

From: [REDACTED]
To: [REDACTED]
Subject: [REDACTED]
Date: 16 April 2025 10:34 AM
Attachments: [REDACTED]

THIS IS AN EXTERNAL EMAIL

Classification: Internal

Dear Sir/Madam,

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

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

CAA Building Notification

As the proposed development exceeds 91.4m 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 DTI/ODPM Circular 01/2003 'Safeguarding of Aerodromes & Military Explosives Storage Areas'.

CAA Crane Notification

Where a crane is 150m or higher, crane operators are advised to notify the CAA (cranes@caa.co.uk) and Defence Geographic Centre (dgcc@mod.gov.uk) via Crane notification (Civil Aviation Authority (<https://www.caa.co.uk/CommercialIndustry/Airspace/Event-and-Obstacle-Notification/Crane-notification/>)).

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

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

Kind regards

Simon Vince Airport Planning Manager

On behalf of Heathrow Airport Ltd.



Airport Safeguarding Limited | Admin Building (EDCL), T5, Terminal
International Airport, Gatwick, BN1 1UJ
United Kingdom

T: [REDACTED] M: [REDACTED]

E: [REDACTED]

Visit our website: <https://www.airport-safeguarding.co.uk> or connect
on LinkedIn: [airport-safeguarding-limited](https://www.linkedin.com/company/airport-safeguarding-limited)



From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 14 April 2025 10:08

To: 'Simon Vince' <Simon.Vince@airport-safeguarding.co.uk>

Subject: Planning Application Consultation 25/00403/10/24

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Dear Sir/Madam,

Please see attached consultation for (via Korum, 40-55 Grosvenor Street) 55 - 57 Grosvenor Street London EC2V 8AA.

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Korum McCullen

Environmental Department

City of London

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Please note that Heathrow Airport Holdings Limited and its subsidiaries, "Heathrow", London, including any company and its subsidiaries, with its information security policy. This includes working events for computer viruses.

COMPANY INFORMATION: For purposes of Heathrow companies, please visit <https://www.heathrowairport.co.uk>. For information about Heathrow Airport, please visit <https://www.heathrowairport.co.uk>.

Heathrow Airport Holdings Limited is a private limited company registered in England under Company Number 20777258, with its Registered Office at The Company Centre, Nelson Road, Harlow, Essex, SSM 2JH.

LPA Ref: 25/00433/FULEIA

London City Airport Ref: 2025/LCY/110

Date: 17/04/2025

Dear Kieran McCallum,

Thank you for consulting London City Airport. This proposal has been assessed from an aerodrome safeguarding perspective. Accordingly, it was found not to conflict with London City Airport's safeguarding criteria.

LPA Reference	25/00433/FULEIA
Proposal	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.
Location	83 - 87 Gracechurch Street London EC3V 0AA
Borough	City of London
Case Officer	Kieran McCallum

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

CAA Building Notification

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

CAA Crane Notification

where a crane is 100m or higher, crane operators are advised to notify the CAA (arops@caa.co.uk) and Defence Geographic Centre (dvof@mod.gov.uk) via Crane notification | Civil Aviation Authority (caa.co.uk)

<https://www.caa.co.uk/Commercial-industry/Airspace/Event-and-obstacle-notification/Crane-notification/>

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- start and completion dates

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

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

If you need guidance, templates, documents or have any queries please contact safeguarding@londoncityairport.com.

Kind regards,

Lucy Dale

On behalf of London City Airport

From: [REDACTED]
To: [REDACTED]
Subject: RE: [EXTERNAL] Planning Application Consultation: 25/00433/FULEIA [SG33687]
Date: 17 April 2025 11:56:25
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)

THIS IS AN EXTERNAL EMAIL

Our Ref: SG33687

Dear Sir/Madam

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

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

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

Yours faithfully

2TAM

NATS Safeguarding

E: [REDACTED]

4000 Parkway, Whiteley,
Fareham, Hants PO15 7FL
www.nats.co.uk



NATS Internal

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 14 April 2025 16:07

To: NATS Safeguarding <[REDACTED]>

Subject: [EXTERNAL] Planning Application Consultation: 25/00433/FULEIA

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Dear Sir/Madam

Please see attached consultation for (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Kieran McCallum
Environment Department
City of London

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

Date: 22 April 2025
Our ref: 510191
Your ref: 23/01718/FUL



City of London
PLNComments@cityoflondon.gov.uk

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir or Madam

Planning consultation: 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

Location: : (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V0AA

Thank you for your consultation on the above dated 14 April 2025 which was received by Natural England on 14 April 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

Based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Natural England's generic advice on other natural environment issues is set out at Annex A.

Sites of Special Scientific Interest Impact Risk Zones

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires local planning authorities to consult Natural England on "Development in or likely to affect a Site of Special Scientific Interest" (Schedule 4, w). Our SSSI Impact Risk Zones are a GIS dataset designed to be used during the planning application validation process to help local planning authorities decide when to consult Natural England on developments likely to affect a SSSI. The dataset and user guidance can be accessed from the data.gov.uk website

Further general advice on the consideration of protected species and other natural environment issues is provided at Annex A.

We would be happy to comment further should the need arise but if in the meantime you have any

queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully,

Beemal Brahmbhatt
Consultations Team

Annex A – Natural England general advice

Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/nppf-2012.pdf) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapeinstitute.org/resources/guidelines-for-landscape-and-visual-impact-assessment/) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/14/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/nppf-2012.pdf) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/nppf-2012.pdf) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/nppf-2012.pdf) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/nppf-2012.pdf)).

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/61222/nppf-2012.pdf) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A – Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](https://www.gov.uk/wildlife-licences) (www.gov.uk) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK](https://www.gov.uk/government/publications/local-nature-recovery-strategies) (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](https://www.brownfieldhub.org.uk/) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/dataset/open-mosaic-habitat-inventory) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115144/national-planning-policy-framework-2019.pdf) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

[Biodiversity Net Gain](https://www.gov.uk/government/publications/biodiversity-net-gain-guidance) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](https://www.gov.uk/government/publications/biodiversity-net-gain-planning-practice-guidance) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](https://www.gov.uk/government/publications/calculate-biodiversity-value-with-the-statutory-biodiversity-metric) for more information. For small development sites, [The Small Sites Metric](https://www.gov.uk/government/publications/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-managing-your-land)

Annex A – Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](#) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](#). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A – Natural England general advice

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment).

Date: 22 April 2025
Our ref: 510191
Your ref: 25/00433/FULEIA



City of London
PLNComments@cityoflondon.gov.uk

BY EMAIL ONLY

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

T 0300 060 3900

Dear Sir or Madam

Planning consultation: 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

Location: : (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V0AA

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SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION

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We would be happy to comment further should the need arise but if in the meantime you have any

queries please do not hesitate to contact us.

For any queries regarding this letter, for new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours faithfully,

Beemal Brahmbhatt
Consultations Team

Annex A – Natural England general advice

Protected Landscapes

Paragraph 189 of the [National Planning Policy Framework - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework) (NPPF) requires great weight to be given to conserving and enhancing landscape and scenic beauty within Areas of Outstanding Natural Beauty (known as National Landscapes), National Parks, and the Broads and states that the scale and extent of development within all these areas should be limited. Paragraph 190 requires exceptional circumstances to be demonstrated to justify major development within a designated landscape and sets out criteria which should be applied in considering relevant development proposals. Section 245 of the [Levelling-up and Regeneration Act 2023 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2023/1/section/245) places a duty on relevant authorities (including local planning authorities) to seek to further the statutory purposes of a National Park, the Broads or an Area of Outstanding Natural Beauty in England in exercising their functions. This duty also applies to proposals outside the designated area but impacting on its natural beauty.

The local planning authority should carefully consider any impacts on the statutory purposes of protected landscapes and their settings in line with the NPPF, relevant development plan policies and the Section 245 duty. The relevant National Landscape Partnership or Conservation Board may be able to offer advice on the impacts of the proposal on the natural beauty of the area and the aims and objectives of the statutory management plan, as well as environmental enhancement opportunities. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate proposed development.

Wider landscapes

Paragraph 187 of the NPPF highlights the need to protect and enhance valued landscapes through the planning system. This application may present opportunities to protect and enhance locally valued landscapes, including any local landscape designations. You may want to consider whether any local landscape features or characteristics (such as ponds, woodland, or dry-stone walls) could be incorporated into the development to respond to and enhance local landscape character and distinctiveness, in line with any local landscape character assessments. Where the impacts of development are likely to be significant, a Landscape and Visual Impact Assessment should be provided with the proposal to inform decision making. We refer you to the [Guidelines for Landscape and Visual Impact Assessment \(GLVIA3\) - Landscape Institute](https://www.landscapeinstitute.org/resources/guidelines-for-landscape-and-visual-impact-assessment-glvia3/) for further guidance.

Biodiversity duty

Section 40 of the [Natural Environment and Rural Communities Act 2006 \(legislation.gov.uk\)](https://www.legislation.gov.uk/ukpga/2006/41/section/40) places a duty on the local planning authority to conserve and enhance biodiversity as part of its decision making. We refer you to the [Complying with the biodiversity duty - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/complying-with-the-biodiversity-duty) for further information.

