

Committee:	Date:
Planning Applications Sub Committee	8 th July 2025
Subject: 85 Gracechurch Street, 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.	Public
Ward: Langbourn	For Decision
Registered No: 25/00433/FULEIA	Registered on: 27 th March 2025
Conservation Area: Leadenhall Market	Listed Building: No

Summary

The application relates to a site located at the northern end of Gracechurch Street, bounded by Gracechurch Street to the west, the New Moon Public House to the north, Bulls Head Passage to the south, and Leadenhall Market to the north and east. The site is located within the Leadenhall Market Conservation Area, and there are a number of other designated heritage assets in the surrounding area, including Leadenhall Market itself (Grade II*), St Michael Cornhill (Grade I), St Peter Upon Cornhill (Grade I), Lloyds Building (Grade I), Nos. 12 & 14-19 Leadenhall Street (Grade II), Nos. 81-82 Gracechurch Street (Grade II), Former Ship Tavern, Lime Street (Grade II), Nos. 7-9 Gracechurch Street (Grade II). Heritage assets in the wider area, including the Tower of London World Heritage Site, are detailed within the relevant sections of the main body of this report.

Planning permission is sought 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. The development has a maximum height of 147.9m above ordnance datum (AOD) and would be 31 storeys high inclusive of plant levels.

An associated listed building consent application has submitted for partial demolition and reconstruction works to the party walls between 83-87 Gracechurch Street, 81-82 Gracechurch Street, and Leadenhall Market, stabilisation of retained sections and integration of the party wall to the proposed Development at 83-87 Gracechurch Street, works associated with the development of the application site.

An Environmental Statement accompanies this scheme.

Objections were received from statutory consultees including Historic England and the City of London Conservation Area Advisory Committee ("CAAC") in relation to the overall scale and height of the development which they consider to harm the Conservation Area and nearby listed buildings.

Objections were received from nearby residents, related to the noise, and health and safety risks during construction, and the scale of the proposal within the Conservation Area.

The representations received are set out in the main body of the report and are also included in full in the background papers.

The site is within the Central Activities Zone in a highly sustainable location, and within the City Cluster. The proposal would deliver a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.

The proposal provides a significant increase in office floorspace – an uplift of c. 24,000 sqm delivering approximately 1.5% towards the total office floorspace target (1.6 million sqm gross) to be achieved by 2040 as aspired to by the City Plan 2040, which is estimated to accommodate between 1,700 and 2,205 full-time equivalent (FTA) jobs, an

uplift of 1,260 to 1,630 FTE jobs. Additionally, the lower floors are designed to be capable of being taken up by SME or flexible working operators while the upper floors provide larger more regular floor plates suitable for a range of office occupiers.

It is considered that the proposal would deliver a compelling new cultural and exhibition offer for the City that would align with the Destination City agenda, comprising the exhibition space for the nationally significant archaeological find of the first Roman forum-basilica of London, the new Public Hall, and Heritage Walkway at level 05. The proposals would attract new audiences, alongside the provision of a new route through to Leadenhall Market. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place aligning with Destination City.

The architectural design approach has been amended through the planning process to consider options and strike the overarching balance of growth need and heritage conservation, which is at the heart of the strategic balance of the Plan-led approach to growth in the CoL. This is in line with the long-term Plan-led approach to consolidating substantial uplift in commercial uses in the defined City Cluster of tall buildings, allowing for the capacity of the site to be optimised relative to strategic heritage constraints, whilst allowing for higher densities commensurate with the uniquely high levels of economic agglomeration and public transport connectivity in this part of the CoL and wider CAZ.

The plan form and cranked and fluted detailing of the tower above all derive from the surroundings. Whilst some harm has been found to be caused to a number of heritage assets (addressed in detail within this report), this harm has been minimised and mitigated through design and it is considered that overall the proposals would very much build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness in accordance with NPPF policies.

The proposal would optimise the use of land, delivering high quality office space, and a substantial proportion of publicly accessible space which includes public access and exhibition of what is a nationally significant archaeological find in the Roman forum-basilica remains. c.

The proposal would preserve the ability to recognise and appreciate the Tower of London ("ToL") as a Strategically Important Landmark, whilst according with the associated

visual management guidance in the London View Management Framework (“LVMF”) as it relates to the Outstanding Universal Value (“OUV”).

Historic England (“HE”) have objected to the application on the basis of harm caused to Leadenhall Market, the Leadenhall Market Conservation area, and to St Michael’s Church. In addition, it is acknowledged that HE found ‘low’ less than substantial harm to the World Heritage Site (“WHS”), also making reference to intrusions in views to St Peter Ad Vincula (NB specific harm is not identified in this instance) and harm to the Bank Conservation Area, albeit it did not object on these grounds and acknowledging this harm is reduced in comparison to the consented scheme. Officers attribute considerable importance and substantial weight to the views of HE as the Government’s advisor on the conservation of the historic environment. The scale of change in all instances is considered to be between negligible and minor, the magnitude of impact small, in both baseline and in particular in cumulative scenarios. Officers disagree regarding the levels of harm attributed.

In all instances, the proposal is not considered to harm the attributes of the OUV, the authenticity or integrity of the WHS, and to preserve its significance. Therefore, proposal would not harm the significance of the ToL, whether in relation to the WHS or any of the component heritage assets which comprise it.

Concerning the LVMF, the site is in the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long-established positive role on the skyline of the Capital. It is considered that the Cluster aids the observer’s appreciation of the wider geography of London as a recognisable and important landmark. Officers consider it symbolises the historic commercial and economic heart of the Capital, important in reading the wider socio-economic and cultural topography of London. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul’s and the ToL. However, it would be visible from several identified views, in particular the River Prospects.

As per the consented proposals, the proposal would not harm, and would make some positive contributions to, the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the Strategically Important Landmarks, in accordance with London Plan Policy HC4.

The proposals would preserve the nationally significant remains of the Roman Forum-Basilica in situ, conserve them and reveal them to public view in the form of a bespoke, free to enter exhibition space. This represents a major public benefit of the proposals and conditions are recommended concerning investigation, excavation, evaluation, preservation, basement and foundation design, public engagement, and a management plan. An Archaeological Exhibition Space Management Plan would also be secured via s106 obligation, which will include details on visitor management arrangements and curation of the space. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan with regards to archaeology.

A low level of less than substantial harm is found to the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I).

The harms, enhancements and public benefits are considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the conclusion of this report.

Giving considerable importance and weight to the desirability of preserving the significance and setting of listed buildings, this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits detailed within this report, including the positive contribution the scheme would make to the core and unique character of the City Cluster, while the public benefits include the delivery of growth in a highly sustainable location, the unique offer of a highly compelling mix of cultural spaces across the lower levels of the proposal and public realm improvements. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.

In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Cycle parking and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. A lower quantum of cycle parking has been accepted in this instance given the unique nature of the site, where tall buildings would typically be serviced via extensive

basements which are limited in the context of the need to preserve and exhibit the nationally significant archaeological finds at the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistics guidance. The building is proposed to be serviced overnight using the Public Hall, with details of the delivery and servicing secured by planning obligation. It is considered at this stage that the proposed servicing arrangement would be acceptable.

A carbon options study has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability and avoiding demolition. It concludes that the intended transformation of the site, including making the recently discovered archaeological remains of the Roman basilica publicly accessible, providing highest quality floorspaces with high amenity and wellbeing values and climate resilient design, along with a range of urban greening measures and benefits relating to the activation and diversification of the local area, can only be fully delivered by a redevelopment on this site, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

The proposed development would reach close to the GLA's Standard Benchmark for life-cycle embodied carbon. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for recycling and reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in 18% carbon emissions beyond the Part L baseline, and an estimated low energy use intensity (EUI), as well as targeting a BREEAM "outstanding" rating. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the potential performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, and it cannot avoid demolition in accordance with Policy CS15(3), it complies with (taking account of the mitigation measures proposed) London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2,

CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant.

It is the view of officers that as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, as policy CS1 is complied with, as policies relating to office floor space delivery, would be complied with that, notwithstanding the conflicts with CS12 (Historic Environment), CS14(2) (Tall Buildings) DM12.1 (Managing Change affecting all heritage assets and spaces); DM12.2 (Development in conservation areas); Emerging City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets), and London Plan HC1 (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.

In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with other relevant design, community, culture, environmental and public realm related policies.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

The scheme would provide benefits through the community infrastructure levy (CIL), improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S106 agreement.

Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan (such as the proposal before you) without delay.

As discussed within the main report, the paragraph 215 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less than substantial harm.

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

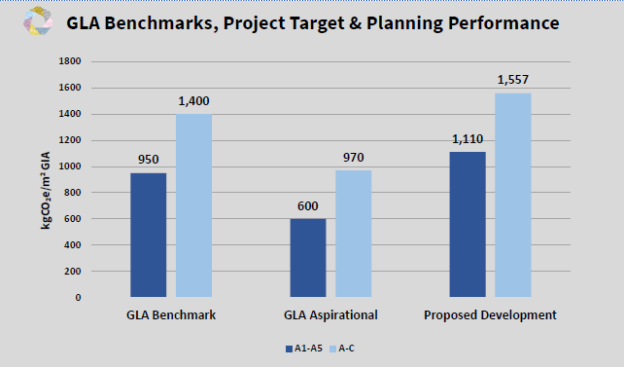
Recommendation

- (1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:
 - (a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008); and
 - (b) The application being referred to the Secretary of State pursuant to the Town and Country Planning (Consultation) Direction 2024 and the application not being called in under section 77 of the Town and Country Planning Act 1990; and
 - (c) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.
- (2) That the Department for Digital, Culture, Media & Sport (DCMS) be notified of the application and advised that the City Corporation intends to grant planning permission and that the Planning and Development Director be given delegated authority to consider any response received from DCMS, UNESCO or ICOMOS.
- (3) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990.
- (4) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

APPLICATION COVER SHEET

85 Gracechurch Street

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	57.67m AOD		149.4 m AOD (reduction of 6.3m from consented scheme)	
2. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Offices	7671	Offices	34,771
	Retail	364	Flexible Retail	344
			Public Hall	596
			Basement Level Cultural Space	478
			Level 05 Public Cultural Space	136
3. OFFICE PROVISION IN THE CAZ	c. 27,100sqm net additional office floorspace			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	445-615 FTE (estimated)		1,700-2,205 FTE (predicted)	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	0	Car parking spaces	0
	Cycle long stay	0	Cycle long stay	399 5% accessible Sheffield Stands 10% folding lockers 85% two-tier cycle stands
	Cycle short stay	0	Cycle short stay	43
	Lockers	0	Lockers	2 lockers per 3 long-stay cycle spaces
	Showers	0	Showers	24
	Changing facilities	0	Changing facilities	DDA compliant shower and changing facilities, male and female changing facilities
6. PUBLIC REALM	Opening of public exhibition space dedicated to the display of archaeological artifacts found at the Roman Basilica beneath 85 Gracechurch Street. A new publicly accessible hall connecting Gracechurch Street Lime Street Passage and Leadenhall Market, measuring 596sqm, reinstating a historic public route through the City of London. Heritage walkway at 5 th floor level.			

	EXISTING	PROPOSED												
7. SERVICING VEHICLE TRIPS	Estimated 17 trips per day	<u>Unconsolidated</u> 84-86 delivery trips per day <u>Consolidated</u> 42-43 delivery trips per day												
8. SERVICING HOURS	Servicing vehicles would only be able to access the site between the hours of 11pm-7am to avoid conflict between service vehicles and the general public, with the exception of cargo bikes													
9. OPERATIONAL CARBON EMISSION SAVINGS	Overall improvements against Part L 2021: 18% GLA requirement: 35% Be Lean stage improvements against Part L 2021: 13% GLA Requirement: 15% Be Green stage improvements against Part L 2021: 5%													
10. OPERATIONAL CARBON EMISSIONS	91.9 Tonnes CO2/annual – Part L Regulated 2,757 tonnes/CO2 over 30 years – Part L Regulated													
11. EMBODIED CARBON EMISSIONS	 <p>GLA Benchmarks, Project Target & Planning Performance</p> <table border="1"> <thead> <tr> <th>Category</th> <th>A1-A5 (kgCO₂e/m² GIA)</th> <th>A-C (kgCO₂e/m² GIA)</th> </tr> </thead> <tbody> <tr> <td>GLA Benchmark</td> <td>950</td> <td>1,400</td> </tr> <tr> <td>GLA Aspirational</td> <td>600</td> <td>970</td> </tr> <tr> <td>Proposed Development</td> <td>1,110</td> <td>1,557</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Upfront embodied carbon: 1,110 kgCO₂e/m² GIA (A1-A5) Life Cycle Embodied Carbon: 1,557 kgCO₂e/m² GIA (A-C) excluding B6 and B7 (operational) 		Category	A1-A5 (kgCO ₂ e/m ² GIA)	A-C (kgCO ₂ e/m ² GIA)	GLA Benchmark	950	1,400	GLA Aspirational	600	970	Proposed Development	1,110	1,557
Category	A1-A5 (kgCO ₂ e/m ² GIA)	A-C (kgCO ₂ e/m ² GIA)												
GLA Benchmark	950	1,400												
GLA Aspirational	600	970												
Proposed Development	1,110	1,557												
12. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m2 GIA)	<ul style="list-style-type: none"> Whole Life Carbon Emissions (A-C) including B6&B7: 2,104 kgCO₂e/m² GIA 													

13. CARBON OPTIONS ASSESSMENT

- LIFE-CYCLE CARBON EMISSIONS

	Minor Refurbishment	Major Refurbishment	Major Refurbishment With Extension	New Build
Option Reference	Option 1	Option 2	Option 3	Option 4
Project Reference Period	60	60	60	60
Gross Internal Area (m2 GIA)	8,589	8,238	14,105	36,306
Net Internal Areas (m2 NIA)	6,458	Unknown	10,758	23,310
Change in GIA vs. Existing	-	351	5,516	27,717
Change in NIA vs. Existing	-	Unknown	4,300	16,852
Substructure % retained by mass	100%	100%	0%	0%
Superstructure % retained by mass	100%	95%	63%	0%
Total WLCA (incl. B6 & pre-demolition) kgCO2e/m2 GIA Module B7 is not considered	1,125	1,168	1,411	1,898
Upfront Embodied Carbon excl. sequestration (kgCO2e/m2 GIA)	54	351	662	1,105
In use and End of Life Embodied Carbon excl. B6 & B7 (kgCO2e/m2 GIA)	355	463	485	602
Estimated Whole Building Operational Carbon for building life time (B6) kgCO2e/m2 GIA)	711	347	258	179
Total WLCA (incl B6 & pre-demolition) (tCO2e) Module B7 is not considered	9,659	9,625	19,903	68,896
Total existing building demolition (tCO2e)	43	58	85	436
Upfront Embodied Carbon (A1-A5) (tCO2e)	464	2,892	9,338	40,118
In Use Embodied Carbon (B-C) (tCO2e)	3,049	3,814	6,841	21,856
Operational carbon for building lifetime (B6) (tCO2e)	6,104	2,862	3,640	6,486

14. TARGET BREEAM RATING

Seeks to achieve over 77% of the available water credits
Targeting BREEAM rating of “Excellent” in line with policy target with aspiration for “Outstanding”.
Aims to achieve a BREEAM targeted score of 87% with a view to a future score of 90%.

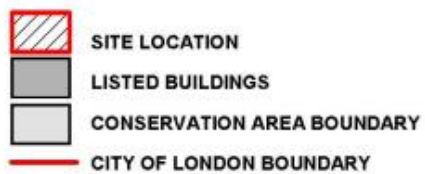
15. URBAN GREENING FACTOR

0.33 (GLA calculation), but this increasing to 0.37 when measured using the CoL methodology.

16. AIR QUALITY

Air Quality Neutral and Air Quality Positive assessments submitted, with NRMM and back-up power generation (inter alia) subject to details reserved by condition.

ADDRESS:
85 Gracechurch Street



Main Report

Environmental Statement

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

environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.

5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also form part of the environmental information to be examined and taken into account by your Committee.
6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
7. The effect interactions of each of the likely significant effects has been considered in the assessment. Mitigation and monitoring measures as proposed in the ES would be secured through planning conditions and/or planning obligations within the S106 agreement as appropriate.

Site and Surroundings

8. The site is located towards the northern end of Gracechurch Street, on the east side. It is bounded by Gracechurch Street to the west, the New Moon Public House and Leadenhall Market to the north, Bulls Head Passage to the south and Leadenhall Market to the east.
9. The red line boundary of the proposed development includes public realm proposals for improved and widening of footways on the south side of the eastern footway of Gracechurch Street.
10. The existing building was completed in 1934-35. It is 8 storeys high with 2 basements and comprises 364 sq.m (GIA) retail and 7,671 sq.m (GIA) offices (Total 8,035 sq.m)
11. Residential properties at: 4 Bulls Head passage lie to the south, at the Publican's Flat New Moon Public House to the north, Jamaica Buildings to the west and at 14 Lime Street to the east of the site. The site is in the Leadenhall Market Conservation Area.

12. There are a number of designated heritage assets in the immediate vicinity of the site. These include:
- Leadenhall Market Conservation Area
 - Leadenhall Market (grade II*)
 - St Michael Cornhill (grade I)
 - St Peter Upon Cornhill (grade I)
 - Lloyds Building (grade I)
 - Nos. 12 & 14-19 Leadenhall Street (grade II)
 - Nos. 81-82 Gracechurch Street (grade II)
 - Former Ship Tavern, Lime Street (grade II)
 - Nos. 7-9 Gracechurch Street (grade II)
13. Other designated heritage assets in the wider setting include: Tower of London World Heritage Site incorporating the Chapel Royal of St Peter ad Vincula (grade I), The Monument (grade I), Southwark Cathedral (grade I), Cannon Street Towers (grade II), Former PLA Building (grade II*, Lloyds Bank, 39 Threadneedle Street (grade II), Royal Exchange (grade I), 1 Cornhill (grade II), 13-14, 23-27, 28-30, 33-35, 39, 48, 50 Cornhill (grade II) and 15-22 Cornhill (grade II*), 39-40 Lombard Street (grade II), St Paul's Cathedral (grade II), No. 37 & 39 Lime Street (grade II), 7 & 9 Bishopsgate and The Royal Bank of Scotland (grade II), 2a Eastcheap (grade II), 7-8 Philpot Lane (grade II*), 23 and 25 Eastcheap, (grade II)
14. St Mary Woolnoth (grade I), and the Bank Conservation Area.
15. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.
16. Planning permission was granted in March 2023 for the following development:
17. Partial demolition of existing building (Gracechurch Street frontage adapted) and the erection 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.

18. The consented scheme is a material consideration when considered the application subject to this report. The current proposals are a further iteration of the design of the consented scheme, the necessity of which has been caused by the find of in-situ remains of London's first Roman forum-basilica, a 2,000-year-old structure of national significance, the remaining extent of which was greater than anticipated prior to archaeological investigations.
19. The alterations to the scheme have included extensive changes to the basement design, given the consented four levels of basement in the consented scheme could not be achieved while preserving or exhibiting the archaeological finds, and this has resulted in alterations across the building as a result of the structure work necessary to bring the building to ground while preserving the archaeological remains. The proposal subject to this application is the subject of a full planning application, and associated application for listed building consent, and is assessed on its own merits in the remainder of this report. Nevertheless, the extant consent represents a material consideration.
20. An application for listed building consent has been submitted (reference number 25/00548/LBC) for those works necessary to facilitate the proposed development. This application is currently under consideration.

Proposals

21. Planning permission is sought for:
22. 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.
23. The scheme would provide 36,325sq. M GIA floorspace comprising:
 - 34,771 sq.m of office floorspace;
 - 344 sq.m of flexible retail;
 - 596 sq.m of public hall;
 - 478 sq.m of cultural space at basement level; and

- 136 sq.m of public cultural space at level 05.

24. The proposed scheme reaches a maximum height of 147.9m AOD (Above Ordnance Datum) and would be 31 storeys in total height (inclusive of plant) and include two basement levels. The proposal is formed of a base rising from ground floor to level 05, with a tower element rising above. The base fronts Gracechurch Street, with the proposed facade reconstructed in a style referencing the original 1930's facade, with minor modifications with regards to the previously present fenestration and columns. The proposal includes a ground floor public passageway formed from the existing central portal entrance onto Gracechurch Street and would provide a new public route from Gracechurch Street into Leadenhall Market and on to Lime Street Passage.
25. The proposed development would predominantly be in office use, with a Public Hall at ground floor, a Heritage Walkway at fifth floor level and areas of flexible retail use at ground and first floor levels. The scheme provides a significant increase in office floorspace and an increase in retail floorspace on the site, with the aim of creating an open and permeable publicly accessible ground floor with a variety of retail uses, with flexible Grade A office floorspace above.
26. At ground floor level, the Public Hall would be flexible in use, it is designed to be a complimentary extension to Leadenhall Market, providing civic, event and market space to be used for food kiosks, market stalls and cultural activities such as film screening and exhibitions. It has been designed to be as flexible as possible.
27. At basement level, a public exhibition space is proposed accessed via lift and staircase from ground floor level. This exhibition space, with London Museum as content partner, includes seminar or education spaces, and the exhibition of the remains of London's first Roman forum-basilica in-situ. A Cultural Strategy has been submitted which sets out the intention to include the display of objects including artefacts from the site alongside the use of digital technologies allowing unique and immersive experiences for visitors.
28. The top of the base level, at fifth floor, includes a Heritage Walkway which provides an attractive elevated public space offering unique views across this part of the City, given its proximity to the Grade II* listed Leadenhall Market and its views towards the Grade I listed Lloyds of London, linking together the surrounding context of London through different eras and the Roman forum-basilica at basement level.

