Adverse effect (Not Significant) in terms of human Perception to SR2. All other SRs would experience negligible effects (Not Significant).
978. In respect of traffic noise and during the deconstruction and construction phases, it is anticipated that a peak in construction vehicle movements of 74 daily (less than 8 per hour) would occur, spread over the working day. This would be expected to equate to an increase in road traffic noise of less than 1 dB on roads surrounding the Site (negligible magnitude of impact). The effect is considered Negligible, short-term, local, and therefore Not Significant.
979. Noise and vibration mitigation during deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Scheme of Protective Works to be secured by condition, and freight movements would be controlled through the Deconstruction and Construction Logistics Plans, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.
980. The Environmental Statement concludes that operational traffic noise associated with the proposed development would be negligible and not significant for all sensitive receptors.
981. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below the background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.

982. Conditions are proposed to be attached in respect of the hours of use of the cultural centre, music and promoted events.
983. The majority of deliveries and servicing will be secured by condition to take place from the on-site loading bay overnight between 11pm to 7am. However, for refuse collections including glass, this will be restricted to be between the hours of 8pm and 11pm by condition to prevent amenity harm from the noisier nature of this type of servicing.
984. The submission considers the noise and vibration impacts of development on the environment. Subject to a series of conditions to mitigate noise and vibration during deconstruction and construction and operational phases of development, the proposed development would comply with Policies D13 and D14 of the London Plan and policy DM15.7 of the local plan and Policy HL3 and HS3 of the emerging City Plan 2040.

Contaminated Land

985. Local Plan policy DM15.8 and draft Policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.
986. Policy S1 of the emerging Draft City Plan expects developers to address land contamination.
987. The application is accompanied by a Preliminary Risk Assessment, prepared by Soiltechnics, which assesses the impact on ground conditions associated with the proposed development, including potential effect on human health, surface and groundwater, sensitive ecosystems and species, and property.
988. The PRA identifies potential contaminant linkages which require further investigation through intrusive methods. The City's Environmental Health Officer requested conditions that require a detailed site investigation be completed prior to commencement of development to identify potential for contamination, an investigation and risk assessment prior to construction, and, if this finds the potential for contamination, that intrusive investigations are required to provide information to support a suitable remediation strategy and mitigation measures.
989. Thus, overall, subject to condition the proposals are in accordance with Policy DM15.8 of the Local Plan and Policies S1 and HL4 of the emerging City Plan.

Sustainability

CoL Planning for Sustainability SPD (February 2025)

990. The City of London's 'Planning for Sustainability' Supplementary Planning Document (SPD) was formally adopted on 19th February 2025. The purpose of the SPD is to provide guidance on how developments should approach environmental sustainability. It provides additional detail and guidance on how to fulfil policies of the London Plan, adopted Local Plan 2015, as well as emerging policies within the City Plan 2040. The SPD is now a material consideration in determining planning applications, however as set out in the SPD, the requirements only apply to applications submitted after its adoption. Although the requirements of the SPD do not apply to the Proposed Development at 63 St Mary Axe, the application has been reviewed with the emerging guidance in mind (and in accordance with existing local plan policies relating to sustainability) to ensure the scheme delivers the best outcome possible in terms of sustainability. The scheme is considered to be in general compliance with the actions recommended in the SPD, with the exception of the extent of basement proposed (6 storeys). Basement construction is strongly encouraged to be kept to a minimum due to the high carbon impact associated.

Circular Economy:

991. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1 set out the City's support for circular economy principles. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The Table at page 133 of the Local Plan states that one of the means of delivery of the Sustainable Development and Climate Change policies is to engage in pre-application discussions to explore opportunities to avoid demolition. Policy DM 17.2 of Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 strategic policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options.
992. To address these policies, the application explored opportunities to retain and refurbish the buildings or building elements currently on site. This information is presented in the pre-redevelopment audit, Carbon Options assessment, pre-demolition audit and Circular Economy Statement.
993. The redevelopment appraisal concluded that retention of the existing structures would significantly limit the opportunities of the site:
- to develop the lower ground levels into a best-in class environment

- providing public amenities
- significant improvements to the public realm including extensive greening and greater accessibility
- to deliver maximum potential for densification/new office floor space, particularly given the site's location in the eastern cluster, an area designated for tall buildings.

994. The application proposal is for full demolition of the existing buildings and a substantial new replacement building. Full redevelopment enables the site to fulfil maximum site potential in terms of office floor space, operational performance, greening and climate resilience as well as social and economic benefits.

Existing Buildings

995. There are two buildings on site originally constructed in the late 1980s:

63 St Mary Axe – a reinforced concrete frame building (12m x 6m grid) originally constructed at 6-storeys with single basement level was extended with a steel frame to 9 storeys in 2011. The extension maximized the existing structural loading capacity.

Camomile Court - concrete and steel framed building (8.5m x 8.5m grid) with 2 basement levels. The latest refurbishment was in 2008.

996. The ground and first floors of both buildings are clad in smooth granite whilst the second to sixth floors are clad in Portland stone, with original double glazing and an aluminium stick framing system.

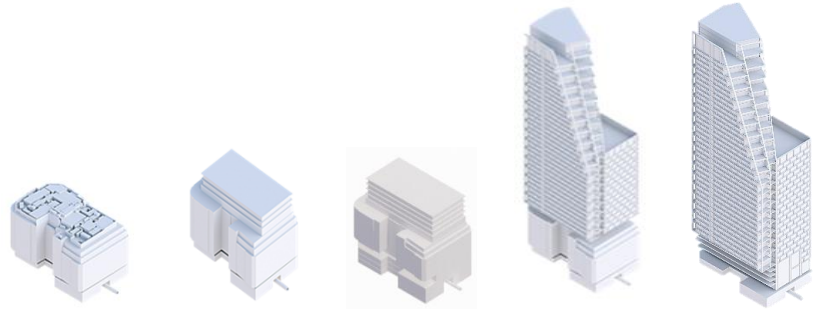
Carbon Options:

997. A carbon options assessment was undertaken in line with the City's Carbon Options Guidance. A 3rd party review confirmed the assessment is compliant with City policy.

998. A total of 5 development options, were considered as summarised below:

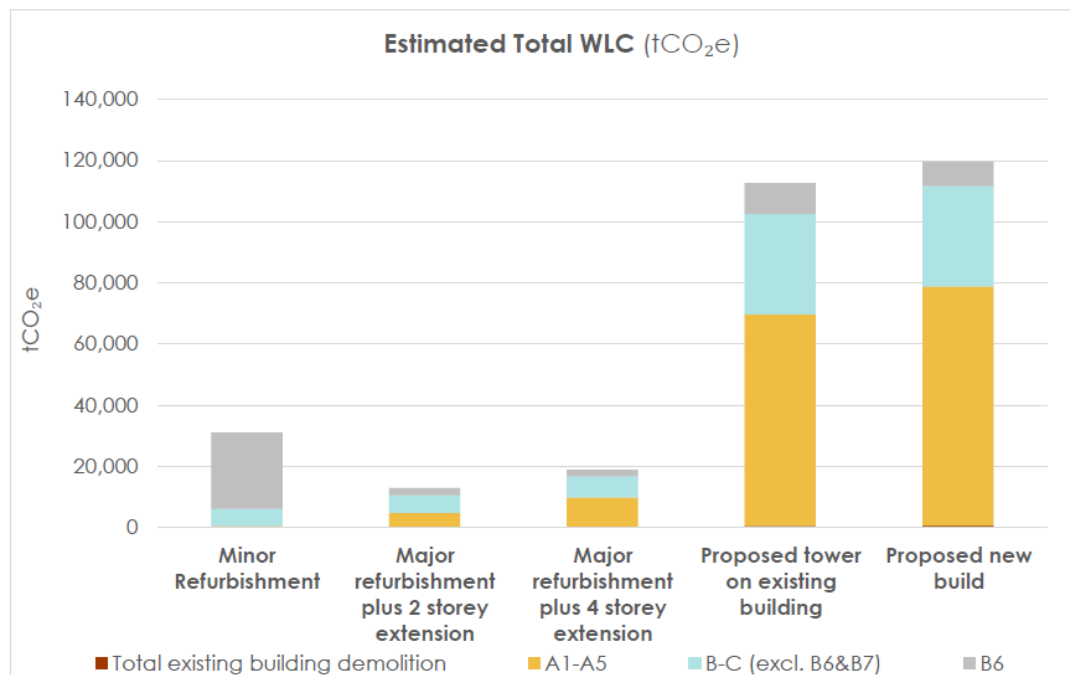
- Option 1 - Minor Intervention to existing building; 14,510m² GIA
- Option 2a - Major refurbishment and partial 2-storey extension. Upgrades to existing facade, internal finishes and MEP to improve operational performance and provide all-electric systems; 16,638m² GIA
- Option 2b - Major refurbishment and part 2, part 4 storey extension. Significant modifications to the foundations would be required. Lower floors opened up to improve the public realm. All new façade, internal finishes, and fully electric MEP; 19,645m² GIA

- Option 3 - Proposed tower on existing building; New internal finishes and all electric MEP to upgrade operational performance; 93,428m² GIA
- Option 4 - New development. Retention of existing substructure basement box and piled foundations (20% of existing substructure); 93,428m² GIA.



	Option 1	Option 2a	Option 2b	Option 3	Option 4
Gross Internal area (GIA) m²	14,510	16,638	19,645	93,428	93,428
Increase in GIA (over existing)	0	2,128	5,135	78,918	78,918
Substructure % retained (by mass)	95	80	70	50	20
Superstructure % retained (by mass) <i>(frame, upper floors, roof, stairs, ramps)</i>	100	80	60	25	0
Superstructure % retained (by area) <i>(external walls, windows, external doors)</i>	100	60	0	60	0
Upfront Embodied Carbon (A1-A5) <i>(kgCO₂e/m² GIA) exc. sequestration</i>	39	282	485	741	837
In-use & End of Life Embodied Carbon (B-C) (kgCO ₂ e/m ² GIA) <i>excl. B6 & B7</i>	390	351	351	351	351
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO ₂ e/m ² GIA)	429	633	836	1,092	1,188
Fuel source	Electricity	Electricity	Electricity	Electricity	Electricity
Whole Building Operational Energy Use (kWh/m ² GIA per year)	268	90	70	70	55
Whole Building Operational Carbon for building lifetime (B6) (kgCO ₂ e/m ² GIA)	1,716	138	108	108	85
Target EPC rating	C	B	A	A	A
Total WLC Intensity <i>(incl. B6 & pre-demolition)</i> (kgCO ₂ e/m ² GIA) <i>B7 not considered</i>	2,145	780	958	1,205	1,280
Upfront Embodied carbon (A1-A5) (tCO ₂ e)	566	4,692	9,528	69,230	78,199
In-use embodied carbon (B-C) (tCO ₂ e)	5,659	5,840	6,895	32,793	32,793
Operational carbon for building lifetime (B6) (tCO ₂ e)	24,904	2,300	2,112	10,045	7,893
Total absolute WLC <i>(incl. B6 and pre-demolition)</i> (tCO ₂ e) <i>Module B7 not considered</i>	31,129	12,977	18,826	112,613	119,611

Extract from the Carbon Options Guidance dashboard comparing total WLC tonnage for each option



999. Key constraints of the existing building:
- With limited existing public realm and poor permeability across the Site, substantial alterations to the existing buildings' façade would be required to activate the ground floor.
 - Floor level difference between the two buildings (60-250mm) makes connection across floor plates or extension spanning both buildings challenging. Existing level difference, ceiling heights and core location result in sub-optimal internal layout/occupant experience and don't meet highest grade office expectations
 - There is limited scope to increase floor area without significant structural intervention with significant programme and carbon impact. 63 St Mary Axe was extended by two floors previously (2011), and it is assumed the existing foundations would not be able accommodate further floors within their current load capacity.
1000. With only minor interventions to the existing fabric Option 1 has the lowest upfront embodied emissions but the highest overall emissions rate per m2 due to poor operational performance of building fabric and MEP systems.
1001. Options 2a and 2b include upgrades to the existing fabric and MEP equipment resulting in significantly improved operational performance. Option 2a has minimal intervention to existing structure. A small 2-storey extension (c. 2000m2) on Camomile Court is possible without exceeding the existing structural loading capacity. It was concluded that an additional 4 storeys would not be possible without significant strengthening to existing

foundations/structure causing much additional build complexity and embodied carbon, making Scenario 2b an unviable option. WLC emissions of Option 2 are only 11% of Option 4.

1002. Option 3 and 4 are able to provide substantial social and economic benefits, due to the significant uplift in floor area, however, retention of the existing building severely limits the public realm improvements possible in Option 3. Option 3 would also require such extensive strengthening to the existing substructure and core that the embodied carbon benefits of retention would be nullified. Carbon savings compared to Option 4 are only 6-7% (per m² and absolute). Option 4 is the developer's preferred option but also has the highest carbon by a significant margin (apart from option 3). However, Option 4 directly responds to the City's planning and strategic policies including office floorspace requirements, provides the greatest public offering, and highest quality office space. Option 4 is also able to provide significantly more urban greening and biodiversity including development of one of the City's Cool Routes (see Cool Routes Section later in the report) and better climate resilience through reduced urban heat island effect, water management and improved mitigation against overheating.
1003. The development proposal is derived from Option 4, full redevelopment. The key difference is the introduction of an additional 3-storeys of basement (increase from 3 to 6 storeys) in order to accommodate plant and to meet the cycle parking and end of trip facilities requirements of the London Plan. It is not possible to locate cycle parking above ground due to the provision of generous public realm and public amenity provision across ground floor, and levels 01 and 02. Embodied carbon emissions for the development proposal would be considerably higher than Option 4 due to the extent of additional basement – estimated at an additional 15 kgCO₂e per m².
1004. Key reasons the full redevelopment option was brought forward include:
- Significantly more floor area (376% greater GIA than Option 2a)
 - Greatly improved public realm offering, with better accessibility, and generous greening across multiple levels
 - Most efficient floor layout and floor heights, enabling best longevity, flexibility, operational energy performance and letability
 - Enhanced indoor air quality and natural daylighting to all areas providing best health and wellbeing attributes
 - Improved climate resilience through reduced urban heat island effect, water management and improved mitigation against overheating.

Development Proposal

1005. The application proposal is for full demolition of the existing buildings. According to the Pre-Demolition Audit (PDA), given the age, structure type and composition of the buildings, opportunities for reuse are considered to be extremely limited. This is due to:

- Existing buildings were not constructed in a manner which facilitates disassembly
 - Due to their age, elements such as windows and glazing are not anticipated to meet current building regulations.
1006. The Pre-demolition audit identified substantial amounts of concrete, steel, carpets/vinyl/flooring, bricks, steel, mixed metals, timber and glass to arise from the demolition process and provided recommendations to maximise the potential reuse opportunities of existing materials. Elements identified as having the greatest potential for reuse are:
- Fit-out materials such as raised access flooring, ceiling panels, lighting, bike storage and lockers
1007. The audit identified the following key demolition products as having high potential reuse value and recommended further investigation at detailed design stage:
- Bricks - subject to condition survey
 - Structural steel - Upon engagement, the contractor, will be required to establish potential reuse opportunities
 - Stone cladding - subject to condition survey
 - MEP equipment – engagement with manufacturers required
1008. The applicant will engage with the supply chain and in early discussions with potential contractors to ensure avenues for the highest value reuse are explored.
1009. The development has committed to the following measures to address construction waste and embed circular economy principles:
- Targeting a minimum 20% recycled content (by value) across whole building. This target is to be included within the contractor's appointment.
 - Structural efficiency and standardisation
 - Material efficiency of building services – commitment through BREEAM Mat06 credit
1010. The following additional measures are proposed subject to further assessment at detailed design stage:
- Use of Material Passporting
 - Crushing, grading and re-use on site of concrete arising from demolition
 - Targeting materials with Environmental Product Declarations (EPD)s and a high recycled content including specifications for concrete with 20-60% GGBS and Electric Arc Furnace (EAF) re-bar.
1011. It is worth noting that procuring large quantities of GGBS and EAF steel can be challenging/expensive in the current market. The potential impact of these

elements is discussed in more detailed in the Whole Life-cycle carbon section below.

1012. The Circular Economy Statement outlines the circular economy targets and commitments of the proposed development. Key proposals are set out below:

Component or material reuse

- Standardised components/structural element sizes

Adaptability / flexibility

- Standardised structural grids allowing for easier reconfiguration of space
- Soft spots in grids to enable future vertical penetrations such as stairwells, elevator shafts, or services voids
- Provisions have been made to allow for additional opening windows in the future, enhancing the building's adaptability to changing internal layouts or occupancy needs.
- Future proofing capacity -The services infrastructure has been designed to include additional MEP capacity to support high-load uses and dedicated tenant's risers and plant space to provide tenants with the ability to install supplementary systems

Disassembly / replaceability

- Steel frame with mechanical fixings
- Unitised façade and window systems to allow ease of replacement
- MEP equipment designed to be readily accessible for ease of maintenance and replacement

1013. The strategic objective of Local Plan Policy CS15 (and emerging City Plan 2040 Policy S8) of avoiding demolition has been addressed through the exploration of development options which retain the existing buildings. This pre-redevelopment appraisal was conducted in line with the CoL's Carbon Options Guidance and reviewed by a 3rd party. The appraisal determined that to maximise the value of the site, best meet the client brief and address other strategic objectives of the City including growth, delivery of high quality office floor space and public amenities and improving climate resilience, full demolition was necessary.