Designated nature conservation sites

Paragraphs 193-195 of the NPPF set out the principles for determining applications impacting on Sites of Special Scientific Interest (SSSI) and habitats sites (Special Areas of Conservation (SACs) and Special Protection Areas (SPAs)). Both the direct and indirect impacts of the development should be considered.

A Habitats Regulations Assessment is needed where a proposal might affect a habitat site (see [Habitats regulations assessments: protecting a European site - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/habitats-regulations-assessments-protecting-a-european-site) and Natural England must be consulted on 'appropriate assessments' (see [Appropriate assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/appropriate-assessment) for more information for planning authorities).

Natural England must also be consulted where development is in or likely to affect a SSSI and provides advice on potential impacts on SSSIs either via the [SSSI Impact Risk Zones \(England\) \(arcgis.com\)](https://arcgis.com) or as standard or bespoke consultation responses. Section 28G of the Wildlife and Countryside Act 1981 places a duty on all public bodies to take reasonable steps, consistent with the proper exercise of their functions, to further the conservation and enhancement of the features for which an SSSI has been notified ([Sites of special scientific interest: public body responsibilities - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-public-body-responsibilities)).

Protected Species

Natural England has produced [Protected species and development: advice for local planning authorities - GOV.UK](https://www.gov.uk/government/publications/protected-species-and-development-advice-for-local-planning-authorities) (standing advice) to help planning authorities understand the impact of particular developments on protected species.

Annex A – Natural England general advice

Natural England will only provide bespoke advice on protected species where they form part of a Site of Special Scientific Interest or in exceptional circumstances. A protected species licence may be required in certain cases. We refer you to [Wildlife licences: when you need to apply](https://www.gov.uk/wildlife-licences) (www.gov.uk) for more information.

Local sites and priority habitats and species

The local planning authority should consider the impacts of the proposed development on any local wildlife or geodiversity site, in line with paragraphs 187, 188 and 192 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity to help nature's recovery. Natural England does not hold locally specific information on local sites and recommends further information is obtained from appropriate bodies such as the local environmental records centre, wildlife trust, geoconservation groups or recording societies. Emerging [Local nature recovery strategies - GOV.UK](https://www.gov.uk/government/publications/local-nature-recovery-strategies) (www.gov.uk) may also provide further useful information.

Those habitats and species which are of particular importance for nature conservation are included as 'priority habitats and species' in the England Biodiversity List published under section 41 of the Natural Environment and Rural Communities Act 2006. Most priority habitats will be mapped either as Sites of Special Scientific Interest on the Magic website or as Local Wildlife Sites. We refer you to [Habitats and species of principal importance in England](https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england) (gov.uk) for a list of priority habitats and species in England. You should consider priority habitats and species when applying your 'biodiversity duty' to your policy or decision making

Natural England does not routinely hold priority species data. Such data should be collected when impacts on priority habitats or species are considered likely.

Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land. We refer you to the [Brownfield Hub - Buglife](https://www.brownfieldhub.org.uk/) for more information and Natural England's [Open Mosaic Habitat \(Draft\) - data.gov.uk](https://data.gov.uk/dataset/open-mosaic-habitat-inventory) (Open Mosaic Habitat inventory), which can be used as the starting point for detailed brownfield land assessments.

Biodiversity and wider environmental gains

Development should provide net gains for biodiversity in line with the NPPF paragraphs 187(d), 192 and 193. Major development (defined in the [National Planning Policy Framework \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/115111/national-planning-policy-framework-2019.pdf) glossary) is required by law to deliver a biodiversity gain of at least 10% from 12 February 2024 and this requirement is also applies extended to small scale development from April 2024. For nationally significant infrastructure projects (NSIPs), it is anticipated that the requirement for biodiversity net gain will be implemented from 2025.

[Biodiversity Net Gain](https://www.gov.uk/government/publications/biodiversity-net-gain-guidance) guidance (gov.uk) provides more information on biodiversity net gain and includes a link to the [Biodiversity Net Gain Planning Practice Guidance](https://www.gov.uk/government/publications/biodiversity-net-gain-planning-practice-guidance) (gov.uk).

The statutory biodiversity metric should be used to calculate biodiversity losses and gains for terrestrial and intertidal habitats and can be used to inform any development project. We refer you to [Calculate biodiversity value with the statutory biodiversity metric](https://www.gov.uk/government/publications/calculate-biodiversity-value-with-the-statutory-biodiversity-metric) for more information. For small development sites, [The Small Sites Metric](https://www.gov.uk/government/publications/the-small-sites-metric) may be used. This is a simplified version of the statutory biodiversity metric and is designed for use where certain criteria are met.

The mitigation hierarchy as set out in paragraph 193 of the NPPF should be followed to firstly consider what existing habitats within the site can be retained or enhanced. Where on-site measures are not possible, provision off-site will need to be considered.

Where off-site delivery of biodiversity gain is proposed on a special site designated for nature (e.g. a SSSI or habitats site) prior consent or assent may be required from Natural England. More information is available on [Sites of Special Scientific Interest: managing your land](https://www.gov.uk/government/publications/sites-of-special-scientific-interest-managing-your-land)

Annex A – Natural England general advice

Development also provides opportunities to secure wider biodiversity enhancements and environmental gains, as outlined in the NPPF (paragraphs 8, 77, 109, 125, 187, 188, 192 and 193). Opportunities for enhancement might include incorporating features to support specific species within the design of new buildings such as swift or bat boxes or designing lighting to encourage wildlife.

[The Environmental Benefits from Nature Tool - Beta Test Version - JP038 \(naturalengland.org.uk\)](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory biodiversity metric.

[Natural environment - GOV.UK \(www.gov.uk\)](#) provides further information on biodiversity net gain, the mitigation hierarchy and wider environmental net gain.

Ancient woodland, ancient and veteran trees

The local planning authority should consider any impacts on ancient woodland and ancient and veteran trees in line with paragraph 193 of the NPPF. The [Natural England Access to Evidence - Ancient woodlands Map](#) can help to identify ancient woodland. Natural England and the Forestry Commission have produced [Ancient woodland, ancient trees and veteran trees: advice for making planning decisions - GOV.UK \(www.gov.uk\)](#) (standing advice) for planning authorities. It should be considered when determining relevant planning applications. Natural England will only provide bespoke advice on ancient woodland, ancient and veteran trees where they form part of a Site of Special Scientific Interest or in exceptional circumstances.

Best and most versatile agricultural land and soils

Local planning authorities are responsible for ensuring that they have sufficient detailed agricultural land classification (ALC) information to apply NPPF policies (Paragraphs 187, 188). This is the case regardless of whether the proposed development is sufficiently large to consult Natural England. Further information is contained in the [Guide to assessing development proposals on agricultural land - GOV.UK \(www.gov.uk\)](#). [Find open data - data.gov.uk](#) on Agricultural Land Classification or use the information available on [MAGIC \(defra.gov.uk\)](#).

The Defra [Construction Code of Practice for the Sustainable Use of Soils on Construction Sites \(publishing.service.gov.uk\)](#) provides guidance on soil protection, and we recommend its use in the design and construction of development, including any planning conditions. For mineral working and landfilling, we refer you to [Reclaim minerals extraction and landfill sites to agriculture - GOV.UK \(www.gov.uk\)](#), which provides guidance on soil protection for site restoration and aftercare. The [Soils Guidance \(quarrying.org\)](#) provides detailed guidance on soil handling for mineral sites.

Should the development proceed, we advise that the developer uses an appropriately experienced soil specialist to advise on, and supervise soil handling, including identifying when soils are dry enough to be handled and how to make the best use of soils on site.

Green Infrastructure

For evidence-based advice and tools on how to design, deliver and manage green and blue infrastructure (GI) we refer you to [Green Infrastructure Home \(naturalengland.org.uk\)](#) (the Green Infrastructure Framework). GI should create and maintain green liveable places that enable people to experience and connect with nature, and that offer everyone, wherever they live, access to good quality parks, greenspaces, recreational, walking and cycling routes that are inclusive, safe, welcoming, well-managed and accessible for all. GI provision should enhance ecological networks, support ecosystems services and connect as a living network at local, regional and national scales.

Development should be designed to meet the 15 [GI How Principles \(naturalengland.org.uk\)](#). The GI Standards can be used to inform the quality, quantity and type of GI to be provided. Major development should have a GI plan including a long-term delivery and management plan. Relevant aspects of local authority GI strategies should be delivered where appropriate.

Annex A – Natural England general advice

The [Green Infrastructure Map \(naturalengland.org.uk\)](https://naturalengland.org.uk/green-infrastructure-map) and [GI Mapping Analysis \(naturalengland.org.uk\)](https://naturalengland.org.uk/gi-mapping-analysis) are GI mapping resources that can be used to help assess deficiencies in greenspace provision and identify priority locations for new GI provision.

Access and Recreation:

Natural England encourages any proposal to incorporate measures to help improve people's access to the natural environment. Measures such as reinstating existing footpaths, together with the creation of new footpaths and bridleways should be considered. Links to urban fringe areas should also be explored to strengthen access networks, reduce fragmentation, and promote wider green infrastructure.

Rights of Way, Access land, Coastal access and National Trails:

Paragraphs 105, 185, 187 and 193 of the NPPF highlight the importance of public rights of way and access. Development should consider potential impacts on access land, common land, rights of way and coastal access routes in the vicinity of the development.