29. The proposed scheme would also deliver public realm improvements along Gracechurch Street, where footway widening is proposed, alongside improvements to pavement finishes and kerbs.
30. Above these levels, the lower floors are taken up by end of trip facilities, including shower and changing rooms, and cycle parking – principally uses which would have been accommodated at the basement levels in the extant scheme.
31. The tower element of the proposal takes up floors 5 to 29, with levels 5 to 12 tapering outwards to the north east in the buildings chamfered massing, levels 12 to 23 taking up the main body of the building, and with levels 24 to 29 then tapering inwards from the south east corner completing the chamfer of the overall building. The proposed tower includes a roof terrace amenity area for office users.
32. Servicing of the proposed building would take place overnight and within the Public Hall at ground floor level, to avoid conflicts with the public use of this space, and outside of servicing hours the Hall would be publicly accessible.
33. With regards to urban greening, there are extensive landscaping proposals at the site which include greening of the façade, greening at the upper terrace levels in the base of the building, and planting of the roof top amenity space.

Consultation

Statement of Community Involvement

34. The applicants have submitted a Statement of Community Involvement prepared by Kanda, outlining their engagement with stakeholders.
35. A public exhibition took place on the 13th of February 2025 from 12-6pm at 85 Gracechurch Street. 3.18 A total of 73 individuals attended the exhibition.
36. A designed newsletter distributed to 1,232 addresses to promote the consultation.
 - 8 meetings organised with local stakeholders and elected members.
 - An in person drop-in session attended by 73 members of the public.
 - A dedicated consultation website which was visited 257 times by 207 different users across the consultation.

- A geo-targeted social media campaign which secured a reach of 75,531 generating 276,901 impressions and 621 clicks

Statutory Consultation

37. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
38. Nearby residential occupiers were notified directly of the application by letter on 24th April 2025. The application was advertised in the press on 29th April 2025. Site notices advertising the planning application were posted on 24th April 2025.
39. At the time of publication of this report, one objection letter has been received. A summary of the representations received, and the consultation responses is set out in the table below.
40. All representations made in relation to the application are available in the public case file and have been read in full and considered in making this report and recommendation. Copies of all received letters and e-mails making representations are attached in full and appended to this report.

Consultation responses	
Air Quality	Recommended conditions.
London Borough of Camden	No objection
City And Hackney Public Health - Suicide Prevention	No comments received.
City Heritage Society	No comments received.
City of London Archaeological Trust	Letter of support received.
City of London's Environmental Health Department	Recommended conditions.
City of Westminster	No comments received.

City Police - General	<p>Meetings were held previously with the applicant, and through liaison with the security consultant the City of London Police's recommendations have been taken into the final design. Security screening, cycle store management, access and escape from the 5th floor public viewing balcony, and the roof space garden terrace should comply with Secure by Design guidance, and balustrades should be considered in line with CoL guidance.</p> <p>Response:</p> <p>Conditions concerning these matters are recommended to be attached.</p>
City Property Advisory Team	No comments received.
Cleansing Services	<p>Waste strategy proposed is acceptable and no objections.</p> <p>Response:</p> <p>Noted.</p>
Commissioner of Police	No comments received.
City of London's City Operations Division - Contract And Drainage Service	<p>Under the UK Water Industry Act 1991, section S111(1) and Building Regulations, Part H (Drainage and Waste Disposal) 2002, this proposal needs to comply with the requirements of the Sewerage Undertaker (Thames Water Utilities Ltd), these being;</p> <p>'Any building proposal which includes catering facilities will be required to be constructed with adequate grease traps to the satisfaction of Thames Water utilities ltd or their contractors.'</p> <p>Response:</p> <p>An informative would be attached setting out this advice.</p>
Council For British Archaeology	No comments received.
Counter Terrorist Section	No comments received.
Environment Agency	The Environment Agency (EA) has no objections to the proposed development but has provided advisory comments for consideration.

	<p>The EA recommends that any Non-Road Mobile Machinery (NRMM) used during site preparation, construction, or demolition meets the latest emissions standards (Regulation (EU) 2016/1628), particularly for developments within 2km of an Air Quality Management Area. Such machinery should also be registered for inspection where applicable.</p> <p>The EA encourages the inclusion of water efficiency measures in all new developments, suggesting that non-residential schemes over 1,000 sqm meet the BREEAM 'Excellent' standard for water consumption or equivalent.</p> <p>It is noted that the site lies within 75m of a Medium Combustion Plant regulated by EA. As such, the applicant should consider design or mitigation measures to minimise potential impacts (e.g. noise, odour, emissions) on future occupants. This aligns with paragraph 200 of the NPPF, which seeks to ensure new development integrates effectively with existing permitted uses.</p> <p>The EA requests a copy of the final decision notice for their records.</p> <p>Response:</p> <p>Air quality matters are addressed below and via condition, and the use of NRMM would be subject to conditions related to deconstruction and construction logistics.</p>
Greater London Authority	<p>Land Use</p> <p>Provision of office space in the CAZ supported, and cultural exhibition space and other areas of public access strongly supported.</p> <p>Layout and Public Realm</p> <p>Spaciousness, quality and accessibility of the public hall with market stalls is supported. The provision of fifth-floor viewing terrace with direct connection with archaeology, both being publicly accessible, is supported.</p> <p>Scale, Form and Massing</p> <p>The proposed height and mass is similar to the extant consent, however the proposals would be rationalised with a simpler and more elegant form. Changes to the transition from the building on Gracechurch Street to the new building above have resulted in improvements, and are supported.</p>

	<p>Heritage</p> <p>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.</p> <p>Transport</p> <p>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. A final Delivery and Servicing (DSP) and Construction Logistics Plans (CLP), and Travel Plan should be appropriately secured.</p> <p>Energy and Carbon Reduction</p> <p>Some matters require resolution prior to the Mayor's decision making stage</p> <p>Response:</p> <p>Support for design, scale, massing, and land use are noted, and the heritage conclusions are noted while being referenced in the relevant sections of this report. Noted also that the applicant is currently addressing the energy and carbon reduction matters with GLA officers and this this would need to be agreed prior to conclusion of Stage 2 of the GLA referral process.</p>
Heathrow Safeguarding	<p>The application has been assessed against safeguarding criteria, and we can confirm that we have no safeguarding objections to the proposed development.</p> <p>However, we would like to draw your attention to the following:</p> <p>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'.</p> <p>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</p>

	<p>(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/</p> <p>The following details should be provided before the crane is erected:</p> <ul style="list-style-type: none"> • the crane's precise location • an accurate maximum height • start and completion dates <p>Response:</p> <p>An informative would be attached setting out this advice.</p>
Highways	No comments received.
Historic England - GLAAS	<p>The development affects a heritage asset of equivalent significance to a scheduled monument. 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.</p> <p>In our view, this residual harm would be largely offset by significant public benefits from revealing and interpreting the site's significance.</p> <p>Recommended conditions.</p> <p>Response:</p> <p>Such conditions are recommended to be attached, and this response is addressed in the relevant section of this report below.</p>
Historic England	<p>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.</p> <p>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.</p>

	Response: consideration of the impacts identified in Historic England's response are contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, Designated Heritage Assets, Leadenhall Market Conservation Area, Bank Conservation Area and 85 Gracechurch Street and Principle of Redevelopment.
Historic Royal Palaces	No comments received.
London Borough of Islington Council	No comments received.
Lead Local Flood Authority	No comments received.
Lighting Consultations	No comments received.
London Borough of Greenwich	No objections.
London Borough of Hackney	No comments received.
London Borough Of Southwark	No comments
London Borough of Tower Hamlets	The LPA has no observations to make.
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.
London Underground	No objection.
Ministry of Housing, Communities and Local Government	No comments received.
NATS Safeguarding Office	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.
Natural England	No objections 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.

SAVE	No comments received.
Society For the Protection of Ancient Buildings	No comments received.
Strategic Transportation Planning	No comments received.
Surveyor To the Fabric of St Paul's	<p>The surveyor has requested the following confirmation: "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 <i>technical</i> visibility or impact, is not permitted. We request that this is confirmed for the length and breadth of the Processional Way.</p> <p>Response:</p> <p>This is addressed in the following sections below: impacts of a tall building; architecture, urban design and public realm; St Paul's Viewing Points; and St. Paul's Cathedral. In summary, The designs have developed the principles established by the consented scheme, so that the height and form of the proposal would preserve the pre-eminent skyline setting of St Paul's in strategic views from the Processional Route.</p>
Thames Water	<p>Thames Water has raised concerns due to the development's proximity to strategic sewer and water mains. They request a condition requiring approval of a Piling Method Statement and Layout Plan before any piling begins, to prevent potential damage to underground infrastructure.</p> <p>Thames Water has been unable to confirm whether there is sufficient capacity for foul and surface water drainage. They request conditions preventing occupation until capacity is confirmed, a phasing plan is agreed, or necessary upgrades are completed.</p> <p>For water supply, current capacity supports only a limited portion of the development (447m² retail space or 1.5 l/s peak flow). Occupation beyond this should be conditional on upgrades or a phasing plan.</p> <p>Additional information including drainage strategies and detailed piling plans is required to discharge these conditions.</p> <p>Response:</p>

	<p>A Clean Water Capacity Report has been provided by the applicant, and authored by Thames Water, confirming sufficient capacity for foul and surface water drainage(dated 1st May 2025).</p> <p>Other matters raised are addressed via condition.</p>
The City Surveyor	No comments received.
The Director of Culture, Heritage & Libraries	No comments received.
The District Surveyor - Fire Strategies	No objections.
Transport For London	<p>With the extant consent broadly establishing the acceptability of all transport impacts proposed, with the recent revisions to the scheme being considered relatively minor in strategic transport terms.</p> <p>A package of highway improvements have been agreed, given the proposals impact on the Transport for London Road Network.</p> <p>An s106 obligation is requested for the applicant to enter into a s278 with TfL, with s278 to include an agreed scope of works, a Road Safety Audit, and temporary works to facilitate construction. A condition concerning the submission of a Construction Logistics Plan is recommended.</p> <p>Full public access through the Public Hall should be secured through s106 obligation.</p> <p>Delivery and servicing restrictions should be secured via condition, and should not apply to cargo bikes with the provision of cargo bikes welcomed.</p> <p>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.</p> <p>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.</p> <p>Response:</p>

	This Response is noted, with conditions attached as recommended.
Twentieth Century Society	No comments received.
Victorian Society	No comments received.

Letters of Representation

Letters of representation – one letter of objection received from the owners/occupiers of 3 surrounding sites	
Residents of 4 Bulls Head Passage	<p>Three residents and owners of Flats A, B and C, 4 Bulls Head Passage objected to this proposal on a number of grounds.</p> <p>Firstly, their flats share a party wall with the proposed development, they state this places the owners in immediate proximity and prompting objections.</p> <p>They are also concerned about significant noise, health risks, and safety issues during construction, which they feel have not been properly addressed in the Health Impact Assessment. A meeting with the developer took place and access was granted to their properties, however, they feel they have received no meaningful assurances regarding protection from construction hazards.</p> <p>They also feel the 32-storey tower is out of character with the historic Leadenhall Market and its conservation area, noting that objections from Historic England and the City of London Conservation Area Advisory Committee remain unresolved.</p> <p>Additionally, they believe the proposal breaches the London Plan and local planning policies, which discourage tall buildings in heritage settings and require harm to heritage assets to be clearly justified.</p> <p>Response: Consideration of these impacts are contained in the following sections later in the report: Design and Heritage, Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing.</p>

Freehold owner of 2-4 Bulls Head Passage	<p>Email received 3rd June:</p> <p>The rear of the property overlooks a lightwell and several windows and ventilation openings in the rear wall open onto this lightwell. Drawings show these would be closed during the building work.</p> <p>There is a boundary dispute between the parties. Discussions are ongoing with the applicant – of which amendments would be required to the plans as submitted currently.</p> <p>Request that the applications be brought to Planning Committee after the agreement of revised plans.</p> <p>Letter received 18th June:</p> <p>The submitted proposals occupies the freehold directly up to the freehold boundary, requiring oversailing of our property with a service cradle to allow for window leaning.</p> <p>Such oversail requires our permission, without permission the applicant would trespass our freehold rights.</p> <p>This can easily be avoided, with the developer having a clear choice to set back the building to ensure the cradle would remain within their freehold space. We were not made aware of this oversailing until recently.</p> <p>We have made clear to the developer in writing on 11th June 2025 that we do not grant permission to oversail our freehold and have asserted our rights as freeholders not to be trespassed.</p> <p>It appears that the developers intend in the future to rely upon the Access to Neighbouring Land Act 1992 (“The Act”) to gain access to clean the windows once the building has been completed. However the Act cannot be used either to build a new property or for later access to service such a property.</p> <p>Planning permission should not generally be granted for applications where Building Regulations cannot be met, the planning application should either be rejected or put on hold till the Developers are able to amend their application so that they can show that they can meet the Building Regulations.</p> <p>Response:</p> <p>Consideration of these impacts are contained in the following sections later in the report: Design and Heritage, Noise and Vibration, Health Impact Assessment, Air quality and Daylight, Sunlight, Overshadowing. Where matters above are not material planning considerations, these are addressed following this table.</p>
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<p>City of London's Conservation Area Advisory Committee (CAAC)</p>	<p>They welcome the slight reduction in height of the proposed building, the greening and the improved heritage offer.</p> <p>The Committee reiterated its objection considering that this proposal represented a significant overdevelopment of a constrained and sensitive site.</p> <p>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.</p> <p>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.</p> <p>Response to comments: consideration of the impacts identified in the City of London Conservation Area Advisory Committees response is contained in the following sections of this report: Design and Heritage, Principle of a Tall Building, Tall Building – Impacts, Strategic Views, 26 Leadenhall Market Conservation Area and 85 Gracechurch Street, Principle of Redevelopment.</p>
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Support

41. Letters of support have been received from the London Museum, and setting out their support for their partnership with the applicant and their engagement since the granting of planning permission in 2023, and their enthusiasm for a long-term partnership with the applicant in providing consultancy as to the in-situ exhibition at basement level and the heritage walkway at 5th floor level (subject to further agreement).
42. A letter from support has also been received from the City of London Archaeological Trust. The Trust encourage all procedures to be adopted during construction as advised by Historic England, while praising the proposed presentation of the archaeological finds as laid out in the submitted 'Cultural Vision' document. Additionally, a letter of support has been received from the EC BID.

43. Not all the representations above are material planning considerations. Specifically, where the representations from neighbouring properties make references to freehold rights and oversailing rights the grant of planning permission does not confer any private rights and any such right necessary to build and operate the building would need to be gained by the applicant. It is not a requirement of planning that such rights be gained prior to the grant of planning permission. It is not a requirement of planning that such rights be gained prior to the grant of planning permission. Those matters that are material considerations have been dealt with in this report.

Policy Context

44. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
45. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which was published for Regulation 19 consultation on 18 April 2024. It was then submitted to the Secretary of State on 29 August 2024, and has completed its Examination in Public at the time of writing this report. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
46. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of very limited weight and will not be referred to in this report.
47. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 (as amended in February 2025) and the Planning Practice Guidance (PPG) which is amended from time to time.
48. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.

49. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
50. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
- c. approving development proposals that accord with an up-to-date development plan without delay; or
 - d. where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination. [Footnote 9: The policies referred to are those in paragraphs 66 and 84 of chapter 5; 91 of chapter 7; 110 and 115 of chapter 9; 129 of chapter 11; and 135 and 139 of chapter 12.]
51. Paragraph 49 states that local planning authorities may give weight to relevant policies in emerging plans according to:
- a. the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
 - b. the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
 - c. the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
52. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
53. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.

54. Paragraph 91 of the NPPF states that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available (or expected to become available within a reasonable period) should out of centre sites be considered.
55. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lives, through promoting good health and preventing ill-health.
56. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
57. Paragraph 104 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.
58. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 110 states that "Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
59. Paragraph 117 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and it should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
60. Paragraph 118 states that "All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be

supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

61. Paragraph 125(c) provides that planning policies and decisions should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused”.
62. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”
63. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing with a high standard of amenity for existing and future users.
64. Paragraph 136 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...’
65. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard

of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

66. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
67. Paragraph 164 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems and help to reduce greenhouse gas emissions, such as through its location, orientation and design.
68. Paragraph 166 states that, in determining planning applications, Local Planning Authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
69. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 208 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
70. Paragraph 210 of the NPPF advises, "In determining applications, local planning authorities should take account of:

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

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

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

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

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

74. Paragraph 216 of the NPPF states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.

75. Paragraph 219 of the NPPF states “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance.

Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

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

Statutory Duties

77. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
 - To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
78. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
79. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

Main Considerations

80. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation

responses, in addition to the development plan, and other material considerations including SPGs, SPDs and emerging policy.

81. There are policies in the Development Plan which support the proposal and others which do not. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it.
82. The principal issues in considering this application are:
 - The principle of development;
 - The appropriateness of the proposed uses, including the new cultural offer;
 - The appropriateness of a tall building on site;
 - The appropriateness of the architecture, urban design, and the new public realm;
 - The impact of the proposal on the Tower of London World Heritage Site;
 - The impact on strategic views in the London Views Management Framework and on other strategic local views;
 - The impacts of the proposal on the setting and significance of heritage assets;
 - The acceptability of the proposed highway and transportation arrangements including servicing, cycle parking provision and impact on highways;
 - The acceptability of the scheme in terms of its environmental effects including wind microclimate, daylight and sunlight, overshadowing, solar glare, thermal comfort, flood risk, air quality, contaminated land, building resource efficiency, energy consumption and sustainability, urban greening, overheating, and flood risk;
 - The potential impacts of the development on buried archaeology;
 - The acceptability of the proposal in accessibility terms;
 - Acceptability of the proposed security, suicide prevention and fire safety arrangements;
 - The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan, including the paragraph 215 balancing exercise;
 - Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and the Human Rights Act; and
 - The requirement for financial contributions and other planning obligations

Principle of Development and Economic Considerations

83. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity, and significant weight on the need to support economic growth and productivity, taking

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

84. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
85. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These officebased economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
86. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.
87. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local

business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

88. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace is therefore required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
89. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
90. London Plan Policy GG2 sets out the mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are wellconnected by existing or planned public transport; proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and placemaking, strengthening London's distinct and varied character.
91. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.

92. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
93. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
94. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, at policy DM1.2, further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
95. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy and enhancing the City's evening and weekend economies; creating new and enhanced culture, leisure and visitor attractions; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces; delivering new, inclusive open spaces and enhancing the City's public realm for everyone; delivering urban greening and greater biodiversity; and creating an inclusive, healthier and safer City for everyone.
96. The emerging City Plan (2040) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1,200,000sqm during the period 2021-2040. This floorspace should be adaptable and

flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

97. The application site is situated within the Eastern Cluster as defined in the Local Plan 2015 and the City Cluster as defined in the emerging City Plan 2040. The Cluster contains the greatest density of businesses and jobs in the City and both the Local Plan 2015 and emerging City Plan 2040 recognise that the Cluster can accommodate significant growth in office floorspace and is a location for tall buildings. The emerging City Plan in Strategic Policy S21: City Cluster, identifies the Cluster as a key area of change. In the Local Plan 2015 the site is within the Eastern Cluster Key City Place as set out within policy CS7.
98. The Cluster Policy area is defined by an illustrative diagram and on the Policies Map in the adopted and emerging Plan. The area is intended to be a general strategic area where tall buildings can be delivered on appropriate sites. Strategic Policy S21 of the emerging City Plan identifies the City Cluster as a key area of change where a significant growth in office floorspace and employment will be successfully accommodated including through the construction of new tall buildings together with complementary land uses, transport, public realm and security enhancements.
99. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are further reflected in the Corporations 'Destination City' vision for the square mile.
100. The proposed scheme would help deliver the City's strategic objectives and support the City's economic role by providing a substantial and strategic contribution of flexible Class E (office) floor space alongside a complementary retail and cultural offer and new public realm. The principle of development has also been demonstrated through the extant permission at the site, as set out in the relevant section above.

Land Uses

101. The proposed building predominantly provides office use (Class E), with a Public Hall (Sui Generis) at ground floor, and a Heritage Garden and Cultural Space (Sui Generis) at fifth floor which provides amenity for City workers, residents and visitors, and areas of flexible retail use (Class E(a), E(b), drinking establishment (Sui Generis) and hot food takeaway (Sui Generis) at ground, first and fifth floor. The proposed uses are set out as below:

Land Use	Use Class	GIA (m2)
Office Space	E (g) (i)	34,771
Retail	E (a), E(b),	344
Public Hall	Sui Generis	596
Basement Cultural Space	Sui Generis	478
Level 05 Heritage Walkway	Sui Generis	136
Total		36,325

102. The following sections of the report provided an assessment of these proposed uses in turn.

Provision of Office Accommodation

103. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.
104. The predominant use of the proposed development is office space, comprising of 34,771 sq.m (GIA) of Commercial/Office Floorspace Class E(g). The office space is classified as best-in-class, Grade A office space.
105. Adopted Local Plan Policy CS1 aims for a significant increase in new office floorspace in the City. This policy seeks to deliver 1,150,000sqm of additional office floorspace

between 2011 and 2026. The emerging City Plan 2040, in Policy S4, seeks to deliver at least 1.2 million sqm net of new office floorspace in the period between 2021 and 2040.