1014. The Proposed Development addresses the circular economy principles set out in London Plan policy SI 7, with a design that is durable, adaptable and facilitates future maintenance and eventually disassembly. Whilst opportunities for material reuse are limited, the development proposal is targeting high recycling rates and high levels of recycled content in new materials, measures which reduce the embodied carbon emissions of the development supporting the schemes compliance with policy SI2. Encouraging the reuse of existing resources is also a key consideration of Paragraph 161 of the NPPF.

1015. A revised circular economy statement at detailed design stage (pre-commencement) is required by condition with specific reference to maximising the reuse value of demolition materials based on the opportunities set out in the pre-demolition audit to address the significant construction waste which would result from full demolition. A post construction update to the Circular Economy statement is also required by condition.

Operational energy strategy and related emissions

1016. The redevelopment has been designed in accordance with the principles outlined in Local Plan Policy DM 15.2 Energy and CO₂ emissions assessments, and relevant provisions of the GLA London Plan Policy SI 2 Minimising greenhouse gas emissions and Policy SI 3 Energy Infrastructure and Policy SI 4 Managing Heating Risk.

Energy Performance

1017. London Plan Policy SI 2 requires major development to be net zero-carbon, with minimum reductions in regulated emissions (i.e. those associated with heating, cooling, ventilation, hot-water and lighting) beyond Part L of the Building Regulations 2021. Minimum reductions for non-residential developments:
- 15% reduction using energy efficiency measures alone (*Be Lean*)
 - 35% overall reduction
1018. The GLA acknowledges in their Energy Assessment Guidance note (Nov 2022) that non-domestic buildings using heat pumps will find it challenging to achieve these targets as the baseline itself includes ASHPs.

Table 1: Regulated carbon dioxide savings from each stage of the energy hierarchy.

	Tonnes CO ₂ per annum	Stage emissions reduction	Stage percentage reduction
Baseline (Part L 2021)	550	-	-
Be Lean: Demand reduction	394.8	155.2	28%
Be Clean: Decentralised energy	394.8	0	0
Be Green: Low/zero carbon technologies	370.4	24.4	4%
Total reduction			33%

1019. The operational emissions are expected to result in 1,302 kg CO₂/m², which amount to 132,122 tonnes CO₂e over a 60-year period.

Energy Strategy

Be Lean:

1020. The Be Lean stage focuses on reducing energy demand through design and construction measures. Proposed measures implemented:
- High-performance building fabric (including low u-value glazing) and low air permeability
 - Optimized glazing ratios, of 31% to 60% across different facades, limiting peak solar gains to 40 W/m² in line with BCO Guidance
 - Passive and mixed-mode ventilation - office floors are designed to operate with natural ventilation during mid-season conditions, supported by automated window actuators and an integrated building management system (BMS) which enables the building to switch between mechanical and natural ventilation based on internal and external conditions significantly reducing reliance on active cooling systems
 - Night purging - cool air is drawn through the space overnight to pre-cool the internal thermal mass. This reduces the morning cooling load and delays the need for mechanical cooling during the day
 - External shading provided by structural elements of façade design and set back of windows. Performance optimised through early-stage parametrical modelling
 - Exposed thermal mass of concrete slabs act as a heat sink to mitigate peak heating/cooling loads
 - Mechanical ventilation with heat recovery system
 - High-efficacy LED lighting with efficient lighting controls to maximise the use of natural daylight and reduce artificial lighting loads
 - Variable speed drives/sensors on pumps/fans responding to variable building loads
 - Photovoltaic panels at roof level
 - Smart energy/building management systems and controls
1021. The development achieves a 28% emissions reduction against Part L at 'Be Lean' stage which is above average compared to other commercial developments recently approved in the City and considering the use class and proposed u-values/curtain walling system. This is primarily attributed to the mixed-mode ventilation strategy, and associated night purging, accounted for in the modelling mean the actual estimated cooling demand is 90% lower than the notional (7 kWh/m²/yr compared to 72kWh/m²/yr). Night purging results in a 10% reduction in cooling load and openable windows provide a further 8% saving on overall energy.

Be Clean:

1022. The applicant has consulted the City Surveyors and relevant network providers to discuss existing and proposed heat networks. At present there are no district heat networks (DHN) in the area that the proposed development

can connect to. The applicant has provided commitment that the development will be designed to allow future connection to a district heating network. The design shall include:

- a single point of connection to the district heating network
- space allocated for heat exchangers
- a safe-guarded pipe route to the site boundary, and sufficient space in cross-section for primary district heating pipes where proposed routes are through utility corridors

Drawings/documentation demonstrating how the development meets these requirements will be secured by condition.

Be Green:

1023. The Be Green stage focuses on incorporating renewable energy technologies. An all-electric building (except emergency generator) is proposed. Main features for the scheme include:
- Highly efficient Air source heat pump (ASHP) system with thermal storage and heat recovery will provide heating, cooling and hot water for office areas. Where possible, the ASHPs will utilise refrigerants with low Global Warming Potential
 - The development includes ~42m² of photovoltaics (PVs), located on the roof, providing an estimated yield of 8,507 kWh per annum. Roof area for PV is limited due to competing needs of plant and amenity space as well as the tapered form of the tower.
1024. Emergency backup power is by a diesel generator which is being provided for life safety systems only. An alternative battery solution is not feasible due to the significant size of the pumps being supported for sprinkler and wet riser.
1025. Under the 'Be Green' stage a 4% reduction in carbon emissions is achieved.

Overall Target

1026. The development proposal would achieve a 33% reduction in regulated CO₂ emissions overall, representing only a 2% shortfall against the London Plan requirements. This is a high level of emissions reduction for an office building. The efficiency improvements and carbon emissions reductions as demonstrated in the submitted Energy Statement are considered policy compliant. Equal or improved performance will be secured by condition.

Cooling Hierarchy

1027. In accordance with the London Plan Policy SI4 (Managing Heat Risk), the development follows the cooling hierarchy to reduce overheating risk and minimise the need for active cooling:
- Minimising internal heat generation:
- Use of energy-efficient lighting and equipment.

- Maximise use of daylight
- Optimised building management systems.
- Minimise and strategically locate pipework.

Reducing heat entering the building:

- External shading provided by structural elements of façade design and set back of windows
- High thermal performance building fabric
- Glazing specifications derived from thermal comfort analysis considering solar gains targets, orientation, and exposure per floor. 48% average window-to-wall ratio.

Managing heat within the building:

- High level of exposed thermal mass for office floors acts as a heat sink during nighttime (night purging), reducing peak demand during the day

Passive / mixed mode ventilation:

- Openable windows with actuators allowing automatic control. Mixed-mode ventilation employed to reduce energy demand. Facade design has accounted for potential future openings, ensuring that additional opening windows can be added without significant modifications.

Mechanical Ventilation:

- Amenity levels, Ground Floor to Level 03, will be served by local mechanical ventilation units typical fan coil units at high level.

Active cooling (low carbon):

- Minimised through passive measures. When required, cooling is delivered to the building by highly efficient air-cooled chillers with a seasonal energy efficiency rating (SEER) of 4.69.

1028. The cooling strategy demonstrates compliance with the London Plan's cooling hierarchy, prioritising passive measures and energy-efficient solutions to mitigate overheating risks and reduce reliance on active cooling systems. The approach ensures that the designed to adapt to rising temperatures while minimising energy consumption and carbon emissions.

EUI and Space Heating Demand:

1029. The adopted GLA Energy Assessment Guidance (2022) requires developments to calculate space heating demand and Energy Use Intensity (EUI) - a measure of a building's total annual energy consumption which includes regulated and unregulated energy. For offices, the GLA benchmarks are 55 kWh/m²(GIA)/year for EUI and 15 kWh/m²(GIA)/year for space heating demand. The UK Net Zero Carbon Buildings Standard (UKNZCBS) sets an EUI limit of 83kWh/m²/yr for new build offices starting on site in 2026.

1030. The project is employing a NABERS Design for Performance (DfP) approach to optimise whole building operational energy performance. At Stage 2, the whole building EUI is estimated at 73 kWh/m²/year (GIA), falling short of the GLA target but bettering the UKNZCBS target. 73 kWh/m²/year is the lowest EUI of the six office buildings over 30 storeys approved in the City in the past 2 years. For the base building the project is estimated to achieve an EUI of 69.3 kWh/m²/year (NIA), equivalent to a NABERS 5* rating.
1031. The estimated space heating demand is 23.5 kWh/m²/year (GIA) which fails to meet the GLA benchmark. The applicant has explained that the building's unique massing likely plays a significant role. The upper floors are quite narrow, resulting in a high ratio of exposed façade area to floor area, which increases heat losses. With cooling being the dominant load in this building, priority was given to reducing cooling demand through the natural ventilation strategy achieved through openable windows. Openable windows require more framing, and frames generally perform worse thermally (i.e. have higher U-values) than both glazing and solid wall elements. As a result, buildings with openable windows typically experience a higher overall heat loss rate compared to those with sealed glazing units. The predictive modelling was undertaken on a Stage 2 model so remains an early estimate. Currently, the control strategy is the same year-round. The design will look to introduce seasonal controls to enhance cooling in summer and prevent unwanted heat losses whilst the building is in heating mode. Set points will also be adjusted to improve efficiencies. Once the control strategy has been further developed, the applicant expects the heating demand to decrease considerably.

Conclusion for Operational energy performance

1032. The application demonstrates a wide range of measures taken to optimise energy efficiency in the development balancing daylight and overheating, employing passive ventilation and thermal mass, and using energy efficient and low carbon building systems. The development is considered to comply with the requirements set out in London Plan policies SI2 and SI4, Local Plan policies DM15.2 and DM15.3.
1033. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and the carbon offsetting contribution to account for any shortfall against London Plan targets. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

Whole Life-cycle Carbon:

1034. The GLA Whole Life-cycle Carbon Assessment (WLCA) Guidance requires referable schemes to use the original (1st edition) assessment methodology

developed by RICS (Royal Institution of Chartered Surveyors). RICS have since published a 2nd edition which came into full effect on 1st July 2024. The GLA has indicated that it would not update its guidance to reflect the changes made in the 2nd Edition for now.

The update methodology of the RICS 2nd Edition includes:

- a mandatory early design contingency factor (15% across most building elements) to account for uncertainties related to design elements that may develop further during subsequent RIBA stages
- requirement to report of emissions from preconstruction demolition and refrigerant leakages
- changes to modelling items such as baseline material assumptions, transport distances and waste rates

1035. WLCAs which follow RICS 2nd Edition guidance are typically more accurate and present higher carbon emissions than those following 1st Edition guidance primarily due to the 15% contingency and additional elements being reported.

1036. The WLCA submitted for the Proposed Development follows the RICS 2nd Edition guidance meaning that the figures include a 15% contingency factor. The results are set out in the table below, against the GLA benchmarks. These benchmarks do not account for the 15% contingency factor, inclusion of preconstruction demolition and refrigerant leakages or revisions in assessing transportation distances. Therefore, comparison of the Proposed Development's embodied carbon performance against the GLAs current WLC benchmarks should be assessed with this in mind .

1037. Total WLC emissions of the proposed development over a 60-year period are estimated to be 271,512 tCO₂e (2,676 kgCO₂e/m² GIA) (inc. B6-B7, and sequestration). Operational carbon (B6-B7) accounts for 49%, lifecycle embodied carbon 51%, and upfront embodied carbon (A1-A5) 35% of total WLC emissions.

Floor Area = 101,460 m² GIA

		Carbon Intensity (kgCO ₂ e/m ² GIA)		
Stages	Life-cycle Carbon Emissions (tCO ₂ e)	Development proposal	GLA standard benchmark	GLA aspirational benchmark
Upfront Embodied carbon (A1-A5)	95,883	945	950	600
In-use & End-of-Life Embodied carbon (B-C, exc. B6-B7)	45,088	444	450	370
In-use Operational carbon (B6-B7)	132,122	1302	-	-
Life-cycle Embodied Carbon (A-C, excl. B6-B7, incl. sequestration)	140,120	1382	1400	970
Whole life-cycle carbon (A-C, incl. B6-B7 inc. sequestration)	272,322	2,684	-	-

1038. Key aspects of the design which support material and carbon efficiency include:
- Structural efficiency and standardisation - Lean design principles have been maximised throughout, focusing on floor plates and vertical structure. Floor/columns grid studies have been undertaken to optimise space flexibility, project brief, architectural vision and structural efficiency. The structural design is based on a modest column grid (9x7.5m) and a lean post-tensioned concrete slab, which reduces the quantities of materials needed for upper floor slabs. The repetition of floor layouts enables standardization of steel elements, thereby reducing off-cuts and waste. Proposed use of HISTAR structural steel reduces overall steel weight.
 - Targeting materials with Environmental Product Declarations (EPD)s and a high recycled content.
 - Specification of low carbon materials:
 - Cement replacement in concrete – currently set at 70% GGBS for substructure and 30% GGBS for post-tensioned slabs
 - Electric Arc Furnace (EAF) steel for structural frame and re-bar. HISTAR structural steel also reduces overall weight of the structure.
 - Steel connections and perimeter composite columns - 60% recycled content.
 - Aluminium façade panels with recycled content
 - Standardized façade bays - reducing wastage in manufacturing.
1039. The applicant has also committed to produce sustainable fitout guides and green leases to encourage tenants to reduce their carbon impact.
1040. Further carbon reduction opportunities identified for exploration during the developed design phase, include:
- Pre-cast facade system over unitised façade, reducing aluminium framing and associated metal sheeting
 - A change in concrete casting technique for core walls (jump form instead of slip form) allowing up to 30% cement replacement (0% cement replacement currently proposed)
1041. The current design includes 6 levels of basement to accommodate a variety of services and equipment to operate the building. This is of particular concern as basement construction results in high embodied carbon emissions including from transport, pollution, is highly disruptive in terms of noise and traffic and extends the construction programme.
1042. During design development, a number of water-cooled chillers and pumps were relocated from the basement to roof level to eliminate 1,500m³ basement

excavation dig and to reduce steel pipework by 350 meters of 400mm diameter steel. The applicant has stated that further optimisation of basement space will be prioritised during detailed design stage. The majority of the substructure is proposed as using a concrete mix with 70% cement replacement (GGBS) which results in substantial carbon savings over traditional concrete mixes. These carbon savings are already factored into the WLCA. If these levels of cement replacement cannot be achieved at procurement stage, the carbon impact will be very significant.

1043. The submitted WLCA shows the embodied carbon emissions for the Proposed Development achieving the Standard GLA benchmarks, but considerably higher than the Aspirational Targets. Some of the key carbon reduction measures included in the design specification carry a moderate procurement risk, specifically the HISTAR EAF steel, low carbon aluminium (50% recycled content) and higher-than-typical volumes of cement replacement (GGBS).
1044. The range of GGBS specified has been validated by the project's structural engineer, and balances viability and programme across the different building elements. Procurement of GGBS will be discussed with the contractor at the next stage of design and the applicant will explore alternative cement replacements.
1045. If Electric Arc Furnace (EAF) steel can't be procured for the structural frame and a standard specification steel (Blast Oxygen Furnace with 20% recycled content) is used, the increase to upfront embodied carbon would be 89 kgCO₂e/m² (9% of total per m² upfront embodied carbon) or 9,030 tCO₂e total.
1046. The WLCA was reviewed by a third-party consultant. The reviewer noted the reliance on the procurement of certain low-carbon materials (such as EAF steel and high % GGBS concrete) to achieve the GLA benchmarks but found the assessment to be technically sound.
1047. A detailed design stage Whole Life-cycle Carbon Assessment demonstrating achievement of at least the GLA Standard benchmarks and a confirmation of the post construction results are required by conditions.

BREEAM

1048. The office spaces will be assessed under BREEAM UK New Construction 2018 (V6) as a shell and core project while the retail spaces will be delivered under a single, shell only, BREEAM 2018 (V6) assessment. The applicant is targeting BREEAM 'Outstanding' for the office areas, whilst the retail areas target an 'Excellent'. Due to the limited works being undertaken in the retail areas – shell space ready for building services and local equipment fit-out by prospective vendors - Ene 01 performance credits will be challenging to achieve and as a result the applicant considers an Excellent rating most appropriate.

1049. The pre-assessment scores for both office and retail areas include comfortable buffers over the minimum score threshold required for the target ratings.
1050. The office area is on track to achieve a high number of credits in all of the CoL's priority areas; Energy, Materials, Water, Waste and Pollution.
1051. The Wst 05 credit – Adaptation to Climate Change is targeted as required by the Local Plan.
1052. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and emerging City Plan 2040 Policy DE1. A post-construction BREEAM assessment is requested by condition.

Urban greening and biodiversity:

Urban Greening

1053. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of development designs. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Local Plan Policy CS19 and Emerging City Plan 2040 policy OS2 (City Greening) mirror these requirements and requires the highest levels of greening in line with good design and site context.
1054. The landscaping proposal will comprise a network of trees underplanted by shrubs and perennials, providing arboreal connectivity and biodiversity habitats across the tower building.
1055. The key enhancements include:
- Extensive ground floor landscaping with mature trees, climbing plants, and planters;
 - Green roofs at levels 27 & level 28;
 - Soft landscaping on corner terraces at Southeast and Southwest elevations;
 - Species habitat provision: such as bird and bat boxes, and areas dedicated to support invertebrates.
 - 76 trees including on corner balconies
1056. Landscaping proposal outline:
- Public realm: characterized by tall trees, grouped with smaller multi-stem woodland trees. Trees have been selected for their biodiversity benefits (with half the trees native or cultivar of native trees), shade tolerance and

beauty. Trees will be underplanted with vegetation of the open woodland, alongside evergreen shrubs, woodland grasses, ferns and perennials. Climbing plants will be planted up the public space below the building canopy, and along the external walkways that link levels 0 to 5, selected to suit the light levels, with flowering plants provided on facades receiving daylight.