Consideration should also be given to the potential impacts on any nearby National Trails. We refer you to [Find your perfect trail, and discover the land of myths and legend - National Trails](#) for information including contact details for the National Trail Officer.

The King Charles III England Coast Path (KCIIIECP) is a National Trail around the whole of the English Coast. It has an associated coastal margin subject to public access rights. Parts of the KCIIIECP are not on Public Rights of Way but are subject to public access rights. Consideration should be given to the impact of any development on the KCIIIECP and the benefits of maintaining a continuous coastal route.

Appropriate mitigation measures should be incorporated for any adverse impacts on Rights of Way, Access land, Coastal access, and National Trails.

Further information is set out in the Planning Practice Guidance on the [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment).

Kieran McCallum
Corporation Of London
Development Plan
PO Box 270
London
EC2P 2EJ

Our ref: NE/2025/138076/01
Your ref: 25/00433/FULEIA
Date: 28 April 2025

Dear Kieran

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.

Thank you for consulting us on the above application on 14 April, 2025.

Environment Agency Position

Whilst we have **no objections** to this application, we would like to draw your and the applicant's attention to the following advisory comments.

Advice to Local Planning Authority

The control of emissions from Non-Road Going Mobile Machinery (NRMM) at major residential, commercial or industrial sites

Where development involves the use of any non-road going mobile machinery with a net rated power of 37kW and up to 560kW, that is used during site preparation, construction, demolition, and/ or operation, at that site, we strongly recommend that the machinery used shall meet or exceed the latest emissions standards set out in Regulation (EU) 2016/1628 (as amended). This shall apply to the point that the machinery arrives on site, regardless of it being hired or purchased, unless agreed in writing with the Local Planning Authority.

This is particularly important for major residential, commercial, or industrial development located in or within 2km of an Air Quality Management Area for oxides of Nitrogen (NOx), and or particulate matter that has an aerodynamic diameter of 10 or 2.5 microns (PM10 and PM2.5). Use of low emission technology will improve or maintain air quality and support Local Planning Authorities and developers in

improving and maintaining local air quality standards and support their net zero objectives.

We also advise, the item(s) of machinery must also be registered (where a register is available) for inspection by the appropriate Competent Authority (CA), which is usually the local authority.

The requirement to include this may already be required by a policy in the local plan or strategic spatial strategy document. The Environment Agency can also require this same standard to be applied to sites which it regulates. To avoid dual regulation this informative should only be applied to the site preparation, construction, and demolition phases at sites that may require an environmental permit.

Non-Road Mobile Machinery includes items of plant such as bucket loaders, forklift trucks, excavators, 360 grab, mobile cranes, machine lifts, generators, static pumps, piling rigs etc. The Applicant should be able to state or confirm the use of such machinery in their application to which this then can be applied.

Advice to applicant

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.

Commercial/Industrial developments

We recommend that all new non-residential developments of 1000sqm gross floor area or more (i.e. 'major' developments) should achieve the [BREEAM 'excellent' standard](#) for water consumption (category 'WAT 01'), or equivalent. This standard may already be a requirement of the local planning authority.

We also recommend you contact your Local Planning Authority for more information.

Development in close proximity to activity regulated by an Environment Agency permit advisory

The proposed development is located within 75m of Medium combustion plant (MCP) comprising of 3 small boilers and one standby generator. New developments within 75m metres of MCP could result in impacts including the nearby community being exposed fumes/odour and noise.

Planning policy requirements (paragraph 200 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of existing permitted sites could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure from the neighbouring existing permitted sites and/or through financial contributions to the operator of the facility to support measures that minimise impacts.

Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause local residents some concern.

It is important that planning decisions take full account of paragraph 193 of the NPPF. When a new development is built near to existing permitted sites this does not automatically trigger a review of the EPR permit(s).

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Demitry Lyons
Sustainable Places Planning Advisor

Email: [REDACTED]
Telephone: [REDACTED]

Kieran McCallum
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Development Management
Planning and Building Control
Housing and Regeneration Directorate
Tower Hamlets Town Hall
160 Whitechapel Road
London E1 1BJ
www.towerhamlets.gov.uk

Application Number: PA/25/00704
Your ref: 25/00433/FULEIA

Enquiries to: Holly Ganderton
Tel:
Email:

28 April, 2025

Dear Kieran McCallum,

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

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

Location	(site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA
Proposal	Observation requested by City of London for 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.

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

1. The LPA has no observations to make.

If you require any further information please contact the officer named at the top of this letter.



The best of London in one borough

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

Yours sincerely,



Sripriya Sudhakar, Director Planning and Building Control



Historic England

Mr Kieran McCallum
Environment Department
City of London
Guildhall
London EC2V 7HH

Your Ref: 25/00433/FULEIA
Our Ref: 231978

Contact: Helen Hawkins

01 May 2025

Dear Kieran,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2024**

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. (site Known As 85 Gracechurch Street)

Recommend Archaeological Conditions

Thank you for your consultation received on 14 April 2025.

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

Advice on non-archaeological heritage impacts are being provided by Historic England's Development Advice team in a separate letter.



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Assessment of Significance and Impact

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

An archaeological desk-based assessment, Environmental Statement archaeology chapter and Cultural Plan accompanied the planning application. Archaeological evaluation was carried out for the site under the previous planning permission and work also took place on the site in the 1930s and 1990s. Therefore there is a good understanding of likely archaeological survival on the site which has been explained very clearly in the desk-based assessment.

Previous work, particularly the most recent evaluation, has established that remains of the first Roman forum-basilica have a good survival on the site, below the current basement slab, although truncation is expected from the current and previous buildings. Remains of the second forum are also likely to be present. A wall belonging to a medieval building called the Garner is also likely to survive in some form on the site and remains of post-medieval date relating to the Spread Eagle Inn are expected. The first forum-basilica and second forum remains are recognised as being nationally important, although they are not designated as a Scheduled Monument as they are not yet fully understood and can be appropriately managed through the planning system.

Conditions attached to the previous planning permission established the principle of retaining the remains of the first forum-basilica within the new basement and the provision of an exhibition and display of the remains. The ES chapter identifies that the retention and display of the remains is a beneficial effect of the development, as is the proposed synthesis and re-examination of all the records previously produced for the forum-basilica. The retention and display focusses on the remains of the first forum as the second forum remains are likely to be more fragmentary and the second forum covered a much wider area.

GLAAS welcomes the applicant's aspirations to provide a world class visitor experience for the site and their redesign of the basement area to accommodate the preservation of the forum-basilica remains.

In order for the building to be constructed safely, some loss of archaeological material will be necessary so that the pile wall can be inserted around the remains, providing support to the deeper basements proposed to the east of the site away from the first forum-basilica and to the main building. The drawings showing this area of loss are provided in the desk-based



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assessment. GLAAS understands that it will be very difficult to deviate from the submitted drawings during the new development, but full excavation of archaeological remains in these areas will be carried out. Full excavation of the second forum remains and any other archaeological remains of significance will be carried out in the east of the site where the basements will extend to a greater depth.

We expect that the long-term management of heritage spaces would be secured through a Section 106 agreement and would be happy to assist in its formulation.

Planning Policies

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

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

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

Recommendations

The development affects a heritage asset of equivalent significance to a scheduled monument, Londinium's Roman Forum, which has two major construction phases.

These are large assets of which only relatively small parts are affected but the first forum Tribunal is a key element of the asset so its loss would in our view have amounted to an unacceptably high level of harm. We are very pleased that this loss has been avoided and now consider the overall harm to be a moderate level of less than substantial harm.

In our view this residual harm would be largely offset by significant public benefits from revealing and interpreting the site's significance.

I recommend attaching conditions as follows:

Investigation

No demolition other than above basement slab level or development shall take place until a



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written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

A. A programme of evaluation in the east of the site to be carried out before removal of the basement slab

B. Production of a programme of construction work which demonstrates how the archaeology to be retained will be managed and protected during the construction phase

C. The programme and methodology for the main site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

D. Procedure for assessing the significance of archaeological remains revealed and where appropriate establishing a strategy for their preservation.

E. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material, including consideration of their relationship to the forum-basilica as a whole and significance to understanding Londinium's development. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI

Informative

The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

Public Engagement

Prior to the commencement of the main archaeological site investigation details of an appropriate programme of public engagement with the site's archaeological and historical interest including a timetable shall be submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved programme.

Informative: Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.



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Basement and Foundation Design

Irrespective of the approved drawings, the final basement configuration would be submitted to and approved in writing with the Local Planning Authority in consultation with Historic England. This shall include details of the basement and foundation design and construction method to protect and where appropriate conserve, interpret and display archaeological remains in-situ. The development shall be carried out in accordance with the approved details.

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

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Excavation

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

Public engagement

Where appropriate, local planning authorities and the developer are advised to make investigative works open to and interpreted for the public and to include that as part of the



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WSI. Opportunities for public engagement, proportionate to the significance of the investigation, could, for example, include enabling participation in investigation, providing viewing platforms and interpretation panels, jointly designed open days in partnership with the local community, public talks and online forums as well as coverage in local media. Once analysed, the results and the knowledge gained may be communicated, in addition to formal publication and deposition of the archive, through displays, exhibitions and popular publications and might inform site design and public art.

