

From Paul Jones City Operations Division

Telephone **Email**

Date 15 Ap ril 2025

Environment Department

Subject GREASE TRAP REQUIREMENT

For action

Application - PT_KC/25/00433/FULEIA

Address: (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street, London EC3V OAA

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

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

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

Paul Jones



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

DIRIGE CITY LONDON

From District Surveyors Office Environment Department

Telephone

Email

Date 17 April 2025 **Our Ref** DS/FS25/0019

Your Ref PT_KC /25/00433/FULEIA

Subject (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street

London EC3V 0AA

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

I have reviewed the submitted information and have no comments:

I consider that policies D5 and D12 have been met.

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

Email: plncomments@cityoflondon.gov.uk

From Ms Hazel Austin
Environmental Health Officer
Environment Department

Telephone

Email

Date 24 April 2025 **Our Ref** 25/02778/NPLN

Your Ref PT_KC /25/00433/FULEIA

Subject (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA

Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

This department acknowledges receipt for the above application and have the following comments and observations to make:

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.

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.

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 Class A/E use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class A 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.

Ventilation and extraction equipment:

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' 2nd Edition dated May 2022 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

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

Noise from plant:

- (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.

INFORMATIVE: 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.

Noise and vibration from mechanical systems or other plant:

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.

Commercial Kitchen Drainage:

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.

Internal noise levels:

All residential premises in the development shall be designed and constructed to attain the following internal noise levels:

Bedrooms- 35dB LAeq (07:00-23:00), 30dB LAeq,T* and 45dB LAmax not to be exceeded more than 10 times per night), *T- Night-time 8 hours between 23:00-07:00 Living rooms- 35dB LAeq, T*, *T- daytime 16 hours between 07:00-23:00. A report detailing the sound insulation properties of the building envelope shall be provided and shall include the specification and acoustic data sheets for glazed areas of the development and any complementary acoustic ventilation scheme. Where external noise levels exceed WHO guidelines then provision of acoustic ventilation will need to be considered. A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any relevant part of the building.

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.

INFORMATIVE: To ensure internal noise standards are met, external noise levels should be determined over a period of time when it would be anticipated that ambient noise levels are likely to be at their highest. A minimum measurement period of 3 days is recommended and should preferably include weekdays and weekend. If I minute measurements of the Lamax are not practical then the 15 minute measurements should be corrected by +2dB to more accurately reflect potential impacts. Post completion testing should be carried out when it would be anticipated that ambient noise levels are likely to be at their highest.

Noise from use Class E / Sui Generis affecting offices / non offices:

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

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

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

Full Lighting Strategy submission:

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out 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 to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036.

Contaminated Land:

Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):

- a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.
- b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
- c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. 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 and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

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, to prevent pollution of the water environment, 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.

Roof Terrace / Viewing platform Hours:

The viewing platform level 5, balconies, terraces and roof terrace throughout hereby permitted shall not be used or accessed between the hours of 22.00 on one day and 08.00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

Hours of servicing:

No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building. REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

No music audible outside the premises:

No live or recorded music that can be heard outside the premises shall be played. REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Roof Terrace Music:

No amplified or other music shall be played on the roof terraces, balconies or the viewing platform.

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.

Promoted Events:

There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

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.

Sewer Vent Condition:

Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

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



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

From Kyri Eleftheriou-Vaus Air Quality Officer

Telephone Email

Date: 19/06/2025

Your Ref: 25/00433/FULEIA

Subject: 83 - 87 Gracechurch Street, London, EC3V OAA

Phased development comprising; Demolition of existing building and the erection of a new building comprising basement levels and ground floor plus upper storeys including office use (Class E(g)(i)); flexible retail use (Class E(a), Class E(b), drinking establishments and hot food takeaway); Public Hall (sui generis); a Cultural Space (sui generis); and a public exhibition associated with archaeological findings (Sui Generis), with cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works.

An ES has been submitted as part of the EIA, with an Air Quality Chapter included. 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. The site has an existing consent in place through the application reference 22/0115/FULEIA and this application is a re-designed proposal of the consented scheme. The proposal is for the demolition of the existing building with a mixed use, office led, 31 storeys plus ground building.

The proposed development is 'car free' and does not have any car parking spaces. A Delivery Servicing and Waste Management Plan has been submitted which predicts 80 delivery/service vehicles per day. Through consolidation this is assessed to be reduced by at least 50% resulting in an increase of 20-23 vehicle trips per day compared to the existing site.

There are four backup generators proposed, three for life-safety purposes and one 440kW generator proposed for future tenant/business continuity use. The impacts of these were assessed within the submission for the consented scheme and have not been re-assessed even though there have been several design changes and model variables since the 2022 submission. It has been noted that the flue location has changed for all combustion sources and within the assessment under the consented scheme there is no inclusion of a power outage scenario. It is not clear whether the hours of usage provided is solely for testing, and two of the generators are stated as to be operation for greater than 50 hours per year.

The Air Quality Neutral Assessment submitted assesses the development as being air quality neutral, as per GLA guidance. In terms of transport emissions the development is 'car-free' therefore an assessment is not required. It should be noted that as per GLA guidance emissions from service and delivery vehicles are excluded from the assessment. In terms of building

emissions it has been stated that all proposed combustion based backup plant proposed for the development can be excluded from the assessment. As stated above there is plant proposed for business continuity usage and plant predicted to operate for more than 50 years per year. These variables should be included within the assessment therefore a condition has been recommended for a revised assessment to be completed.

The Air Quality Positive Statement submitted was generic and did not include any measures that were not already required through local or London Plan policy or any 'innovation or future proofing' measures. A revised document will be required to ensure that measures to improve the local air quality environment are maximised and that the development pushes beyond compliance.

A number of queries have been raised with the applicant regarding the suitability and accuracy of the air quality assessment documents. Therefore, a number of conditions have been recommended for which the assessment methodology will need to be agreed with the Air Quality Team.

Should the development be approved please attach the following conditions:

Condition M28C amended / 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. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing necessary to meet that purpose, and shall not be used at any other time.

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.

Condition M26F

Prior to any plant being commissioned and installed in or on the building an Air Quality Impact Assessment shall be submitted to and approved in writing by the Local Planning Authority. The assessment will comply with the City of London Air Quality Supplementary Planning Document and the methodology will be agreed with the LPA. It shall detail how the development will minimise emissions from any proposed plant, and exposure to air pollution during its operational phase. The mitigation detailed in the report shall thereafter be maintained in accordance with the approved assessment for the operational life of the building.

Reason

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

Condition M29

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

Reason

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

Air Quality Neutral Assessment

A revised air quality neutral assessment that considers the building and transport emissions must be submitted. The air quality neutral assessment must follow the latest air quality neutral guidance and the methodology will be agreed with the LPA.

Reason

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

Air Quality Positive Assessment

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

Reason

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

Condition M32 NRMM

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

Reason

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

Informatives

Roof gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.

In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

Compliance with the Clean Air Act 1993

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

Generators and combustion plant

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