- First to Fifth Floor - the external walkways and balconies gardens will comprise shade tolerant planting mixes.
- Corner Terraces - Levels 06 to 22: From level 6 upwards, each floor will have access to at least one corner terrace planted with a tree. Each tree will site in a minimum of 5 cubic metres of soil to ensure space for future root growth. Trees will be underplanted with shrubs, including some evergreens. Trees have been selected which provide seed and small berries eaten by birds. From level 23 upwards, wind resistant tree species which provide suitable habitats for birds, bees and butterflies, have been selected.
- Roof Garden Level 27 - generously planted with shrub and perennial planting and meadow planting mixes. All planting selected to be sun-loving, drought tolerant, nectar and pollen-rich to encourage biodiversity. The paved area has 'blue roof' water storage below.
- Roof Garden Level 28: Semi-shaded space with four multi-stem trees underplanted with low shrubs, grasses and perennials.

1057. The landscaping proposal covering an area of 2,495m² achieves an Urban Greening Factor of 0.58 which exceeds the London Plan Policy G5 target of 0.3 for office developments.

Biodiversity

1058. Policy OS4 of the emerging City Plan 2040 sets out biodiversity net gain (BNG) requirements for major developments. Due to the City's highly urban nature, the statutory 10% BNG is not an appropriate mechanism for delivering meaningful biodiversity improvements in the Square Mile. Instead, the City Plan sets a minimum target of three biodiversity units per hectare (3BU/ha).
1059. The proposed greening intervention will align with the City of London's' Biodiversity Action Plan (BAP) through the provision of a wide diversity of habitats. The provision of targeted nesting aids for species such as house sparrows, black redstarts, swifts, and wild bees will also align with the BAP.
1060. According to the baseline assessment the site baseline is 0.02 biodiversity units. The proposed measures would deliver on a conservative basis, a total of 1.10 habitat unit or 2.83 BU/ha. The unit increase of 6943.64 % satisfies the statutory requirement of 10% BNG however the units per hectare rate falls slightly short of the emerging City Plan target. Species mix, tree selection and

opportunities to tailor the green roof habitats to increase biodiversity will be explored during detailed design stage.

Cool Routes

- 1061. The City's Climate Action Strategy established a Cool Streets and Greening project to improve the climate resilience of streets, parks and open spaces. This included the designation of Cool routes across the Square Mile that aim to offer a comfortable pedestrian experience. These routes prioritise the growth of biodiversity and the provision of shading (preferably by trees).
- 1062. The development is one of the first to submit a report covering a Cool Routes strategy. The report details how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate and passes through the site.
- 1063. As the existing highways pavement is crowded with below ground utilities, retrofitting trees is difficult. The proposed solution is to plant trees below the building's canopy, on land that is relatively free of existing services. Planted into large soil trenches, and underplanted with shrubs, grasses, ferns and perennials, evaporation from tree and plant leaves will create a cooler microclimate. The site also includes a publicly accessible drinking fountain.
- 1064. This contribution to a Cool Route which would improve climate resilience and public wellbeing is considered a wider environmental sustainability benefit helping mitigate the development's life-cycle carbon emissions in line with the guidance of the Planning for Sustainability SPD.

Overall

- 1065. The landscaping strategy is detailed and well considered. It would provide generous publicly accessible green and biodiverse spaces at levels 0 to 4, greening including trees at all levels and support the development of a Cool Route. The proposal meets or exceeds London Plan Policies G1 Green infrastructure, G5 Urban greening G6 Biodiversity and access to nature. Local Plan Policy CS19 Open Spaces and Recreation and emerging City Plan Strategic Policy S14 Open Spaces & Green Infrastructure.

Climate Resilience

Overheating

- 1066. Based on the current details, all studied zones meet the thermal comfort requirements for the DSY1 weather file without any additional mitigation strategies. All areas have also been assessed against future DSY2 and DSY3 weather files, which shows that with the recommended glazing in place (i.e. with maximum g-values of 0.28), all areas meet the thermal comfort

requirements as well as achieving both credits for BREEAM Hea 04 Thermal comfort.

- Recessed windows would prevent overexposure to direct sunlight;
- Openable windows and maximized opportunities for natural ventilation and night purging to minimize the impact of temperature variation;
- Landscaped roof terraces would provide natural cooling and shading to the building
- Specification of facade materials with low thermal conductivity and high frost resistance
- The facade design has accounted for potential future openings, ensuring that additional opening windows can be added without significant modifications.

Urban Heat Island

1067. In line with Policy G5 of the Local Plan and Policy CR1 of the draft Local Plan, the building has been designed to minimize contributions to the urban heat island effect as far as possible, by integrating vegetation on every floor to improve evaporative cooling with terraces at each level containing at least one tree and shrubs.

Flooding

1068. The application is supported by a Flood Risk Assessment (FRA) and a Sustainable Urban Drainage Strategy to manage surface water run-off in line with London Plan Policy SI13. The site lies predominantly within Flood Zone 1 an area with a probability of flooding less than 0.1% each year. Below-ground storage systems and sustainable urban drainage systems will be used at source to attenuate runoff to the greenfield rate (0.95 l/s) prior to discharge into the public sewer network resulting in a positive reduction in flood risk. Proposed measures include:
- blue roofs with an 80m² storage capacity
 - an attenuation tank in the basement with a 35m² capacity
 - rainwater harvesting tank at levels 15/16.

Water Stress

1069. The development includes a range of measures to minimise mains water consumption:
- Water efficient fixtures and fittings targeting a minimum 50% reduction in potable water consumption over a baseline specification - in accordance with BREEAM Wat01 methodology.
 - rainwater and greywater harvesting - in line with London Plan Policy SI5
 - Automatic metering, a mains water leak detection system and sanitary shut-off valves to all WC areas to mitigate any risk of water leaks.

- SuDS have been incorporated into the landscaping strategy as far as reasonably practicable. A combination of blue roofs at roof/terrace level, deliver a total 115 m³ storage, with greywater used to irrigate the proposed landscaping.

Overall Climate Resilience

1070. The building design responds well to climate change resilience by minimising overheating risk, saving water resources and incorporating high levels of urban greening and biodiversity. The development proposal is supported by an Adaptation to Climate Change report which addresses the requirements of the BREEAM Wst 05 credit. The report does not address all of the key climate related risks within the Square Mile as identified in the City's Climate Action Strategy and Adaptive Pathways study. A Climate Change Resilience Sustainability Statement will be required pre-commencement with an update post completion, both secured by condition.

Conclusion

1071. The proposed development effectively integrates principles of sustainability and adheres to the policy objectives outlined in the Greater London Authority's (GLA) London Plan, the City of London Corporation's Local Plan 2015, and the draft City Plan 2040.
1072. The strategic policy and objective of avoiding demolition through the re-use of existing buildings or their main structures has been achieved by exploring opportunities to avoid demolition through the options analysis. The proposed development optimises the delivery of highest quality office floorspace while integrating greening at all levels and enhanced public amenities. This is particularly notable at the street level, where full development facilitates a transformed public realm with better circulation and accessibility, generous greenery, community and retail uses across multiple levels, benefits which could not be delivered through retrofit where extension and opening up potential was significantly limited, as demonstrated in pre-redevelopment analysis. Whilst the opportunities for material reuse (in-situ and off site) are limited, the scheme embraces forward-looking circular design principles - prioritising longevity, adaptability, and low maintenance - while achieving a c. 480% increase in office space.
1073. The development achieves the GLA standard benchmarks for upfront and life-cycle embodied carbon through a mixture of lean design and low carbon material specifications. The energy strategy has been optimised for the site, prioritising passive measures to significantly reduce operation energy use and the associated carbon emissions. Through the design of the façade, and incorporation of mixed-mode ventilation and night-purging the development would achieve a leading reduction in cooling demand. Excellent operational energy performance is further demonstrated through the targeting of a NABERS UK rating of 5 stars and a BREEAM 'Outstanding' rating for the office areas. The proposal comes close to meeting the London Plan target of 35%

operational carbon emission savings despite the stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA. Offset payments will be made to mitigate the shortfall to reach the net zero carbon target. Although it cannot avoid demolition in accordance with Policy CS15(3), it complies with (taking account of the mitigation measures proposed) London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The energy strategy also addresses paragraph 161 of the NPPF by minimising overheating risk and supporting renewable and low carbon energy contributing to a significant reduction in operational emissions.

1074. The building design responds well to climate change resilience by minimising overheating risk, reducing flood risk and saving water resources through rainwater harvesting and greywater recycling, and SuDS including blue/green roofs incorporated into the extensive urban greening with high biodiversity, which also reduces the urban heat island effect. The development is also one of the first to include a specific 'Cool Routes' strategy explaining how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate and passes through the site. The scheme is thereby compliant with London Plan policies G5 SI 4, SI 5 and SI 13, Local Plan policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Security

1075. London Plan Policy D11 ('Safety, security and resilience to emergency') states that development should include measures to design out crime that – in proportion to risk- deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
1076. Local Plan policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism. Local Plan policy DM3.2 (Security measures in the new developments and around existing buildings) seeks to ensure that new development in connection with the City of London Police. Policy DM3.3 (Crowded Places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.
1077. Strategic policy S2 of the emerging City Plan 2040 sets out how the City would work with the City of London Police, the National Protective Security Authority (NPSA) and the London Fire Brigade to ensure that the City is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism, by ensuring that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces.

1078. The City of London Police have been consulted on this planning application and have provided a number of comments and advice to the applicant. This includes ensuring adequate access controls for different parts of the building, sufficient natural and formal surveillance and in respect of Hostile Vehicle Mitigation.
1079. The main entrance doors would be freely accessible during opening hours, and these would be locked during out of hour periods and monitored through an access control system. The office entrance doors would provide the capability to separate the offices from the public functions. The entrance to the cycle store would be accessible via access control or video intercom, with the secure line from the entrance gate to main storage level being designed to using anti-tailgating speed lanes.
1080. The external stairs, walkway and lift which are publicly accessible would have video surveillance in addition to onsite security. Secure lines within the building would provide the capability to restrict access to authorised building occupants, with turnstiles provided within the ground floor, and levels 1 and 2 to separate public access from tenant circulation. Within the basement levels, access would be restricted between front and back of house areas through the use of a control system.
1081. Hostile Vehicle Mitigation (HVM) is currently proposed around the entrance to the loading bay. The City of London Police have advised that a HVM review for the whole site is required including a Counter Terrorism Risk Assessment and Vehicle Dynamics Assessment. HVM would be required to be integrated within the design and not be a line of bollards particularly on the southern and western elevations. Full details of the HVM and associated assessments would be secured by condition.
1082. The building would have the ability to 'lock down' using physical measures in the event of an external threat, ensuring people do not enter dangerous areas and preventing any threats from entering the building.
1083. The applicant has confirmed they will engage with the Police during the next phase of the project, to ensure their comments and recommendations are taken into account.
1084. The full details of the security measures would be secured by condition and within various management plans within the S106 agreement, which would be assessed in consultation with the City of London Police. Subject to the imposition of conditions and S106 obligations, is considered to be in accordance with London Plan policy D11, Local Plan policies CS3, DM3.2, DM3.3 and DM3.5 and emerging City Plan 2040 policy S2.

Suicide Prevention

1085. Local Plan Policy CS3 requires that security and safety measures are of an appropriate high-quality design. Draft City Plan Policy DE5 requires security and safety to be considered.
1086. Policy DM3.2 'Security measures in new development and around existing buildings' aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm.
1087. Policy DE4 'Terraces and Elevated Public Space' of the emerging Local Plan 2040 advises that appropriate safety measures should be included in high rise buildings to prevent people from jumping or falling.
1088. The City of London Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrence capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.
1089. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building regulation K2 states the following:
- A) Any stairs, ramps, floors and balconies and any roof to which people have access, and
 - B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.
1090. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS6180: Barriers in and around buildings.

1091. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. UK Health Security Agency (UKHSA) main design recommendations for fencing on high rise buildings and structures advised a barrier height of at least 2.5m high, no toe or foot holes, and an inwardly curving top is recommended as it is difficult to climb from the inside. The barrier should be easier to scale off from the outside in case an individual wishes to climb back to safety.
1092. Developers must, as a minimum, comply with building regulations standards, and where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.
1093. The proposed development contains two large communal terraces on floors 27 and 28, smaller tenant managed corner terraces on floors 6 to 42 (all of similar designs), and a publicly accessible balcony at the 3rd floor facing on London Wall. Access to the larger communal terraces on floors 27 and 28 will be operated and managed by the building landlord. Access to the smaller terraces at floors will be operated and managed by the tenants occupying those floors. Only the lower 3rd floor balcony will be accessible to members of the public.
1094. The application has been reviewed by officer in conjunction with the city's advisor on suicide prevention matters. For the smaller tenant operated terraces and the publicly accessible 3rd floor balcony, a physical barrier of 1.6m height will be installed at the edges. As the larger communal terraces have increased risk due to the higher capacity, the design of the barrier will be 2.1m high at the edges. The height proposed for the glazed balustrades exceeds the minimum height set out in Approved Document K. The detailed design of these balustrades will be secured by condition.
1095. Terraces shall also be equipped with video surveillance for the building operators to detect whether an attempt to bypass security and safety measures is occurring and increase the opportunity and capacity for human intervention. Furniture on the terraces must be fixed to prevent it being used as a footstool. These matters will be secured by condition as part of a risk assessment.
1096. Thus, it is considered that the proposed development is acceptable in terms of suicide prevention subject to conditions to secure further details of the

proposed balustrades and a risk assessment. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the emerging City Plan 2040.

Health Impact Assessment

- 1097. Policy HL9 of the emerging City Plan 2040 requires major development to submit a Healthy Impact Assessment (HIA) to assess potential health impacts resulting from proposed developments.
- 1098. Policy GG3D of the London Plan states that “to improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments”.
- 1099. The application is accompanied by a Health Impact Assessment (HIA) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health effect.
- 1100. The HIA has been based on the London Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health identifying relevant pathways towards health outcomes drawing on wider determinants of health. The HIA concludes that the development overall has a beneficial impact on health and wellbeing for people on-Site and in the surrounding area. Beneficial effects include: Understanding and addressing a diversity of community needs; Facilitating active travel and healthy lifestyles; Safeguarding environmental and human health by prioritising sustainable, comfortable and attractive design throughout the Site Mitigating against anti-social and criminal behaviour, as well as promoting mental wellbeing and social cohesion through an improved sense of community and the provision of an enhanced public realm; providing training and employment opportunities, although the specifics of how benefits will be targeted for local people in particular will be determined following planning consent.
- 1101. The HIA proposes recommendations with the aim of ensuring the potential benefits of the proposed development are maximised, for example by continuing to engage with operational phase users and the local community to ensure changing needs are met and committing to local procurement, training and employment agreements.
- 1102. Potential impacts identified would be mitigated as so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.

1103. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable and the proposals would comply with London Plan Policy GG3 and emerging City Plan Policy HL9.

Fire Statement

1104. A Fire Statement has been submitted outlining the fire safety strategy for the building which has been reviewed by the City District Surveyor's office. The statement adequately covers the relevant fire aspects of the design and is in accordance with policies D5 and D12 of the London Plan. Thus, the Fire Statement is considered acceptable for the planning stage and is secured by condition.

Planning Obligations and Community Infrastructure Levy

1105. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in the payment of Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
1106. These contributions would be in accordance with the Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
1107. On the 1st April 2019 the Mayoral CIL2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
1108. CIL contributions and City of London planning obligations are set out below.