Preservation

Where archaeological remains are to be preserved within a development there will normally be a requirement to provide details of how this will be achieved. Typically this would involve a design and methods statement for groundworks. Where particularly important or vulnerable features are to be preserved there may also be a requirement to monitor their condition and take remedial action in the event of decay.

Management Plan

Management Plans help pull together an understanding of significance to evidence the conservation and management of heritage assets. From this informed basis, plans are then used to develop programmes of repair, restoration or to draw up proposals for change. Management Plans should be structured to meet the needs of the specific property/site and designed to be used for every day reference by staff managing the site. Management Plans not only pull together and analyse the history of a site or landscape, they can also be an important record in their own right.

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

This response relates solely to archaeological considerations. Historic England's Development Advice Team will be responding separately.

Yours sincerely

Helen Hawkins

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



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

Telephone 020 7973 3700 Facsimile 020 7973 3001

HistoricEngland.org.uk

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

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

Sent: 02 May 2025 14:59

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

Subject: RE: Planning Application Consultation: 25/00433/FULEIA

THIS IS AN EXTERNAL EMAIL

FAO Kieran McCallum,

25/00433/FULEIA

Location: (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.

Thank you for your consultation.

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

My colleagues in Spatial Planning will respond separately with comments, if any.

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

Kind regards,

Mehmet Kani | Safeguarding Engineer

LU/DLR | Infrastructure Protection | Engineering
Transport for London

7th Floor Zone B, 5 Endeavour Square, Stratford E20 1JN



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

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: Monday, April 14, 2025 4:02 PM

To: Location Enquiries <[REDACTED]>

Subject: Planning Application Consultation: 25/00433/FULEIA

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning

(Development Management Procedure) (England) Order 2015 for (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA .
Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Kieran McCallum
Environment Department
City of London

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This message has been scanned for malware by Forcepoint. www.forcepoint.com



Historic England

Mr Kieran McCallum
London Borough of Hounslow
Civic Centre
Lampton Road
Hounslow
TW3 4DN

Our ref: P01591363

2 May 2025

Dear Mr McCallum

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

**(SITE KNOWN AS 85 GRACECHURCH STREET) 83 - 87 GRACECHURCH
STREET LONDON EC3V 0AA**

Application No. 25/00433/FULEIA

Thank you for your letter of 14 April 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application. The Greater London Archaeological Advisory Service (GLAAS) will respond separately regarding the archaeological impacts of the proposals.

Summary

Historic England provided extensive advice on the consented scheme (22/01155/FULEIA), which was informed by our London Advisory Committee. Our concerns are set out in our letter of 30 January 2023 - whilst these still stand, we recognise that the existing consent is now a material consideration.

The discovery of part of the first Roman Basilica beneath the site is exciting and we welcome proposals to retain and display it, and the consequent slight reduction in height of the proposed tall building. This would slightly reduce harm to the Outstanding Universal Value (OUV) of the Tower of London World Heritage Site, to St Michael, Cornhill (grade I) and the Bank Conservation Area, compared to the consented scheme.

However, harm would remain in each case and the harm that would be caused to the Leadenhall Market listed building (grade II*) and associated conservation area, which was the thrust of our objection, would remain largely unchanged.

Since the previous scheme was granted consent, UNESCO's World Heritage Centre requested that the UK Government submit a report about the World Heritage Site's



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State of Conservation, because of concerns about the cumulative impact of tall buildings in its setting. The proposals for 85 Gracechurch Street would adversely impact attributes of the Outstanding Universal Value (OUV) of the World Heritage Site, which attracts the greatest possible weight as the most important part of the World Heritage Site's significance. This will need to be taken into account, particularly in the context of the cumulative impact of tall buildings encroaching on the Tower's setting.

Historic England Advice

Significance of the heritage assets

a) Leadenhall Market

The development site is within the Leadenhall Market Conservation Area. This is a small conservation area centred on the grade II* listed market buildings, with tightly drawn boundaries which reflect the predominantly low scale of the characterful historic buildings, which contrast dramatically with larger-scale modern buildings immediately adjacent. The market is a highly valued part of the historic City.

The existing character of the conservation area relies on a delicate balance between the historic street frontages and buildings outside its boundary of a markedly different scale and character. Some of these juxtapositions are positive and others are not, often depending on their proximity and physical relationships.

b) Bank Conservation Area and the Church of St Michael, Cornhill

The western side of Gracechurch Street is within Bank Conservation Area and shares similar characteristics to the Leadenhall Market Conservation Area opposite.

St Michael's Church, Cornhill is Norman in origin and was rebuilt after the Great Fire of London. The upper levels of the tower were completed by Nicholas Hawksmoor in 1722. His rich gothic design finishes the four massive corner turrets with elaborate panelling and finely detailed pinnacles. The church is grade I listed reflecting its exceptional architectural and historic interest.

Due to the enclosed nature of the site, there are few good views of the church or its tower - one good view of the tower is from the public space east of the Royal Exchange, where the viewer is not constrained by the relatively narrow width of Cornhill. The clear sky behind the tower in this view makes an important contribution to the ability to appreciate its significance as a local landmark and its architectural detailing.

c) The Tower of London World Heritage Site



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

The Tower is vulnerable to development in its setting, particularly the expansion of the City's cluster of tall buildings. The Statement of OUV (SOUV) adopted by the World Heritage Committee in 2013, notes in the section relating to integrity that such development 'could limit the ability to perceive the Tower as being slightly apart from the City or have an adverse impact on its skyline as viewed from the river.'

Impact of the proposals

The proposals are for the redevelopment of the site with a tall building of up to 147.9 metres AOD in height. The existing Gracechurch Street would be dismantled and rebuilt, effectively forming a plinth to the new development.

The dramatically different scale of the proposed building to the general scale of the conservation areas, and to that of the multiple heritage assets in whose immediate setting it would stand, would result in harm to their significance. The proposals would detract from the prominence of the listed market buildings and their roofscape, and would overshadow the top-lit arcades.

The upper levels of the proposed development would appear directly behind the pinnacles of St Michael's, Cornhill in the important view, just to the east of the Royal Exchange, described above. The prominence of the church tower and its filigree detailing would become lost against the proposals, harming the ability to appreciate its significance. The strong positive contribution the listed building makes to Bank Conservation Area would also be diminished, resulting in harm to the latter.

The proposals would impinge on the silhouette of the Chapel of St Peter ad Vincula when viewed from the Inner Ward of the Tower of London. This would cause some harm to the surviving medieval remains attribute of OUV. The key components of this attribute are the surviving associated buildings, including specifically the chapel, as the Statement of Outstanding Universal Value (SOUV) describes. The ability to appreciate these buildings, and so the attribute, in part relies on the contribution made by their settings.

Similarly, the proposals would cause some harm to the concentric defences attribute. Their visual dominance (alongside the White Tower) was central to the control of the



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City following the Norman Conquest, during the Middle Ages and as late as the nineteenth century. The way in which the setting of the City is perceived from within and outside of the Tower's boundary is key to appreciating its strategic function.

The sense of encroachment of the Tower's surroundings would contribute to an already significant erosion of its dominance, another attribute of OUV, which would also threaten the integrity of the WHS as the WHS Management Plan warns.

Relevant policy and guidance

The NPPF requires planning policies and decisions to reflect relevant international obligations and statutory requirements (Paragraph 2). Amongst these obligations are those under the 1972 UNESCO World Heritage Convention which includes requirements that the UK Government protects and conserves the World Heritage within its territory and ensures that it is transmitted to future generations.

Chapter 16 of the NPPF concerns the historic environment. Paragraph 202 notes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. It recognises that these assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance.

Tall Buildings policy (Policy CS14) of the adopted Local Plan indicates that permission will be refused for tall buildings in inappropriate locations, including conservation areas.

The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (GPA3) recommends a staged approach to understanding impacts on setting. Step 3 of this guidance requires an assessment of the effects of proposed development on significance or the ability to appreciate it. A further checklist of potential attributes of a development which may affect significance is provided, including:

- § Proximity to asset
- § Position in relation to key views to, from and across
- § Prominence, dominance or conspicuousness
- § Competition with or distraction from the asset
- § Dimensions, scale and massing
- § Materials (texture, colour, reflectiveness, etc)
- § Change to skyline, silhouette

Historic England's position

Given the harm that the proposed development would cause to the City's historic



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environment, especially Leadenhall Market, its conservation area, and St Michael's Church, and the local plan's policy to protect the significance of such designated heritage, including by specifically avoiding tall buildings in conservation areas, Historic England maintains its objection to the application proposals.

We continue to raise concerns in relation to the harm to the ability to appreciate attributes of the OUV of the WHS, including its physical dominance, surviving medieval remains and concentric defences. This harm would be less than substantial in the language of the NPPF, and low in the range of such harm, but would contribute to a greater cumulative impact. Though the harm would be less than the consented scheme, it will need to be taken into account.

The status of the Tower of London as a World Heritage Site means that preserving that part of its significance, which comprises its attributes of OUV, as well as its integrity and authenticity, must be given the greatest possible weight. ICOMOS, as adviser to the UNESCO World Heritage Committee, 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' (Bury House Technical Review, 20/00848/FULEIA).