106. As well as being considered Grade A office space, the proposed office space would contribute to the operational decarbonisation of the City's stock of office floorspace, as detailed further in the assessment of the sustainability credentials of the proposed scheme in the latter sections of this report. The proposed development is estimated to accommodate between 1,700 and 2,205 full-time equivalent (FTA) jobs, an uplift of 1,260 to 1,630 FTE jobs. Further, the lower floors are designed to be capable of being taken up by SME or flexible working operators while the upper floors provide larger more regular floor plates suitable for a range of office occupiers. Alongside is provision of a range of interior and exterior environment amenity and floor area, the proposal is considered in accordance with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.
107. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a considerable uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

Provision of Retail Space

108. Policy DM 1.5 encourages mix commercial uses within office development which contribute to the City's economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also supported by policy OF1 of the emerging City Plan.
109. The application site is located within the designated Leadenhall Market Principal Shopping Centre (PSC) as set out in the Local Plan (2015). The existing site contains 364sq.m of retail floorspace including a health and wellness (Holland & Barrett) retail unit and a healthy food to go chain retail unit occupied by Pure. The proposed works to this site would provide market-style retail uses (Class E and Sui Generis) floorspace, within

the Public Hall, amounting to an uplift in retail floorspace. An exemplary level of activity is provided at ground floor level, complementing the nearby Leadenhall Market, through the provision of an east-west through-route within the Public Hall. It is envisaged retail provision would be provided in the Public Hall areas including pop-up/'micro-retail' retail spaces such as stalls and kiosks which would enliven the public realm in this location and enable public events to take place which would activate the frontages of the building. Leadenhall Market is located adjacent which in recent years is underperforming however the addition of this proposed development through wider range of multi-use spaces and activities of a cultural and retail nature would encourage footfall and retain a higher proportion of visitors. The reinstatement of a historic City public route running through the site would enable better access between the traditional retail units within the Victorian Market and the proposed new development.

110. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character. Adopted Local Plan Policies CS20 and DM20.1 prioritise retail uses within PSCs and seek to resist the loss of retail frontage and floorspace. Emerging City Plan policy S5 encourages the continued provision of retail uses in the PSC and complementary uses that provide an active frontage. The proposals are in conformity with both emerging and adopted Local Plan retail policies.

Provision of Cultural Space

Basement and Ground Floor Level

111. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:
- Providing, supporting and further developing a wide range of cultural facilities including the cultural quarter focused on the Barbican complex, the Guildhall School of Music and Drama, the Guildhall Art Gallery and City Libraries.
 - Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.
 - Protecting existing cultural facilities where they are need.
 - Providing visitor information and raising awareness of the City's cultural and heritage assets.

- Allowing hotel development where it supports the primary business or cultural role of the City.

112. The emerging City Plan 2040 under Policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.
113. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.
114. The submitted Cultural Plan was produced by MOLA, the London Museum and the applicant, setting out the cultural vision for the site and the varied proposed cultural uses within – including the exhibition and public access space concerning the Roman forum-basilica, the proposed Public Hall, and the Heritage Walkway.

Roman Forum-Basilica Exhibition

115. This publicly accessible space at basement level would be an exhibition of the in-situ remains of the Roman forum-basilica, with the London Museum acting as cultural content partner. Spaces dedicated to teaching and seminars, and the display of objects, are to be considered alongside the use of digital technologies allowing unique and immersive experiences for visitors.

Public Hall

116. The Public Hall features a significant east-west public through-route, and double height space, and several levels for public use. The Cultural Strategy sets out a vision which includes opportunities to accommodate a programme of curation which appeals to different audiences and seeks to attract them to the City of London, giving existing examples of such events that could be accommodated and which are regularly held in London (e.g. Lumiere light displays, and visual art fairs).

117. Each space would be the subject of a condition requiring the submission of a Public Access and Management Plan, and s106 obligations requiring management plans would also be required. The spaces are considered substantial benefits of the scheme, and in compliance with Policy CS11 of the Local Plan and emerging City Plan 2040 Policy CV2.

Heritage Walkway

118. Local Plan 2015 policy DM10.3 and draft City Plan 2040 policies S8, S12 and DE4 seeks the delivery of high quality, publicly accessible elevated viewing spaces. Public access to tall buildings within the City is important in creating an inclusive City.
119. Policy D9 (D) of the London Plan states that 'free to enter publicly accessible area should be incorporated into tall buildings where appropriate'.
120. The Heritage Walkway proposed would comply with these policy aspirations, providing a unique view at level 05. This view is considered an appropriate and attractive public viewing space, given its proximity to the Grade II* listed Leadenhall Market and its views towards the Grade I listed Lloyds of London, linking together the surrounding context of London through different eras and the Roman forum-basilica at basement level. The details of the operation and management of this space would be secured via condition and s106 obligation.
121. The proposals for the elevated public space are in accordance with Local Plan policy DM10.3, draft City Plan 2040 policies S8, S14 and DE4, which seek the delivery of high-quality, publicly accessible elevated viewing spaces.
122. It is considered that the proposal would deliver a compelling new cultural and exhibition offer for the City that would align with the Destination City agenda. The proposals would attract new audiences, alongside the provision of a new route through to Leadenhall Market. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place aligning with Destination City. Final details of the operation and management of the spaces would be secured through conditions and the S106 agreement through submission of the Viewing Deck Management Plan. The proposal would therefore accord with policy CS11, CS22, DM1.5, DM10.3, DM19.3 and DM22.1 of the Local Plan 2015 and policies CV2, HL5, HL7 and DE4 of the emerging City Plan 2040.

Principle of a Tall Building

123. The proposal is considered a tall building as defined by the adopted Local Plan (CS14, para 3.14.1) and the emerging City Plan 2040 (S12(1), 75m AOD>). With reference to the 'Eastern Cluster' Policy Area in the adopted Local Plan (Policy CS7, fig. G) and in the revised 'City Cluster' Policy Area (emerging Policy S21, fig. 28) in the emerging City Plan 2040, the proposal is located in the City Cluster of tall buildings.
124. For the spatial planning purposes of London Plan Policy D9(B), the application site, due to its location in the Eastern/City Cluster of tall buildings, is in a location identified as suitable for tall buildings in the Development Plan.
125. However, as per the consented scheme, on a site-specific basis, the proposal is in the Leadenhall Market Conservation Area, therefore falling within a localised area that is both within the wider designated tall buildings cluster area and also deemed 'inappropriate for tall buildings' under Local Plan Policy CS14 (because it is in a conservation area). It is recognised that there is a tension between the wording of London Plan Policy D9, which envisages under Part B that locations where tall buildings may be an appropriate form of development will be identified in development plans, and the more dated Local Plan 2015 Policy CS 14 which identifies only areas which are 'inappropriate'.
126. The proposal draws in-principle support from its location in the City Cluster, whilst being located in an inappropriate area as referred to in CS14(2) as it is in a conservation area. In *R (ota LB of Hillingdon) v. Mayor of London* [2021] EWHC 3387 (Admin), the High Court held that London Plan Policy D9(B) was not a pre-condition or 'gateway' to the application of the criteria in D9(C). In other words, even where a proposed tall building falls outside an area identified as suitable in a development plan under Part B, the impacts of the tall building as set out in Part C should still be considered.
127. An assessment against London Plan Policy D9 (C) and (D) is made below, with reference where relevant to other sections of this report. It is found that the proposal, as per the consented scheme, would satisfy the criteria in (C) and (D), including in relation to Part C (d), finding that it would not harm the significance of the Leadenhall Market Conservation Area.
128. As a matter of planning judgement, it is considered the proposal would accord with London Plan Policy D9 but would conflict with Local Plan Policy CS 14(2). This conflict with a Development Plan policy is addressed at the end of the report when considering

whether the proposal accords with the Development Plan as a whole, as part of the Planning Balance.

Impacts of a Tall Building

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

Visual Impacts

130. In relation to London Plan Policy D9(C; 1; i) the impact of the proposals upon the City and wider London skyline in long range views has fundamentally informed the optimisation of site and the overall height and form. The designs have developed the principles established by the consented scheme, so that the height and form of the proposal would preserve the pre-eminent skyline setting of St Paul's in strategic views from the Processional Route. It has also been designed to step down from the summit of the emerging City Cluster in strategic riparian views and assisting in assimilating the isolated bulk of 20 Fenchurch Street into a coherent cluster and urban form, in line with the long-term Plan-led approach in which the GLA, CoL and HE have played a significant curatorial role.
131. The top is designed with a flourish offering a pleasingly subtle 'crown' in those wider views. The massing of the tower base includes a set back from the edges at podium level 5, creating a break in the Gracechurch Street elevation in response to the existing parapet line, preserving the character of the principal façade within the conservation area. In relation to D9(C; 1; ii), mid-range views, the proposal relates appropriately to the form and character of the developing Cluster, stepping down in height southwards towards the river from its apex at 22 Bishopsgate/1 Undershaft. In comparison, the proposal is of a more modest height than other existing and consented tall buildings in the Cluster, given here for reference (in descending AOD height order):
- 1 Undershaft: 304.9m
 - 22 Bishopsgate: 294.94m
 - 122 Leadenhall Street (the 'Cheesegrater'): 239.40m
 - Heron Tower: 217.80m
 - 52-54 Lime Street: 206.50m

- Tower 42: 199.60m
- 30 St Mary Axe (the 'Gherkin'): 195m
- Leadenhall Court: 182.7m
- 20 Fenchurch Street: 160m
- 85 Gracechurch Street: 155.70m
- 70 Gracechurch Street: 155m
- 50 Fenchurch Street: 149.6m

132. The proposal has therefore been designed with the future evolution and consolidation of the Cluster in mind. As such the proposals will be appreciated as in keeping with the evolution of the Cluster, readily identified as part of this group and reinforcing the spatial hierarchy of the local and wider context. Its sculpted, serrated silhouette and elevations of pale masonry and extensive urban greening would give the proposal a distinctive identity on the skyline and create a distinct albeit familial relationship with the predominantly glazed and more formally geometric profiles of its built, emerging, and consented neighbours. (D9 C:1:a:ii, D9 C:1:b).

133. The design response has evolved specifically in reference to identified sensitive townscape viewpoints illustrated within the HTVIA. The principal elevation addresses Gracechurch Street, with the remainder to the rear situated within the medieval street pattern of the Leadenhall Market Conservation Area. The local context therefore exhibits a duality between the compact plots and lower rise buildings within the Conservation Area and the existing towers of the City Cluster, which create an immediate backdrop and wider context experienced alongside the Conservation Area.

134. The sensitive rebuilding of the principal Gracechurch Street elevation ensures its positive contribution to the local street scene is conserved. The solid masonry base and set back of the tower element above, while configured differently from the consent, ensures the relationship of the base with the surrounding built frontages is consistent with the consented scheme, reinforcing the existing datums along Gracechurch Street as well as the contrast with the City Cluster rising above, allowing the scale and character and vitality of the street to be preserved.

135. As above, the creation of a break in the built frontage to Gracechurch Street at level 5, enables a soft green parapet edge as well as a public walkway, viewing terrace and cultural space at roof level overlooking the market. This walkway provides an area of publicly accessible open space available at no charge (D9; D) to be secured in the S106.

A sense of vitality is further promoted with the re-establishment of a historic through-route across the site, with the provision of a Public Hall enhancing a sense of activity at street level (D9 C:1:a:iii). This enhances permeability within the general surroundings and provides the maximum feasible amount of open space. A complete description and assessment of the podium and tower's design is addressed below, and this has been found to be of the highest architectural quality, ambitious in scope and calibre (D9C:1:c).

136. A full assessment of impact with regards to heritage assets, particularly with regard to the Leadenhall Market Conservation Area is outlined in the relevant sections below. The conclusion of this assessment is that the proposed development will result in an overall modest enhancement to the Conservation Area. This assessment has concluded that the proposals will be appreciated as part of a dense, close-knit consolidating backdrop of tall buildings. The visual strength of this existing juxtaposition is such that, while it is acknowledged the proximity of the proposals could feel uneasy in certain views of Leadenhall Market, this would be balanced out by the replacement of poor quality with high quality architecture, nullifying those fleeting incidents with countervailing benefit.

137. Further to this, the following enhancements to the Conservation Area have been identified:

- (i) the rebuilding of the principal historic façade of 85 Gracechurch Street, restoring its decorative quality and enhancing its positive contribution to the character of the streetscape.

- (ii) the reinstatement and reinterpretation of a historic space through the site and

- (iii) the further activation of the streetscape surrounding the market, amplifying a sense of the historic experiential setting to the market which would have been defined by the bustle of diverse commercial trade and consumption (D9 C:1;d-e).

138. A low level of less than substantial harm has been identified to St Michael Cornhill (grade I listed), and slight levels of less than substantial harm to Tower Bridge (grade I listed) and the Bank Conservation Area. For the reasons set out in detail in this report, it is considered there is clear and convincing justification for this, not least the delivery of an important site in the long-term consolidation of the City Cluster, and that the harm is more than just outweighed by wider public benefits, including heritage benefits, in this instance. Overall, it is considered the proposal would make a positive contribution to the core and unique character of the City Cluster in which it is situated and options were explored as

part of an optimisation exercise to avoid and mitigate harm to heritage, as set out in this report and as part of the prior consent.

139. In accordance with D9 (C; 1; e), the proposal has been found through detailed analysis, referred to later in this report, not to cause harm to the Outstanding Universal Value of the Tower of London World Heritage Site, and the ability to appreciate it. This is by reason of its siting within the long-established and consolidating Cluster backdrop, intervening distance and height when viewed from in and around the Tower of London. In accordance with D9 (C; 1; f), the proposal would be set well back from the banks of the River Thames, outside the Thames Policy Area. It would step down towards 20 Fenchurch Street at the 'prow' of the emerging Cluster, which then steps down to preserve the historic scale of the Upper Pool of the Thames, preserving the open quality and views of/along the river, avoiding a strong 'canyon effect' when seen in association with the London Bridge Cluster.
140. In accordance with D9 (C; 1; g), the proposal would not cause adverse reflected glare, addressed elsewhere in this report, in particular due to its modern masonry grid designed to enhance sustainability and prevent solar gain. In accordance with D9 (C; 1; h), the proposal has been designed to minimise light pollution from internal and external lighting, which is inherent in the façade, and will be secured in detail via condition.
141. The proposal has been assessed in reference to the potential impacts set out at Policy D9 (C; 1) and is considered to accord with that element of the policy.

Functional Impact

142. Through interrogation via the pre-app process the internal and external design and construction detailing, materials and emergency exits have been designed to ensure the safety of all occupants (D9;C;2;a). Similarly the proposals have been assessed and developed from the start of the proposals to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, without disturbance or inconvenience for surrounding public realm (D9;C;2;b).
143. Particular care has been taken with regards to the Public Hall, basement archaeology exhibition space, level 5 roof top walk way and office uses so that entrances, access routes and floorspaces have been designed to allow for peak time use, avoiding unacceptable overcrowding or isolation in surroundings (D9;C;2;c). In particular the provision of a Public Hall, archaeology exhibition and heritage walkway is considered

an ambitious offer which will promote the creation of jobs, services, facilities and economic activity (D9;C;2;e). The proposals have also been thoroughly tested with regards to the capacity of the transport network in the area, proving the existing services are able to provide sufficient access to facilities, services, walking and cycling networks, and public transport for people living or working in the building (D9;C;2;d). No adverse effect has been identified on the operation of London's aviation navigation and the proposals also have been found to avoid significant detrimental effect on solar energy generation on adjoining buildings (D9;C;2;f).

144. It is considered the proposal would meet the functional considerations of Policy D9 (C; 2).

Environmental Impact

145. The proposals have been found to provide safe and suitable levels of wind, daylight and sunlight and temperature conditions will not compromise the comfort and enjoyment of open spaces. The design is considered to ensure safe and comfortable levels of solar glare and solar convergence (D9;3;a). Additionally, the design has given consideration for how the proposals can assist with the dispersal of air pollutants and will not adversely affect street-level conditions or create harmful levels of noise from air movements, servicing or building uses, preserving the comfort and enjoyment of surrounding open space (D9;3;b-c). It is considered the proposal would meet the environmental considerations of Policy D9 (C; 3).

Public Access

146. The proposal would deliver a new public route and large new Public Hall at ground floor level, and archaeological exhibition at basement, while at fifth floor level the proposal would incorporate a roof top walkway and cultural space. These three offerings would comprise free to enter, publicly-accessible areas and their locations are the optimal ones to unlock (i) vastly improved pedestrian experience and amenity at ground floor level (ii) optimal views at roof level over the Leadenhall Market Conservation Area and of the City Cluster (iv) unique educational and cultural facility showcasing London's Roman civic centre. It is considered that the provision of publicly accessible open space has been optimised in respect of the site's particulars and that the proposal would meet the considerations of Policy D9 (D).

Conclusion

147. Overall it is the view of your Officers that the proposed development accords with London Plan Policy D9, but conflicts with Local Plan Policy CS 14(2).

Architecture, Urban Design and Public Realm

Architecture

148. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate the significant growth of core CAZ employment and complementary commercial/leisure uses which are at the heart of the strategic delivery function of the City Cluster to accommodate substantial growth in accordance with Policies CS7 and London Plan Policies SD 4, SD5 and E1.
149. The architectural design approach has been amended through the planning process to consider options and strike the overarching balance of growth need and heritage conservation, which is at the heart of the strategic balance of the Plan-led approach to growth in the CoL. This is in line with the long-term Plan-led approach to consolidating substantial uplift in commercial uses in the defined City Cluster of tall buildings, allowing for the capacity of the site to be optimised relative to strategic heritage constraints, whilst allowing for higher densities commensurate with the uniquely high levels of economic agglomeration and public transport connectivity in this part of the CoL and wider CAZ. This long term approach has created an emerging and also unique site context, in terms of character, to which the proposal has been designed to respond. Overall, for the reasons set out below, it is considered that the proposal would accord with the design-led approach of London Plan Policies D3 and D8, delivering a design solution making effective use of limited land resources, in accordance with strategic Local Plan Policy CS10 and City Plan Policy S8.
150. It is considered that the scheme would represent 'Good Growth' by design, in accordance with the London Plan Good Growth objectives GG1-6: growth which is socially, economically and environmentally inclusive. The site lies on the western edge of the City Cluster, with its principal frontage to Gracechurch Street and the remainder embedded

within the tight-knit, fine-grained medieval street pattern of the Leadenhall Market Conservation Area. It thus has two very distinct local contexts to, as per the consented scheme, this proposal seeks to respond: the matrix of chiefly low-rise buildings on compact plots arranged upon the medieval streets, and, above these, the existing towers of the City Cluster, modelled to form a cohesive Cluster on the City's skyline, which appear as an immediate backdrop against which the Conservation Area is perceived and experienced from ground level. Fundamentally shaped by the local distinctiveness of these two contexts, the proposal would comprise architecture of the highest quality, with outstanding sustainability credentials, be attractive and contextual at numerous scales and would, in the form of the proposed Public Hall at ground floor level and exhibition space at basement level showcasing the London Basilica, over and above the consented scheme, the current proposals would deliver a landmark new civic space in support of Leadenhall Market and of the City's wider 'Destination City' initiative and world class exhibition space. It would resolve the design challenges posed by the site by comprising two main elements: a street-level building or 'podium' with a tower above.

Podium Building

151. The podium would be an outstanding response to the site's local distinctiveness. It would sensitively rebuild the existing 1930s building's Gracechurch Street frontage in approximate facsimile, modified by recessing the existing bronze-coloured windows to give greater depth, introducing new bronze coloured window elements to the lower parts and widening the existing granite stone surround. The proposed windows use a crittal style in keeping with the early twentieth century character of the existing building. The extent of the works necessitate the rebuilding of the façade' stone-work, recreated to match the existing design, with amendments to the proportions around the entrances and depth of the window reveals. The detailed design of the reinstated façade will be controlled by condition to ensure the stonework and windows remain in the spirit of the existing building, ensuring the contribution of this building to the street front is retained and improved.
152. The massing on Gracechurch Street is simplified in comparison to the consent, to enable the necessary structural frame to bridge over the archaeological remains discovered at basement level. The GLA have welcomed this modification, finding it to be an improvement over the constented proposals. The proposals retain a break between the podium and tower above with an open balcony accessible from the office space at level 5, enabling the introduction of planters and greening to create a soft parapet and distinct separation of massing between street level and the tower above. The proposals here are

a change from the existing consent, using a series of four giant columns to create an open character to the parapet. The columns and soffit to the tower are clad in metal to match that of the reinstated windows frames and spandrels of the building below, using a classical fluting to the column design. This detail is complimented by the fascia to the soffit which uses a vertical relief detail to create interest. This open area is planted, accessible from the level 5 offices, with the walkable extent set well back from the building edge. Appropriate suicide prevention measures will be applied via condition.

153. This approach is considered an appropriate way to distinguish the two parts of the building and maintain sufficient breathing space above the retained elevation. Furthermore, the upper setbacks to the south and east elevations would help to minimise the visibility of the tower from the tightknit network of surrounding streets, giving it visibility only from a more limited spatial area.
154. Beyond would be perceived and accessed the proposed new Public Hall and passage, taking up almost the entire ground floor plane, it alone would be an outstanding new piece of architecture. The hall would reveal and reinstate a lost historic route connecting Gracechurch Street and Lime Street Passage. Entering from Gracechurch Street, the public would pass through a broad, two storey entrance space, rising to five storeys in a series of increasing volumes. The design of the interior hall has drawn on the theatricality of the hanging balconies associated with the historic Spread Eagle courtyard to create a vibrant, layered civic space with three balconies overlooking the hall interior. The vertical expression of this interior space is defined with a series of brick arches creating a sequence of niches to either side of the hall, with each arch picked out in a stretcher course surround. The soffits to each balcony have integrated lighting within perforated ceiling tiles (into which acoustic mitigations would also be integrated) which together with clerestory lighting at level five create a dynamic, theatrical lighting to the interior, taking inspiration from iconic Roman architecture.
155. Within the Public Hall, retail units would animate the hall and southern frontage to Gracechurch Street and the rear eastern entrance. Lifts to the Level 5 rooftop walkway and cultural space, basement exhibition space, and bike lifts would be prominently positioned in line with the main entrance to reinforce public desire lines through the site, emphasised with appropriate signage to aid wayfinding.
156. The entrance to the office floors is separated from the public hall, with office tenants entering via the northern bay into the Gracechurch Street façade with an entirely

separate reception desk, lobby, WCs and lift bank. This separation is considered an improvement upon the consented scheme, reinforcing the civic quality of the public realm.