MCIL2

<i>Liability in accordance with the Mayor of London's policies</i>	<i>Contribution (excluding indexation)</i>	<i>Forwarded to the Mayor</i>	<i>City's charge for administration and monitoring</i>

<i>MCIL2 payable</i>	<i>£14,247,724.39</i>	<i>£13,677,815.42</i>	<i>£569,908.98</i>

City CIL

<i>Liability in accordance with the City of London's policies</i>	<i>Contribution (excluding indexation)</i>	<i>Available for allocation</i>	<i>Retained for administration and monitoring</i>
<i>City CIL</i>	<i>£6,213,907.50</i>	<i>£5,903,212.13</i>	<i>£310,695.38</i>

City Planning Obligations

City Planning Obligations	Contribution (excluding indexation)	Available for allocation	Retained for administration and monitoring	Payment terms
<i>Affordable Housing</i>	<i>£4,142,605.00</i>	<i>£4,101,178.95</i>	<i>£41,426.05</i>	<i>Upon implementation of the development</i>
<i>Local, Training, Skills and Job Brokerage</i>	<i>£2,485,563.00</i>	<i>£2,460,707.37</i>	<i>£24,855.63</i>	<i>Upon implementation of the development</i>
<i>Carbon Offset Contribution (as designed) Not indexed</i>	<i>£1,055,644.00</i>	<i>£1,055,644.00</i>	<i>£0</i>	<i>Upon completion of the development</i>
<i>Section 278 (Evaluation and Design Fee) Not indexed</i>	<i>£125,000.00</i>	<i>£125,000.00</i>	<i>£0</i>	<i>Upon commencement of the development</i>
<i>Security Measures Contribution (Eastern City Cluster)</i>	<i>£828,521.00</i>	<i>£820,235.79</i>	<i>£8,285.21</i>	<i>Upon implementation of the development</i>
<i>S106 Monitoring Charge</i>	<i>£8,000.00</i>	<i>£0</i>	<i>£8,000.00</i>	<i>Upon commencement of the development</i>
Total liability in accordance with the City of London's policies, excluding indexation	£8,645,333.00	£8,437,766.11	£82,566.89	

1109. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Local Procurement Strategy for Demolition and Construction
 - Submission no later than eight weeks prior to first preparatory operations
- Local Training, Skills and Job Brokerage Strategies for Demolition and Construction
 - Submission of Local Training, Skills and Job Brokerage Strategy for demolition no later than eight weeks prior to first preparatory operations
 - Submission of Local Training, Skills and Job Brokerage Strategy for construction no later than eight weeks prior to commencement
- Delivery and Servicing Management Plan (including Consolidation), to include the following provisions:
 - No servicing outside of the hours of 20:00 and 23:00 on any given day for refuse, recycling and glass collections
 - No other servicing outside the hours of 23:00 and 07:00 on any given day, to be exclusively undertaken from the on-site loading bay
 - No more than 64 two-way trips per day using goods vehicles, including site management vehicles with mode split as: 2 motorcycle/scooter; 20 car; 30 LGV and 12 heavy goods vehicles (3 axle)
 - Details of booking system for all goods vehicles and site management vehicles servicing the site, including refuse and recycling
 - No vehicles greater than 8 metres in length servicing the site, including in instances of fit-out post completion unless otherwise agreed with the City of London in writing
 - Submission no later than six months prior to completion
- Provision of two Accessible Car Parking Spaces, provided on the following terms:
 - Submission of Accessible Car Parking Space Management Plan no later than six months prior to completion
 - Availability of two Accessible Car Parking Spaces between the hours of 07:00 and 19:00 Monday to Sunday as a minimum, with provision to extend to 23:00 where

- necessary, for employees and other users of the building, including visitors
 - Responsibility for allocation of the car parking spaces, enforcement of parking contraventions and criteria for decision-making in cases of overdemand for the accessible parking spaces
 - Free of charge use of the two accessible car parking spaces for the lifetime of the development for all users
 - Submission no later than six months prior to completion
 - Provision of the Accessible Car Parking Space for the lifetime of the development
- Travel Plan (including Cycling Promotion Plan)
 - Submission no later than six months prior to completion, including provision for disabled people to enter and exit the site and guidance to promote responsible cycling.
- Construction Monitoring Contribution
 - £53,820.00 due upon commencement covering the first year of the development
 - £46,460.00 due upon the anniversary of the commencement for each subsequent year up to completion of the development
- Legible London Contribution (£24,000.00 Indexed), to be paid upon implementation of the development
- City of London Cycle Infrastructure Improvement Contribution (£32,000.00 Indexed) to be paid upon implementation of the development
- TfL A10 Contribution (£100,000.00 Indexed)
- TfL Cycle Membership Contribution (£90,000.00 Indexed)
- Carbon Offsetting Document Submissions
- 'Be Seen' Energy Performance Monitoring
- Utility Connection Requirements
- Provision of Changing Places toilet at basement level and External Accessible Toilet at street level with Management Plan to include the following provisions
 - Free of charge access for users

- Cleansing arrangements by the owner
 - Security arrangements by the owner
 - Operational hours between 06:00 and 22:00 for the External Accessible Toilet and the Changing Places Toilet.
 - To be submitted no later than six months prior to completion
- Section 278 and section 38 Agreement (City of London), to include but not limited to the following scope of works:
 - Outwich Street and Houndsditch
 - Reconstruction of the footways adjacent to the planning application
 - Resurfacing of the carriageways adjacent to the planning application
 - Renewing of road markings and associated traffic orders
 - Improvements to the existing pedestrian crossing to suit the new site layout
 - Reviewing the existing parking arrangement to suit new site layout and associated traffic orders
 - Camomile Street
 - Reconstruction of the footways adjacent to the planning application
 - Resurfacing of the carriageways adjacent to the planning application
 - Renewing of road markings and associated traffic orders
- Highway Reparation and other Highways Obligations, to include but not limited to:
 - Submission of highways schedule of condition survey no later than eight weeks prior to first preparatory operations
 - Provisions for site access, consents and licences
- London Wall Corridor Improvement Contribution or Highways and Public Realm Improvement Contribution (£1,200,000.00 indexed)
- Provision of the Public Route, including Specification and associated Public Access & Management Plan
 - To be submitted no later than implementation of the development
 - The public routes shall be accessible to the public between 8am and 8pm.

- Provision of Public Realm at Camomile Park and activation of the servicing bay, including Public Access and Management Plan
 - To be submitted no later than implementation of the development

- Provision of Social Enterprise Retail Space and associated management plan to be submitted no later than six months prior to completion, to include but not limited to the following terms:
 - The provision of a minimum of 30sqm (gross internal area) floorspace to form the Social Enterprise Retail Space at ground floor
 - The provision of a minimum of 120sqm (gross internal area) floorspace to form the Social Enterprise Retail Space on either the first or third floor
 - Provision of the Social Enterprise Retail Space no later than upon occupation
 - Submission of the Social Enterprise Retail Space Management Plan six months prior to completion for the approval of the City of London Corporation
 - A fair and reasonable service charge for the Social Enterprise Retail Space Operator, to be agreed with the Social Enterprise Retail Space Operator and secured in the associated management plan
 - A peppercorn rent for the Social Enterprise Retail Space Operator
 - All necessary and reasonable costs relating to the full fit-out of the Social Enterprise Retail Space covered by the owner
 - Provision of the Social Enterprise Retail Space for the lifetime of the development, unless otherwise agreed via a deed of variation with the City of London Corporation
 - To submit a review of the Social Enterprise Retail Management Plan each year for the first five years of operation including statistics regarding use, and upon request by the City of London Corporation for each year thereafter

- Provision of Multifunctional Cultural Space and associated cultural and visitor management plans to be submitted no later than six months prior to completion, to be provided on the following terms:
 - Provision of a minimum of 268sqm (gross internal area) of floorspace at ground floor level to form the Multifunctional Cultural Space no later than upon occupation
 - Provision of a minimum of 193sqm (gross internal area) of floorspace at first floor level to form the Multifunctional Cultural Space no later than upon occupation

- Provision of a minimum of 189sqm (gross internal area) of floorspace at level two to form the Multifunctional Cultural Space no later than upon occupation
 - Submission of the Multifunctional Cultural Space Management Plan six months prior to completion for the approval of the City of London Corporation, including details of the charitable operator focused on the performing arts and any other perspective charitable or social users of the space.
 - A fair and reasonable service charge for the Multifunctional Cultural Space Charitable Operator, to be agreed with the Multifunctional Cultural Space Operator and secured in the associated management plan
 - A peppercorn rent for the Multifunctional Cultural Space Charitable Operator
 - All necessary and reasonable costs related to the full fit-out covered by the owner
 - Provision of the Multifunctional Cultural Space for the lifetime of the development, unless otherwise agreed via a deed of variation with the City of London Corporation
 - Provision of discounted tickets for performance space events public groups, which may include but not be limited to charitable organisations, study groups and schools.
 - No more than two private events per month to take place in any part of the multifunctional cultural space to be agreed in writing with the City of London Corporation, not to exceed 10 hours in length and not to take place over more than two calendar days, with all other events to be run by the Multifunctional Space Charitable Operator or charity or community group as agreed by the City of London Corporation, with all private events to be advertised in advance.
 - To submit a Multifunctional Space Management Plan, to be reviewed each year for the first five years of operation including statistics regarding use and case studies, and upon request by the City of London Corporation for each year thereafter
- Provision of accessible public lift and associated management plan to be submitted no later than six months prior to completion
 - Provision of Churchyard of St Augustine Papey Space and Roman Wall Viewing Platform, to include but not limited to the following terms:
 - Provision of the space 24 hours a day, save for circumstances of force majeure, requirement to carry out essential cleaning, maintenance, fit-out or other structural

or non-structural alteration or occasional temporary closure not exceeding one day per calendar year to assert rights of proprietorship

- Provision of Churchyard of St Augustine Papey Space management plan including details of complimentary installations such as plaques, signage and artworks

- Television Interference Survey
 - First Television Interference Survey to be carried out no later than three months prior to commencement
 - Second Television Interference Survey to be carried out no later than three months post completion of the development
- Wind Audit (if requested within five years past completion of the development)
- Solar Glare Assessment (if requested within five years past completion of the development)
- Provision and funding of a PhD placement in partnership with an appropriate Arts and Humanities Research Council or other partner

1110. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

Monitoring and Administrative Costs

1111. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

1112. The applicant will pay the City of London's legal costs and the City Planning Obligations Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

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

1113. The City, as a public authority, must in exercise of its function, have due regard to the need to:

- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
- Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

- Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
1114. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against some because of their marriage or civil partnership status. It is the view of officers that a decision to grant planning permission in this case would reduce barriers to access for disabled people through the provision of an enhanced step free public realm and two blue badge parking bays on at ground floor level. Officers consider that the provision of Social Enterprise retail space and the provision of a publicly accessible multifunctional cultural space would advance equality of opportunity.

Human Rights Act 1998

1115. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention Right (being rights set out in the European Convention on Human Rights ("ECHR")).
1116. Insofar as the grant of planning permission will result in the interference to private and family life (Article 8 of the ECHR) including by causing harm to amenity of those living nearby in residential properties, it is the view of officers that such interference is necessary in order to secure benefits of the scheme and therefore necessary in the interest of the economic wellbeing of the country, and proportionate. It is considered that the proposals would result in some impact on neighbouring residential properties, albeit not to such an extent as to result in an unacceptable impact on the existing use of nearby residential properties, by reason of loss of light or privacy. As such the extent of the harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan policy DM10.7, London Plan policy D6, or policy DE8 of the emerging City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs adverse impacts on nearby residential properties and that such impact is necessary in the interest of the economic wellbeing of the country and is proportionate.
1117. Insofar as the grant of planning permission would result in the interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

Conclusion and Overall Planning Balance

1118. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the emerging City Plan 2040 and considering all other material considerations.
1119. The proposed development comprises of the demolition of the existing buildings on site and their replacement with an office-led tower incorporating high-quality flexible public realm at ground floor level, and on the publicly accessible walkways on levels 1 to 3, related cultural and retail spaces at ground, first, second and third floor levels. The proposal would deliver a high quality, office-led development in City Cluster, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses, and maintaining the City's position as the world's leading international finance business centre.
1120. Objections and observations have been received from Statutory consultees including Historic England- GLAAS, Historic England, The Council for British Archaeology, Historic Royal Palaces, The City of London Archaeological Trust and third parties including on behalf of The Wardens and Society of the Mystery or Art of the Leathersellers of the City of London. Across the two rounds of consultations, a total of two objections were received. The grounds of objection included the size and design of the development, its impact on designated and non-designated heritage assets, the loss of the burial ground and remains and the impact on the environment and amenity of the surrounding buildings. This report has considered the concerns raised and where there is clear disagreement, clear reasoning has been provided in this report. Further to this, any requisite mitigation would be secured by conditions or S106 obligations.
1121. The site is within the Central Activities Zone and highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The site is central to the City's growth modelling and would deliver nearly 4.23% of the required commercial space to meet projected economic and employment growth demand until 2040. This would be a highly strategic quantity of growth for one scheme to deliver. The scheme would provide 85,624sqm (GIA) of office floorspace (Use Class E(g), which would be flexible, sustainable Grade A commercial office floor space suitable for circa 4,500 FTE City workers. The proposed office floorplates are designed to be subdivided and arranged in a number of ways to accommodate a range of office occupiers, including SMEs.
1122. The proposals are classed as a tall building under adopted and emerging policy, and the site is not located in an area identified as inappropriate for a tall building in the City's Local Plan. Officers have thoroughly assessed the proposals and as a matter of planning judgement, it is considered the proposal

would accord with CS7 and CS14 of the Local Plan, policy S12 and S21 of emerging City plan 2040 and London Plan policy D9 (A, B, C, D).

- 1123.** The proposals would optimise the use of land, delivering high quality office space, a multi-layered series of publicly accessible spaces. The site's interfaces with and contribution to its surroundings would be significantly improved. It would enhance convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy. The proposals constitute Good Growth by design and be in accordance with all Local Plan Policies CS10 and DM 10.1, Emerging City Plan 2040 Policy DE3, London Plan Policies D3, D4 and D8, the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-6.
1124. The proposed development would be a sophisticated interplay of expressive, playful design and functionality, combining office, public, and cultural spaces within a visually compelling and contextually responsive form. The design throughout seamlessly integrates public amenities and generous urban greening, with the towers' edges defined by tree canopies, and at its lower levels, the multi-levelled Camomile Park, which would host the reimaged Churchyard and revealed Roman wall. Collectively, these elements would endow the proposals with a landmark quality, making it a fitting and distinguished addition to the City Cluster. This is in accordance with London Plan policies D3, D4, D9, and City Plan policies CS10 and DM 10.1, 10.3, 10.8 and emerging City Plan 2040 policies S8, DE2, DE3, DE4 (1 and 2), DE8 relevant sections of the NPPF and National Design Guide.
1125. The proposed development would represent a highly accessible and inclusive building, with full details being secured by condition and S106 obligation. The proposed development would comply with policy D5 of the London Plan, policy DM10.8 of the Local Plan and policy HL1 of the emerging City Plan 2040.
1126. The proposal would not harm the attributes or components of the Outstanding Universal Value or authenticity and integrity of the Tower of London World Heritage Site, in accordance with the relevant parts of the Local Plan policy CS12, CS13(3), Emerging City Plan 2040 policy S11, HE1, HE3, London Plan policy HC2, HC3, associated guidance in the World Heritage Site Management Plan, Local Setting Study and LVMF SPG.
1127. The scheme would comply with London Plan Policy HC4, Local Plan policy CS13, and emerging City Plan policy S13 and associated guidance in the LVMF SPG and Protected Views SPD and neighbouring local view policies and guidance.
1128. The proposals would enhance the significance of the Churchyard of St Augustine Papey (NDHA) and significance of the London Wall Scheduled Ancient Monument, and result in no harm to the significance of any Listed

building, Conservation Area or scheduled Monument and would thereby comply with heritage policies HC1 of the London Plan, Local Plan policies CS12, DM12.1 DM12.4 and emerging City plan 2040 S11, HE1, in addition to relevant sections of the NPPF and the objective set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990.

1129. There is high potential for the survival of medieval and later burials within the former churchyard and archaeological remains from periods before this; proposals would remove all archaeological deposits on the site if these survive so could have an impact on these. This impact is considered to be appropriately and effectively managed through the use of conditions attached to this permission, with a PhD studentship proposed alongside the usual measures to oversee and manage the recording, excavation and subsequent study of the burials if these are present, a particularly noteworthy and rigorous arrangement to maximise the potential for this site to advance archaeological knowledge in various ways. Subject to the conditions and S106 obligations, the proposal would comply with policies DM12.4 of the Local Plan, policy HE2 of the emerging City Plan 2040 and HC1 of the London Plan.
1130. Working with a Cultural Partner and Social Enterprise Partner on the lower levels of the building, combined with the creation of Camomile Park, the elevated walkways and retail units, the development would support the aspirations of Destination City to increase footfall and become a 7-day week inclusive destination. The development would create a new pleasant place in the City to linger, enjoy and experience, rather than just pass through.
1131. The scheme has been designed to ensure that its impact is acceptable in environmental terms. The daylight and sunlight, microclimate, thermal comfort, ground conditions, air quality and noise credentials of the development are acceptable subject to mitigation and conditions where relevant. Some existing residential dwellings will be adversely affected by changes in daylight and sunlight. However, considering the BRE Guidance, the location of the application site and impacted residential properties within the Cluster, the dense urban environment of the City particularly the Cluster, and any reasonable increase in massing, proposed in order to meet the aims of the development plan and the priorities of the CAZ on the delivery of floorspace, the impact of the above mentioned residential properties are considered acceptable in this instance and not considered to result in unacceptable impacts when considered in context. Further to this, in the proposed development in the cumulative scenario only, one amenity space (Devonshire Square A) would not comply with BRE guidance as there would be an 100% loss in terms of the area of this space receiving at least two hours of direct sunlight, the impact on this space is acknowledged and officers consider the benefits of the proposal outweigh the harm caused to this space.
1132. In transportation terms, the proposals would align with aspiration set out in the City's Transport Strategy. Acceptable levels of cycle parking and facilities are proposed, which would encourage active travel to the site. The proposal would provide a betterment of local public realm and the highway (though S278

Agreement and contribution to the London Wall Corridor Study and works to the south of the building), and with these improvements the additional pedestrian trips on the transport network can be accommodated. Demolition and construction methodologies would be secured by condition and proposals agreed between the Highways Authority and the appointer contractor, in accordance with construction regulations and logistic guidance. The proposed development would take delivery servicing off the street as it would provide an on-site delivery and servicing area, with all vehicles being to access and egress in forward gear, and with sufficient consolidation secured through a delivery and servicing management plan.