We note that ICOMOS's comments in these cases concerned tall buildings at the edge of the cluster close to the Tower, as viewed from the south. The impact of the current proposals would be different and affect a narrower range of views from within the WHS, but would contribute to the overall negative cumulative impact of the cluster as described above. Recently, ICOMOS has indicated concern at proposed buildings that would have a more comparable impact to proposals at 85 Gracechurch Street (No.60 Gracechurch Street, 24/00743/FULEIA, No.70 Gracechurch Street, 24/00825/FULEIA and 47-50 Mark Lane, 24/01044/FULL).

The *Operational Guidelines for the Implementation of the World Heritage Convention* (2024) advise that a Heritage Impact Assessment (HIA) is essential for all interventions, including development projects, that are planned within or around a World Heritage property (paragraphs 110, 118bis). Specific guidance on the HIA process has been produced: UNESCO's *Guidance and Toolkit for Impact Assessments in a World Heritage Context* (2022). A HIA in accordance with the toolkit, assessing the potential impacts on the attributes which convey the World Heritage Site's OUV, does not form part of the planning submission and is a key requirement.

The World Heritage Centre is already aware of the consented scheme for the site and requested information from the UK State Party to the World Heritage Convention about it in 2023.

Recommendation



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Historic England

Historic England objects to the application because of the harm to the conservation areas and listed buildings that it would cause, and the clear conflict with the Development Plan, given that there is no policy support for a tall building in this location. We additionally raise concerns in relation to the harm to the Tower of London World Heritage Site.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

Alexander Bowring

Inspector of Historic Buildings and Areas

cc Helen Hawkins, GLAAS



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City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

5th May 2025

Dear Sir/Madam,

At its meeting on 1st May 2025 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:

C.70 25/00433/FULEIA - (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA

Leadenhall Market Conservation Area/Langbourn Ward. No Ward Club Rep.

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.

Whilst welcoming the slight reduction in height of the proposed building, the greening and the improved heritage offer, the Committee reiterated its objection considering that this proposal represented a significant overdevelopment of a constrained and sensitive site. Members agreed that there would be substantial loss of character in the Leadenhall Market Conservation Area and damage to the setting of nearby listed buildings. Whilst acknowledging the benefits to the Leadenhall Market and the area more generally in increasing the public realm and making provision for heritage display and interpretation on this site, the Committee was unanimous in its view that these benefits did not outweigh the serious damage to the character and appearance of the Conservation Area that would result.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox
Secretary



Corporation of London Department of Planning & Transportation Our DTS Ref: 73067 Your Ref:
PO Box 270 Guildhall London EC2P 2EJ 25/00433/FULEIA
6 May 2025

Dear Sir/Madam

Re: 85 GRACESHURCH STREET 83-87, GRACECHURCH STREET, -, LONDON, -, EC3V 0AA

Waste Comments

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

With the information provided, Thames Water has been unable to determine the Foul water infrastructure needs of this application. Thames Water has contacted the developer in an attempt to obtain this information and agree a position for FOUL WATER drainage, but have been unable to do so in the time available and as such, Thames Water request that the following condition be added to any planning permission. "No development shall be occupied until confirmation has been provided that either:- 1. Foul water Capacity exists off site to serve the development, or 2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan, or 3. All Foul water network upgrades required to accommodate the additional flows from the development have been completed. Reason - Network reinforcement works may be required to accommodate the

proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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

Water Comments

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

development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

Thames Water are currently working with the developer of application 25/00433/FULEIA to identify and deliver the off site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve the first 447m² retail space or up to a peak flow of 1.5l/s for your development, but beyond that upgrades to the water network will be required. Works are on going to understand this in more detail and as such Thames Water feel it would be prudent for an appropriately worded planning condition to be attached to any approval to ensure development doesn't outpace the delivery of essential infrastructure. There shall be no occupation beyond the first 447m² retail space, 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 additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to low / no water pressures 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. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues."Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

Thames Water recommend the following informative be attached to this planning permission. Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow

if you're considering working above or near our pipes or other structures.
<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

Supplementary Comments

Please submit a foundation/piling layout plan clearly indicating the locations of all foundation/piles to be installed on the development site. This plan should show the positions of the foundation/piles in relation to Thames Water clean water mains and sewers and local topography such as roads (please include road names), existing buildings and/or any other notable features. Thames Water require drawings indicating the location of all piling and the clearance between the face of the pile to the face of a pipe. If any basements intended to be constructed as part of the development, please clearly indicate the location and footprint. Without these drawings and cross-sectional details Thames Water will not be able to review your proposals and discharge your planning condition.

The Developer is also requested to confirm whether they have been in touch with Thames Water to discuss or arrange for the abandonment of any existing assets beneath the development site. Please give a short summary of any correspondence to date and any references they have been provided.

Plans of Thames Water apparatus can be obtained through our website at www.thameswater-propertysearches.co.uk. Please use the following reference in all future correspondence: DTS 73067.

Thames Water require a drainage strategy to be provided, detailing points of discharge for foul & surface water, together with expected flow rates and drainage hierarchy for surface water.

Yours faithfully

Development Planning Department

Application ref: 2025/1631/P
Contact: Sarah White

Date: 6 May 2025

Development Management
Regeneration and Planning
London Borough of Camden
Town Hall
Judd Street
London
WC1H 9JE

Phone: 020 7974 4444

planning@camden.gov.uk
www.camden.gov.uk/planning

Dear Sir/Madam

DECISION

Town and Country Planning Act 1990 (as amended)

Request for Observations to Adjoining Borough - No objection

Address:
(Known as 85 Gracechurch Street)
83 - 87 Gracechurch Street
London
EC3V 0AA

Proposal:

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.

Drawing Nos: See City of London planning application ref. 25/00433/FULEIA

The Council, as a neighbouring planning authority, has considered your request for observations on the application referred to above and hereby raises no objection.

Conditions and Reasons:

Informative(s):

- 1 Reasons for no objection:

The application site is a significant distance from the London Borough of Camden boundary and any heritage assets within the borough. Due to the distance, siting and nature of the works, the development is not considered to harm the character or appearance of Camden. It is noted that the proposed tower block would be visible in long views from the Borough, however it would not impede any protected or strategic views from the London Borough of Camden, including those towards St Paul's Cathedral.

In respect of impact on the amenity of residents within Camden, given the distance of the works proposed from the borough border it is not considered to give rise to any negative impact. As such no objection is raised.

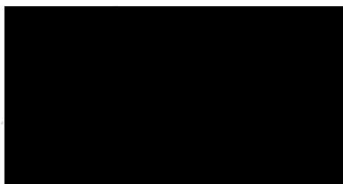
If planning permission were to be granted, Camden would encourage a construction management plan to be secured in order to limit negative impacts on the vicinity and local vehicular traffic.

Camden would encourage a development of a high quality design and a development of the highest sustainability standards which would have minimal impact on the transport network.

It is advised that London Borough of Camden raises no objection, and the application should be determined under the City of London's planning policies.

In dealing with the application, the Council has sought to work with the applicant in a positive and proactive way in accordance with the National Planning Policy Framework. The council publishes its adopted policies online, along with detailed Camden Planning Guidance. It also provides advice on the website for submitting applications and offers a pre-application advice service.

Yours faithfully



Daniel Pope
Chief Planning Officer

SOUTHWARK COUNCIL

LBS Registered Number: 25/OB/0021

Date of issue of this decision: 12/05/2025



LBS Reg. No.: 25/OB/0021

Date of Issue of Decision: 12/05/2025

Your Ref No.:

Applicant City Of London Corporation

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

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.'

At 83-87 Gracechurch Street London EC3V 0AA

In accordance with your letter received on 15 April 2025 and supporting documents.

Signed: *Stephen Platts*

Director of Planning and Growth

Surveyor to the
Fabric
The Chapter House
St Paul's Cathedral
St Paul's Churchyard
London EC4M 8AD

Tel: 
Web: www.caroe.com

Kieran McCallum
Environment Department
City of London Corporation
Sent via email only

16th May 2025

Dear Kieran,

**Letter of Response: Development at 85 Gracechurch Street (ref:
25/00433/FULEIA)**

I write on behalf of the Dean and Chapter of the Cathedral Church of St Paul, regarding the above live planning application.

Many thanks to Officers at the City of London for the additional time and assistance in reviewing this application.

The principal focus of the Cathedral with this particular scheme lies in potential impacts along the Processional Way, along Fleet Street leading to the Cathedral. This is an important and sensitive part of the setting of the Cathedral. The historic route between St Paul's and the Palace of Westminster forms a significant approach to the Cathedral and allows a unique appreciation of its architectural and historic interest.

We note from the submission material that the scheme has been designed to be entirely invisible along the Processional Way. Officers will be well versed in the methodologies and advanced technologies now used to assess the extent of visibility in these kinetic sequences. We request that, due to the sensitivity described above, Officers establish that they are certain that scheme is not visible in this approach – and that even extremely minor visibility, so often called

technical visibility or impact, is not permitted. We request that this is confirmed for the length and breadth of the Processional Way.

We hope that this is a consultation response that furthers the shared aims of the Cathedral and City of London.