157. Above the hall levels 3 and 4 will provide the end of trip facilities for the office users including showers lockers and cycle stores, accessed via two main lifts to the rear of the main stair within the hall. The proposals include 'Long Stay' cycle parking, accessible cycle parking and bike repair station.
158. The Basement Level 1 of the proposed development will comprise an exhibition and education space, celebrating the archaeological remains of the first Roman Basilica of Londinium. This cultural space will comprise world-class immersive experience using clear walk-over flooring directly over the remains which can be programmed to create an augmented reality space. This approach will allow the archaeology to be experienced in context and in-situ whilst ensuring the displays are flexible and can be updated with minimal further intervention or disturbance. Conditions will be applied to ensure the protection of the archaeology during the construction and operational phases as well as ensure the dis-mounting, replacement or improvement of any technology can be undertaken without risk to the remains. This space is considered to offer a vastly improved cultural space in comparison to the consented scheme given the quality and extent of remains uncovered. Access into the exhibition space is via the central stair and lifts within the main hall. Visitors will move through an arrival desk to a gallery space, with amenities including WCs, store and baby changing space before moving through the immersive display area and seminar room. The space has been designed for adaptable use as an events space when out of hours. Access via public lift to the level 5 roof space then moves visitors on to experience the site in context of the Victorian Market modern London skyline, showcasing an experiential sense of history unique to the scheme. The final fit-out of the exhibition space will be controlled by condition to ensure a high-quality equitable and innovative space which will seek to demonstrate the best in exhibition design.
159. The east elevation comprises a narrow slot between the Leadenhall Market buildings, and would chiefly consist of a simple arched portal providing compelling glimpses of the Hall beyond, faced in stone. At fifth floor level, the proposed Rooftop Walkway would cantilever out, forming a viewing platform from which to appreciate the intricate Victorian roofscape of Leadenhall Market and that of the wider Conservation Area, adapted in plan form in comparison to that of consented scheme, reducing the extent of overhang to

project over the eastern elevation only. As per the consented scheme the walkway would enable new roof-level views of the City Cluster and other heritage assets in the vicinity, including the Grade I listed Lloyds of London building. This has been designed with regard to neighbourliness, existing rooflines and views and would optimise public access in the most compelling area of the scheme, in accordance with Local Plan policy DM10.3 (2) and City Plan DE4.

160. As with the consented scheme the podium part of the proposed development therefore represents an outstanding design response to the local distinctiveness of the site, retaining and finessing its existing scale and architectural character while introducing new spaces, architectural forms and materials and creating new views which multifariously respond to phases in the site's history and the rich, humane context of the Leadenhall Market Conservation Area, all in accordance with London Plan policy D3, Local Plan policies CS 10, DM10.1, DM10.3 and emerging City Plan 2040 S8.

Tower

161. Above the podium, the fundamental layout, orientation, scale, appearance, and shape of the tower are a response to the local distinctiveness of the Leadenhall Market Conservation Area and the wider City skyline. As per the consent, the plan and profile of the tower are derived from the irregular, medieval site plan which has been carried upwards through the tower's form to celebrate the site's location within the fine grain of the Leadenhall Market Conservation Area.
162. Following the relocation of the exhibition space to the basement, structural and efficiency considerations led to a more compact core and a reduction in the number of office floors served. The overall form is now approximately 8 metres shorter than the consented scheme, with office spaces located between Levels 5 and 29.
163. The massing to the eastern façade has been modified since the consented scheme, retaining an articulation in local views, but enabling an increase in office space above Level 12, compensating for the reduction in lower-level office space due to the relocation of plant and EOT facilities above ground.
164. As per the consent, the stepped upper reaches of the proposal on the south and east elevations respond to the seminal views of St Paul's Cathedral along the Processional Route; the stepping back of these elevations would ensure that the proposal would at no point be visible in the views of the Cathedral along Fleet Street and Ludgate Hill.

165. As previously stated, the tower is considered a convincing and high-quality response to this macro, strategic view-level context.
166. The tower would be more solid rather than fully glazed in appearance and would consist of primary horizontals interspersed with fluted double-height columns. These cranked horizontals and fluted columns are directly inspired by existing architectural motifs in Leadenhall Market; they would set it apart from its primarily glazed neighbours and diversify the Cluster as a group.
167. The elevations would incorporate user-operated ventilation panels. Deep, projecting planters with raked, reflective soffits and chamfered corners would create dynamism, depth, and modelling to the west elevation; while to the east elevation to Lime Street Passage a similar arrangement of deep, projecting planters is proposed; on both elevations they would act to give the tower a distinctively serrated silhouette on the skyline.
168. Atop the tower, the final two stories would be expressed differently in the form of a 'crown' of double-height columns, disengaged (for emphasis) from the west, southern and eastern elevations. The set backs allow for a generous roof garden and terrace for office occupiers, designed to provide amenity space suitable for presentations or receptions. This includes an auditorium space, WCs and storage space alongside consolidated plant space. Plant space at level 30 includes provision for: heating and cooling pump rooms, a life safety generator, switchrooms and provision for a separate tenant generator. Atop this, the roofscape of the building would include air source heat pumps-chillers and future tenant heat rejection plant. This is considered to be an integrated approach to the building's fifth elevation, in accordance with Local Plan policy DM 10.1(6) and City Plan 2040 policy S8(10).
169. The very concept of the 'Public Hall' proposed at ground level elides well with the history of public gathering and trading on the site since the Roman period; the architectural forms deployed by the scheme would suitably evoke that period. The space at basement and fifth floor level devoted to interpreting the Roman Forum-Basilica would further parse the history and local distinctiveness of the site. Finally, the plan form and cranked and fluted detailing of the tower above all derive from the surroundings. Whilst some conflict has been found with some heritage assets (addressed elsewhere in this report), it is considered that overall the proposals would very much build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness in accordance with NPPF policies

Urban Design and Public Realm

170. The proposed development delivers a mix of subterranean, ground-level, and elevated public space, complemented by a vibrant mix of cultural and retail offerings. This integrated approach draws a diverse audience and fosters an inclusive, welcoming, and highly functional environment for both visitors and workers. Each space is thoughtfully designed to prioritise safety, accessibility, and user experience.
171. The ground floor of the existing eight-storey building at 85 Gracechurch Street lacks level access, offers little meaningful public amenity space, and does not provide a public connection into Leadenhall Market. The proposal would significantly improve the existing public realm in and around the site, including;
1. A multi-level Public Hall at ground floor, open daily, with informal seating, pop-ups, retail frontages, and cultural programming. It reintroduces a historic east–west route connecting to Leadenhall Market.
 2. A basement-level cultural space displaying the archaeological remains of the first Roman Basilica, with exhibitions and learning areas.
 3. 5th Floor Public Viewing Deck with indoor–outdoor spaces, offering views over Grade II* listed Leadenhall Market and the City.

Since the original consent, the main cultural space has been moved from the 5th Floor to the basement to preserve and showcase significant archaeological remains. At ground level, the office lobby is now located to the north, with the Public Hall and flexible retail unit to the south. Lift cores have been consolidated in the north, providing access to both the viewing platform and basement cultural space, complemented by a large public staircase. These changes improve the clarity and accessibility of the public elements while strengthening the cultural offer through the integration of significant archaeological remains. The revised layout also provides a clearer separation of public and private uses, resulting in a more coherent and welcoming arrival experience.

172. The proposals represent compliance with London Plan (2021) Policies D3, D4, D8, G1, G5, T1, and T2; City of London Local Plan (2015) Policies CS10, CS15, CS16, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.8, DM15.5, DM16.2, DM19.1, and DM19.2; Emerging City Plan 2040 Policies S10, S14, AT1, AT3, S8, DE2, DE3, and DE5; as well as the City of London Public Realm SPD and the City Public Realm Toolkit. The creation of new public spaces and improvements to the existing public spaces comply with policy,

the public realm proposals are considered by officers to be a benefit of the scheme, weighing in its favour. The proposals would represent a substantial public realm offer to the City.

Ground Floor Public Hall and East West Route

173. The ground-level public realm centres on a new Public Hall envisioned as a modern extension of Leadenhall Market. The Public Hall will combine pop-ups, small vendors, informal seating, fixed retail, and cultural programming to create a lively public dining and events space, supporting City and London-wide festivals through performances, exhibitions, and markets. The proposals introduce active frontages across the site, creating a multifunctional space that fosters movement, socialising, and cultural engagement and caters to the needs of a diverse public. A Public Hall and Public Route Access and Management Plan, secured through a Section 106 agreement, will ensure the space aligns with London Plan Policy D8 and the Public London Charter, detailing strategies for safety, accessibility, inclusivity, public access, events, and maintenance to keep the space functional and welcoming to all.
174. The Public Hall will provide 371 sqm (net) of civic-scale public space at ground level, arranged across three split levels. Upper-level balconies, inspired by the timber walkways of the former Spread Eagle Inn, activate the Hall vertically, creating a sophisticated split level civic space. The walkways are inserted into Romanesque brick arch vaults that reference the Roman origins of the site. This contextually specific design aligns with City of London Local Plan policies, including DM10.1(9) and S8(1), and supports the vision of the emerging City Plan 2040, particularly in enhancing the historic character of the area while addressing contemporary civic needs.
175. The reinstated historic east–west route between Gracechurch Street and Lime Street Passage will enhance pedestrian connectivity, supported by proposed footway widening on Gracechurch Street, and contribute to the City's network of human-scale courts and alleys. The reinstatement of this historic route aligns with policies DE4, S8(1), and AT1(4) of the emerging City Plan, as well as DM16.2(6) of the Local Plan. The route traverses the dynamic sequence of the Public Hall, where the spatial experience transitions from the grand entrance on Gracechurch Street to the more intimate scale of Lime Street Passage. Access to the basement cultural use and Level 05 terrace will be provided via a lift from the Public Hall, ensuring step-free access, with a dedicated stair offering an additional direct link to the basement. Servicing will be consolidated and time-managed to avoid conflicts with pedestrian movement along the reinstated route, secured through a Delivery and Servicing Plan. The route and associated spaces will meet high standards

of accessibility, with level thresholds, inclusive materials, and clear wayfinding. A Public Hall and Public Route Access and Management Plan, secured via s106 and/or conditions, will ensure the space is well-maintained, safe, and actively managed as a key part of the City's public realm.

176. Throughout the proposal, signage would be discreetly located in various zones around the Public Hall, advertising the presence of the London Basilica Exhibition, the retail units and various functions as required; details of these would be secured via condition. Signage to the building's exterior elevations to Gracechurch Street and Lime Street Passage would be sensitive, where required, having regard for and in accordance with CS10(7), DM10.5 of the Local Plan and S8 (12) of the emerging City Plan 2040.
177. The hard landscaping draws on the City of London Public Realm Design Guidelines, using granite setts and kerbs to reflect the character of Leadenhall Market. Yorkstone will widen footways, ensuring a seamless fit with the surrounding context. The central route, paved in durable, multi-tonal granite setts, will accommodate servicing while creating a continuous surface from exterior to interior—forming a welcoming threshold to the grand Gracechurch Street entrance. Materials throughout will follow the City's palette of simple, high-quality finishes, in line with the City Public Realm SPD and City of London Public Realm Toolkit and Local Plan (2015) Policies DM10.1, DM10.4, London Plan (2021) Policies D3, D4 and D8.
178. The proposed public realm at ground floor represents a high-quality design and a strong architectural response to both local and pan-London contexts. Conditions are proposed to ensure its full potential is realised through detailed design, construction, and operation, in line with Policy D3(12) of the London Plan and S8(14) of the emerging City Plan 2040.
179. The visitor journey is designed as a layered experience through the building. Entry begins at the ground-level Public Hall, which leads down via lift to the basement exhibition centred on the remains of the Roman Basilica. From there, visitors can take the same lift up to a fifth-floor viewing deck. The lifting strategy and its management will be secured via S.106 to ensure inclusive access.

Basement Exhibition Space

180. Accessible via a lift or staircase from the Public Hall, the Basement Exhibition Space showcases the in-situ remains of the First Roman London Basilica, offering a deeper understanding of Roman Londinium. The space aligns with Policy S8 (1) of the City of

London Local Plan, which highlights heritage protection, and Policy S2 (3) of the emerging City Plan 2040, which promotes integrating cultural experiences and heritage in the public realm.

181. The design incorporates a reinforced glass floor revealing the illuminated ruins of the Roman basilica below, creating an immersive and engaging exhibition that celebrates the site's rich heritage—a significant public benefit of the scheme. The space also includes accessible toilets, a baby changing facility, and seminar and presentation areas to support educational use, including school visits and academic workshops. This proposal supports Policy DE4 of the City of London Local Plan, which promotes the provision of inclusive and accessible cultural and educational facilities and aligns with the Plan's broader aims to enhance public access to heritage assets and foster learning opportunities.

5th Floor Public Viewing Deck

182. The Public Viewing Deck on Level 5 will offer vistas over the rooftops of Leadenhall Market, the Grade I-listed Lloyd's of London, and the surrounding conservation area. Linked by lift to the Public Hall and basement exhibition, it complements the cultural experience by placing the Roman Forum in the context of the contemporary cityscape. Local Plan policy DM10.3 and emerging City Plan 2040 policies S8, S14, and DE5 support high-quality, publicly accessible terraces that enrich the City's cultural and civic life. The proposed fifth-floor terrace aligns with these aims, enhancing public access, offering new views, and complementing the site's broader cultural offer.
183. At the southern end of the Public Viewing Deck, a seminar room will provide opportunities for education, skills development, and training, linked to the programming of the basement exhibition. A consistent timber decking will be used across both the interior and exterior areas to create visual continuity and reinforce the connection between the seminar space and the outdoor terrace.
184. In terms of current legislation, Building Regulation K2 states the following: K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, Shall be provided with barriers where it is necessary to protect people in or about a building from falling. Further details about suicide prevention measures for the Public Viewing Deck will be secured via condition.

Public Realm, Management, Cultural and Programmable Events

185. The Public Hall will be publicly accessible seven days a week, with controlled access after-hours to manage servicing and safety. The proposed public realm is designed to support different uses throughout the day and night 24 hours a day, 7 days a week. Servicing will take place during off-peak hours, allowing the Public Hall to function as a public space with active frontages and cultural uses during the day. Outside standard visiting hours the basement level could also be used for events such as receptions, lectures, or launches.
186. The level 5 public terrace will be open daily, remain closed to private events during public hours, and be accessed via dedicated ground-floor lifts with security, with out-of-hours use managed through a Section 106 agreement.
187. The cultural plan aligns with London Plan Policy D8 and the draft Public London Charter, maximizing public access while minimizing restrictive rules. A Viewing Deck Management Plan would be secured through a Section 106 agreement with the finer details of the operation to be negotiated.

Urban Greening Factor

188. The proposal would incorporate significant urban greening, focused on the east, west and upper south elevations from levels 8 to 28 where 1.5m deep planters would be integrated into the building's architecture holding a diverse selection of drought tolerant plants and shrubs selected for their performance under the respective solar and wind conditions of these upper reaches of the tower.
189. The Level 05 terrace on the western façade features woodland inspired planting that softens ground-level views along Gracechurch Street, creating a visual transition between the retained façade and the new tower. Climbing plants on steel trellis would provide vertical greening to buildings columns, whilst larger shrubs with high wind tolerance are placed at the terrace edges to provide shelter.
190. The Level 30 terrace features a woodland-edge planting design with hardy, predominantly native species arranged in layered heights to suit the changing microclimate, enhance biodiversity, and reduce maintenance. Urban greening has therefore been integral to the architectural approach, in accordance with DM10.2 of the Local Plan and S8(7) of the emerging City Plan. Across the entire application boundary,

the development achieves an Urban Greening Factor (UGF) 0.37 which exceeds the exceeds the London Plan (2021) Policy G5(B) UGF target of 0.3.

191. Full details of the landscape designs, including planting specification, and strategies for furniture, lighting, hard surfaces and maintenance, will be conditioned to ensure the designs are of a high quality and resilient in this context. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed buildings, and public realm and is considered to be compliant with London Plan policies D3, D8, G1, G5 and SI13, and City of London Local Plan (2015) Policies DM10.2, DM10.4, CS15, DM15.5, DM19.2.

Lighting

192. In the Hall, perforated ceiling tiles will be backlit to provide soft, dynamic illumination that enhances the warm and welcoming atmosphere. Subtle lighting integrated into the soffits of the walkways to further accentuate the depth and dimension of the brick vaults. At basement level, targeted spotlighting will illuminate the Roman ruins beneath a reinforced glass floor, as well as exhibition artefacts, creating a focused and engaging display.
193. The proposed lighting design aligns with the adopted City Lighting Strategy, aiming to enhance visual amenity while minimising light spill. It is contextually sensitive and reflects the spatial character principles set out in the City Cluster design guidance. Full details will be secured via planning condition.

Transport Related Urban Design Considerations

194. The proposal would optimise Healthy Streets goals by creating a destination for a broad demographic of pedestrians. It would be accessible and welcoming to all, reachable on foot from numerous public transport systems with prominent and legible pedestrian/cyclist entrances from two sides. The proposal would have excellent public transport connectivity and would incorporate widened footways to Gracechurch Street and 104 short stay and 505 long stay cycle parking spaces, thereby making it possible for a majority of visitors to walk, cycle or use public transport to access the proposal, all in accordance with, Policies T1(B) and T2 of the London Plan, as well as CS10 (4,5), CS16 (3ii), DM10.4 (2,8) DM10.8(2) DM16.3 of the Local Plan policies and S10, AT1 (1,2,4) AT3(1), S8(1,2), DE2 (2) of the emerging City Plan.

195. The proposal would provide access for all across the site in a manner which is step-free and inclusive, without undue separation or hinderance. It is important that the elevations, external and part internal, at ground and basement levels but also from levels one to five, are well detailed to achieve the promised positive interfaces and active frontages, and these details would be reserved via condition.
196. All vehicle servicing (excluding cargo cycles) occurs overnight to avoid conflict with public hall users, following agreed hours. Building security personnel staff office entrances during business hours to restrict access, while between 19:00 and 07:00, entrances are secured with swipe access, ensuring controlled egress onto Gracechurch Street.
197. Hostile vehicle mitigation on Gracechurch Street is achieved through removable PAS68-rated bollards spaced no more than 1.2m apart, allowing out-of-hours servicing access. Further security features have been integrated into the architecture, with bespoke metalwork roller shutters to the west and east portals providing visually unobtrusive safety measures.

Conclusion

198. Overall, the proposal makes exemplary use of a highly constrained site, delivering high-quality, inclusive public spaces that significantly enhance the local environment while contributing meaningfully to the City's cultural and civic life. Key features include a thoughtfully designed and actively programmed Public Hall, an immersive exhibition that brings the site's rich Roman history to life, and a Public Viewing Terrace offering expansive views of surrounding heritage assets—together enhancing the site's public value and firmly establishing its role as a cultural and educational destination. The proposed sequence of spaces supports the principles of Good Growth by Design—enhancing accessibility, inclusion, and user experience in accordance with London Plan Policy D3 and Good Growth objectives GG1–GG6.
199. Public realm improvements, active travel enhancements, and pedestrian-first design support the City's Transport Strategy and modal hierarchy. The scheme strengthens the site's interface with its surroundings and enhances convenience, comfort, and visual amenity in accordance with City of London Local Plan Policies CS10 and DM10.1, emerging City Plan Policies S8 and DE2, the NPPF, and the National Design Guide.

200. The architecture and urban design proposals therefore comply with Local Plan Policies 2015 CS10, DM10.1, DM10.2 DM10.3, DM10.4, DM10.8, CS16, DM16.2, CS19, DM 19.1 and DM19.2, emerging City Plan Policies 2040 HL1, S8, S1, S8, DE1-3, DE4 (1-2) and DE5-8, S10, AT1, S14, OS1-OS3, OS5; and London Plan 2021 Policies Good Growth objectives GG1- GG3, GG5-GG6 D3, D4, D5 and D8; NPPF 2024 paras 131, 135, 137, 136 and 140 , National Design Guide and the City Public Realm SPD all which require high-quality public realm and increased urban greening.

Heritage and Strategic Views

201. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. It seeks to implement the Mayor's LVMF SPG, protect and enhance views of historic City Landmarks and Skyline Features and secure and appropriate setting and backdrop to the Tower of London. Policy S23 of the emerging City Plan 2040 seeks the same and takes into account the Tower of London World Heritage Site Management Plan (2016).

Tower of London World Heritage Site – Impact on Outstanding Universal Value (OUV) and Relationship to Setting

202. The proposed impact on the World Heritage Site (WHS) has been assessed against the seven attributes, and their components, of Outstanding Universal Value (OUV) contained within the adopted Statement of OUV. It is considered that all attributes of OUV draw on the contribution of setting for significance and an appreciation of it, but in particular the attributes:

- i. an internationally famous monument
- ii. landmark siting
- iii. symbol of Norman power and
- iv. physical dominance (of the White Tower);

203. and to a lesser extent:

- v. concentric defences
- vi. surviving medieval remains and

vii. physical (historical) associative evidence.