1133. Carbon optioneering has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability to inform the development proposals. Whilst the proposed development would incorporate a large basement (accommodating plant, cycle parking and end of trip facilities), which has an high embodied carbon impact, it is considered that this is required to unlock the greatest number of benefits that would contribute to the wider sustainability and future proofing of the City, this includes optimising the delivery of highest quality office floorspace whilst integrating greening, community and retail uses across multiple levels, benefits which could not be delivered through retrofit where extension and opening up potential was significantly limited, as demonstrated in the pre-development analysis. The building would be designed to high sustainability standards including an increase in local greening and ecological value, operational energy efficiency (including a leading reduction in cooling demand), targeting BREEAM 'Outstanding' and NABERS UK rating of 5 stars and adopting Circular Economy Principles. The Proposed Development is also one of the first to include a specific 'Cool Routes' strategy detailing how the landscaping and public realm is designed to connect into and support the proposed East-West Cool Route that links London Wall to Aldgate.
1134. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, City Eastern Cluster and public realm would be complied with, and policies relating to design, heritage, tall buildings and strategic views of the Local Plan would be complied with. Whilst there would be conflict policies S8 (17), S12(h) and DE4(3) of the emerging City Plan 2040 due to the lack of an elevated public space and policy DE7 of the emerging City Plan as the impact of the proposed development on the nearby hotel have not been assessed, the proposals comply with the development plans when considered as a whole.
1135. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies.

1136. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
1137. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with as well as policies relating to office floor space delivery, environmental impacts, provision of a cultural offer and public realm delivery would be complied with, and as the relevant design policies, and the criteria in London Plan policy D9C and D are satisfied, the proposals comply with the development plan when considered as a whole.
1138. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicated otherwise.
1139. The duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the local planning authority to have special regard to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess. In this case officers are of the view that the settings and significance of listed buildings will be preserved and therefore the section 66(1) objective is achieved.
1140. Among the other material considerations to consider is the NPPF. The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Achieving sustainable development means the planning system has three overarching objectives. The proposal contributes to those objectives in the following main ways:
- The provision of 85,624sqm (GIA) of Grade A office floorspace, which would provide an uplift of 67,731.7sqm (GIA) on the site, which would contribute 4.23% toward the City's projected additional minimum requirement of 1.6million sqm GIA. This is a notable contribution by a single development to the City's strategic economic objective. The development is projected to support 4,500 employees daily on-site, and increased spending in the locality boosting local businesses and a post-covid resurgence.
 - The introduction of retail provision on the site, enhancing the retail offer in the Cluster and wider City, supporting and diversifying its primary business function whilst enhancing a place which would be more interesting and vibrant with active frontages at ground floor level.
 - The provision of dedicated space for a food and beverage Social Enterprise provider within the ground floor level and on either level 1 or 3. At ground floor a public facing food offer would be provided with either

further public facing offer on or space for non-public training and development activities on level 1 or 3 (the offer on level 1 or 3 would be dependent on how the Social Enterprise provider operates). This would provide a unique offer through employment, training outreach, providing pathways into employment and training for underrepresented groups.

- The provision of a multi-function cultural space, offering raked seating and supported by foyer, rehearsal and back of house facility space, would offer social, educational and well-being benefits. The proposals would provide a space which can accommodate cultural events to bring a new dynamic to the City and facilitate a 7 day a week Destination City and details of this will be included within a management plan secured within the S106 agreement.
- The overall quality of the development and proposals would attract visitors, increase tourism, support and improved work productivity and enhance the image of the area.
- The scheme would deliver growth in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy, assisting in creating sustainable patterns of transport.
- At local ground floor level, the proposal would result in significant enhancement of the public realm through the setting back of the building on three elevations and the creation of Camomile Park to the south, public routes through the building, as well as the raised walkways, introducing an attractive open space and creating permeable routes through the building. Camomile Park would include the retention and re-landscaping of the former churchyard of St Augustine Papey and revealing the remains of the Roman Wall of the public, re-establishing the visual connection between the two to the enhancement of both. These spaces would support active and cultural uses which will enhance the vitality, character and distinctiveness of the site and wider City Cluster, including new views and heritage appreciation all of which align with Destination City aspirations.
- The improvements to the public realm for pedestrians and cyclists, including pavement widening and streetscape enhancements, would encourage active travel and support the wellbeing of users, constituting a key social and environmental benefit in a highly congested area, subject to the detail being confirmed through a S278 agreement and S106 financial contributions for the enhancement of streets and spaces. It is the view of officers that satisfactory details can be secured through such agreements.
- The proposal would incorporate a significant uplift in greening and biodiversity benefits across the ground floor level, walkways, balconies and terraces, connecting to and supporting the City's proposed East-West Cool Route.
- The proposal would secure a S106 obligation of £4,101,178.95 (excluding monitoring and indexation) towards affordable housing provision and £2,460,707.37 (excluding monitoring and indexation) towards local training, skills and job brokerage.

- A PhD placement, in partnership with MOLA and/or another Arts and Humanities Research Council (AHRC) body, would be funded by the applicant to participate in the aforementioned work of recording and carry out the excavation analysis, recording, publication and archiving. This would go beyond the usual archaeological requirements and would represent an enhancement of the usual archaeological processes required post-permission.

1141. Paragraph 10 of the NPPF sets out there is a presumption in favour of sustainable development. For decision taking that means approving developments that accord with an up-to-date development plan without delay.
1142. Paragraph 85 of the NPPF states that significant weight is to be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The contribution that the scheme will make to supporting economic growth is a factor which weighs in its favour.
1143. The scheme would also provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. The payment of CIL is a local finance consideration that weighs in favour of the scheme.
1144. It is the view of officers that the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

Application Documents

- Completed Application Form, prepared by DP9
- CIL Form, prepared by DP9
- Cover Letter, prepared by DP9, dated 6 February 2025
- Existing Location Plan – 1864-FPA-XX-XX-DR-A-16050, prepared by Fletcher Priest Architects
- Existing Drawings, prepared by Fletcher Priest Architects
- Environmental Statement, prepared by Trium dated December 2024 (as amended), including:
 - Volume 1: ES Main Report
 - Volume 2: Built Heritage, Townscape and Visual Assessment
 - Volume 3: Technical Appendices
 - Non-Technical Summary
- Aviation Safeguarding Assessment Issue 2, prepared by K L Grant Consulting, dated 31 January 2025
- Biodiversity Net Gain Report Issue D, prepared by Assystem Energy and Infrastructure, dated 05 February 2025
- Equality Statement, prepared by Trium dated January 2025
- Fire Statement Rev 01, prepared by Arup dated 31 January 2025
- Health Impact Assessment, prepared by Trium dated January 2025
- Operational Waste Management Strategy Version 01, prepared by Velocity dated January 2025
- Outdoor Thermal Comfort Assessment, prepared by RWDI dated 31 January 2025
- Tower of London Heritage Impact Assessment, prepared by The Townscape Consultancy dated May 2025
- Outline Delivery and Servicing Plan, prepared by Velocity dated January 2025
- Outline Demolition & Construction Environmental Management Plan, prepared by TCCL dated January 2025
- Archaeological Desk Based Assessment, prepared by MOLA dated January 2025
- Circular Economy Statement version 02, prepared by CBRE dated May 2025
- Cool Routes Report Rev 01, prepared by Fletcher Priest Architects dated January 2025
- Culture & Social Value Strategy, prepared by Things Made Public dated January 2025
- Energy Assessment Rev 02, prepared by Hilson Moran dated January 2025
- Flood Risk Assessment, prepared by AKT II dated January 2025
- Preliminary Investigation Report- Land Contamination Rev 01, prepared by Soiltechnics dated January 2025
- Stage 2 Drainage Strategy Report, prepared by AKT II dated January 2025
- Pedestrian Level Wind Microclimate Assessment, prepared by RWDI dated January 2025

- Preliminary Ecological Appraisal Rev D, prepared by Assystem dated January 2025
- Statement of Community Involvement, prepared by Kanda dated January 2025
- Sustainability Statement, prepared by CBRE dated January 2025
- Utilities Assessment Issue 02, prepared by Hilson Moran dated January 2025
- Ventilation/ Extraction Statement Issue 02, prepared by Hilson Moran dated January 2025
- Whole Life Carbon Assessment, prepared by CBRE dated May 2025
- Wind Analysis Response prepared by RWDI dated May 2025
- Pedestrian Comfort Level Assessment Technical Note prepared by Velocity dated May 2025
- Adaption to Climate Change prepared by CBRE dated September 12th 2024
- Annex 8.6 Overshadowing Assessment prepared by GIA dated May 2025
- Annex 8.8 Light Pollution Assessment prepared by GIA dated May 2025
- Appendix 8.3 Drawings prepared by GIA dated May 2025
- Heating & Cooling Systems Note
- Pre-Redevelopment and Pre-Demolition Audit prepared by Velocity dated May 2025
- Schedule of Responses to GLA Comments Received dated 23 May 2025
- Public Transport Impact Assessment Note prepared by Velocity dated May 2025
- Drawing Issue Sheet, prepared by Fletcher Priest Architects
- Clarifications on Cultural Partner and Social Enterprise Partner Commitments prepared by DP9 dated 23 May 2025
- Design and Access Statement Rev 01, prepared by Fletcher Priest Architects dated January 2025
- Planning Statement, prepared by DP9 dated January 2025
- Transport Assessment Version 0.1, prepared by Velocity dated January 2025
- Terraces and Balconies Windiest Season
- Cycle Promotion Plan Rev 0.1, prepared by Velocity dated January 2025
- Daylight and Sunlight results for Bevis Marks Synagogue and Petticoat Square, Middlesex Estate, prepared by GIA
- Video, Kinetic Viewing Experience Across Tower Bridge, prepared by Miller Hare
- Commentary to accompany Video, prepared by The Townscape Consultancy
- Technical Note prepared by AKT II dated June 2025
- Response to Objection prepared by GIA dated June 2025
- Part L 2021 Performance Spreadsheet
- GLA Detailed Application Stage Circular Economy Statement
- Project Details Spreadsheet
- GLA Compliance Comments Spreadsheet
- 63 St Mary Axe, Redacted Cost Plan for RIBA Stage 2 Whole Life Carbon

- 25_00223_FULEIA Circular Economy Statement Spreadsheet dated 29 May 2025
- Circular Economy workshop (Ambitions workshop) June 2025
- Project Sky 2: WELL/BREEAM Workshop Date: 02/09/2024
- GLA Compliance Schedule
- 26 Wormwood Street Visuals (Addendum to Annex 5)
- Air Quality Comments Response by Hilson Moran dated 17 April 2025
- Air Quality Comments Response by Hilson Moran dated 9 May 2025
- Review of daylight and sunlight assessment at 63 St Mary Axe, prepared by BRE
- Sky2 Camomile Court 3rd Party Review of Whole Life Carbon Assessment Report May 2025
- Correspondence from EoN regarding heat network dated 22 May 2025
- Correspondence from City of London Climate Action dated 13 May 2025
- Correspondence from DP9 regarding the loss of gym dated 23 June 2025

Internal Consultations

- Email, Air Quality Officer, 24 March 2025
- Memo, Environmental Health Officer, 28 March 2025
- Memo, LLFA, 01 April 2025
- Email, Cleansing Services, 05 May 2025
- Memo, District Surveyors, 08 May 2025
- Email, Cleansing Services, 12 May 2025
- Letter, The City of London Archaeological Trust, 16 May 2025
- Memo, Air Quality Officer, 03 June 2025

External Consultations

- Acknowledgement Letter, Lambeth, 18 March 2025
- Email (Objection), Roshan Thakkar, 12 March 2025
- Acknowledgement Email, Haringey, 20 March 2025
- Acknowledgement Letter, The Royal Borough of Kensington and Chelsea, 20 March 2025
- Acknowledgement Letter, London Borough of Richmond Upon Thames, 21 March 2025
- Acknowledgement Letter, Tower Hamlets, 21 March 2025
- Acknowledgement Letter, Westminster City Council, 21 March 2025
- Acknowledgement Email, GLA, 21 March 2025
- Letter, Hackney, 24 March 2025
- Email, Active Travel England, 25 March 2025
- Letter, Gatwick Airport, 26 March 2025
- Letter, City Airport, 28 March 2025
- Email, Heathrow Airport, 28 March 2025
- Email, NATS Safeguarding, 28 March 2025
- Email, Haringey, 31 March 2025

- Letter, The Royal Borough of Kensington and Chelsea, 02 April 2025
- Acknowledgement Letter, Hammersmith and Fulham, 04 April 2025
- Acknowledgement Letter, Islington, 04 April 2025
- Letter, Southwark, 07 April 2025
- Letter, Historic England GLAAS, 08 April 2025
- Letter, Royal Borough of Greenwich, 03 April 2025
- Letter, Lambeth, 11 April 2025
- Letter, Environment Agency, 15 April 2025
- Email, Council for British Archaeology, 16 April 2025
- Letter, Historic Royal Palaces, 22 April 2025
- Letter, Historic England, 16 April 2025
- Letter, Natural England, 22 April 2025
- Letter, London Borough of Richmond Upon Thames, 23 April 2025
- Email, Surveyor to the Fabric of St Paul's, 02 May 2025
- Report, GLA Stage 1 Response, 06 May 2025
- Email, Heathrow Airport, 09 May 2025
- Letter, Network Rail, 09 May 2025
- Email, Active Travel England, 09 May 2025
- Letter, London City Airport, 12 May 2025
- Email, NATS Safeguarding, 13 May 2025
- Letter, The Royal Borough of Greenwich, 15 May 2025
- Email, Historic England GLAAS, 16 May 2025
- Letter, London Borough of Tower Hamlets, 16 May 2025
- Letter, London Borough of Tower Hamlets, 16 May 2025
- Letter, London Borough of Hammersmith and Fulham, 19 May 2025
- Letter, Environment Agency, 21 May 2025
- Email, Transport For London Infrastructure Protection, 22 May 2025
- Email, Natural England, 27 May 2025
- Email, Historic England, 30 May 2025
- Letter, Westminster City Council, 29 May 2025
- Letter, Lambeth Council, 04 June 2025
- Letter, London Borough of Hammersmith and Fulham, 06 June 2025
- Email, Surveyor to the Fabric - St Paul's Cathedral, 06 June 2025
- Email, Council for British Archaeology, 10 June 2025
- Email, Thames Water dated 17 June 2025
- Email, Dr Lorna Flores Villa BRE dated 19 June 2025
- Email, GLA dated 19 June 2025
- Email, Thames Water dated 20 June 2025

Representations

- Objection, Roshan Thakkar, 12 March 2025
- Objection, Daniella Wax, 16 April 2025
- Objection, Eversheds Sutherland (International) LLP on behalf of The Wardens and Society of the Mystery or Art of the Leathersellers of the City of London, 5th June 2025

Appendix A

REAONSED CONCLUSIONS ON SIGNIFICIANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in this report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan and a Travel Plan. Mitigation measures should be secured including wind mitigation. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreement. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions

Appendix B

London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D10 Basement Development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy S6 Public toilets
- 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 HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI6 Digital connectivity Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport

- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

Emerging City Plan 2040

- Draft Strategic Policy S1: Health and Inclusive City
- Draft Policy HL1: Inclusive buildings and spaces
- Draft Policy HL2: Air quality
- Draft Policy HL3: Noise
- Draft Policy HL4 Contaminated land and water quality
- Draft Policy HL5: Location and protection of social and community facilities
- Draft Policy HL6: Public Toilets
- Draft Policy HL7 Sport and Recreation
- Draft Policy HL8 Play areas and facilities
- Draft Policy HL9: Health Impact Assessment (HIA)
- Draft Strategic Policy S2: Safe and Secure City
- Draft Policy SA1: Publicly accessible locations
- Draft Policy SA2 Dispersal Routes
- Draft Policy SA3: Designing in Security
- Draft Strategic Policy S3: Housing
- Draft Policy HS3: Residential Environment
- Draft Strategic Policy S4: Offices
- Draft Policy OF1: Office Development
- Draft Policy OF2: Protection of Existing Office Floorspace
- Draft Policy OF3 Temporary 'Meanwhile' Uses
- Draft Strategic Policy S5 Retail and Active Frontages

- Draft Policy RE2 Active Frontages
- Draft Policy RE3 Specialist Retail Uses and Clusters
- Draft Strategic Policy S6: Culture and Visitors
- Draft Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Draft Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Draft Policy CV3: Provision of Visitor Facilities
- Draft Policy CV5 Evening and Night-Time Economy
- Draft Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Draft Policy N1 Infrastructure Provision and Connection
- Draft Policy IN1: Infrastructure Capacity
- Draft Strategic Policy S8: Design
- Draft Policy DE1: Sustainable Design
- Draft Policy DE2: Design Quality
- Draft Policy DE3: Public Realm
- Draft Policy DE4: Terraces and Elevated Public Spaces
- Draft Policy DE5 Shopfronts
- Draft Policy DE6 Advertisements
- Draft Policy DE7: Daylight and Sunlight
- Draft Policy DE8: Lighting
- Draft Strategic Policy S9: Transport and Servicing
- Draft Policy VT1: The impacts of development on transport
- Draft Policy VT2 Freight and Servicing
- Draft Policy VT3: Vehicle Parking
- Draft Policy VT5: Aviation Landing Facilities
- Draft Strategic Policy S10: Active Travel and Healthy Streets
- Draft Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Draft Policy AT2: Active Travel including Cycling
- Draft Policy AT3: Cycle Parking
- Draft Strategic Policy S11: Historic Environment
- Draft Policy HE1: Managing Change to Historic Environment Development
- Draft Policy HE2: Ancient Monuments and Archaeology
- Draft Policy HE3: Setting of the Tower of London World Heritage Site
- Draft Strategic Policy S12: Tall Buildings
- Draft Strategic Policy S13: Protected Views
- Draft Strategic Policy S14: Open Spaces and Green Infrastructure
- Draft Policy OS2: City Urban Greening
- Draft Policy OS3: Biodiversity
- Draft Policy OS4: Biodiversity Net Gain
- Draft Policy OS5 Trees
- Draft Strategic Policy S15: Climate Resilience and Flood Risk
- Draft Policy CR1: Overheating and Urban Heat Island Effect
- Draft Policy CR3 Sustainable Drainage Systems (SuDs)
- Draft Policy CR4 Flood Protection and Flood Defences
- Draft Strategic Policy S16: Circular Economy and Waste

- Draft Strategic Policy S26 Planning Contributions
-

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- Barbican and Golden Lane Conservation Area SPD, February 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy October 2024
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

CS2 Utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

CS3 Security and Safety

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

CS4 Planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS7 Eastern Cluster

To ensure that the Eastern Cluster can accommodate a significant growth in office floorspace and employment, while balancing the accommodation of tall buildings, transport, public realm and security and spread the benefits to the surrounding areas of the City, by:

1. Increasing the provision of sustainable, energy-efficient, attractive, high quality office floorspace in a range of accommodation types, that meet the varied needs of office occupiers and achieve modernisation of office stock.
2. Promoting the Eastern Cluster as a location for inward investment, providing assistance to potential developers, investors and occupiers.
3. Delivering tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline, and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings and taking account of their effect on the wider London skyline and protected views.
4. Ensuring the safety of businesses, workers, residents and visitors, promoting natural surveillance of buildings, open spaces and streets and protecting against crime and terrorism.
5. Enhancing streets, spaces, and the public realm for pedestrians, providing new open and public spaces where feasible, increasing connectivity with surrounding

areas and improving access to facilities and services, particularly in the Cheapside and Aldgate areas and towards the City Fringe.