Yours sincerely,



*Oliver Caroe; RIBA AABC
Surveyor to the Fabric of St Paul's Cathedral
For and on behalf of Caroe Architecture Ltd*

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

Directors:

Oliver Caroe RIBA AABC
Mark Hammond RIAS RIBA AABC

Associates and Designers:

Touseer Ahmad RIBA AABC CEPH
Matthew Cox RIBA CA MAPM
Andrew Senior ARP

Tel: 020 8921 5222



Kieran McCallum
City of London
PO Box 270
Guildhall
London
EC2P 2EJ
25/1483/K
Y. Ref: 25/00433/FULEIA
19 May 2025

Directorate of Place and Growth
The Woolwich Centre, 2nd Floor
35 Wellington Street
London, SE18 6HQ

DECISION NOTICE –RAISE NO OBJECTION

Dear Kieran McCallum,

Town & Country Planning Act 1990 (As Amended)
The Town and Country Planning (General Permitted Development) (England) Order 2015

Site: (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street
London EC3V
Applicant: C/O Agent
Proposal: 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.

Drawings

I refer to your letter dated 14 April 2025 enclosing details in respect of the above.

The Royal Borough has now formally considered the matter and raises no objections.

The Council has **NO** further observations to make.

Thank you for consulting me on this matter.

Yours faithfully



Assistant Director



Your ref: 25/00433/FULEIA

My ref: 25/02610/OBS

Please reply to:

Nikki Mitchell

Tel No:

Email:

Kieran McCallum
Environment Department
PO Box 270
Guildhall
London
EC2P 2EJ

Town Planning & Building Control

Westminster City Council

PO Box 732

Redhill, RH1 9FL

5 June 2025

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.: 25/02610/OBS

Application Date:

Date Received: 15.04.2025

Date Amended: 15.04.2025

Plan Nos: Letter from City of London Corporation dated 14 April 2025

Address: Development Site (Known As 85 Gracechurch Street) 83 - 87, Gracechurch Street, City Of London, London

Proposal: 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.

Yours faithfully,

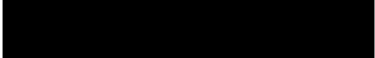
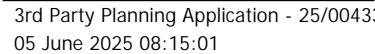
Tracy Darke

Director of Town Planning & Building Control

Note:

- '3f' The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



From: 
To: 
Subject: 3rd Party Planning Application - 25/00433/FULEIA - additional info
Date: 05 June 2025 08:15:01

THIS IS AN EXTERNAL EMAIL

Corporation of London, Department of Planning & Transportation, , Guildhall, London, EC2P 2EJ

05 June 2025

Our DTS Ref: 73067

Your Ref: 25/00433/FULEIA - additional info

Dear Sir/Madam,

Re: SITE KNOWN AS 85 GRACESHURCH STREET 83-87, GRACECHURCH STREET, -, LONDON, -, EC3V 0AA

Waste Comments:

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

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.

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.

Water Comments:

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

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

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

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

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 the following condition be added to any planning permission. No development shall be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or - a development and infrastructure phasing

plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan. Reason - The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development” The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning Department (e-mail: devcon.team@thameswater.co.uk) prior to the planning application approval.

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.

Supplementary Comments:

Yours faithfully,
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,
WD3 9SQ,
Email: [REDACTED]

[REDACTED]

From: Gavin McLaughlin
Sent: Thursday, June 12, 2025 7:52:10 AM
To: McCallum, Kieran
Cc: Begolli, Nora ; Paklim Wong
Subject: 85 Gracechurch Street 25/00433/FULEIA - TfL Spatial Planning comments

Hi Kieran

Sorry for the delay in us responding formally to this application:

25/00433/FULEIA | 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. | (site Known As 85 Gracechurch Street) 83 - 87 Gracechurch Street London EC3V 0AA

We have the following comments:

The extant consent broadly establishes the acceptability of all transport impacts proposed. We consider recent revisions to the scheme in this re-submission to be relatively minor in strategic transport terms.

Footway widening and a new vehicular access in from Gracechurch Street form part of the agreed package of highway improvements, directly impacting the Transport for London Road Network (TLRN) of which TfL is the highway authority.

The overall servicing arrangement proposed, shown in Figure 2 below, is satisfactory in principle and appears to comply broadly with draft London Plan policy T7 (Deliveries, servicing and construction).

We also request a Section 106 (s106) agreement obligation for the applicant to enter into a Section 278 (s278) agreement with TfL at zero cost to TfL. TfL should agree the scope of TLRN works including during construction in the wording of the s106 agreement before it is signed, and it must specify the works may require strategic modelling to TfL standards at the Owner's expense.

A full Construction Logistics Plan (CLP) must be secured by pre-commencement condition and discharged in consultation with TfL as the highway authority for Gracechurch Street.

The pit lane and temporary crossover arrangement proposed on Gracechurch Street A10, under TfL highway authority as part of the TLRN, is not yet fully agreed in detail by TfL and requires extensive further discussions prior to implementation. An October 2025 commencement as referenced in the Outline CLP may be challenging to facilitate so soon in

terms of non planning consents and therefore seems practically unlikely. Early liaison with TfL to clarify expected access arrangements in particular is strongly urged. TfL is nonetheless happy to accept construction access from the A10 may be required and planning permission can be awarded on this basis by the City Corporation if they wish; the principle is accepted but designs and details must be optimised with full sign-off by TfL at every stage, and impacts on the strategic highway must be minimised as far as possible throughout.

Temporary works to facilitate construction must form part of a separate s278 agreement with TfL and this should also be specified in the planning decision and s106 agreement.

Furthermore, a Stage 1 Road Safety Audit (RSA) needs to be conducted by a TfL-approved suitably qualified and independent safety auditor prior to implementation for both the temporary and permanent s278 works to the TLRN. A Designer's Response to the Stage 1 RSA must also be shared with TfL for approval and further comments prior to commencement, and the highway works may need to be redesigned significantly if they are deemed likely to increase road danger. That would be unacceptable due to sub-section F of draft London Plan policy T4 (Assessing and mitigating transport impacts). TfL's RSA team will assess (as part of the mandatory Auditor verification process) the size and scope of the scheme and whether an equivalent to the Site Visit can be done using online mapping only. This must be agreed with TfL's RSA Team in advance of the Audit being completed. In some cases it will not be possible to complete the RSA without a site visit, in which case the audit will need to be deferred. Any deviation away from SQA-0170 without prior approval from TfL's RSA Team may result in the RSA being rejected and needing to be redone.

Full public access 24/7 along the re-opened pedestrian connection from Gracechurch Street to Lime Street Passage, including for cyclists, should be secured in perpetuity in the s106 agreement.

The proposed delivery and servicing restrictions for access by motorised vehicles to be overnight only in the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings, and 21:00-07:00 on Sunday and Monday evenings, should be secured by condition to enable future planning enforcement if necessary. This must not apply to cargo bikes. The proposed provision of facilities for cargo bikes is very welcome.

The cycle parking proposed, including under-provision against full London Plan standards, and some end of journey facilities and short stay cycle parking on upper floors, is considered acceptable and in sufficient accordance with London Plan policy T5 due to the unique archaeological challenges of the site.

The design and delivery of all cycle parking should be secured by condition and discharged in consultation with TfL. The full Delivery and Servicing (DSP) and Construction Logistics Plans (CLP) must be discharged in consultation with TfL as highway authority for the TLRN and this should also be explicitly acknowledged in the planning decision and relevant condition wording.

Thanks and kind regards,

Gavin McLaughlin MSc; MA; MRTPI
Spatial Planning | City Planning

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

M: [REDACTED]

[REDACTED]

PLEASE CONFIRM ALL MEETINGS IN MY OUTLOOK CALENDAR

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



For more information regarding TfL Spatial Planning, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit:

<https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-services>

CoLAT

The City of London
Archaeological Trust

Kieran McCallum
Environment Department
Corporation of London

By email only

13 June 2025

Dear Mr McCallum

Archaeology at 85 Gracechurch Street EC3
Ref 25/00433/FULEIA

Thank you for your letter of 14 April 2025 inviting comments on the proposed redevelopment at 85 Gracechurch Street. My apologies for this late submission, but hopefully our comments are not too late. These comments concern the management of the archaeology during rebuilding, and the presentation of the site in the future building.

On the procedures to be adopted during construction, we are satisfied with the work of MOLA and the advice of Historic England. We encourage you to ensure that every aspect of the advice and direction given by Historic England is observed. This will be to the credit of the developer and the Corporation.

The proposed presentation of the archaeology in the future building (as laid out in the MOLA document, their Cultural Plan or Cultural Strategy) is excellent. As proposed in part 5 of this, 'Cultural Vision', the archaeological remains will form an integral and central part of the building, not a sideshow or a display in a corner. A successful predecessor of this thinking was at Crosswall, which is the way to go. CoLAT welcomes the intention to give the archaeology of the City, in this extremely historical location, its proper place. This is necessary for the future well-being of the City.

Yours sincerely



John Schofield
Secretary, CoLAT

The City of London Archaeological Trust (CoLAT) was founded by the City of London and the Museum of London in 1974, to promote and assist all kinds of archaeological work in the City of London and its environs.