204. The GLA have raised particular concerns regarding attribute ii, and this is addressed below. Historic England have raised concerns regarding attribute vi and v. It is noted that Historic England's consultation response refers to previously published comments from UNESCO, highlighting concerns over the cumulative impact of tall buildings upon the Tower of London. UNESCO's comments do not specifically address the proposals assessed in this application, however consideration of the cumulative impact is illustrated in the submitted HTVIA which shows the future baseline of consented schemes, and an assessment of the Cumulative impact has informed officers conclusions, as set out below.
205. Whilst the ToL comprises a scheduled ancient monument, various listed buildings and is in a conservation area (LB of Tower Hamlets), it is considered proportionate and robust, on the circumstances of the case, to consider the impact on OUV in order to draw a conclusion on the impact on these assets, with the exception of St Peter ad Vincula (Grade I), the impact on which it is considered necessary to assess as a designated heritage asset in its own right.
206. The WHS Management Plan establishes a 'local setting area', and 'immediate setting' and a non-spatially defined 'wider setting'. The proposal is not in the designated local setting (as identified in Fig. 4 of the WHS Management Plan) but is located in the much wider setting. The Local Setting Study identifies in section 7 those most representative views and/or viewing areas to and from the Tower of London (ToL) which are deemed to exemplify the OUV and the components, with management guidance providing a baseline for assessing change. The representative views/viewpoints overlap with some LVMF viewing locations, assessed together here for clarity.
207. HE and the GLA have raised concerns regarding impact to an appreciation of the silhouette of St Peter Ad Vincula and the loss of the relative prominence and status of the Tower through the expansion of the City cluster in these views, increasing its proximity and dominance and this is addressed below. It is important to note that the proposals reflect a reduction in height in comparison to the consented scheme. Additionally, the WHS Management Plan acknowledges the influence of the Cluster of tall buildings in signifying the City's commercial centre, stating (at para 2.4.25) that 'its visibility expresses the evolving political and cultural relationship between the Tower and the trading centre of the City of London'. It recognises that the Cluster has had an

emerging distinct identity and the relationship between the ToL and the Cluster is long-established, having existed for over half a century, forming a backdrop in views, including over buildings in the Inner Ward.

208. In recognising the place of the Cluster in the wider setting it also acknowledges that it will intensify as a distinct and separate element to the ToL. At para 7.3.27, the Management Plan states that proposals for tall buildings to the west of the White Tower, falling within the background of the WHS, should consider (i) their effect on the established Cluster, (ii) the space between it and the ToL and (iii) the effect on the ability to recognise, understand and appreciate the OUV of the Tower.
209. Whilst being proportionate, this impact assessment uses the assessment framework in the Mayor's 'London World Heritage Sites: Guidance on 'setting' SPG, which is based on the relevant ICOMOS guidance, including the impact tables at Appendix 3 and 4, in conclusion.

Impact on OUV/Significance

210. The proposal would have an indirect impact, via change in the wider setting of the WHS. Change is not necessarily harmful. That change would be apparent in views including those from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London.

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

211. This viewpoint is also identified as a Representative View in the Local Setting Study (LSS) (View 9), the impact here is also representative of the impact from Approach 14 (Tower Bridge) in the LSS.
212. The LVMF SPG recognises this as a fine, broad river prospect, its character derived from its significant depth and width. It is the only designated River Prospect in which there are two Strategically Important Landmarks (SILs), St Paul's and the ToL. It allows the ToL, perhaps better than anywhere else, to be read as a significant part of the rich tapestry of London, where there is an acknowledged prominent relationship with the backdrop of tall buildings in the CoL (para 182). The SPG states that an understanding and appreciation of the ToL is enhanced by the free sky space around the White Tower, and that where it has been compromised its visual dominance has been devalued. It states that the middle ground includes the varied elements of the City, rising behind the Tower, which includes prominent tall buildings of the late 20th and early 21st centuries, and earlier periods such

as spires of City churches and the Monument. Other prominent buildings or structures in the background include the Canon Street Station towers, BT Tower, Centre Point and Tate Modern, which all combine to draw and hold the attention of the observer.

213. The visual management guidance anticipates the consolidation of the Cluster which, it is said, will add considerably to the character and stature of the view, and that any new skyline buildings must account for how they relate to skyline features (para 187). The guidance states that landmarks which enable an appreciation of the scale and geography of London should not be obscured by inappropriate development in the foreground, applying particularly to the Monument (para 185). The visual management guidance further states that the background should be managed sensitively, and that development should not compromise a viewer's ability to appreciate OUV (para 186).
214. The GLA have raised specific concerns regarding views of the proposals infilling open sky between 20 Fenchurch Street and the City Cluster, which they find to detract from the appreciation of the WHS. The proposal would be located at a significant distance to the west of the ToL, on the western edge of the Cluster. In the baseline situation, the upper levels of its south and eastern facades would form a new presence between 20 Fenchurch Street and 1 Leadenhall; but located on the far side of the Cluster to the ToL, the impact on the wider setting of the ToL is negligible in this view. In the cumulative scenario, the proposal would be seen with the consented developments such as 70 Gracechurch Street as part of a consolidated Cluster and having the same negligible impact on the wider setting.
215. Officers note the proposals would appear at a considerable distance to the west from the focus of the ToL in the foreground, the WHS would not be obscured, distracted from or dominated. Given the intervening distance, siting, scale, form and appearance, the proposal would not harm those relevant attributes of OUV. It would leave unaffected those relevant components which form part of the LVMF visual management guidance – the physical form and visual dominance of the White Tower, the iconic sky-etched silhouette, the close relationship with the River Thames and the City beyond in the background, in accordance with the visual management guidance in the LVMF SPG (paras 183-186).
216. The effect of the proposal (when considered alone) on this view, on OUV and on the setting and significance of the designated heritage assets, is considered to be minor and neutral, in the baseline and of a minor benefit in the cumulative scenario, in that it would assist in consolidating the Cluster as a more singular coherent urban form adding to the

stature of the view. Accordingly, the proposal is not considered to harm the setting of the WHS or its OUV.

217. More widely, the siting, scale, form and orientation of the proposal would help to consolidate the Cluster and so make a positive contribution to the character and composition of the view, preserving an appreciation of identified landmarks, including preserving the observer's ability to recognise and appreciate the relevant Strategically Important Landmarks – the ToL and St Paul's Cathedral – in accordance with London Plan Policies HC4, Local Plan policy CS13 and emerging City Plan 2040 Policy S13. It would not obscure an appreciation of the scale and geography of London, including the Monument, in accordance with the visual management guidance in the LVMF SPG.
218. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57) and grow the character and stature of the view in line with the view specific visual management guidance.
219. Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmarks. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would ensure that the juxtaposition between elements, including the river frontages and key landmarks. It is in accordance with London Plan Policy HC4 and associated visual guidance in the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

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

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

is deemed a central characteristic of the view (para 411/413), and its rich variety of landmarks including City Cluster towers such as the Gherkin and Tower 42.

221. In the baseline and cumulative scenarios, the proposal would be largely obscured behind 20 Fenchurch Street, occupying a small amount of sky space immediately to the east of it, with a small amount of the upper parts of its east elevation visible. The proposal's stepped, serrated silhouette and articulation of the crown would slot neatly into the gap between 20 Fenchurch Street and 1 Leadenhall Court, providing a pleasing adjunct to the simpler, geometric forms of these buildings. It would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57).
222. Given the pre-eminence of the River Thames in the foreground, the openness of the ToL ensemble defining its north bank, and the significant intervening distance between the ToL and the (largely screened) proposal, it is considered that the proposal would not undermine the composition or characteristics of the view, or of the landmark elements. The observer would continue to recognise and appreciate the ToL as the Strategically Important Landmark, set away from the City and not lost in it. In both baseline and cumulative scenarios, it is considered that the proposal would have a negligible impact on these views and would not result in any harm to the setting of the WHS or its OUV. The siting, height, scale, sculpted massing and masonry detailing would comprise a high-quality design, set a significant distance away from the WHS, respecting the setting of the Tower and not dominating it, in accordance with the relevant LVMF visual management guidance (SPG paras 414-415).
223. The proposal would not affect the fore/middle grounds of the views, or the close relationship with the River Thames and principal setting of this iconic view (SPG paras 416-417). It would not appear in the background, preserving the sky-backed Protected Silhouette of the ToL between the Assessment Points, whilst preserving the long-established relationship between the ToL and the consolidating Cluster as two distinct, juxtaposed urban forms, in accordance with the visual management guidance (SPG paras 418- 422) and relevant parts of the LSS. The proposal would preserve the relevant attributes of OUV and their associated components.
224. The proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF SPG (para 57) and grow the central characteristic of the view which is the juxtaposition of the modern city and the ToL WHS and of built elements of all eras.

225. Overall, the proposal would preserve and enhance the characteristics and composition of the view as a whole, preserving the characteristics and composition of the landmark elements, and a recognition and appreciation of the Strategically Important Landmark. The proposal would not be intrusive, unsightly or prominent to the detriment of the view, and would allow the observer to see specific buildings in conjunction with their surrounding environment.
226. Thus it is in accordance with London Plan Policy HC4 and associated visual guidance in the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.

Other World Heritage Site Views

227. The Local Setting Study (section 7) identifies Representative Views which are deemed to best exemplify the OUV of the ToL. It provides an analysis of the character of these views as a baseline against which change can be assessed. The proposal would impact on views from the Inner Ward and from the Inner Curtain Wall (North and South) as well as the approaches from Tower Bridge and along Tower Wharf; the representative impact is to be found in submitted HTVIA views 13A-C, in addition to views 10-12 from Tower Bridge Approach and Tower Wharf.

Inner Ward

228. These views are deemed by the Local Setting Study to illustrate well the ToL's significance as the setting for key historical events and the relationship and scale of surrounding palace buildings of the Inner Ward. It aims to maintain views illustrating the living tradition of the ToL, its rich ceremonial life and unique sense of place set apart from the modern city outside the walls, where the relationship between the scale of individual buildings can be appreciated. Under 'key issues' it states tall buildings could, and so not in principle would, detract from that unique sense of place apart from the modern city and/or could affect the scale of the enclosing historic buildings. The associated 'Objectives and Guidance' states that development should
- (i) respect that sense of place and (ii) ensure the buildings surrounding the Inner Ward remain the focus of the view.
229. The LSS states that there is a range of views from within the Inner Ward; these have been assessed in the three-dimensional model, in addition to the submitted HTVIA views. In the baseline scenario the proposal would, from a significant part of Tower Green and the Scaffold Site, be concealed behind the western range of enclosing buildings, having

no visual impact. From the very eastern and south-eastern edge of this area, near the head of the steps down to the Bloody Tower, the upper stages of the proposal would appear behind the Chapel of St Peter ad Vincula and, from certain viewing points, engaging with its bell tower but falling below the towers parapet and lantern.

230. As per the consented scheme, this would be a fleeting impact, perceptible only from a smaller quantum of the viewing area; when moving toward the Chapel, in its immediate setting from the Green, the proposal would move out of view and leave the ensemble unchallenged and still pre-eminent. The effect would be the same in the cumulative scenario, though with the proposal a little less prominent due to the presence of other consented schemes, where it would firmly be read as part of the consolidating singular Cluster form, set away at some distance from the compelling and arresting foreground setting at the heart of the medieval palace complex and its rich traditions. Due to the reduction in the height of the scheme in comparison to the consented design, it is further noted that the current proposals reflect a reduced visibility in these views.

231. It is considered, then, in accordance with the guidance in the LSS, that the proposal would (i) respect the unique sense of place and the preeminent stage in which those rich traditions would continue to take place and (ii) allow those enclosing Inner Ward buildings to remain the focus of the observer. Officers disagree with Historic England, considering the proposals to be in keeping with the existing character of the skyline behind the Chapel, which is presently characterised by glimpsed, partial views of the upper levels of Towers within the City Cluster. For this reason officers do not consider the proposals undermine the ability to appreciate the surviving medieval remains associated with the ToL (attribute iv). Further discussion of impacts to St Peter Ad Vincula as a Grade I listed building is included below (Para 481). It is further considered that the iconic, strategic landmark siting and dominance of the White Tower would be unchanged. Therefore in terms of the overarching attributes of OUV and their components, the relationship between the ToL and the City beyond is considered to be maintained, the proposal being a proportionate addition to the emerging Cluster as a distinct, long-established backdrop entity, set away from the ToL, which would not be lost within it and preserving the extent to which the structures within the curtain walls are perceived as a distinct historic group with layered historic and functional associations.

Inner Curtain Wall (South)

232. The LSS recognises that these views are a 360-degree experience where the aim is to maintain an appreciation of the ToL as a riverside gateway, an appreciation of the historic

relationship between the ToL and the River and, whilst under the associated guidance, seeking to maintain the White Tower as the key focus to the north, appearing more dominant than buildings in the Inner Ward or those beyond. In the baseline scenario, the upper stages of the proposal would be clearly visible above the Beauchamp Tower, occupying clear sky space to the north of 20 Fenchurch Street, between it, 1 Leadenhall and the Cluster beyond. The sculpted, tiered south and east elevations and the refined crown of the proposal would provide a complementary form to the simple geometric forms of the other Cluster buildings; moreover, the proposal would be considerably lower than them, positioned as a mediating step in height. In these respects, the proposal would assist in consolidating the Cluster's distinct singular urban form and separate, long-established identity, more so in the cumulative scenario when it would be perceived as nestling amongst other consented schemes such as 70 Gracechurch Street.

233. In both scenarios, the White Tower, accentuated by its massive, fortified walls, would remain the focus of the view. It would continue to dominate that part of this 360-degree viewing experience, with the Cluster a distant subservient entity beyond; whilst the proposal would not intrude into the other vantages of this viewing experience, preserving the essential relationship between the ToL and the River and an appreciation of it as a historic gateway.

234. It is considered that those identified relevant attributes and components of OUV would be preserved, and the visual management guidance in the Local Setting Study complied with.

Inner Curtain Wall (North)

235. The LSS acknowledges that this is a 360-degree experience and demonstrates a 'clear contrast between the historic Tower and the modern city outside its walls'. The identified aim is to (i) maintain views that reveal the relationship between the Tower and the City and (ii) maintain an appreciation of the defences as an outstanding example of concentric castle design. Under 'Key Issues' the LSS recognises that future tall buildings could reduce the perceived prominence of the Tower in its setting, stating that such buildings, under the associated guidance, should continue to reveal the historic relationship of the ToL and the City to the north and that clear views of the concentric curtain walls should be preserved.

236. Sited a considerable distance to the west in these views, in the baseline scenario, the upper stages of the proposal would appear prominently in the sky between 20 Fenchurch

Street and 1 Leadenhall. The sculpted, tiered south and east elevations and the refined crown of the proposal would provide a complementary form to the simple geometric forms of the other Cluster buildings; moreover, the proposal would be considerably lower than them, positioned as a mediating step in height. In these respects, the proposal would assist in consolidating the Cluster's distinct singular urban form and separate, long established identity; more so in the cumulative scenario, when it would be perceived nestling amongst other consented schemes, although the proposal would begin to be occluded by the consented form of 50 Fenchurch Street, lowering its prominence in the view.

237. In both scenarios, the proposal would appear on the western side of the established Cluster, consolidating its distinct form, whilst preserving that relationship with the ToL, and preserving the pre-eminence of concentric defences in these views, all in accordance with the guidance.

Other Views of the ToL

238. Other views have been provided which are not identified as strategic views in LVMF or as views in the Local Setting Study but which demonstrate the attributes and components of OUV where there would be a relationship with the proposal.
239. The view from the riverside walkway of Tower Wharf, looking west, demonstrates the relationship between the emerging City Cluster in the background and the ToL which towers over the immediate foreground. In this view, the proposal would reinforce the relationship between the two distinct urban forms – the Cluster in the background and the ToL ensemble continuing to dominate the foreground, causing no harm.

Conclusion – Impact on the Tower of London World Heritage Site

240. The proposal would preserve the ability to recognise and appreciate the ToL as a Strategically Important Landmark, whilst according with the associated visual management guidance in the LVMF as it relates to OUV.
241. It is acknowledged that HE and the GLA found 'some' and 'low' less than substantial harm respectively to the WHS, albeit neither the GLA or HE object to the scheme on these grounds acknowledging this harm is reduced in comparison to the consented scheme. Officers attribute considerable importance and substantial weight to the views of HE as the Government's advisor on the conservation of the historic environment. However, for the reasons set out in the detailed assessment, officers disagree that the

proposal would cause harm. The scale of change in all instances is considered to be between negligible and minor, the magnitude of impact small, in both baseline and in particular in cumulative scenarios.

242. In all instances, the proposal would preserve the attributes of the OUV and the authenticity and integrity of the WHS, . While the concerns of the GLA and HE are acknowledged the proposal has been designed to read as part of the consolidating singular form of the Cluster, as part of a long-established backdrop to the ToL ensemble which has been curated by consistent decision making on behalf of the strategic and local planning authority for the best part of half a century. Therefore, proposal would not harm the significance of the ToL, whether in relation to the WHS or any of the component heritage assets which comprise it.

Other London View Management Framework Impacts

243. The London View Management Framework (LVMF) designates pan London views deemed to contribute to the Capital's identity and character at a strategic level.
244. The site is in the City Cluster of tall buildings, which the LVMF SPG visual management guidance seeks to consolidate to reinforce its long established positive role on the skyline of the Capital. It is considered that the Cluster aids the observer's appreciation of the wider geography of London as a recognisable and important landmark. Officers consider it symbolises the historic commercial and economic heart of the Capital, important in reading the wider socio-economic and cultural topography of London.
245. Being in the City Cluster of tall buildings, the proposal is sited to avoid breaching designated Protected Vistas towards Strategically Important Landmarks (SILs), including of St Paul's and the Tower of London (ToL). However, it would be visible from several identified views, in particular the River Prospects.
246. In view of the consented scheme, views where the proposals are considered to have no interaction with the management guidance or the impacts can be reasonably judged from another viewpoint, have been scoped out of assessment. This is considered to be a proportional response given the impact of the proposals over the baseline scenario, noting that the consented scheme is a material consideration and the reduced height and mass of the new proposals.

London Panoramas

247. The proposal would be visible, to the discerning, focused eye and/or through use of magnification, from all the London Panorama Assessment Points. In all instances the City Cluster, or component elements of the Cluster, which the guidance seeks to consolidate (para 57, for example), is either identified as a landmark element or other feature of the view. 1A.1-2, Alexandra Palace Viewing Terrace, is an iconic broad and deep panorama from the northern suburbs back across the Thames basin and towards Central London. The visual management guidance (para 85) identifies the Cluster as a distant focal point allowing for orientation. The proposal would be discernible as part of the consolidation of the City Cluster, assisting in the process of visually ameliorating the isolated bulk of 20 Fenchurch Street into a more coherent singular urban skyline form. This would support the aim of para 87 that new tall buildings consolidate and improve the composition of existing clusters of tall buildings, sharpening the distinction between the lower density residential of the mid-ground and background higher density character of central London. In consolidating this townscape element, in line with para 90, the proposal would manage the transition down to St Paul's Cathedral as the SIL, releasing growth pressure on the intervening unspoilt distant horizon of the Surry Hills (South London) and on a clear day, the North Downs, thus preserving and enhancing the viewer's ability to recognise and appreciate St Paul's. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.
248. 2A.1, Parliament Hill from the summit, is another famous strategic panorama of London from one of its best-known peaks. As at Alexandra Palace, given the wide span and depth, the consolidation of significant tall buildings into clusters assists the viewers orientation, understanding and ultimately appreciation of the view. The siting of proposal in the City Cluster means there would be no impact on the three Protected Vistas towards the two SILs, St Paul's and the Palace of Westminster. It is a good place to appreciate the City Cluster's emerging conical form, both picking out the individual silhouettes and as part of a consolidating singular identity and coherent urban skyline form. In baseline and cumulative scenarios, the proposal would assist in assimilating the isolated bulk of 20 Fenchurch Street into a discreet identity for a place of London-wide and National importance. Para 96/106 recognises the contribution of the City Cluster demarcating the financial district and governmental centre of London. As identified (para 97), like the Shard on the opposite side of London Bridge, the Cluster assists the observer in

recognising and isolating St Paul's, whilst the consolidation of tall buildings allows for an appreciation of it in its wider backdrop of the rolling Surrey/Kent hills and its prominent place in the wider Thames basin, which the guidance identifies as framing the silhouette of the city (para 96). The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

249. 3A.1, Kenwood at the viewing gazebo, is another Hampstead Heath view from one of the finest historic homes in North London. Given the pre-eminence of the gentle and verdant foreground and middle ground of the Heath, an appreciation of the great depth of an otherwise framed view of central London is dependent on tall built form breaking the distant North Downs. As such, the City Cluster is a strong orientation point and complementary feature in an appreciation of the composition and characteristics of the view. The siting of the proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's, or on a recognition or appreciation of the Palace of Westminster as the other SIL.

250. The proposal would assist the consolidation of the conical City Cluster as a distinct and coherent urban skyline form, assisting in drawing out that arresting contrast between the semi-rural parkland and the modern commercial core of central London rising above and beyond, as identified in the visual management guidance (para 116). It would assist in assimilating the isolated bulk of 20 Fenchurch Street into the dense clustering of more rectilinear towers, as identified at para 117, whilst in breaking the distant Downs allowing the observer to orientate and, to the right, assist in recognising and appreciating St Paul's as the SIL, especially since it is backdropped by the Shard, just the other side of London Bridge. The consolidation of tall buildings here frees the wider backdrop hills to accentuate an appreciation of St Paul's and its strategic location in the wider Thames Basin (para 121). The distinction of a singular Cluster form avoids the visual confusion caused by ad-hoc tall buildings which undermines the recognition and appreciation of the Palace of Westminster (para 118). The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a very minor enhancement to the view overall.

251. 4A.1-2, Primrose Hill summit, is a small foothill in the initial climb up the North London hills, it is a popular destination just north of Regent's Park affording a spectacular panorama of central London seen in close detail. The siting of the proposal in the City Cluster means there would be no impact on the two Protected Vistas towards St Paul's and the

Palace of Westminster, the SILs. 228. The City Cluster is identified as a complementary feature of the view, where it is identified as somewhat screened by towers at Euston (para 129), standing in contrast to the lack of order or coherence of the mix of larger commercial and residential buildings in the middle ground (para 128). The proposal would assist in consolidating the clear conical City Cluster form, assisting in the assimilation of the isolated bulk of 20 Fenchurch Street into a singular coherent skyline form. This would assist the composition of the view, consolidating an existing landscape feature in accordance with para 130 of the SPG. This will assist in differentiating it from the consolidating Isle of Dogs Cluster in the background, assisting in an appreciation of the scale and depth of London. The proposal would assist the stepping down of the Cluster towards St Paul's, whilst assisting in the preservation of the sky gap and appreciation of the distant wooded hill horizon line which reinforces a recognition and appreciation of St Paul's. In the cumulative view the proposals would be entirely occluded. The proposal would allow for the consolidation of an important cluster of tall buildings in accordance with para 57 of the LVMF SPG. The proposal would result in a minor enhancement to the view overall.