6. Ensuring the provision of high quality utilities (including CCHP where feasible) and communications infrastructure, encouraging early engagement and joint working between developers and utility providers and maximising the space under the streets, particularly through the use of pipe subways.

7. Delivering improvements to public transport to cope with the demands of the growing numbers of workers and visitors, implementing street and traffic management measures and ensuring that improvements do not compromise the quality of the environment.

CS10 Design

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

CS11 Visitor, arts and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

CS12 Historic environment

To conserve or enhance the significance of the City's heritage assets and their settings and provide an attractive environment for the City's communities and visitors.

CS13 Protected views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS14 Tall Buildings

To allow tall buildings of world class architecture and sustainable and accessible design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level, by:

1. Permitting tall buildings on suitable sites within the City's Eastern Cluster.
2. Refusing planning permission for tall buildings within inappropriate areas, comprising: conservation areas; the St. Paul's Heights area; St. Paul's protected vista viewing corridors; and Monument views and setting, as defined on the Policies Map.
3. Elsewhere in the City, permitting proposals for tall buildings only on those sites which are considered suitable having regard to: the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features.

4. Ensuring that tall building proposals do not adversely affect the operation of London's airports

CS15 Sustainable development and climate change

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate by: ...

CS16 Public transport, streets and walkways

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Open Spaces and Recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS21 Housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

Policy DM 1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and

there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- prejudicing the primary business function of the City;
- jeopardising the future assembly and delivery of large office development sites;
- removing existing stock for which there is demand in the office market or long term viable need;
- introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.2 Assembly and protection of large office development sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a. assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b. invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c. ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d. resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

Policy DM 1.4 Temporary alternative use of vacant office buildings and sites

1. To permit the temporary use of vacant office buildings and sites by other uses where such uses would not produce unacceptable amenity conflicts nor prejudice the eventual return of the site to office use.
2. To refuse the temporary replacement of vacant offices with housing where it would adversely affect the existing beneficial mix of commercial uses

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;

b) reasonable gas and water supply considering the need to conserve natural resources;

c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;

e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

Policy DM 3.1 Self-containment in mixed use developments

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
- b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;

- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;

- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

Policy DM 10.5 Shopfronts

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

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

Policy DM 10.6 Advertisements

1. To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.
2. To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities

1. To resist the loss of existing visitor, arts and cultural facilities unless:
 - replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
 - they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
 - it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.
2. Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;

- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.2 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.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 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.

Policy DM 12.5 Historic parks and gardens

1. To resist development which would adversely affect gardens of special historic interest included on the Historic England register.
2. To protect gardens and open spaces which make a positive contribution to the historic character of the City.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
 - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve

national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated onsite will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (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.

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish

whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

- a) road dangers;
- b) pedestrian environment and movement;
- c) cycling infrastructure provision;
- d) public transport;
- e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

- a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
- b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

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

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

Policy DM 16.6 Public car parks

No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

Policy DM 16.7 Aviation landing facilities

No heliports will be permitted in the City. Helipads will only be permitted where they are essential for emergency or security purposes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

- a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
- b) the benefits of the development outweigh the flood risk to future occupants;

c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and

b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

Policy DM 18.3 Flood protection and climate change resilience

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:

- a) be publicly accessible where feasible; this may be achieved through a legal agreement;
- b) provide a high quality environment;
- c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
- d) have regard to biodiversity and the creation of green corridors;
- e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

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

Policy DM19.4 Play areas and facilities

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas identified as deficient, by:

- protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
- where the creation of new play facilities is not feasible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;
- requiring external play space and facilities as part of new residential developments which include 20 or more family units (those with 3 or more bedrooms) or 10 or more affordable units of 2 or more bedrooms;
- promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.

2. Play areas and facilities should not be located where they would cause undue disturbance to neighbouring occupiers.

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.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
 - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

Policy DM 22.1 Location and protection of social and community facilities

1. To resist the loss of social and community facilities unless:
 - replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.
3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- in locations which are convenient to the communities they serve;
- in or near identified residential areas, providing their amenity is safeguarded;
- as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

Policy DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

Appendix C

Methodologies for Assessing Daylight, Sunlight and Overshadowing

Existing Buildings

Daylight to Existing Buildings

The BRE guidelines (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

1. **Daylight to windows: Vertical Sky Component (VSC):** a measure of the amount of sky visible from a centre point of a window (irrespective of the size of the window). The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
2. **Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the 492 proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

The BRE guidelines recommends compliance with both the VSC and daylight distribution (NSL) assessment criteria.

Sunlight to Existing Buildings

Sunlight to windows: Annual Probable Sunlight Hours (APSH): Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

Interpreting Assessment Data

In undertaking assessments, a judgement is made as to the level of impact on affected windows and rooms. Where there is proportionately a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment, which 493 are referenced in Appendix H of the BRE guidelines and have become part of an industry standard utilised by Daylight and Sunlight consultants. It is for the Local Planning Authority to decide whether any losses would result in a reduction in amenity which is or is not acceptable.

It should be noted that where there are existing low levels of daylight in the baseline figures, any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Proportionate Percentage change (10% reduced to 8% = 20% reduction); and
- Actual / Absolute change (10% reduced to 8% = 2% change).

Open Spaces

Overshadowing

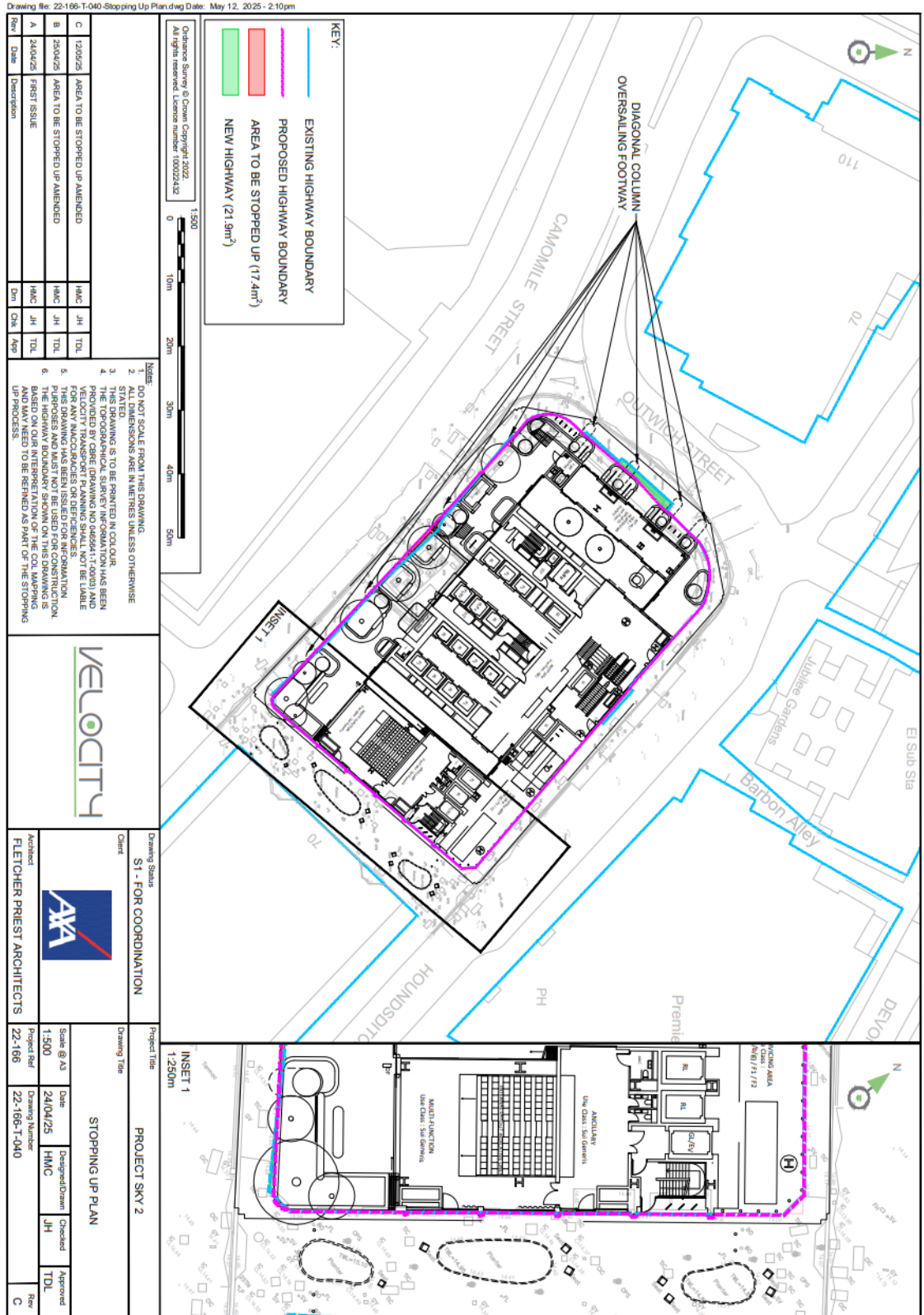
Sunlight to open spaces: Sunlight Hours on the Ground (SHOG): The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21 March.

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

Assessing the Cumulative Impact of Development Proposals

Paragraph 3.10.41 of the Local Plan and paragraph 6.1.59 of the emerging City Plan state that “when considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals”. The impact of a proposed development on the daylight and sunlight received by neighbouring properties and open spaces is assessed against the light levels in the existing scenario. When assessing the cumulative impact of development proposals, the impact of the proposed development would be assessed alongside any other nearby developments with either full planning permission, a resolution to grant consent, those development proposals that have been submitted but not yet determined and / or potential future applications that due to be submitted (none of which have been completed). In undertaking an assessment of the cumulative impact of such development proposals it can be determined the extent to which the impact of each development proposals can be attributed. It should be noted that previous completed developments are considered to form part of the existing baseline against which the development proposals would be assessed.

Appendix D – Highways Stopping Up Plan



Drawing file: 22-166-T-040-Stopping Up Plan.dwg Date: May 12, 2025 - 2:10pm

Rev	Date	Description	Rev	Date	Description
A	24/04/25	FIRST ISSUE			
B	25/04/25	AREA TO BE STOPPED UP AMENDED			
C	25/04/25	AREA TO BE STOPPED UP AMENDED			

- Notes:
- DO NOT SCALE FROM THIS DRAWING.
 - ALL DIMENSIONS ARE IN METRES UNLESS OTHERWISE STATED.
 - THIS DRAWING IS TO BE PRINTED IN COLOUR.
 - THE TOPOGRAPHICAL SURVEY INFORMATION HAS BEEN PROVIDED BY THE CLIENT AND THE CLIENT SHALL BE RESPONSIBLE FOR ANY INACCURACIES OR DEFICIENCIES.
 - THIS DRAWING HAS BEEN ISSUED FOR INFORMATION ONLY AND IS NOT TO BE USED FOR ANY OTHER PURPOSE.
 - THE HIGHWAY BOUNDARY SHOWN ON THIS DRAWING IS BASED ON OUR INTERPRETATION OF THE COL-MAPPING AND MAY NEED TO BE REDEFINED AS PART OF THE STOPPING UP PROCESS.



Drawing Status
S1 - FOR COORDINATION

Drawing Title			
PROJECT SKY 2			
STOPPING UP PLAN			
Scale @ A3	Date	Designed/Drawn	Checked
1:500	24/04/25	HMC	JH
Project Ref	Drawing Number	Approved	Rev
22-166	22-166-T-040	TDL	C



Client
FLETCHER PRIEST ARCHITECTS

Schedule

APPLICATION: 25/00223/FULEIA

63 St Mary Axe, London, EC3A 8AA

Demolition of the existing buildings (with part retention of the existing basement and foundations) and the construction of a new building of ground plus 45 storeys (with basements) for use as offices (Class E (g)), flexible commercial and cultural uses (Use Classes E (a/b/c), F1, F2), multi-functional spaces (sui generis) and a public lavatory (sui generis); the creation of a series of external walkways and terraces at the lower levels; public realm and highways works; the excavation and re-landscaping of the former churchyard of St Augustine Papey; the excavation and provision of visual access to the remains of the Roman Wall; ancillary plant, servicing and parking and all associated works with the proposed development.

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

CONDITIONS

Time Limit for Commencement	
1	Time Limit The development hereby permitted shall be begun before the expiration of three years from the date of this permission. Reason: To ensure compliance Section 91 of the Town and Country Planning Act 1990.
Environmental Health	
2	Plant Noise Levels (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 worst affected noise sensitive premises (see informative). The background noise level shall be expressed as the lowest typical LA90 (15 min) during which time 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 shall be taken (unless otherwise agreed in writing by the local planning authority) 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 ensure that the proposal meets the requirements of the Agent of Change principle and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.
3	Grease Separator Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues. REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8.
4	Music No live or recorded music shall be played that it can be heard outside the premises or within any other premises. 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.
5	Opening Hours The hereby permitted retail/food and beverage and multi-function cultural space shall not be open to the public between the hours of 23:00 on one day and 07:00 on the following day. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
6	Hours of use of the roof terraces, balconies and elevated walkways The roof terraces, balconies and elevated walkways hereby approved shall not be used or accessed between 23:00 on one day and 07:00 on following day, 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.
7	Music on roof terraces, balconies and elevated walkways

	No amplified or other music shall be played on the roof terraces, balconies or elevated walkways. 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.
8	Promoted Events There shall be no promoted events on the premises (including the terraces, balconies and elevated walkways). A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public. 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.
9	Scheme of Protective Works (Demolition) There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.
10	Scheme of Protective Works (Construction) There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set

	out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts
11	Acoustic Report Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the offices does not exceed NR40 attributable to the other uses of the ground floor and/or basement levels. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter. REASON: To protect the amenities of occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.
12	Fume Extract Arrangements Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the commercial kitchen uses. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the kitchen use takes place. REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
13	Plant Vibration 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.
14	Ventilation and Extraction including Odour Control Systems Maintenance All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance. Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3
15	Site Investigation Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved. REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
16	Investigation and Risk Assessment No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of

	the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
17	Remediation Scheme Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority. REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
SuDS/Water	
18	SuDS Detailed Design Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

	(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater harvesting, pump system, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2.79 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 260 m³ ; (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works. (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory. Reason: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
19	SuDS Lifetime Maintenance Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details: (a) A Lifetime Maintenance Plan for the SuDS system to include: - A full description of how the system would work, it's aims and objectives and the flow control arrangements; - A Maintenance Inspection Checklist/Log; - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system. Reason: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
20	Piling Method Statement (Waste Water) – Thames Water No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with

	Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.
21	Piling Method Statement (Clean Water)- Thames Water No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) and piling layout plan including all Thames Water clean water assets, the local topography and clearance between the face of the pile to the face of a pipe has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan. Reason: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
22	Water Network Upgrades – Thames Water No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development" The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning.
Archaeology	
23	Written Scheme of Investigation No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology

	of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works. Where heritage assets of archaeological interest are identified then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include: A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works B. Details of a programme for delivering related positive public benefits to include community outreach and site visits during excavations. C. Production of a programme of extensive scientific analysis of human remains formulated in association with the London Museum. The results of the scientific analysis should be included in part D and should include, but not be limited to, stable isotope analysis, aDNA, Carbon 14 dating, digital x-ray and calculus sampling carried out across a suitable sample of the cemetery population. D. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material (including retention of human remains in appropriate storage). This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI. E. The results of the archaeological excavation should be used to inform the design of the former Churchyard garden. The Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
24	Archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall

	No development shall commence until details of an archaeological and historical interpretation strategy for the churchyard garden and Scheduled Wall has been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details and maintained for the duration of the development. REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
Aviation	
25	City Airport - Permanent Obstacle Lighting Scheme Obstacle lights shall be placed on the top corners of the building. These obstacle lights must be steady state red lights with a minimum intensity of 2000 candelas. Periods of illumination of obstacle lights, obstacle light locations and obstacle light photometric performance must all be in accordance with UK regulation. Reason: Permanent illuminated obstacle lights are required on the development to avoid endangering the safe movement of aircraft and the operation of London City Airport.
Sustainability	
26	Circular Economy Prior to the commencement of the development (excluding demolition) an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance including achieving a minimum 20% recycled content (by value). The Statement shall provide evidence of the steps taken to maximise reuse at highest value of the key demolition products identified in the pre-demolition audit, including the listing of suitable items on an appropriate materials exchange platform. The end-of-life strategy of the statement shall include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft

	Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2; emerging City Plan 2040 policies DE1 and S16.
27	Post Construction Circular Economy No later than 3 months after completion of the building, a post-construction Circular Economy Statement and material passport details shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development. The Statement is to include actual waste arisings and final processing routes for all existing materials. The statement shall also be submitted to the GLA at: circulareconomystatements@london.gov.uk. REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan and Policy S16 of emerging City Plan 2040.
28	Whole Life Cycle Carbon Emissions a) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Whole Life-Cycle Carbon Assessment (WLCA) shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions of the development achieve at least the GLA's Standard Benchmarks, and setting out further opportunities to reduce emissions towards the GLA's Aspirational Benchmarks (as set out in the GLA's Whole Life-Cycle Assessment Guidance). The WLCA shall provide details of the measures to reduce embodied carbon emissions from substructure and superstructure to achieve the GLA's Standard Benchmark without relying on potential savings from low carbon materials which present a procurement risk. The assessment shall include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life-Cycle Carbon Assessment. The development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development. b) If the approved levels of cement replacement, particularly in substructure concrete (70%), or the use of low carbon steel (e.g. EAF, reused or high % recycled content) cannot be achieved - thereby significantly increasing emissions associated with the structure of the development - a detailed justification shall be submitted to the Local Planning Authority. To help mitigate the associated impact of on structural carbon emissions, exemplar initiatives to minimise emissions shall be developed and agreed with

	the Local Planning Authority and implemented before and during the demolition and construction phases, and documented as a case study. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance and that the development is sustainable in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan 2015 policies, DM15.2, DM 17.2 – emerging City Plan 2040: S8, DE1.
29	Post-construction whole-life cycle carbon emissions Once the as-built design has been completed (upon commencement of RIBA Stage 6), a post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment shall provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment shall be submitted along with any supporting evidence as per the guidance and shall be received no later than three months post as-built design completion, unless otherwise agreed. The assessment shall also be submitted to the GLA at: ZeroCarbonPlanning@london.gov.uk REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.
30	Energy Network Connection Prior to the commencement of the development, excluding demolition, details of a future energy network connection shall be submitted to and approved in writing by the local planning authority, including: • a single point of connection to the district heating network • a space allocated for heat exchangers or other plant as required • a safe-guarded pipe route to the site boundary, and sufficient space in cross-section for primary district heating pipes where proposed routes are through utility corridors The development shall be implemented in accordance with the approved details and be retained as such for the lifetime of the development.

	REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the London Plan: SI3 - Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4 - emerging City Plan 2040 policy DE1.
31	Climate Change Resilience Sustainability Statement - Pre-commencement Prior to the commencement of the development, excluding demolition, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, overheating, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. In The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development. REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
32	Climate Change Resilience Sustainability Statement – Post completion Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. The statement shall include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

	REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation and emerging City Plan 2040 policies CR1, CR2, CR3, CR4.
33	BREEAM A post construction BREEAM assessment demonstrating that a rating of 'Outstanding' has been achieved for office spaces and a rating of 'Excellent' has been achieved for the retail spaces (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion. REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.
34	Updated Biodiversity Net Gain Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment shall be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS4. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.
35	Greening and Biodiversity Prior to the relevant works, a revised, detailed landscaping strategy describing the quality, quantity and maintenance of the proposed urban greening and biodiversity measures shall be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority. REASON: To ensure the development delivers the highest quality public realm with the highest feasible levels of greening and biodiversity and supports wellbeing, and climate resilience including minimising the urban heat island, and reducing heat stress and flood risk in line with the following policies in the Development Plan and draft Development Plans: London Plan policies GG2, G5 and G6, Local Plan policies DM15.5, DM

	18.3 and DM19.2, emerging City Plan 2040 policies DE2, OS2, OS3 and OS4.
36	Habitat Maintenance and Management Plan Prior to the commencement of the development, excluding demolition, an Ecological Habitat Maintenance and Management Plan shall be submitted and approved by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following: • details of ecological landscaping, along with associated management and monitoring, including irrigation and rainwater attenuation • detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided • details of habitat created for solitary bees • details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided • Build-up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible). The measures as set out in the plan shall be carried out and so maintained. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development.
37	Post Construction UGF and BNG Within 6 months of completion details of the measures to meet or exceed the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development. Any survey data collected is to be submitted to Greenspace Information for Greater London CIC (GiGL) to support the City of London fulfilling its statutory reporting requirements. REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and emerging City Plan 2040 policy OS2 and OS4.
Design/Public Realm Including Lighting	

38	Architectural details 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 building including details of compliance with the approved Circular Economy Strategy, and inclusive access management plan; b) construction of 1:1 sample material and facade panels of agreed sections of the facades; c) detailed drawings of a scale no less than 1:20, in plan, section and elevation of agreed typical bays, including reference to materials, finishes, lighting, details of jointing, and drip details, and any necessary expansion/movement joints; d) Notwithstanding the approved drawings for floors 0-6, 1:20 detailed drawings in plan, section and elevation, in addition to material specification and finishes, including all entrances and door design, soffits, clear glazing, column face pattern and texture and integrated art panels, and information boards; shall be provided. e) Full details of terraces, including all elevations, layouts, entrance design and location, fenestration, planters, seating, lighting, soffits, drainage, irrigation, balustrades and any other infrastructure required, demonstrating adequate microclimatic mitigation has been considered where necessary; f) Details of walls, railings, balustrades, ramps, gates, screens, handrails etc, bounding or within the site; g) Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room; h) details of the integration of M&E and building services into the external envelope, including but not limited to, details of external ducts, vents, louvres and extracts; i) details of all new service vehicle, fire escape and cycle store entrances; j) details of all external signage for all aspects of the building; k) details of access to the roof for cleaning and maintenance, including details of mansafe equipment; l) notwithstanding the approved drawings, full details of the rooftop including any plant equipment and the roofscape; REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and emerging policies DE2, DE6 and HE1 of the Emerging City Plan 2040.

39	Landscaping details Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, 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. details of all soft landscaping, including the position, size and types of plants, specifying their seasonal interest, in addition to details of their respective planting beds and substrate requirements, and their contribution to biodiversity and local habitat; b. details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights, overall height, canopy size when installed and when mature; and details of tree pits/trenches and growing medium for soft and hard surfaces and their respective top and subsoil requirements as per British standards; c. details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation; d. details of the method of irrigation and nutrient delivery systems for all soft landscaped areas; e. details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures; f. Details of Hostile Vehicle Mitigation measures g. details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual; h. details of the Landscape management and maintenance plan (LMMP) for all soft and hard landscaping, including ecological management and street furniture for all proposed landscaping All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally

	approved, or such alternatives as may be agreed in writing by the Local Planning Authority. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2 and policies DE2, DE3 DE8 and HE1 of the emerging City Plan 2040
40	Former Churchyard of St Augustine Papey 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) Notwithstanding the approved drawings, full details and specification of the design for the former churchyard, its hard and soft landscape detailing, elevations, soffits and design for artwork and historic interpretation, signage and lighting will be provided ; REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2, DM12.1 and policies DE2, DE3,DE4, DE6, DE8 and HE1, HE2 of the emerging City Plan 2040
41	Lighting Strategy Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of: (a) lighting layout/s; (b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits); (c) a lighting control methodology; (d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies; (e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;

	(f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering; (g) details of aviation lights including locations; and (h) details of how the lighting proposals will be inclusive for a range of people including options for testing sightlines and transitions. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy. REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and DM15.7 and City of London Lighting Strategy SPD.
42	Street Lighting Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
43	Benches on Level 3 Elevated Walkways Prior to the affected works, a plan and associated microclimate testing must be submitted to and approved in writing by the Local Planning Authority, showing that benches on the Level 3 Elevated Walkway are sited in an area suitable for occasional sitting. The benches shall be sited in an area suitable for occasional sitting for the lifetime of the development. REASON: To ensure that the benches are located in acceptable microclimatic conditions and to comply with policy DM10.1 of the Local Plan and policies S8 and DE2 of the emerging City Plan 2040.
44	Plant and GPDO Telecoms No plant or telecommunications equipment shall be installed on the exterior of the building (to the roof above the building line), including any

	plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) (England) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
Accessibility and Inclusivity	
45	Signage and Wayfinding Prior to commencement excluding demolition, a signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, cultural uses, flexible uses and toilets and any other relevant uses or historic sites shall be submitted to and approved in writing by the Local Planning Authority. REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4
46	Inclusion and Accessibility Before any works thereby affected are begun, the following details shall be submitted 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) All surface materials including details of slip resistance, contrast, colour, texture and acoustic properties, as appropriate. (b) Details of an inclusive entrance strategy (including internal principal access routes) to include information at a scale of no less than 1:20 and 1:5 of thresholds, door opening mechanisms, door furniture, framing contrast, access control points, manifestation and matwells. (c) Details of reception facilities as relevant, to include location, non-slip floor materials, a lowered section of the desk with capacity for an under-counter knee recess and demonstrating how backlighting glare is avoided. (d) Details of wider aisle gates at all controlled points of entry. (e) Details of seating in the public realm and on terraces to ensure that options for seating include single, aligned and group facing seating, seating at a range of heights, and with options for backrests and arms for support when rising, and for wheelchair users to transfer to sit alongside companions.

	(f) Details of all accessible toilet provision (all wheelchair and ambulant provision), including layout and options for right and left handed transfer at a scale of no less than 1:20. (g) Details of the auditorium style seating in the Multifunction Space including options for wheelchair users, and people who need arm-supports or back rests. (h) Details and specifications for all lifting devices including doors, widths, control panels, floor surfaces, means of operation and internal car dimensions. (i) Details including a section at drawn scale of no less than 1:5 of thresholds for the external terraces, balconies and walkways. (j) Details of the routes-through between south and west terraces at levels 1 to 3 to ensure that there is sufficient room for a wheelchair or mobility scooter user, or person using crutches, or with an assistance animal to be able to move comfortably between terraces, without conflict with people using stairs. Reason: To ensure the development proposals provide a fully accessible and inclusive facility in accordance with policy DM10.8 and policy D5 of the London Plan.
47	Publicly Accessible Changing Places and Accessible Toilet Before any works thereby affected are begun details including layout drawings at a scale of no less than 1:20, surface materials and lighting, shall be submitted and approved in writing by the Local Planning Authority of: (a) Changing Places facilities at basement level one (b) Accessible toilet accessed externally at ground floor level (c) Associated signage The approved facilities shall be available to general public free of charge for the lifetime of the development. The signage informing the general public of toilet facilities on site, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development. Reason: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with policy DM22.2 of the Local Plan.
48	Inclusive Access Management Plan Prior to the occupation of the development, and Access Management Plan shall be submitted to and approved in writing by the Local Planning.

	All development pursuant to this permission shall be carried out in accordance with the approved, which shall provide specific details on how the development will be constructed, operated and managed or for the lifetime of the development, to ensure that the highest standard of accessibility is provided. This Inclusive Access Management Plan shall include details of: 1. Website content giving prior information to be hosted by the building operator including photos as relevant and an easy read version with information on: (a) Travel distance from the key step-free points of arrival including identification of resting points and distance of intermediate intervals. (b) Setting down points within the vicinity of the development including information on kerb heights and distance to controlled crossing points. (c) A protocol of users of the accessible parking bays for the disabled users of the development. This should include (but not limited to) prior information with photos on: • Dimensions of the bays • Protocol for reserving/booking a space • Details of the onward journey and siting of controlled entry system • Any time limits on occupancy of the space (d) A scenario-based assessment of while journey building use by cyclists using larger or adapted cyclists aligned with the information submitted for servicing and standard cycle bays. (e) Details of the Changing Places facility including information on key access and sling (as relevant). (f) Details of dog spend areas in reasonable proximity of the development including dimensions and type of surface. (g) Details of planting demonstrating how unwelcome touch and scent can be avoided. (h) A preview of the cycle parking (including access) and end of trip facilities (i) Wayfinding Strategy (j) Details of training frequency and issue of Personal Emergency Evacuation Plans. (k) Details of assistive technology within the development (l) Details of Rest and recovery facilities

	(m) Sanitary provision including but not exclusively accessible toilets, ambulant toilets and baby changing facilities. 2. Management practices to deliver the Inclusive Entrance Strategy 3. Management practices to deliver the inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs). Reason: To ensure the development proposals provides and is managed as an accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.
Highways and Transportation	
49	Cycle Parking and Facilities Details of the cycle parking shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details to the following, shall be provided in a drawing (scale of not less than 1:20): (a) layout of long stay and short stay cycle parking (b) Assessment on the numbers of cyclists arriving/departing at peak periods. Show that there is sufficient capacity for cyclists to move and get to/from the cycle parking areas. List security measures, if any, required to open the doors. (c) Provide details on the journey from on-street to the parking spaces, showing full dimensions and gradients, including lift dimensions. This should include details for the accessible routes (including cycle lifts, corridor widths and door automation) on drawings on a scale of no less than 1:20. (d) The provision of cycle parking spaces shall comprise of long stay cycle parking of 1463 spaces and short stay cycle parking of 101 spaces. (e) minimum of 73 spaces, shall accommodate larger/adapted cycles with suitable cycle lifts and other associated facilities. All spaces to be shown on a drawing at a scale of no less than 1:20 with dimensions and gradients. (f) Details of the changing facilities, showers (147 showers) and lockers (1463 lockers) shall be submitted and approved in writing by the Local Planning Authority. These facilities shall be provided prior to occupation and maintained throughout the life of the building for the use of occupiers and visitors of the building in accordance with the approved details. The cycle parking provided within the buildings must remain ancillary to the use of the buildings and available at all times throughout the life of the

	buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users. REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.
50	Restricting numbers of deliveries/ servicing There shall be no more than 64 trips associated with deliveries/servicing/waste activities in total over any 24-hour period (accounting for a consolidation rate of 50%). Deliveries on foot and cargo bikes are not restricted. REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.
51	Servicing and Delivery Hours Refuse, recycling, and glass collections must be carried out between the hours of 8pm and 11pm on any given day only. All other deliveries and servicing (excluding any on-foot and cargo bike deliveries) must take place from the on-site loading bay overnight between 11pm on one day to 7am on the following day. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.
52	Servicing Goods including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the on-site delivery and servicing area. REASON: To avoid obstruction on the surrounding streets and to safeguard the amenity of occupiers of adjacent premises in accordance with policies DM16.1, DM16.5 and DM21.3 of the Local Plan.
53	Demolition and Construction Management Plan

	Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details shall be completed in accordance with Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods. The Demolition and Construction Management Plan to include: Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with. • Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing. • Construction vehicle routes to and from the site to be approved with CoL Highways • Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc). • construction vehicle movements to be scheduled to avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request. • encouraging the use of cargo bike deliveries throughout the construction process. • Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements. • A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required. • The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme: http://www.clocs.org.uk/standard-for-clocs/. REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1, and emerging City Plan 2040 policies HL2

	and VT1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.
54	Threshold Levels Before any construction work, including demolition, begins, the proposed threshold levels within the entire perimeter of the site must be submitted to the Local Planning Authority for approval. REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory ground levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement and should be submitted in Cad Format for analysis.
55	Doors etc over public highway No doors, gates or windows at ground floor level shall open over the public highway. REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.
56	Site Condition Survey Before any construction works including demolition are begun, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out. Details must be submitted to and approved in writing by the local planning authority REASON: To ensure the satisfactory reinstatement of the highways, upon completion of construction works, in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement of any construction works to record the condition of the surrounding highways.
57	Stopping Up Order Prior to the commencement of any construction works, the applicant is required to apply for a stopping up order under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at:

	https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways. The application form should be submitted to: transport.planning@cityoflondon.gov.uk REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.
58	Protection of Subway Pipes Prior to the commencement of any construction works, a basement impact and ground movement assessment is required to be submitted to and approved by the Local Planning Authority in writing. REASON: To ensure that demolition and construction works do not adversely impact the existing Houndsditch Pipe, in accordance with London Plan Policy 6.14 and Local Plan policies DM15.6 and DM16.1.
59	Public Highway to be maintained prior to closure order The public highways shall remain as public until such time as the necessary Stopping-up Order has come into effect. No implementation is permitted until then. REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.
60	On-site Accessible Car Parking Bays Two car parking spaces suitable for use shall be provide on the premises in accordance with the details shown on 1864-FPA-XX-GF-DR-A-16108 and shall be maintained throughout the lifetime of the development and be readily available of for use between 7am and 7pm for use by disabled occupiers and visitors without charge to the individual end users of the parking. REASON: To ensure the provision of suitable parking for people with disabilities in accordance with policy DM16.5 of the Local Plan.
61	Unobstructed Headroom A clear unobstructed minimum headroom of 4.75m must be provided and maintained for access ways and delivery and servicing area. REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with policy DM16.5 of the Local Plan.
62	Oversailing No part of the development, including any permanent or temporary structure such as balconies, canopies, building projections, scaffolding, or

	construction equipment, shall oversail or encroach upon the public highway unless and until a licence or other appropriate legal agreement has been entered into with the relevant Highway Authority under the Highways Act 1980 (or any statutory re-enactment or modification thereof). REASON: To ensure the safe and unobstructed use of the public highway and to comply with the requirements of the Highways Act 1980 in accordance with policies DM16.1 and DM16.2 of the Local Plan.
63	Undersailing No part of the development, including any basement, substructure, or other element of the building, shall extend beneath the public highway unless and until all necessary consents, licences, or agreements have been obtained from the relevant Highway Authority under the Highways Act 1980 (or any statutory re-enactment or modification thereof). REASON: To ensure the safe and unobstructed use of the public highway, and to comply with the requirements of the Highways Act 1980, in accordance with Policies DM16.1 and DM16.2 of the Local Plan.
64	Refuse/ Recycling Storage and collection Refuse and recycling, storage and collection facilities shall: (a) be provided within the curtilage of the site to serve each part of the development in accordance with details, must be submitted to and approved in writing by the Local Planning Authority prior to work commencing; and (b) thereafter be maintained as approved throughout the lifetime of the building. REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM 17.1, DM 16.5. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes
TfL Infrastructure Protection	
65	TfL Infrastructure Protection The development hereby permitted shall not be commenced until the following documents (in consultation with London Underground), have been submitted to and approved in writing by the local planning authority which: a. Provide predicted short term and long-term ground movement effects of the works on LU structure or tunnels and in particular changes in

	stresses, changes in heave or settlement, distortion of the structure or tunnels due to required temporary and permanent works. b. provide detailed design and Risk Assessment Method Statement (RAMS) for both temporary and permanent works associated with demolition, excavation and construction of foundations, basement, and ground floor structures, or for any other structures below ground level, including piling. The development shall then be implemented in accordance with the approved details. REASON: To ensure that the development does not impact on existing London Underground/DLR transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.
Air Quality	
66	Emergency Power Supply Prior to the commencement of development, excluding demolition, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. Where it is not possible to deploy alternatives, diesel generators must be the latest Euro standard available. Details of the appliance/plant must be submitted to and agreed by the LPA before installation. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time. The development shall then be implemented in accordance with the approved details. Reason: To demonstrate that local air quality is maintained and operational carbon emissions have been minimised in accordance with Local Plan policies CS15, DM15.1, DM15.2, DM15.6, London Plan policies SI 1, SI 2, SD 4, and emerging City Plan 2040 policies S1, HL2, S8, DE1.
67	Combustion Flues All combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants and must be located away from ventilation intakes and accessible roof gardens and terraces. Reason: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates, in

	accordance with Local Plan policy DM15.6, London Plan policy SI 1 and emerging City Plan 2040 policy HL2.
68	Air Quality Positive Assessment – Implementation Plan Prior to the commencement of development, excluding demolition, an Implementation and Monitoring Plan for the Air Quality Positive Statement must be submitted to, and approved by the local planning authority. This should be completed in-line with the Greater London Authority Air Quality Positive LPG. The development shall be implemented in accordance with the approved details. Reason: In order to ensure all measures detailed within the Air Quality Positive Statement are implemented, therefore ensuring the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality in accordance with Local Plan policy DM15.6, policies SI 1 and emerging City Plan policy HL2.
69	Non-Road Mobile Machinery 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 SI 1. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
Fire	
70	Fire Safety The development shall be carried out in accordance with the approved details within the Fire Statement Reference: SKY2-ARUP-ZZ-XX-RP-YF-000001 Rev 01 prepared by ARUP and dated 31 January 2025. Reason: To ensure that the development incorporates the necessary fire safety measures in accordance with London Plan policies D5 and D12.
Suicide Prevention and Security	
71	Balustrade Details and Risk Assessment

	Before any works thereby affected are begun, details of all balustrades and planting to external terraces and balconies, together with an associated risk assessment, shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building. REASON: To ensure that the Local Planning Authority may be satisfied that there are appropriate safety measures in place in accordance with the guidance in the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) and the following policy of the Local Plan: CS3; and DM3.2.
72	Security Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development. REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.
73	HVM The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of these protection measures, accompanied by a Counter Terrorism Risk Assessment and Vehicle Dynamics Assessment must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. REASON: To ensure that the premises are protected from road vehicle borne damage within the site, and that any proposed protection measures are of a high quality design which does not negatively impact on the quality of the public realm, in accordance with the following policy of the Local Plan: CS3 and DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
Uses	
74	Offices The areas shown on the approved drawings as offices and as set out in Condition 76 of this decision notice, shall be used for those purposes only

	and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. Reason: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
75	Flexible Uses The area shown on the approved floor plans as the following flexible uses: - 125sqm (GIA) of flexile retail/food and beverage/ professional services (Use Class E (a/b/c) - 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g) - 205sqm (GIA) of flexible retail/food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (a/b/g), F1/F2). - 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2). And as set out in condition 76 of this decision notice, shall be used for those purposes only within the Use Class Order and for no other purpose of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification. REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
76	Uses The development shall provide (all figures GIA and excluding plant): - 85,624sqm (GIA) of office floorspace (Use Class E(g)(i)) - 125sqm (GIA) of flexile retail/food and beverage/ professional services (Use Class E (a/b/c) - 1,849sqm (GIA) of flexible food and beverage and office floorspace (Use Class E (b/g)

	- 205sqm (GIA) of flexible retail/food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (a/b/g), F1/F2). - 1,827sqm (GIA) of flexible food and beverage/ offices/ learning and non-residential institutions/ local community floorspace (Use Class E (b/g), F1/F2). - 461sqm (GIA) of multi-functional space (Use Class Sui Generis) - 8sqm (GIA) externally accessible public lavatory (Use Class Sui Generis) - 11,363sqm (GIA) of ancillary basements REASON: To ensure the development is carried out in accordance with the approved plans.
Approved Plans	
77	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: 1864-FPA-XX-B2-DR-A-16060 1864-FPA-XX-B1-DR-A-16061 1864-FPA-XX-GF-DR-A-16062 1864-FPA-XX-01-DR-A-16063 1864-FPA-XX-02-DR-A-16064 1864-FPA-XX-03-DR-A-16065 1864-FPA-XX-04-DR-A-16066 1864-FPA-XX-05-DR-A-16067 1864-FPA-XX-06-DR-A-16068 1864-FPA-XX-07-DR-A-10007 (Demolition Scope Plan 07) 1864-FPA-XX-08-DR-A-16070 1864-FPA-XX-RF-DR-A-16071 1864-FPA-XX-XX-DR-A-16080 1864-FPA-XX-XX-DR-A-16081 1864-FPA-XX-XX-DR-A-16082 1864-FPA-XX-XX-DR-A-16083 1864-FPA-XX-L2-DR-A-16100 1864-FPA-XX-L1-DR-A-16101 1864-FPA-XX-B6-DR-A-16102 1864-FPA-XX-B5-DR-A-16103 1864-FPA-XX-B4-DR-A-16104 1864-FPA-XX-B3-DR-A-16105 1864-FPA-XX-B2-DR-A-16106 1864-FPA-XX-B1-DR-A-16107 1864-FPA-XX-GF-DR-A-16108 1864-FPA-XX-01-DR-A-16109 1864-FPA-XX-02-DR-A-16110 1864-FPA-XX-03-DR-A-16111 1864-FPA-XX-04-DR-A-16112 1864-FPA-XX-05-DR-A-16113

1864-FPA-XX-06-DR-A-16114
1864-FPA-XX-07-DR-A-16115
1864-FPA-XX-08-DR-A-16116
1864-FPA-XX-09-DR-A-16117
1864-FPA-XX-10-DR-A-16118
1864-FPA-XX-11-DR-A-16119
1864-FPA-XX-12-DR-A-16120
1864-FPA-XX-13-DR-A-16121
1864-FPA-XX-14-DR-A-16122
1864-FPA-XX-15-DR-A-16123
1864-FPA-XX-16-DR-A-16124
1864-FPA-XX-17-DR-A-16125
1864-FPA-XX-18-DR-A-16126
1864-FPA-XX-19-DR-A-16127
1864-FPA-XX-20-DR-A-16128
1864-FPA-XX-21-DR-A-16129
1864-FPA-XX-22-DR-A-16130
1864-FPA-XX-23-DR-A-16131
1864-FPA-XX-24-DR-A-16132
1864-FPA-XX-25-DR-A-16133
1864-FPA-XX-26-DR-A-16134
1864-FPA-XX-27-DR-A-16135
1864-FPA-XX-28-DR-A-16136
1864-FPA-XX-29-DR-A-16137
1864-FPA-XX-30-DR-A-16138
1864-FPA-XX-31-DR-A-16139
1864-FPA-XX-32-DR-A-16140
1864-FPA-XX-33-DR-A-16141
1864-FPA-XX-34-DR-A-16142
1864-FPA-XX-35-DR-A-16143
1864-FPA-XX-36-DR-A-16144
1864-FPA-XX-37-DR-A-16145
1864-FPA-XX-38-DR-A-16146
1864-FPA-XX-39-DR-A-16147
1864-FPA-XX-40-DR-A-16148
1864-FPA-XX-41-DR-A-16149
1864-FPA-XX-42-DR-A-16150
1864-FPA-XX-43-DR-A-16151
1864-FPA-XX-44-DR-A-16152
1864-FPA-XX-45-DR-A-16153
1864-FPA-XX-RF-DR-A-16154
1864-FPA-XX-XX-DR-A-16200
1864-FPA-XX-XX-DR-A-16201
1864-FPA-XX-XX-DR-A-16202
1864-FPA-XX-XX-DR-A-16203
1864-FPA-XX-XX-DR-A-16300
1864-FPA-XX-XX-DR-A-16301
1864-FPA-XX-XX-DR-A-16302

1864-FPA-XX-XX-DR-A-16303
1864-FPA-XX-XX-DR-A-16350 Proposed SLP
SKY-GPB-XX-ZZ-L-DR-0030 P01
SKY-GPB-XX-00-L-DR-1000 P01
SKY-GPB-XX-01-L-DR-1001 P01
SKY-GPB-XX-02-L-DR-1002 P01
SKY-GPB-XX-03-L-DR-1003 P01
SKY-GPB-XX-04-L-DR-1004 P01
SKY-GPB-XX-ZZ-L-DR-1006 P01
SKY-GPB-XX-ZZ-L-DR-1007 P01
SKY-GPB-XX-27-L-DR-1008 P01
SKY-GPB-XX-28-L-DR-1009 P01
SKY-GPB-XX-00-L-DR-2000 P01
2001 P01 (General Arrangement - Level 01-05 Section)
SKY-GPB-XX-27-L-DR-2002 P01
SKY-GPB-XX-28-L-DR-2003 P01
SKY-GPB-XX-ZZ-L-DR-2004 P01
SKY-GPB-XX-ZZ-L-DR-2005 P01
SKY-GPB-XX-ZZ-L-DR-3000 P01
SKY-GPB-XX-ZZ-L-DR-4400 P01
1864-FPA-XX-45-DR-A-20045 02
1864-FPA-XX-RF-DR-A-20046 02
22-166-T-039 Rev E Oversailing Plan
22-166-T-040 Rev C Stopping Up Plan
22-166-T-041 Rev B Initial 278 Proposal
22-166-T-042 Rev B Undersailing Plan
1864-FPA-XX-XX-DR-A-22100
1864-FPA-XX-XX-DR-A-22101
1864-FPA-XX-XX-DR-A-22102
1864-FPA-XX-XX-DR-A-22103
33158-HML-XX-B6-SK-N-011001 P01
33158-HML-XX-B1-SK-N-011001 P01
33158-HML-XX-44-SK-N-011001 P01
33158-HML-XX-45-SK-N-011001 P01
33158-HML-XX-ZZ-SK-M-111004 P02
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	NPPF 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.
	CIL The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019. The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone: Office 185GBP per sq.m Retail 165GBP per sq.m Hotel 140GBP per sq.m All other uses 80GBP per sq.m These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created. The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses. 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.gov.uk/cil). 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.
2	Highway Authority 1. This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as the Highway Authority; and works on the public highway must not be commenced until the consent of the Highway Authority has been obtained along with relevant licences and legal agreements. 2. Works to the public highway, are undertaken via a Section 278 Agreement. It forms part of a separate process along with associated fees. The planning permission hereby granted does not authorise these works to be carried out without the necessary agreement, approvals and relevant highways licences. 3. A stopping up order is a legal process under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways. The application form should be submitted to: transport.planning@cityoflondon.gov.uk 4. You are advised to comply with the New Roads and Street Works Act 1991 and notify the Street Authority of any proposed works in accordance with the Act. 5. The City Operations (Highways Management & Maintenance) must be consulted on the following matters which require specific approval: a. Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works, including temporary crossovers. Information can be found at: Highway licences - City of London

	b. The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the City Operations is recommended to ensure the design of the building provides for the inclusion of street lighting. Information can be found at: deshighwaysupport@cityoflondon.gov.uk c. The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). Information on projection licences can be found at: Bridges and highway structures - City of London You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner to secure the air space. Please contact the Corporate Property Officer, City Surveyor's Department at: district.surveyor@cityoflondon.gov.uk d. Bridges over highways, approval for moving an abnormal load through the City of London is required prior to operations. Your proposal must include your intended route and should be emailed to the Bridges team at bridges@cityoflondon.gov.uk. Allow at least three working days for us to process your application.
3	Whole Life Carbon Assessment The post-construction Whole Life Carbon Assessment should be submitted to the GLA along with any supporting evidence as per the guidance no later than three months post as-built design completion: ZeroCarbonPlanning@london.gov.uk Applicants are strongly encouraged to also submit the WLCA to the Built Environment Carbon Database (BECD). The reason for this is for evidence collection and monitoring to support the reduction of whole life carbon emissions in the Local Planning Authority and Greater London.
4	Roof gardens The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to

	emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.
5	Compliance with the Clean Air Act 1993 Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.
6	Generators and combustion plant Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK (www.gov.uk)
7	Environment Agency The Environment Agency advises the following: Water Resources Increased water efficiency in new developments potentially enables more growth to be realised without an increased availability of water resources. Developers can highlight responsible water use as a positive corporate social responsibility message that will boost the commercial appeal of the development. For the homeowner/tenant, lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures in all developments, particularly in those that are new. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be all considered as an integral part of new developments and/or refurbishments. The technology used to achieve improved water efficiency (e.g. efficient fittings, greywater recycling, etc) is also an attractive feature for many prospective building owners and tenants.

8	CAA Building Notification As the proposed development exceeds 91.4m AGL, upon grant of permission, City of London are required to notify the Civil Aviation Authority (CAA) as required under Annex 2 paras 30 – 32 of DfT/ODPM Circular 01/2003 ‘Safeguarding of Aerodromes & Military Explosives Storage Areas’.
9	CAA Crane Notification Where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification Civil Aviation Authority (caa.co.uk) The following details should be provided before the crane is erected: • the crane's precise location • an accurate maximum height • start and completion dates
10	Plant Noise Environmental Health advise the following in respect of the Plant Noise condition: Part (a) “noise sensitive premises” includes commercial properties such as offices. Part of the rationale for the 10dB below background is the prevention of ambient creep i.e. the gradual increase in background noise levels due to successive small incremental changes. This has become more important with the increasing uptake of electric vehicles and other quieter forms of transport in recent years. With this trend likely to continue plant noise will become the dominant noise source in highly built-up areas such as the City of London. It is, therefore, important to maintain or improve the general acoustic environment in order to minimise adverse noise impacts on residents, workers and visitors in the area. The lowest typical background noise level should be determined on a case by case basis with due regard to BS4142 and other relevant standards. Justification for the method of determination of the lowest typical background noise level should be provided. Background noise levels should be determined over a period of time when it would be anticipated that noise levels are likely to be at their lowest. A minimum measurement period of 3 days is recommended and should preferably include weekdays and weekends. Any “emergency plant” should meet the requirements of this condition. Part (b) Plant noise measurements should be taken near to the plant and the levels at the receptors extrapolated in accordance with good practice.
11	Thames Water Assets

	Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB
12	Sewage Flooding Prevention As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section
13	Public Sewers Public sewers are crossing or close to your development. Build over agreements are required for any building works within 3 metres of a public sewer and, or within 1 metre of a public lateral drain. This is to prevent damage to the sewer network and ensures we have suitable and safe access to carry out maintenance and repairs. Please refer to our guide on working near or diverting our pipes: https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Please ensure to apply to determine if a build over agreement will be granted.
14	Water Pressure Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
15	Water Mains

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