City of London Archaeological Trust: Chamberlain's Department, City of London Corporation, Guildhall, London EC2P 2EJ. Website: www.colat.org.uk. Charity No. 268160
Chairman John White Secretary John Schofield, 2 Carthew Villas, London W6 0BS. Email: john@jschd.co.uk

GREATER **LONDON** AUTHORITY

Good Growth

Kieran McCallum
City of London
By Email

Our ref: 2025/0460/S1
Your ref: 25/00433/FULEIA
Date: 23 June 2025

Dear Kieran McCallum

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

83 - 87 Gracechurch Street London EC3V 0AA

Local Planning Authority reference: 25/00433/FULEIA

I refer to the copy of the above planning application, which was received from you on 28 May 2025. On 23 June 2025, Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and the Fire Service, acting under delegated authority, considered a report on this proposal, reference 2025/0460/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Deputy Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 58 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

The application represents EIA development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations. The environmental information made available to date has been taken into consideration in formulating these comments.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

City Hall, Kamal Chunchie Way, London E16 1ZE ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

Please note that the Transport for London case officer for this application is Gavin McLaughlin email gavinmclaughlin@tfl.gov.uk.

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
James Small-Edwards, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
Theo Barker, Agent, DP9

85 Gracechurch Street

Local Planning Authority: City of London

Local Planning Authority reference: 25/00433/FULEIA

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing building and the erection of a 31 storey building comprising office use; flexible retail use, Public Hall; a Cultural Space; and a public exhibition associated with archaeological findings.

The applicant

The applicant is **Hertshten Properties Limited** and the agent is **Woods Bagot**.

Strategic matters summary

Land use principles: The redevelopment of the site within the CAZ for office is supported. The proposed cultural and exhibition uses with public access to the discovered archaeology are strongly supported.

Design and heritage: The proposed height massing and design is supported. A conclusion on policy D9 part C will be made at the decision-making stage. The proposals would result in less than substantial harm to heritage assets, however, the proposed public benefits if appropriately secured would clearly and convincingly outweigh the harm.

Other matters on **Energy, Whole Life Carbon** and **Circular Economy** require resolution prior to the Mayor's decision making stage.

Recommendation

That the City of London be advised that the application does not yet fully comply with the London Plan for the reasons set out in this report. Outstanding matters relating to energy, whole life carbon and circular economy should be addressed.

Context

1. On 28 May 2025, the Mayor of London received documents from the City of London notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in issuing his response.
2. The application is referable under the following categories of the Schedule to the Order 2008:

1D: "Development which comprises or includes the alteration of an existing building where: (a) the development would increase the height of the building by more than 15 metres; and (b) the building would, on completion of the development, fall within a description set out in
3. Once the Council has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the Council to determine it itself.
4. The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.
5. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planapps.london.gov.uk>

Site description

6. The site comprises an existing ground/basement plus 8 storey building within the Central Activities Zone and within London's Square Mile.
7. The building accommodates retail and storage floorspace at ground level with commercial floorspace on upper levels.
8. The site is located within the Leadenhall Market Conservation Area (LMCA) with the Grade II* listed Leadenhall Market located immediately to the north and east of the site. Bulls Head Passage is located to the south of the site and Lime Street Passage is located to the east (rear) of the site and with Bee Hive Passage directly to the east. The site has a PTAL rating of 6b on a scale of 0 (poor) to 6b (excellent).

Details of this proposal

9. The application proposes the demolition of existing building and the creation of a 31-storey building. The proposed uses would comprise 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).

Strategic case history

10. The GLA hosted a pre-application meeting with the applicant team (also attended by the LPA) in February 2025 in respect of proposals to redevelop this site for the demolition of the existing building on site and its replacement with an office-led tower incorporating a public exhibition space at basement level, public market hall at ground level and elevated public terrace and cultural events and exhibition space.
11. The Mayor has previously considered proposals at this site for the '*Partial demolition of existing building (Gracechurch Street frontage adapted) and the construction of a 32 storey (155.70m AOD) building plus basement levels 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); and Heritage Garden and Cultural Space at level 5 (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*' (GLA ref: 2023/0085 LPA ref: 22/01155/FULEIA). The City of London resolved to approve planning permission and on 23 July 2023 the Deputy Mayor advised the Council it could proceed to determine the application.

Strategic planning issues and relevant policies and guidance

12. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the London Plan 2021; and the City of London Local Plan (2015).
13. The following are also relevant material considerations:

The National Planning Policy Framework and National Planning Practice Guidance; and,

Draft City Plan 2040

Relevant strategic supplementary planning guidance (SPG) and London Plan Guidance (LPG), including on Optimising site capacity and London View Management Framework which can be found on the GLA's website [here](https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507).¹

Land use principles

14. The extant consent granted in 2022 establishes the acceptability of the proposed commercial and cultural uses on site. The proposed development would deliver

¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance?ac-63512=63507>

34,771 sq.m of office floorspace an uplift of 27,100 sq.m in office use. The proposed uplift in office floorspace would support the strategic functions of the CAZ and is supported.

15. The proposals will also include a 595 sq.m public hall and over 600 sq.m of cultural space. The creation of cultural floorspace would support the enhancement and expansion of London's cultural assets and would accordance with the objectives of policies HC5 of the London Plan.
16. Since the previous application, significant roman archaeology has been discovered beneath the building. As such, the cultural offer would be enhanced through the incorporation of the archaeology within an exhibition space which will be opened to members of the public. The proposed cultural use and space incorporating the roman archaeology is strongly supported. The City must ensure that the use is appropriately secured, as well as a Cultural Plan, Cultural Strategy and Cultural Management Plan along with public access

Urban design

Development layout and public realm

17. The proposals would provide a public hall with market stalls at ground floor level, along with the creation of a new publicly accessible east/west route connecting Gracechurch Street to Lime Street Passage.
18. The spaciousness, quality, and accessibility of the public hall is supported. The public hall will add variety to the public space available in the area. Careful consideration should be given to the curation of the space to maximise use and be inclusive and accessible to all. Consideration should be given to the legibility of the archaeological find and whether there is direct reference within the public hall.
19. The provision of the fifth-floor viewing terrace and its direct connection with the below ground archaeology, both of which will be publicly accessible, is supported. The public access basement cultural and exhibition space and terrace space at level 5 as well as the ground floor hall is strongly supported.

Scale, form and massing

20. The proposal includes a building up to 31 storeys. This constitutes a tall building according to the borough's local definition. The site is identified in the Local Plan as a site which is suitable for tall buildings. Accordingly, the proposals meet the locational requirements of London Plan Policy D9 (Part B).
21. The proposed height and mass of the building is similar to that of the extant consent. However, the built form of the proposals would be rationalised with a simpler and more elegant form.

22. Further consideration has been given to the visual transition from the retained historic building on Gracechurch Street to new building above. The changes have improved the appearance of the transition and is supported.
23. As such the proposals would have an acceptable visual appearance in local, mid-range and long-distance views. The detailed information submitted with regard to the functional and environmental impacts of the tall building will be reviewed by the Council and any necessary local mitigation must be suitably secured as part of any planning permission.

Architectural quality

24. The appearance of the proposed building is of high quality and does not raise concerns.

Fire safety

25. In line with Policy D12 of the London Plan the application is accompanied by a fire safety statement, prepared by a suitably qualified third-party assessor, demonstrating how the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.
26. Further to the above, the proposal meets the requirements of Policy D5 within the London Plan which requires that developments incorporate safe and dignified emergency evacuation for all building users.
27. The application documentation refers to the proposed creation of a green wall. Clarification should be provided that the green wall meets the highest standard of fire safety.
28. Furthermore, the Fire Statement does not contain a statement of compliance with the aforementioned policies as required by the Fire Safety draft guidance.

Inclusive design

29. The application sets out inclusive design matters, which includes consideration of the newly created public realm, step-free access to all parts of the building and terraces. The City of London should ensure that these measures are appropriately secured. The proposals would achieve an inclusive environment and be in accordance with London Plan Policy D5.

Heritage

30. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be

given to the asset's conservation and the more important the asset, the greater the weight should be.

31. London Plan Policy HC1 Part D requires development proposals to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Development proposals are required to make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
32. The existing building is overall a positive contributor to the significance of the conservation area. Its full demolition causes harm to the LMCA which is not mitigated by the partial façade replication proposed. This, taken together with the scale of the proposed development is considered to cause a high level of less than substantial harm to the LMCA.
33. This application is a revision of the previously consented scheme, mainly in response to greater clarity around archaeology. The site sits above the eastern (dais) end of the first Roman basilica, forming part of the forum complex. The survival of remains already established is substantial and further remains are anticipated to be found on full excavation. The remains are of national and international importance as clear evidence of the centre of government and administration in Roman London. Such remains are required by NPPF Para 213 footnote 75 to be treated by the planning system as designated heritage assets and this is reinforced by London Plan Policy HC1 Part D.
34. The proposals to excavate, preserve in situ and provide public access to and interpretation of the Roman archaeology are strongly supported. These moves are considered to form a heritage benefit. The proposed revisions to the structural design to reduce impacts on the archaeology are welcomed and supported. Appropriate conditions and Section 106 terms will be required to ensure that the public and heritage benefits are adequately managed and fully secured.
35. GLA officers consider that the proposed development causes the following levels of indirect harm to the significance of designated heritage assets, through change to their settings (in all cases the assessment is based on the cumulative scenario). The scale used for less than substantial harm is very low, low, low to middle, middle, middle to high, high and very high.