252. 5A.1-2, Greenwich Park General Wolfe Statue, is a seminal London view of great historical significance allowing one of the most comprehensive views of the Capital. The siting of proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (5A.2).
253. This is a broad and rich panorama allowing a full appreciation of London as a great historic port city focused on the River Thames, with the exceptional foreground formal classical landscape of the Royal Naval College in dramatic juxtaposition with the consolidating Docklands Cluster beyond. The SPG recognises that this offers layering and depth to the view (para 144). The Thames meanders back to central London, announced by the City Cluster, which is an important orientation point for the observer in the recognition of St Paul's.
254. Due to the reduced height of the proposals, the scheme would not be visible in this view, occluded by existing development, resulting in an overall neutral impact.
255. 6A.1 Blackheath Point, is on high ground of historic strategic importance on high ground on the historic route from the Kent coast and the continent and would have been the first site of the skyline of the Capital. The siting of the proposal in the City Cluster means there would be no impact on the Protected Vista towards St Paul's as the SIL (6A.1). As at Greenwich, it would assist in the consolidation of the City Cluster as a coherent skyline

form assisting the composition and characteristics of the view overall. The proposal would result in a very minor enhancement to the view overall.

LVMF River Prospects

LVMF 15B.1-2 – River Prospect, Waterloo Bridge (Downstream):

256. This is an iconic London view. St Paul's Cathedral is identified as the SIL. It is considered that the proposal would complement the development of the emerging City Cluster as a singular, coherent entity on the skyline. In both the baseline and cumulative scenarios, it would have a minor impact on the character and composition of the view, standing amidst 1 Leadenhall, the Scalpel and the Willis Building; with its pale masonry architecture and sculpted silhouette, it would add pleasing contrast and diversity to these simple glazed forms of the other familial Cluster buildings. The height of the proposal is appropriate to the site, appearing as a lower, mediating influence between the apex of the Cluster to the north and 20 Fenchurch Street to the south. Stepping down in height from the Cluster apex, towards the scale of the River, and of a high-quality design, the proposal would accord with para 263 of the SPG guidance. The proposal would not draw tall buildings closer to St Paul's Cathedral, would not affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral, in accordance with guidance in paras 264-267 of the SPG. It would not obscure or detract from any identified landmark element in the view and would give further context to those relevant Cluster landmarks identified. It would consolidate the City Cluster in accordance with para 74 of the SPG. The proposal would result in a modest enhancement to the view overall.

LVMF 16B.1-2 – River Prospect, the South Bank: Gabriel's Wharf Viewing Platform:

257. St Paul's Cathedral is identified as the SIL. The proposal would complement and contribute to the development of the existing and emerging Cluster of tall buildings, drawing in 20 Fenchurch Street, preserving and enhancing the townscape setting of St Paul's whilst not detracting from wider landmarks in the view, all in accordance with the visual management guidance at paras 280-283 and 57 of the SPG. The proposal would result in a minor enhancement to the view overall.

LVMF 19A.1-2 River Prospect, Lambeth Bridge (downstream)

258. The focus of the view is the Palace of Westminster, the SIL, alongside other landmarks including Westminster Abbey, Victoria Tower Gardens, Whitehall Court, the London Eye, Westminster Bridge and Lambeth Palace, whilst 30 St Mary Axe (the Gherkin) and Tower 42 in the City Cluster as also identified as positive features. The visual guidance

describes the juxtaposition between the greater intensity of buildings north of Westminster Bridge and on to the CoL as secondary to the 'semi-pastoral' setting of the World Heritage Site (para 332), while the 75 distant Cluster makes for a deep view (para 333), allowing for a strong appreciation of the geography of London, and a juxtaposition between the political and commercial centres of the Capital.

259. The proposal would assist in the consolidation of the City Cluster and the assimilation of the isolated bulk of 20 Fenchurch Street into a coherent singular skyline form with a stronger identity, in accordance with the aim to consolidate existing clusters in the visual guidance (para 57). In the kinetic experience between A.2-1, the Cluster would track in behind the informal picturesqueness of the chimneyscape of Lambeth Palace in a pleasing and subtle manner, allowing the composition and characteristics of the landmark to remain pre-eminent. It would accentuate the composition and characteristics of the view, in particular, that subtle juxtaposition between the semi-pastoral fore and middle ground and the distant financial district, allowing a greater appreciation of the topography of London.

260. In accordance with the visual management guidance the proposal would respond positively to the characteristics of the river fronting buildings and enhance the composition of the view and the status of all landmark elements (para 334). This is in accordance with the anticipation of the visual guidance, which anticipates the consolidation of the City Cluster (para 338) and a recognition and appreciation of the SIL would be preserved. It is considered the proposal would result in a minor enhancement of the view overall.

Summary of LVMF Impacts

261. As per the consented proposals, the proposal would not harm, and would make some positive contributions to, the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the Strategically Important Landmarks, in accordance with London Plan Policy HC4.

City of London Strategic Views

262. As above, the consented proposals are a material consideration when assessing the scheme. Where the nature of the impact is considered unchanged from the consented scheme and or the impact can be reasonably judged from other provided views, these have been scoped out. This is considered to be a proportional response given the impact of the proposals over the baseline scenario, noting that the consented scheme is a material consideration, and the reduced height and mass of the new proposals.

Monument Views

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

Views from the Monument

264. As per the consented scheme the proposal is not sited in the Monument Views Policy Area and is outside the field of view of identified Views 1-5 from the Viewing Gallery, which would be preserved.
265. Para 4.14 of the Protected Views SPD addresses 'Northern Views' from the Viewing Gallery and states that proposed increases in height near the Monument will be assessed in terms of their impact on views to and from the Monument.
266. As per the consented scheme, the proposal would allow an unbroken view north along Gracechurch Street/Bishopsgate towards Gibson Hall, read as part of the consolidating Cluster, albeit in the cumulative scenario, the proposal would be obscured by the consented form of 55 and 70 Gracechurch Street.

Views of and Approaches to the Monument

267. The proposal would not be in the 'Immediate Setting' of the Monument, as defined in the Protected Views SPD (Figure 8), leaving it preserved in accordance with the guidance at paragraphs 4.16-17 of the SPD. The proposal would be in its near setting and visible in some of the identified Views along Street Axes.

268. In views on approach from the south at Monument Street and Lower Thames Street junction looking north along Fish Street Hill, as per the consented scheme, the proposal would be seen as part of the existing tall buildings to the eastern side of Gracechurch Street, the Monument's sky silhouette and skyline setting would be unaffected. No harm would be caused and the proposal in accordance with paragraphs 4.23 of the SPD.
269. As per the consented scheme, in views from Tower Bridge the proposal would be viewed as part of the consolidating Cluster, remote and at a distance from the orientation of the view along Monument Street in which the skyline setting of the Monument rising out of the Custom House would be unaffected. No harm would be caused and the proposal is considered in accordance with paragraphs 4.22 of the SPD.

Conclusion on the Monument

270. In summary, the proposal has been designed to protect and enhance significant local views of and from the Monument, thus protecting their contribution to the overall heritage of the City, in accordance with Local Plan Policy CS 13 and associated guidance in the Protected Views SPD.

St Paul's Viewing Points

271. The proposal would not be visible and would be out of scope of most of the identified Viewing Points of St Paul's identified in the Protected Views SPD (Figure 3). It would be visible in the kinetic riparian sequences along the Thames bridges and from the South Bank Queen's Walk, in particular in those orientated towards the Cathedral between Hungerford and Millennium Bridges.
272. The proposed height and form of the tower has been designed around the strategic heritage consideration of the processional approach to the Cathedral from Fleet Street and to consolidate a coherent Cluster form in those strategic riparian views in line with LVMF visual guidance.
273. From the Processional Route the envelope and been designed to avoid any erosion of sky silhouette and space afforded to the Cathedral, thus ensuring its pre-eminence in this viewing experience of state and royal significance.
274. From the Thames bridges and South Bank the proposal has been designed to contribute to the stepping down from the summit of the 78 Cluster at 22 Bishopsgate/1 Undershaft

and to continue the process of assimilating the isolated bulk of 20 Fenchurch Street, bringing it into a singular coherent cluster form on the skyline.

275. As per the consented scheme the proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral, seen in context with the existing buildings of the City Cluster, with no alteration to the existing character of this view which takes in the full height of the City Cluster as perceived from the west.
276. Overall, the proposal has been designed to protect and enhance local views of St Paul's Cathedral, its setting and backdrop, in accordance with Local Plan Policy CS 13(2c) and City Plan S13 and associated guidance in the Protected Views SPD and LVMF SPG.

Views from Other Publicly Accessible Elevated Viewing Areas

277. From the rooftop garden at 120 Fenchurch Street, the proposal would appear as a prominent new form alongside 1 Leadenhall Court, its sculpted form and pale masonry architecture providing a foil to the simple glazed geometry of its neighbour. The slender form of the proposal would preserve views of St Paul's Cathedral and allow the two to be read together; it would be possible to perceive how the Processional Route views have shaped the upper parts of the proposal.
278. Views of other notable landmarks in the view such as the Lloyds Building and St Michael Cornhill would be preserved.
279. From the viewing gallery at the Blavatnik Building within the Tate Modern the proposals will appear within the City Cluster, situated between the Leadenhall building and 52-54 Lime Street. The proposal will consolidate the form of the Cluster, resolving the current 'missing tooth' effect between the buildings noted above. Views towards the central brick tower of the Tate modern will be preserved. When the cumulative scheme is considered, this effect will be enhanced, seen together with 1 Leadenhall Street and 70 Gracechurch Street. The visual amenity of the viewing gallery is therefore considered to be preserved.

Other Borough Strategic Views

London Borough of Lambeth Local Views

280. Adopted Local Plan Policy Q25 (Views) designates a series of Panoramas, Landmark Silhouettes and Roofscape Views which are of local interest. It seeks to protect their general composition and character from harm. Further visual management guidance is contained in a draft Local Views SPD.
281. Local Views v and vi are from the South Bank towards St Paul's Cathedral, the proposal would, on the whole, be out of view, given the significant screening effect of foreground buildings/trees, preserving an appreciation of the Cathedral as the main skyline landmark. It would assist in consolidating the overall Cluster form to calm its appearance in contrast to the Cathedral. The proposal would thus preserve and enhance these views.
282. Overall, it is considered the proposal would protect (and enhance) the general composition and character of these Local Views.

London Borough of Southwark

283. Adopted Southwark Plan Policy P22 seeks to preserve and enhance Borough Views of significant landmarks and townscape, enhancing the composition of the panoramas across the Borough and central London as a whole, and includes View 5 (the townscape view south from the centre of Millenium Bridge). In this view the proposals are seen comfortably within the centre of the cluster with the upper levels falling below the height of the adjacent 53 Lime Street. There would be no interaction with St Paul's Cathedral and the character of the view is considered to be preserved.
284. View 4 (King's Stairs Gardens, River Prospect) is identified as a characterful view of some of London's most famous landmarks including Tower Bridge, St Paul's Cathedral and the River Thames. This is amongst other contributing landmarks including 20 Fenchurch Street and the City Cluster in an undulating skyline with a clear narrative demonstrating London's development as an internationally important mercantile city of commerce. The proposal would be visible and would assist in consolidating the City Cluster as a strategic landmark element, framing the viewers orientation key landmarks of Tower Bridge and St Paul's, enhancing their recognition and appreciation in the composition. Overall, the proposal would preserve and enhance the composition of the view, and of significant landmarks and townscape, ensuring the River Thames and its frontage, Tower Bridge and St Paul's are maintained in the view in accordance with P22.

285. In summary, the proposal would preserve Borough Views 1-5 in accordance with Southwark Plan Policy P22 and the visual management guidance contained in Appendix 4.

City of Westminster

286. Adopted Westminster City Plan 2019-2040 Policy 40(F) (Townscape and Architecture) states that new development affecting strategic and local views (including views of metropolitan importance) will contribute positively to their characteristics, composition and significance and will remedy past damage to these views where possible. Whilst in draft, the Metropolitan Views SPD (2007) is understood to contain those local metropolitan views.
287. The downstream views from Hungerford and Waterloo Bridges correspond with the LVMFs and local CoL St Paul's Viewing Points addressed elsewhere in this report. The Metropolitan Views SPD describes them as dominated by the City's financial district, with St Paul's remaining of central importance. This aspect would remain unchanged and as set out elsewhere in this report, the proposal would preserve the setting of St Paul's by consolidating the City Cluster's distinct and separate skyline form, strengthening the overall composition. It is considered the proposal will preserve the character of these views in accordance with the SPD.
288. In summary, the proposal would preserve V42 and V43 with regards to their characteristics, composition and significance of the local views of metropolitan importance, in accordance with Policy 40 and guidance contained in the draft Metropolitan Views SPD.

London Borough of Camden:

289. Other than those relevant LVMF pan-London views from Parliament Hill, Primrose Hill and Kenwood, addressed elsewhere in this report, Camden have not designed strategic local views of relevance to the CoL.
290. Conclusion on Neighbouring Borough Local Views:
291. The proposal would result in the preservation of neighbouring Borough strategic local views.

City Landmarks and Skyline Features, Views Of

292. The proposal would affect views of historic City Landmarks and skyline Features which, in accordance with CS 13, should be protected and enhanced for their contribution to protecting the overall heritage of the City's landmarks in accordance with Local Plan Policy CS13(2).

Lloyd's Building

293. The Lloyd's building is presently partially and distantly visible from a number of viewpoints along the river and to the west, appearing diminutive against its taller neighbours within the Cluster. The quality of these views is such that the building is not readily discernible to the naked eye, and only identified through magnification. Within the majority of views, the proposals will be seen either adjacent, very partially in the background, or partially reducing the visible extent of the Lloyd's building. The Lloyd's building will however continue to be identifiable, curbing the extent of the impact which does not amount to a total loss of visibility.
294. Additionally Officers' assessment has found consented schemes will occlude the Lloyd's Building entirely within these views, mitigating this partial loss of visibility.
295. For completeness, it is noted that within one view from Waterloo Bridge (LVMF 15B.2) the proposals will screen the Lloyd's building entirely. However, the extreme distance of this viewpoint is such that the building is not identified as a contributor within the LVMF SPD, either a 'landmark' or within the supporting text. As such this loss of visibility is not considered to reach a sufficient threshold to create harmful impact. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Cannon Street Station Towers:

296. The proposals will be seen as part of the backdrop behind the Station Towers in views from Southwark Bridge, forming part of the city cluster. While the proposals will be visible in views of towers, the proposal is not considered alter or detract from the presence or contribution of the Station Towers within this view, with the distance of this viewpoint from the site allowing the Station Towers to remain distinct. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Former Port of London Authority HQ

297. The proposals will be visible in views to the Former Port of London Authority, forming part of a backdrop of tall buildings within the City Cluster. Officers consider that while visible, the proposals will not diminish an appreciation of the listed building's silhouette or decorative detail. Further to this the cumulative scheme indicates the proposals will be screened entirely within these views, forming but one part of an evolving established cluster, seen within the distance. Therefore the former Port of London Authority HQ is considered to retain its prominence and visual strength. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see the additional assessment within the designated assets section below.

Southwark Cathedral

298. The location of the proposals will not affect any identified views of Southwark Cathedral. While the building will be visible in views towards the cathedral from Borough High Street, no harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Royal Exchange

299. The proposals will be seen together with Royal Exchange in views east from Bank junction. However, in both the baseline and cumulative scenarios, officers consider this change to be consistent with how the City Cluster currently contributes to these views, providing a backdrop of tall buildings. No harm has been found to the building's significance, nor the contribution of its setting. The overall skyline presence is therefore considered to be preserved. Please see additional assessment within the designated assets section below.

Tower Bridge

300. The proposal would affect viewpoints looking towards Tower Bridge along the South Bank of the River, located to the east and looking west. From Butler's Wharf, in the baseline scenario, the proposal would partially infill the sky gap between 20 Fenchurch Street and the northern tower of the Bridge. As such, the proposal would cause a limited degree of harm to the setting of Tower Bridge, specifically through reduction of its clear sky setting within this view.

301. Officers note this impact will lessen further as the Bridge is approached, subsequently becoming more dominant and commanding within the foreground. Given the limited and transient nature of this impact, combined with the significant distance of the site to the west, the proposals overall are considered to cause a slight level of less than substantial harm to the significance of Tower Bridge, very much at the lowest end of the spectrum. Please see additional assessment within the designated assets section below.

Tower of London

302. The proposals will be seen in views from and towards the Tower of London, specifically identified and assessed in detail elsewhere in the report. This assessment acknowledges the longstanding relationship of the City Cluster with the setting of the WHS, appreciated as a distinct and separate element. This assessment has found the proposals will be seen with the Tower of London in views from London Bridge, Queen's Walk, Tower Bridge and in and around the Tower of London, visible within the western edge of the cluster. Within these views it has been found that the proposals will not obscure, distract from or dominate the Tower of London due to the intervening distance, siting, scale, form and appearance of the proposals. The observer would continue to recognise and appreciate the Tower of London as the Strategically Important Landmark, set away from the City and not lost in it. Officers therefore found the proposal would not harm relevant attributes of OUV or relevant components which form part of the LVMF visual management guidance. The overall contribution of setting and therefore the significance of the WHS or its OUV has therefore found to be preserved. Furthermore it is also considered the proposal would assist in the consolidation and development of the City Cluster of tall buildings in line with the visual management guidance in the LVMF including the view specific visual management guidance. The overall skyline presence of the Tower of London is therefore considered to be preserved.

St Michael Cornhill

303. St Michael, Cornhill is identified in the Protected Views SPD as city church with a skyline presence. The proposals will be seen in transitory views together with the church tower when moving east along Cornhill towards the site. This includes a specific incident where the proposals, through their appearance the background, will be seen to join-together with the tower's outline against the sky. This impact and its effects on the setting and significance of the tower is assessed in detail below. In summary, officers consider this change will be experienced as a fleeting moment, and one taken together with the established views of the city cluster- the latter presently appreciated as a dynamic backdrop feature which frequently results in arresting contrasts of this nature.

Nevertheless, such is the contribution of the view from Cornhill/Royal Exchange Buildings to the church's significance that the proposal is considered to cause a low level of less than substantial harm to its significance, in particular an appreciation of it, taking into account all mitigating factors outlined. Officer's note given the reduction in the scheme's height this level of harm is reduced in comparison to the consented scheme.

Conclusion on City Landmarks and Skyline Features

304. The proposal would preserve views of all relevant City Landmarks and Skyline Features with the exception of causing some minor harms to St Michael's Cornhill and Tower Bridge. This would result in some minor conflict with part of CS 13(2).

Conclusion on Strategic Views

305. The proposal has been sited in the City Cluster which is central to the strategic growth balance in the City. This seeks to consolidate strategic growth in the area with the least impact on pan-London and strategic views which go to the heart of the character and identity of the City and London. It would assist the consolidation of the City Cluster and would preserve and take opportunities to enhance the composition and characteristics of strategic LVMF views. It was also sited and designed to preserve strategic views of and from the Monument and of the setting and backdrop to St Paul's Cathedral, including from the Processional Route. It would enhance the composition and characteristics of a number of neighbouring borough views which draw some benefit as a material consideration. It would draw some more limited conflict with CS13(2) in that, whilst preserving views of most relevant City Landmarks and Skyline Features, would cause some minor diminishment of views of the Church of St Michael Cornhill and Tower Bridge.
306. Overall, the proposal satisfies and draws support from London Plan Policy HC4, Local Plan Policy CS13(1&3) and City Plan S13 and associated guidance in the LVMF SPG and Protected Views SPD. At the same time, it would draw some conflict with the part of CS13(2), as it relates to City Landmarks and Skyline Features. Overall, on balance, it is considered the proposal would accord with Policy CS 13.

Designated Heritage Assets

307. Objections have been received from the Government's advisor on the historic environment, Historic England, in addition to heritage harm has been raised by the GLA.

Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus, but some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.

Leadenhall Market Conservation Area

308. The site of the proposal is located within the Leadenhall Market Conservation Area (CA), with its frontage to the western CA border along Gracechurch Street and its north, east and south elevations facing into series of lightwells which diverge from the intricate tangle of alleys and thoroughfares leading to the heart of the CA; the site's north and east elevations directly adjoin and share party walls with the Market buildings on the Central Avenue and Lime Street Passage, while the south elevation adjoins and shares a party wall with 1-4 Bull's Head Passage.

Character, Appearance and Significance

309. The Leadenhall Market Conservation Area Character Summary and Management Strategy SPD was adopted in 2017. It articulates the character, appearance and significance of the Conservation Area, distilled in six Identified Attributes under Section 3 ('Summary of Character', p.8), as follows:
- The grade II* listed Victorian buildings of Leadenhall Market are an outstanding example of a Victorian market and offer a remarkably cohesive and immersive experience.
 - A vibrant mix of uses and activity, strongly complimenting the predominantly financial and insurance activities in the area.
 - Highly significant archaeological remains relating to the 1st Century Basilica Forum and medieval 'Leaden Hall'
 - A place where the predominant scale of buildings, streets and spaces contrasts greatly with those in its immediate setting, resulting in dramatic townscape views;
 - Preservation of the medieval street plan within the 19th century market buildings, offering an intricately layered plan form and retained historic thoroughfares;
 - An area which is increasingly experienced from higher level viewpoints and where the appearance of its roofscape is of special importance.
310. The SPD highlights, in Section 5 (p.16) certain Identified Views (in a non-exhaustive list) through which this character, appearance and significance can best be appreciated. The

impact of the proposal upon each Identified Attribute and relevant Identified View has been assessed below.

311. The SPD does not specify the contribution of the existing building to the character, appearance, and significance of the CA; instead, it notes (p.20): 'Dating to the 1930s, Nos. 85-87 has a far simpler [than neighbouring 81-82] Portland stone street elevation with minimal surface decoration save for Greek detailing and a strong central granite entrance with prominent keystone. The building has been sympathetically remodelled at street and first floor levels to provide a symmetrical retail frontage'. Though not explicit, the SPD implies that it is the principal facade on Gracechurch Street that contributes to the character, appearance and significance of the CA. The GLA also note that, overall, it makes a positive contribution to the Conservation Area.
312. As per the consent, officers find that the principal Gracechurch Street elevation is the only element of the current site which makes a positive contribution to the Conservation Area, the result of its 'Neo-Grec' style, detailing and higher quality materials, tempered somewhat by later alteration. It is considered that this element makes a modest contribution to the character, appearance and significance of the Conservation Area.
313. The 'roof' above principal parapet level and other secondary elevations are all considered expedient and utilitarian, and of a somewhat incoherent and cluttered form and appearance.
314. At a scale only somewhat familiar but still in abrasive contrast to the adjacent market buildings, it is considered, overall, these elements cause a modest detracting from the Conservation Area, in particular when viewed from Lime Street Passage, but also from above.

Contribution of Setting

315. The CA is located at the western edge of and in amidst the City Cluster of tall buildings and its immediate setting is defined by a backdrop of tall buildings, particularly to the north where in baseline and cumulative scenarios dramatic and dynamic juxtapositions exist with the CA: Lloyd's of London, 1 Leadenhall, 6-8 Bishopsgate, 22 Bishopsgate and 122 Leadenhall Street. These comprise a particularly prominent backdrop in views looking north from Gracechurch Street, Lime Street and Lime Street Passage; views in which No. 85 would also figure. To the south, 20 Fenchurch Street forms a prominent backdrop to southerly views from within the CA, a quality that would be reinforced by the implementation of consented tall building proposals for 55 and 70 Gracechurch Street.

316. Overall, it is considered that the Conservation Area draws only modest contribution from elements of setting to significance, in particular an appreciation of it. The substantial significance is drawn from the intrinsic interest inherent in the physical form and fabric of those contributing elements of the Conservation Areas, comprising good surviving parts of buildings and historic grain and street patterns. It is considered that those positive elements of setting which make a modest contribution to significance are:

- The dramatic and clear contrast in scale between buildings between taller buildings and smaller, finer grain historic structures, best observed in some juxtapositions between new and old such as that between Leadenhall Market and the Lloyd's Building (Grade I) whose special interest in part is deemed by Historic England to glean from it forming a "wonderfully incongruous" backdrop by surrounding listed buildings, in particular that with Leadenhall Market. It is considered this makes a modest contribution to significance and an appreciation of it.

317. The relationship with complementary historic buildings comprising the Bank Conservation Area (assessed below), in particular the buildings fronting the west side of Bishopsgate and Gracechurch Street. This is considered to make a modest contribution to its character, appearance and significance.

318. In summary, then, the CA's character, appearance and significance is augmented in the traditional sense by its westerly setting towards Bank, but also derives a more modern, dynamic contribution to significance from its north and eastern settings of the City Cluster.

Impact

319. Under the proposal, the existing building would be demolished, Gracechurch Street principal façade rebuilt in facsimile with the current openings slightly adapted and enlarged to provide openings for the Public Hall, flexible office space and Heritage Walkway, with the office tower element rising distinct above.

320. The proposal would infill lightwells which currently exist to the north, east and south elevations, with these elevations of the proposal abutting the party walls of the New Moon Tavern, Leadenhall Market, 1-4 Bull's Head Passage and 81-82 Gracechurch Street. As part of this a number of chimneystacks serving the Market, extended upwards in the 1930s as part of the construction of the existing building, would be trimmed back down to approximately their Victorian extents. These works are considered acceptable in

principle and are subject to a separate LBC. Full details of the interfaces between the proposal and the existing party walls around the site would be reserved via condition.

321. The proposed demolition of the building and rebuilding of the Gracechurch Street façade to in an almost completely faithful facsimile, is considered to be acceptable in principle. The demolition of the east, north and south elevations and roofscape of the building, which detract from the character, appearance and significance of the Conservation Area, is considered an enhancement in principle, subject to the acceptability of the replacement.

322. The modifications to the façade would be:

323. (i) widening the existing stone central portal with replacement stone detailing to match moulding and relief (ii) extending vertical bay divisions to ground (iii) introducing bronze doors to the flanking bays, inspired by and in the spirit of drawings of the original elevation and (iv) recessing the existing bronze windows and spandrels on the upper levels to introduce greater depth and articulation to the façade.

324. These works would replace works of later modern remodelling and imbue the elevation with materials and detailing characteristic of the age in which it was designed and built. This is considered to be an enhancement of the elevation, and therefore of its contribution to the CA; relative to the scale of the CA as a whole, and the status of the existing building within it, the level of this enhancement is considered to be slight.

325. Accessed through the reinstated frontage, the proposed Public Hall would reinstate a historic east-west route across the site, linking Gracechurch Street with Lime Street Passage. This would be a direct enhancement of the retained medieval plan form and intricate historic throughfares which, as Identified Attribute 5, the SPD lists as part of the character, appearance and significance of the CA. Faced in traditional materials and of compelling spatial proportions and architectural details influenced by the adjacent Market and Roman architecture the Hall would be a complimentary new space within the CA that would sit comfortably alongside the covered walkways of the Market and the elevations of the wider CA. Moreover, it would sympathise with and perpetuate the historic functionality of the Leadenhall as a gathering-place. Overall, the provision of the Hall and associated reinstatement of the historic route is considered to be a modest level of enhancement to the CA as a whole.

326. Attribute 2 of the SPD identifies that the vibrant mix of uses and activity within the Conservation Area forms part of its character, appearance, and significance. The provision of the proposed Public Hall and the Heritage Walkway would considerably enrich this vibrant mix of uses and activity within the CA, by providing spaces and uses that are currently not present within the CA and would be complimentary to the existing Market and associated uses. It is thereby considered that this would represent a modest level of enhancement of this attribute of character, appearance, and significance overall.
327. As with the consented scheme, care has been taken to differentiate between the podium, and how the proposal meets its immediate context, and the integration of the tower elements above to respond to the unique characteristics and significance of this Conservation Area in amidst the City Cluster.
328. Given the narrow streets of the medieval street pattern and the covered walkways of the Market, the taller tower element would be largely screened from view in the Conservation Area, only appearing in three of the Identified Views noted in the CA SPD.
329. View 7 identified in the SPD is of the eastern portal to the Market, looking west along Leadenhall Place, from the southern base of the Lloyd's Building. In this view, the eastern Market buildings are largely seen against clear sky, but for the upper storeys of the existing building at 85 visible above the Market's eastern portal, and the glazed tower of 1 Leadenhall Court forming a prominent modern bookend to the north. In the baseline scenario, as with the consented scheme the proposal would form a prominent, dynamic new feature of this view, with its sculpted, serrated form rising up directly behind the Market. Its pale masonry architecture would add incident and interest to the view and would form a dynamic contrast with the glazed geometry of 1 Leadenhall Court to the north.
330. The proposal would be perceived as part of the consolidating Cluster, disassociated from the buildings at ground level, an impression reinforced in the cumulative scenario by the glimpsed presence of the upper levels of 70 Gracechurch Street to the south. It is therefore considered that the proposal in this view would reinforce the contrasts in scale identified in Attribute 4 of the SPD.
331. View 8 identified in the SPD is representative of the experience of looking north up Gracechurch Street at the western portal to Leadenhall Market. In both short and long views looking north, the Market and its neighbouring buildings on the eastern edge of

Gracechurch Street, including the proposal site, are seen against the backdrop of existing Cluster towers identified in Attribute 4. In this view, in the baseline scenario, the enhanced, rebuilt façade of the existing building, with new views into the Public Hall beyond, would form a complimentary neighbour to the existing Market portal and Nos. 81-82 Gracechurch Street to the south. The greened parapet edge to the proposals would introduce a welcome degree of softness and planting into this urban environment, while the lower stages of the tower, above, would be read as part of the wider Cluster of tall buildings, somewhat disassociated from the CA.

332. This latter impression would be intensified in longer views from further south on Gracechurch Street, where, as with the consented scheme, the tower's distinctively sculpted form, pale masonry architecture and extensive greening would be seen as a prominent, high-quality new addition to the Cluster, visually assembling with but architecturally distinct from 1 Leadenhall Court, 122 Leadenhall Street and the other towers established in this view. In the cumulative situation, the consented form of 70 Gracechurch Street would appear with and partially mask the proposal, reinforcing this sense of it being a distinctive new addition to an established Cluster.
333. View 16 identified in the SPD represents the experience of looking north from Lime Street/up Lime Street Passage at the Market buildings. Lime Street Passage is framed on both sides by the frontages of the Market, perceived against a backdrop of either low-rise buildings (including the upper storeys of the existing building on the site) or open sky, and terminates in the southern Market portal, dramatically juxtaposed with 1 Leadenhall Court, 22 Bishopsgate and other towers established in what is now an iconic view. Immersed in the fine-grain, historic scale, materiality and architecture of the Market, this street can be said to represent the conservation area's heart; furthermore, it is the place from which Attribute 4 identified in the SPD might best be appreciated.
334. In the baseline scenario, the proposal would form a very prominent new feature of these views. It would rise dramatically behind the range of Market buildings fronting Lime Street Passage in a manner at ease with some of the sublime contrasts in scale an inherent aspect of the Conservation Area and its immediate setting. The walkway at level five would be a prominent new feature above the Market buildings forming a dynamic, immediate backdrop to them. The cranked horizontals and fluted mullions of the pale masonry architecture would have visual affinities with those of the Market buildings, while the planted balconies on the east elevation would add softening and further visual interest.

335. As with the consented scheme it is considered the greatest impact on the Conservation Area would be when viewed from Lime Street Passage from as far back as the junction with Lime Street, though it would be, on the whole, relatively fleeting, transitory, in the oblique and at a high level. It would be mitigated further by the highly modelled lower stages of the rear elevation, which would subtly fan out as it rises, the tight urban grain, intricate street dimensions and arresting vibrancy of the foreground market streetscene. It would remove those current parts of the site which detract from the Conservation Area, replacing unconvincing architecture by reason of its expedient, incoherent and cluttered appearance, with coherent, high quality architecture.
336. Historic England consider the CA relies on a balance between the historic street frontages and the buildings outside the CA of markedly different scale and character, whilst recognising that some of these juxtapositions are positive and others are not, depending often on proximity and physical relationships. Whilst Officers, for the reasons stated, don't consider the Conservation Area relies on those juxtapositions, or that the balance is a delicate one, it is agreed that some are positive and that this relies of judicious analysis having regard for the site-specific circumstances.
337. As with the consented scheme, it is considered that the proposed building would be appreciated as part of a dense, close-knit backdrop of tall buildings, experienced in distinct juxtaposition but immediate proximity, where the strength of the juxtaposition often reinforces the scale of both causing them to be read as distinct. It is the impact of the entire proposal which is to be considered, noting the overall reduced height of the proposals and reduced depth to the walkway over the market buildings. Given the visual weight and relative proximity in this particular instance, whilst some slight harm could be caused, it is considered that the replacement of the poor-quality backdrop would nullify this brief incident with a countervailing benefit, resulting in the entire proposal having a neutral impact on the significance of the conservation area.
338. View 5 of the SPD is discussed for completeness, provided in view 3 to the HTVIA. This view is of the north portal of the Market, looking south from Leadenhall Street along Whittington Avenue, framed to the east by the former Iraqi Bank and to the west by 1 Leadenhall Court. 1 Leadenhall conceals the proposals from view. The proposals can therefore be understood as compliant with the consented character of the view, seen as part of an assembly of new buildings within the market's immediate surroundings.
339. The City of London Conservation Area Advisory Committee (CAAC) consider that the proposal, as with the consented scheme, would represent significant overdevelopment

of a constrained site, lead to the substantial loss of character to the CA. The CAAC do also note the overall reduction in height and improved public offer and redesign of level 5 and planting in particular. The CAAC characterise the proposals as creating a 'loss of character' which damages the setting of the market. In response officers note that, while the main frontage of the site retains some sympathetic details, the upper floors and roofscape have been found to negatively intrude into the otherwise high architectural quality of the surroundings, by virtue of their indifferent design and 'back of house' character. Through the sensitive restoration and rebuilding of the principle frontage and ground floor elevations, those qualities of the existing building of positive 'character' which contribute to the setting of the market and the wider conservation area would be preserved. In addition, the composition of the proposals have also considered the appearance of the site in the round, such that the present incidental quality in views from the east are resolved and replaced with a composed, intentional architectural design.

340. Historic England (HE) considered that the proposal would overshadow the top-lit arcades of the market. As with the consented scheme, detailed technical studies have been undertaken which have found that there would be a negligible/imperceptible impact on lighting levels to the Market, addressed elsewhere in the report. Thus, it is not considered that harm will arise in this respect of the conservation area.
341. Historic England holds that the proposed tower would detract from the prominence of the market, its roofscape and other surrounding historic buildings, the result of overshadowing and a dramatically different scale as to the general scale of the CA. It found the harm would equate to the level stated in their previous objection for the consented scheme, which officers therefore infer is less than substantial, and low to moderate in the range of such harm. For the reasons set out in above this assessment, whilst paying considerable importance and giving substantial weight to views of HE, officers disagree with the harm assessment.
342. Officers consider that on balance the unique spatial qualities of the CA, combined with the particular significance and proposed enhancements, would be preserved, and enhanced to a modest degree, and this is a matter of great weight.
343. The GLA has also considered that a high degree of less than substantial harm would arise from the loss of the existing building, notwithstanding the revised scheme's height and overall form is considered an improvement upon the extant permission . Officers disagree and consider on balance that the conservation area would not be harmed as a result of this and would be preserved, with modest enhancement.

344. The proposal would have a neutral impact on those identified elements of setting contributing to significance. In terms of those positive contrasts in height and scale, which often conjure a sense of the sublime, it is considered the proposal would not detract and could add to this unique spatial aspect of the CA, at the heart of the City Cluster. In terms of that relationship with the Bank Conservation Area on the opposite side of Gracechurch Street, either in baseline and cumulative scenarios, the retention and restoration of the principal façade, and the established backdrop of tall buildings, would mean that relationship would be preserved. Overall, the modest contribution of setting to the significance of the CA would be preserved.
345. On the basis of the impact assessment set out in the preceding paragraphs, Officers disagree with HE's, the GLA's and the CAAC's conclusions. The proposal would be a considered and design-led scheme which has resulted in the long-term optimisation of uplift relative to strategic heritage constraints, and which has successfully taken opportunities to preserve and enhance the Leadenhall Market Conservation Area. The often-indistinguishable immediate backdrop of the City Cluster is inescapable and a component of the significance of the CA. Overall, it is considered that the CA, as a whole, would be enhanced to a modest degree within both the baseline and cumulative scenarios.

Leadenhall Market (Grade II*):

346. The site adjoins, and shares party walls with, the grade II* listed Leadenhall Market. A separate application for listed building (25/00548/LBC) for the party wall works has been submitted.

Significance

347. Market complex of 1881 to designs renowned architect Sir Horace Jones, the City Surveyor. The Market comprises a series of roofed arcades disposed about a loosely cruciform plan (a layout preserving the medieval street alignment), with detached portions to the south, all lined with two storey units comprising shopfronts at ground level with offices/ancillary areas above. Of red brick and Portland stone dressings, the architecture is essentially classical, with much flamboyant renaissance-inspired detailing, and plentiful depictions of dragons and other references to the City Corporation.
348. The Market possesses a high level of historic interest for its status as descendant ultimately of the Roman Forum-Basilica, and subsequently the medieval Leaden Hall –

as a gathering-place for mercantile activity; and for its associations with Sir Horace Jones, the City Surveyor who designed many accomplished market buildings for the City. Leadenhall was his last market building within the City's boundary.

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

Contribution of Setting

351. Overall, the market draws a modest to moderate contribution from elements of setting to significance, in particular an appreciation of it. Most significance is intrinsic and inherent in the physical fabric, plan form and underground archaeology, rather than from setting.
352. To the west, south and east, the immediate setting of the Market is the Leadenhall Conservation Area in which it sits; the historic scale, architecture and urban grain of the CA provides a complimentary foil and sympathetic setting to the Market buildings. The same is true of the Bank Conservation Area lying further to the west across Gracechurch Street. These areas of setting support the historic and architectural/artistic significance of the listed building. Given the character of the market is somewhat self-contained, this wider historic environment makes a near moderate contribution to significance and an appreciation of it.
353. Located within the City Cluster of tall buildings, the setting of the Market to the north and east is of modern tall buildings; as set out in the assessment of the CA, these form a dynamic modern backdrop to the listed building, some of which are exceptional examples of commercial architecture of their time, such as the Leadenhall Building ('the Cheesegrater') and in particular the Lloyd's building, the group value with which Historic England's List Description describes as "wonderfully incongruous" with some complementary 'nods'. This makes a modest contribution to significance and an appreciation of it.

Impact

354. Historic England in their representations consider the proposals would detract from the prominence of the market buildings through the addition of height.. For reasons set out in the assessment above and below, officers consider this change in scale to be an established part of the of the building's setting and this includes an immediacy to how this change is experienced.
355. Officer's note the GLA considers the amended scheme has resulted in a 'simpler', 'more elegant' form, with improvements to the transition between the podium building and tower above, including the level 5 walkway, but conclude a middle degree of less than substantial harm to the market buildings. The designs have been specifically tested through the pre-application process to minimise the visual intrusion of the scheme, so that direct views towards the entrance pediments remain unencumbered. This ensures the sense of arrival into the market is preserved. Further to this, while it is acknowledged the walkway would be a prominent new feature seen above the Market buildings, the soffits have been designed to form a backdrop feature to them, and sympathetic rather than competitive in impact.
356. Historic England consider the proposals will overshadow top-lit arches compromising the architectural character. Officers disagree with this conclusion. The technical studies of the scheme's daylight/sunlight impacts, set out elsewhere in this report, find that a fractional and imperceptible difference in the Market's internal light levels would result. Officers consider a fractional difference in aforesaid light levels would preserve the significance and special architectural and historic interest of the listed building.
357. While the main frontage of the site retains some sympathetic details, the upper floors and roofscape have been found to negatively intrude into the otherwise high architectural quality of the surroundings, by virtue of their indifferent design and 'back of house' character. Through the retention of fabric to the ground floor, those qualities of the existing building of positive 'character' which contribute to the setting of the market and the wider conservation area would be preserved. In addition, the composition of the proposals have also considered the appearance of the site in the round, such that the present incidental quality in views from the east are resolved and replaced with a composed, intentional architectural design.
358. The chief impact would be indirect, via change in the setting of the listed building. In views of the main west portal to the Market, the rebuilt, reimagined Gracechurch Street façade of the proposal would form a complimentary adjunct, harbouring compelling views

of the Public Hall beyond; similarly, in views of the west range of Market buildings along Lime Street Passage, the proposed east entrance to the Public Hall would offer oblique glimpses into the Public Hall. The reinstated historic east-west route kinked through the Public Hall would elide with the spirit of the Market's conception as a formal space on an informal alignment. The sequence of gathering spaces and routes within the immediate orbit of the listed building would be enriched in line with the genius loci or spirit of the place. The glimpses and views of the new gathering-space in the Public Hall would further enrich the fine grain hive of related commercial activities at the heart of the character of the market complex.

359. In longer views north and south along Gracechurch Street, the main west portal is already a comparatively diminutive presence, seen against a wider backdrop of modern tall building development. The proposal would reinforce this existing dynamic and would have a somewhat benign impact on the setting of the listed building in these views.
360. In baseline and cumulative views of the eastern and southern market portals along Leadenhall Place and Lime Street Passage the proposal would form a prominent new feature, rising directly above and occupying previously clear sky above the Market buildings. It is acknowledged that the proposals introduce a marked change of scale within the site, and that the site is located in close proximity to the listed building. However it has been established that this change of scale is a currently appreciable characteristic of the setting to the listed building. Secondly, this proximity with tall buildings has been successfully leveraged to achieve an architectural drama found to be of benefit to the market's existing setting and significance. For example, the juxtaposition between market and Grade I Lloyd's Building is accepted as a positive counterpoint in the surroundings. It is also noted the architectural interest of the building is not reliant on a perception of its prominence within the streetscape, rather views to the market are overwhelmingly characterised by its sudden 'unveiling', as the entrances into the market come into view within the narrow lanes to the east.
361. Officers do accept however that, consistent with the impact to the conservation area outlined above, the contiguity of the site and listed building, could cause some slight harm, through the proximity and visual weight of the proposals. As stated previously, the viewpoints where this harm arises are considered fleeting, transitory and oblique, limited by the intricate urban grain of the surroundings which allows only unfolding rather than distant views. Furthermore, the proposals have been found to resolve the existing harmful contribution of the site's incidental and cluttered upper levels, replacing these

with a composed, intentional high-quality design. Fundamentally it is considered that when taken together, these brief incidences of harm would be nullified with a countervailing benefit, resulting in an overall neutral impact in this instance.

362. Overall, in both baseline and cumulative scenarios it is considered the proposals would preserve the significance and special architectural and historic interest of the listed building and the contribution made by setting to that significance and an appreciation of it.