Table of indirect (setting) impacts			
Designated heritage asset	Category of harm	Extent of harm	View reference
Leadenhall Market Conservation Area	Less than substantial	High	Views 1, 2, 3, 4, 5a, 5b, 6, 7, 9

Leadenhall Market and subsidiary numbering, listed building Grade II*	Less than substantial	Middle	Views 1, 2, 3, 4, 5a, 5b, 6, 7, 9
Nos. 81 and 82 Gracechurch Street, listed building Grade II	Less than substantial	Low to middle	Views 1, 2, 6, 7
The Lloyd's Building, listed building Grade I and Nos. 12 and 14-19 Leadenhall Street, listed buildings Grade II	Less than substantial	Low to middle	Views 9, 22, 23, 24, 25, 26, 29
Lime Street group: Nos. 37 and 39 Lime Street and The Ship Tavern, listed buildings Grade II	Less than substantial	Very low	None
Bank Conservation Area	Less than substantial	Low to middle	1, 2, 6, 9, 22, 26, 29, 30, 31, 32
Gracechurch Street North Group: Church of St Peter, listed building Grade I and associated gateway and Nos. 7 and 9 Gracechurch Street, listed buildings Grade II	Less than substantial	Low	Views 2 and 6
Church of St Michael, Cornhill, listed building Grade I	Less than substantial	Middle	Views 22, 26, 29, 32
Cornhill East Group: Nos. 39, 48 and 50 Cornhill, listed buildings Grade II	Less than substantial	Low	View 32
Cornhill and Lombard Street West Group: Royal Exchange and Church of St Mary Woolnoth, listed buildings Grade I; Nos. 15 to 22 Cornhill, listed buildings Grade II*; No. 1 Cornhill and Nos. 13 and 14 Cornhill, listed buildings Grade II	Less than substantial	Low to middle	Views 29, 30, 31
Bishopsgate Group: Lloyds Bank, Nos. 7 and 9 Bishopsgate and Royal Bank of Scotland, listed buildings Grade II	Less than substantial	Low	View 1
Gracechurch Street South Group: Credit Lyonnais and No. 2A Eastcheap, listed buildings Grade II	Less than substantial	Low	View 1
Philpot Lane Group: Nos. 7 to 8 Philpot Lane, listed building Grade II* and Nos. 23 and 25 Eastcheap, listed building Grade II	Less than substantial	Very low	None

The Monument, listed Grade I	No harm	No harm	Views 8, 11, 14, 15, 16, 17, 23, 25, 26, 29, 35, 39
Tower Bridge, listed building Grade I	Less than substantial	Low	Views 14, 15, 23, 29, 39
Cathedral Church of St Paul, listed building Grade I	Less than substantial	Very low	Views 9, 14, 16, 22, 24, 25, 26, 27a, 27b, 27c, 28, 35, 36, 37, 38, 39, 40
Tower of London Group including the World Heritage Site, multiple listed buildings Grade I, II* and II and the Conservation Area	Less than substantial	Low	Views 10, 11, 12, 13a, 13b, 13c, 14, 15, 16, 17, 29

36. As harm has been identified, the proposals do not comply with London Plan Policy HC1. However, in accordance with the provisions of the NPPF, the harm must be weighed against the public benefits. There are several identified heritage and public benefits, including the uncovering and public display of roman archaeology, exhibition space and public hall. GLA officers consider that the proposed public benefits have the potential to clearly and convincingly outweigh the harm to heritage assets. A final balancing exercise will be undertaken at Stage II once the public benefits package is secured.

Transport

Transport assessment

37. The proposed footway widening and a new vehicular access in from A10 Gracechurch Street directly impact the Transport for London Road Network (TLRN). The overall servicing arrangement proposed is satisfactory in principle and appears to comply broadly with draft London Plan Policy T7. The works will be covered in a S278 agreement which must be secured within the legal agreement.
38. A full Construction Logistics Plan (CLP) will be secured by pre-commencement condition and discharged in consultation with TfL as the highway authority for Gracechurch Street.
39. Though acceptable in principle, the pit lane and temporary crossover arrangement proposed during construction requires further discussions with TfL prior to implementation through the s278 process, to ensure detailed design and management is optimised and impacts on the strategic highway are minimised as far as possible throughout. Temporary works to facilitate construction will also

require a separate s278 agreement. A Stage 1 Road Safety Audit (RSA) must be conducted prior to implementation for all s278 works, both permanent and temporary, and on both City and TfL highway.

40. Delivery and servicing restrictions on access by motorised vehicles have been agreed outside the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings, and 21:00-07:00 on Sunday and Monday evenings. The proposed provision of facilities for cargo bikes is welcomed.
41. The cycle parking proposed, including under-provision against full London Plan standards, and some end of journey facilities and short stay cycle parking on upper floors, is considered acceptable due to the constraints of the site.
42. A final Delivery and Servicing (DSP) and Construction Logistics Plans (CLP), and Travel Plan should be appropriately secured.

Environment and sustainable infrastructure

Energy strategy

43. An energy statement has been submitted with the application. The energy statement does not yet comply with London Plan policies SI2, SI3 and SI4. The applicant is required to further refine the energy strategy and submit further information to fully comply with London Plan requirements. Full details have been provided to the Council and applicant in a technical memo that should be responded to in full; however outstanding policy requirements include:
 - Be Lean – further exploration of energy efficiency measures for the non-domestic element;
 - Be Green – demonstration that renewable energy has been maximised, and further details of the proposed air source heat pumps;
 - Be Seen – confirmation of compliance with this element of policy, with compliance to be secured within the S106 agreement;
 - Energy infrastructure – further details on the problems with the design of district heating network connection is required

Carbon savings

44. For the non-domestic element, the development is estimated to achieve a 18% reduction in CO2 emissions compared to 2021 Building Regulations.
45. The development falls short of the net zero-carbon target and does not meet the minimum 35% carbon reductions on site required by Policy SI2. This is below policy expectations and the carbon savings should be improved. Once the on-site carbon savings have been maximised, a carbon offset payment is required to be secured. This should be calculated based on a net-zero carbon target using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has

been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole life-cycle carbon

46. The applicant has submitted a whole life-cycle carbon assessment, as required by London Plan Policy SI2. The WLC assessment does not yet comply with London Plan Policy SI2. Further technical information is required on evidence of the modelling review process and material quantities and assumptions.
47. A condition should be secured requiring the applicant to submit a post-construction assessment to report on the development's actual WLC emissions, suggested condition wording is available on the GLA [website](#)².

Circular economy

48. The applicant has submitted a Circular Economy Statement. The Circular Economy Statement does not yet comply with London Plan Policy SI7. Further information is required on construction waste factors for modules A and B.
49. A waste management plan that meets requires of London Plan policy must be appropriately secured. A condition should be secured requiring the applicant to submit a post-construction report, suggested condition wording are available on the GLA [website](#)³.

Urban greening and biodiversity

50. The applicant has calculated that the scheme would achieve an Urban Greening Factor score of 0.33 which exceeds the target score of 0.3. The Council should secure all greening measures to ensure the specified target is met.
51. The applicant has set out that there would be a biodiversity net gain of 5476% which complies with the London Plan. Measures to secure the biodiversity net gain should be secured by the Council.

Flood risk, sustainable drainage and water efficiency

52. GLA officers have reviewed the Flood Risk Assessment (FRA) in terms of pluvial (surface water), groundwater and sewer flood risk. The site is considered to be at low risk from flooding.
53. The sustainable urban drainage strategy generally complies with London Plan Policy SI13, and the SUDS strategy should be appropriately secured by condition.

² <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/whole-life-cycle-carbon-assessments-guidance>

³ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance/circular-economy-statement-guidance>

54. The proposed development would meet the requirements of London Plan Policy SI5 relating to water efficiency and consumption, and this should be secured by condition.

Air quality

55. The site falls within the City of London Air Quality Management Area. The applicant has provided an air quality assessment which concludes that the scheme would be air quality neutral and identifies that the proposed development would not require mitigation measures other than during the construction phase of the development. The Council should identify all appropriate mitigation and appropriately secure these as part of any future planning permission. An Air Quality Positive Assessment has been undertaken and concludes the proposed development would likely not lead to adverse impacts on local air quality and conditions for future occupiers.

Local planning authority's position

56. The City of London's planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in July 2025.

Legal considerations

57. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Council must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the Council under Article 6 of the Order to refuse the application; or, issue a direction under Article 7 of the Order that he is to act as the local planning authority for the purpose of determining the application (and any connected application). There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Conclusion

58. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

Land use principles: The redevelopment of the site within the CAZ for office is supported. The proposed cultural and exhibition uses with public access to the discovered archaeology are strongly supported.

Design and heritage: The proposed height massing and design is supported. A conclusion on policy D9 part C will be made at the decision-

making stage. The proposals would result in less than substantial harm to heritage assets, however, the proposed public benefits if appropriately secured would clearly and convincingly outweigh the harm.

Other matters on **Energy, Whole Life Carbon** and **Circular Economy** require resolution prior to the Mayor's decision making stage.

For further information, contact GLA Planning Unit (Development Management Team):
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We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.