Church of St Michael Cornhill (Grade I)

Significance

363. Church of 1670-77 by Sir Christopher Wren, with tower of 1715-21 by Nicholas Hawksmoor and High Victorian remodelling of the interior by Sir George Gilbert Scott. The only parts of the exterior visible are part of the south elevation, the west elevation and the north elevation and base of the tower. The rest is obscured by neighbouring buildings. Wren's body of the church is of Portland stone in his classical style incorporating round-arched windows to the south elevation. Contrastingly, Hawksmoor's tower employs the gothic style to striking effect, in four muscular stages and culminating in four richly modelled polygonal pinnacles with ogee caps and glittering finials. From a surviving drawing of the tower dated 1421, it is clear that Hawksmoor's design for the new tower perpetuates the outlines and style of the old one with only minor differences. To the tower's northern foot is a gothic porch by Gilbert Scott.
364. The building is of very high architectural/artistic interest: for the striking juxtaposition of Wren's classical and Hawksmoor's gothic architectural languages, for the very high calibre of the designs and quality of execution of the building in general, and for Hawksmoor's forceful, idiosyncratic and charismatic interpretation of the gothic style present in the tower, which perpetuates the appearance of its predecessor on the skyline. The building is of very high historic interest: for the associations with the aforesaid architects, stellar names in British architectural history; for its status as a long-lived descendant of an ancient, medieval foundation upon the site of the Roman Forum-Basilica; and for its associations with generations of past City communities, including many notable individuals such as Robert Yaxley, King Henry VIII's physician, buried in the church in 1540. The vast majority of that significance is contained in its physical historic fabric and fixtures and fittings, albeit some significance is drawn from setting.

Contribution of Setting

365. The church is framed on all sides by the bustling historic townscape of the Bank Conservation Area, averaging five storeys in height and dating from the C18 to the present day. Because of the dense, built-up surroundings, only from the churchyard and St Michael's Alley to the south can views of both tower and church be obtained, contributing to its architectural significance. Otherwise, views of the north elevation from the tower can be obtained directly opposite on Cornhill, while the upper stage and pinnacles form a memorable townscape set piece in views east, and to a lesser extent west, along Cornhill. The junction of Cornhill with Royal Exchange Buildings offers a moment to appreciate the pinnacles of the church in an oblique view soaring above the commercial buildings on gently rising land towards one of the City's two hills, Cornhill.
366. Surrounded by historic buildings of a grand but generally lower scale than the tower, the immediate setting of the church in all directions makes a strong contribution to its significance by maintaining the townscape relationship of lower secular buildings and higher ecclesiastical tower that would have prevailed since it was founded. The layering of variable historic plot shapes and architectural treatments, and the fine grain of the medieval street pattern here, all add richness and incident which evoke the preceding centuries of the church's existence and status within its parish and the wider City. These make the strongest, moderate, contribution to significance and an appreciation of it.
367. The views of Hawksmoor's elegant pinnacles, closely resembling their medieval predecessors, rising above the historic commercial frontages lining Cornhill is considered to be a quintessentially 'City' juxtaposition of ecclesiastical grace with commercial grandeur. As such, views of the church eastwards along Cornhill are considered to make a strong contribution both to its architectural and historic significance, especially from the junction with Royal Exchange Buildings, where the pinnacles can be appreciated in their fullest against clear sky.
368. The historic townscape surrounding the church extends for some distance to the west, south and north as the Bank Conservation Area. To the near east, across Gracechurch Street, the City Cluster provides a dynamic modern backdrop of towers to the eastern parts of the Bank Conservation Area of which the church is part. In some of those Cornhill views, particularly from Bank Junction and the commencement of Cornhill, the church's pinnacles are seen against 1 Leadenhall Court and the other modern towers of the Cluster. While this element of setting results in an established, dynamic juxtaposition

between old and new, it is considered to make only a neutral contribution to the significance of the listed building.

369. As well as this local setting, the church's pinnacles can be appreciated from riparian bridge view from the south and west, from Waterloo and Hungerford Bridges, as part of a wider skyline ensemble, albeit against the backdrop of the City Cluster. These views are considered to contribute to the significance of the church by illustrating its status as part of a 'family' of City churches. These make a lesser contribution to significance overall.

Impact

370. The GLA consider the proposals to result in less than substantial harm, at a middle level. While the proposals are lower in height in comparison to the consented scheme, HE considers some less than substantial harm would arise here, where the sky-etched silhouette of the tower would be in part backdropped by the proposal.
371. In views of the church looking east from Bank Junction and the commencement of Cornhill, the proposal would be backdropped by 1 Leadenhall. Officers agree but note that HE did not claim harm would be caused to the church in their formal response on 1 Leadenhall, which is closer and more prominent in the backdrop than the proposal. Nevertheless, Officers agree the transitory moment, described as an incident by HE, around the eastern edge of Royal Exchange Buildings is the best place to appreciate the church in the near setting.
372. Moving east along Cornhill, the proposal would draw closer to the church's pinnacles, and colliding with them at the junction with Royal Exchange Buildings. The proposal's pale masonry architecture, which otherwise would be a positive quality in many views, would here unfortunately blur the silhouette of the pinnacles and detract from (i) the ability to appreciate them as an integral architectural composition and (ii) puncture the composition of church pinnacles with commercial buildings below and the clear sky behind.
373. The resultant impact is considered by Historic England to reflect the same as the consented scheme, which officers therefore infer as less than substantial harm, falling within the middle of the range. t HE has stated this is in part due to the quality of the existing views of the church tower, which HE considered to be the most advantageous in respect of appreciating the church's significance.

374. Officers note however that these impacts are appreciated as a fleeting moment; that the experience of viewing the church whilst moving east along Cornhill is a kinetic one; and that the City Cluster is an established, dynamic backdrop feature that frequently results in arresting contrasts. It is further acknowledged that other views of the tower against clear sky would remain unaffected, including from directly north opposite on Cornhill and from the churchyard. Nevertheless, such is the contribution of the view from Cornhill/Royal Exchange Buildings to the church's significance that it is the view of officers that the proposal would cause a low level of less than substantial harm to its significance, in particular an appreciation of it, taking into account all mitigating factors hitherto outlined, including both baseline and cumulative scenarios.

Tower Bridge (Grade I)

Significance and Contribution of Setting:

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

Impact

377. The GLA consider the proposals would result in less than substantial harm, at a low level, due to changes within the wider setting. Officers note this is an improvement upon the previous level of harm identified by the GLA. This is addressed below. The proposal would affect those views of Tower Bridge from the South Bank of the River from the east looking west. From Butler's Wharf, in the baseline scenario, the proposal would partially infill the sky gap between 20 Fenchurch Street and the northern tower of the Bridge. This

further erosion of sky in the open 'picture frame' of the Bridge between the iconic towers undermines its composition and role as the 'gateway' to central London, drawing the Cluster further south-west into the iconic 'picture frame' between the twin towers. As such, the proposal would cause a limited degree of harm to the setting and therefore the significance of Tower Bridge.

378. The impact reduces on the approach to the Bridge, which becomes more prominent as the observer moves closer, until it commands and dominates the foreground. Given the very limited extent of the impact, its transiency, the significant distance of the proposal to the west and the relative significance of this viewing platform, the proposal overall is considered to cause a slight level of less than substantial harm to the significance of Tower Bridge, very much at the lowest end of the spectrum, within both baseline and cumulative scenarios.

The Monument (Grade I and Scheduled Ancient Monument)

Significance and Contribution of Setting

379. Monument of 1671-77, by Sir Christopher Wren and Robert Hooke. The Monument to the Great Fire symbolised the restoration and renaissance of London following the Great Fire of 1666 as a major European economic, cultural and political centre. It comprises an elegant fluted Roman Doric column of Portland stone, the largest free-standing classical column in the world, crowned with a gilded flaming orb, supported atop a large cuboid pedestal bearing inscriptions and bas-reliefs describing the circumstances of its conception. The Monument is of exceptional architectural/artistic and historic significance as a City/London-wide Landmark.
380. The setting of the Monument makes a significant contribution to its significance and an appreciation of it, in particular its architectural, historic and to a lesser extent artistic significance. It was symbolically sited near the site on Pudding Lane where the Fire began and on near axial alignment with the Old London Bridge, the site of the original Roman bridge from which London originated. It once, alongside the rebuilt City church towers/spires, was pre-eminent in the much artistically represented London skyline as part of a family of Wren landmarks representing the character and identity of the City of London up until the end of the 19th Century. It comprised part of the main southern arrival experience from London Bridge, forming part of the gravitas and grandeur of a Renaissance city. As it did then, it has informed the height and curation of the townscape around it for over 300 years.

Impact

381. The GLA consider the proposals would not result in any harm to the Monument, and officers note this is an improvement over the consented scheme. .
382. Viewed from the South Bank, the proposal would, in the baseline scenario, be perceived at some remove to the north-east, leaving the setting of the Monument untroubled. Looking north along Fish Street Hill towards the Monument, in the baseline scenario, the proposal would appear far in the background, part of the Cluster, and would not encroach upon the silhouette of the Monument; in the cumulative scenario it would be almost entirely occluded by the consented form of 70 Gracechurch Street.
383. Similar to views along Fish Street, views from the viewing gallery at the Monument looking towards the site presently take in the City Cluster. Noting the lower height in comparison to the consented scheme, the proposals will sit entirely within the envelope and sky silhouette established by the existing buildings of the Cluster.
384. Accordingly, the proposal would preserve the significance and setting of the Monument as a grade I listed building and Scheduled Ancient Monument within both baseline and cumulative scenarios.

St Peter Upon Cornhill (Grade I):

Significance and Setting:

385. The significance of the building is exceptional, forming one of the post Great Fire city churches designed by Sir Christopher Wren, and consequently illustrative of his transformative works across the City during that period. The significance of the listed building stems from its high architectural and historic interest as a seventeenth century church. The retention of the lower parts of the medieval tower amplifies the historic rarity value of the fabric, and this is complimented by the expressive classicism of Wren's later façades. Damage to the ground floor frontage to Gracechurch Street is evident, detracting from the otherwise decorative appearance of the building.
386. The setting of the church is unusually secluded, making a range of contributions to the significance of the listed building. Despite being located on a major thoroughfare, there is no access from the church onto Gracechurch Street, so that while the historic character of the eastern elevation is visible, a full appreciation of its significance is not readily achieved in views from the east. Shopfronts obscure the majority of the northern

elevation, aside from a small projecting entrance at ground floor. The most complete views of the building are from within the church yard to the west of Gracechurch Street. This is almost completely enclosed, and accessed only by the narrow St Peters Alley, a small lane thought to date to the Saxon occupation of the City. The immediate setting of the church therefore comprises this yard, with separately listed wrought iron gates (Grade II) creating group interest. The verdant and enclosed quality of the yard makes a positive contribution to the setting of the listed church, as do the glimpsed views of the tower seen from along Cornhill, sign posting the church's location at a topographical high point.

387. As existing, the site is not visible in views within the church yard, but the eastern elevation of the church is seen together with the site, in views south along Gracechurch Street, also taking in the taller buildings of the cluster further to the east. Overall, the site is considered to make a neutral contribution to the setting of the church.

Impact:

388. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting.
389. The technical assessment of the scheme's daylight and sunlight impacts, set out elsewhere in this report, has found that the church would experience a small drop in daylight/sunlight levels. This would be via the stained-glass windows in the east and south elevations, both of which date to the nineteenth and twentieth centuries of the church's existence. It is considered that the decrease would be modest and imperceptible to those experiencing the church's interior and would not affect an observer's ability to appreciate the stained glass windows, preserving the significance of the church.
390. While the proposals will be visible in views south along Gracechurch Street and seen together with the eastern elevation of the church, this is not considered to alter the existing contribution of this view to the listed building's setting, which is already defined by a sense of contrasting architectural character, materiality and scale. It is further noted that the consented scheme to 1 Leadenhall, will be visible in views from the church yard, as well as heighten the sense of contrast to each side of Gracechurch Street. The former churchyard is well contained and enclosed, to the extent the outside world is peripheral to the experience. Therefore officers disagree with the GLA, finding that within this context the proposals are considered to constitute a neutral impact to the setting of the listed church, retaining the existing dramatic change in scale currently appreciable in the

wider surroundings at a high level. The significance and setting of the church would be preserved within both baseline and cumulative scenarios.

Lloyd's of London (Grade I) together with Nos 12 & 14-19 Leadenhall Street (Grade II):

Significance and Contribution of Setting:

391. Designed by Richard Rogers & Partners and completed in 1986 Lloyd's of London retains very high architectural significance, as the pre-eminent example of the 'Hi-Tech' design movement of late Modernism. The building's innovative steel and concrete material expression and flexible planform further amplifies this interest, recognised as one of Rogers' most influential works. Additional historic interest resides in the association with the Lloyd's firm, and the conservation philosophy which resulted in the rehousing of the 'Adam Room' within the new building, comprising an eighteenth-century Robert Adam interior. Similarly, the integration with the retained Nos. 12 and 14-19 Leadenhall Street, built in 1928, designed by Edwin Cooper and separately listed grade II also creates significant group value. The latter reflects the remains of the last headquarters built on the site and comprises a colossal Portland Stone doorway, with coffered dome semi dome above, joined to a grand five storey façade decorated by rusticated piers and Doric entablature.
392. The Lloyd's Building's immediate setting can be generally categorised as fortuitous, defined by a sense of variety and contrast. It is noted however the design of the building is responsive to the Grade II* Leadenhall Market, located immediately to the south-west, with a central glazed atrium playfully echoing the construction and material palette of the Victorian market. The relationship between the two buildings however is chiefly one of extreme counterpoint, with regards to both character and height, and the group value described as "wonderfully incongruous". There is some group value in the relationship between Lloyd's and the emerging Cluster of tall buildings it was designed to consolidate, in particular with the Leadenhall Building opposite, which represents the development in the practice and style of the same influential architectural practice.

Impact:

393. The GLA previously found low to middle less than substantial harm to the significance of the Lloyd's Building.

394. The tall buildings of the City Cluster are located immediately to the north and northeast. These rise substantially above that of the listed building, as seen in more distant views of the Cluster from the south, as well as experienced at street level, particularly from the junction with Lime and Leadenhall Street. The upper storeys of the site are currently visible in views from Lloyd's towards the Market, seen above the stone pediment of the eastern market entrance. These existing glimpses are incidental in quality, taking in the poor-quality rear façade of the current site which detracts, albeit only slightly, from the view.
395. The proposal is beyond the Leadenhall Market to the southwest and would add to the baseline and cumulative backdrop of tall buildings in a dense Cluster which are at the heart of the genius loci of the place. The clear and strong juxtaposition between Lloyd's and the market would remain undiluted by the more distant presence of another tall building.
396. This dense relationship and strong juxtapositions with the surrounding Cluster would be maintained by the proposal, in particular the group relationship with the Leadenhall Building which would be undiluted. The Lloyd's Building would remain appreciable from the Garden at 120 Fenchurch Street, with the proposed building standing clear of Lloyd's to the south in this view.
397. The Lloyd's building is presently partially visible from a number of viewpoints along the river and to the west, appearing comparatively diminutive against its taller neighbours within the Cluster.
398. In the proposed scenario, in view 22 (Tate Modern Blavatnik Viewing Gallery) of the HTVIA the listed building would remain visible, with the proposals seen adjacent to the listed building. As such the existing contribution of this view to the setting and significance of the listed building is considered to be preserved, remaining consistent with the perception of the Lloyd's Building within the tall building cluster. This relationship is changed with the cumulative scenario, with Lloyd's being mostly occluded; however, this is not caused by the proposals.
399. Within views 24 (Blackfriars Station), 25 (LVMF 16B.2), and 26 (LVMF 15B.2), the listed building is partially visible, the glazed atrium just distinguishable in front of the Scalpel. However, it should be noted that the distant quality of these views and the limited amount of the building that can be seen in these views in the context of the dense cluster limits their contribution to the setting and significance of the building, with the

building only identifiable through extreme magnification. The proposals would completely occlude the listed building within these views, resulting in a loss of visibility. However, given the negligible contribution of these views to the setting and significance of the listed building, the resultant impact to significance is considered to be neutral. The listed building would also be fully occluded in the cumulative scenario by other consented schemes.

400. From view 29 (St Paul's Golden Gallery) the listed building is more visible, with its western elevation clearly appreciable albeit within the context of the dense cluster. In this view, the proposals would not impact upon the visibility and appreciation of the listed building from the Golden Gallery,
401. Overall, officer's disagree with the conclusion of the GLA finding that the proposal would preserve the significance and setting of the Lloyd's Building and those of 12 & 14-19 Leadenhall Street which are intrinsically related to one another in a manner and to a degree similar to the consented scheme within both baseline and cumulative scenarios.

Southwark Cathedral (Grade I):

Significance

402. Southwark was for many centuries the only substantial settlement on the south bank of the Thames and situated at the end of the only bridge crossing the river. The original minster and subsequent priory would have been a source of hospitality and accommodation, supplemented over the succeeding centuries by the many inns and hostleries along the adjacent Borough High Street that catered for travellers to and from London. The role of the priory would therefore have been central to the identity and character of the area and its physical presence would have once been much more visually prominent than is the case today. Following the Dissolution, the role of the building as a parish church for an area with a constantly shifting population was slightly different to many others and by the 19th century it was in a very poor condition. It was in danger of demolition to accommodate the new railway infrastructure being introduced into the heart of the capital. The retention and restoration of the church in the 19th century by Gwilt is a key chapter in its history and is obviously expressed architecturally by the embellishment of the crossing tower. The establishment of a new diocese and the award of Cathedral Status in 1905 elevated the ecclesiastical significance of the building in an echo of its former medieval importance so that it now has a significant and substantial role in supporting the varied communities of the area.

Contribution of Setting:

403. The original setting of the then Priory, and later cathedral, comprised the lower inter-tidal stretches of the Thames to the north with the church atop higher ground. The historic crossing of the river, for many centuries the only one in the capital, was a major structure to the east leading to the spine of Borough High Street and its tight urban grain of courts and yards. Although physically separated by its precinct walls from the High Street and the market, the Priory would have been visible in the surrounding areas to east and west until the nineteenth century when the development of significant warehousing, industrial and commercial buildings, many of which were associated with the Port of London to the north, radically changed the setting and visibility of the church. To the east the introduction of the railways elevated above the existing buildings of the High Street and passing in close proximity to the south of the church further isolated it visually from parts of its setting. The visual connection between the church (later cathedral) and the Thames was important historically and continues to make an important contribution to an appreciation of the church, enabling an understanding of its strategic location and the connections between the north and south banks of the river. Changes to the setting of the Cathedral in the 20th century including the creation of Montague Close and Minerva Square has reinforced those connections and provide new views that contribute to the appreciation of the architectural and historic significance of the building. These changes enable an experience of the Cathedral from a quiet public square immediately adjacent to the river which is in contrast to the remainder of the setting of the Cathedral which is busy, noisy and vibrant in parts. The creation of the square and the trees along the northern edge identify the space in mid-distance views from the other side of the river and draw the eye towards the Cathedral tower, seen for the most part against a clear sky and appreciable as an historic landmark.

Impact:

404. View 19 of the HTVIA shows the upper part of the tower of Southwark Cathedral, partially seen in the mid-distance, above the western side of Borough High Street. The buildings of the high street, which gently curves east, prevent full views of the tower of the Cathedral, and in addition, a backdrop of tall buildings is created through sight lines towards Tower 42, 22 Bishopsgate, 6-8 Bishopsgate, and the emerging 1 Leadenhall Street. These buildings are visible behind the tower spires, reaching halfway across the tower's width. The proposals would be visible in this view, seen as part of the existing distant tall building cluster. While this would create a change in the backdrop, this is not considered to dilute the prominence of the tower as presently experienced. The proposals would be appreciated very much in the distance, consolidating the appearance

of the City Cluster and remaining within its visual built envelope. The overall impact to the significance of the listed building is therefore considered to be neutral, with no change in the contribution of its setting within both baseline and cumulative scenarios. This is the same as the consented scheme.

81-82 Gracechurch Street (Grade II):

Setting and Significance:

405. 81-82 Gracechurch Street is a good example of a later 19th century purpose-built office building in the Italianate manner, faced in well-detailed Portland stone. A style then associated with dependable business and finance in a City manner, it reincorporates a much older alley and a ground floor parade of shops. Its principal significance lies in its architectural design including façade details of the Gracechurch Street elevation and potentially its interiors. Its subservient secondary facades to Bull's Head Passage survive well, but are more subtle, of traditional white glazed brick and large tripartite sashed windows to optimise light in a dense setting, are of secondary interest. In the main, significance is drawn from the external architecture and plan form. To a lesser extent does it draw on setting.
406. The building's immediate setting makes a positive contribution of two kinds to the significance of the listed building. Firstly, the building is experienced as a small group of classically detailed Portland stone buildings located on the opposite side of Gracechurch Street. The Lombardy classism exhibited along Lombard Street in particular is considered to establish the sense of a shared architectural decorative language, which sympathetically contextualises the architectural interest of the listed building. The second contribution, albeit to a lesser extent, is the proximity to the western entrance of Leadenhall Market, with its red brick and Portland stone facades seen together with the listed building from the south and north along Gracechurch Street. The character of the market, with its fine-grained commercial buzz, reinforces the sense of activation of the ground floor commercial units within the listed building. Views of the market and listed building terminate in the tall façade of the Scalpel, which together with the modern building at No 20, break above the established building line. The immediate setting is therefore characterised by a mix of stone fronted buildings of various styles, heights and periods juxtaposed with a backdrop of tall modern buildings seen alongside and behind.
407. The site is located immediately adjacent to the north and contributes positively through the materiality and decorative detail of the second and third storeys of its façade. The

roofline of the site terminates significantly above that of the listed building in a series of stepped additions. This roofscape is seen together with the listed building in views north south along Gracechurch Street, undermining this otherwise positive contribution. Similarly, the modern shop fronts and frontage at ground floor of the site appear rather plain and detract from the more evident decorative detail of the surroundings.

Impact:

408. The GLA have commented that the proposals would create less than substantial harm of a low to middle level, to the listed buildings..
409. A separate listed building consent application for works at the site boundary between the two will be assessed under reference 25/00548/LBC.
410. The development would be prominent in views south-west and north-east of 81-82 Gracechurch Street, with the massing of the development highly visible above the roofline of the building. The retention of the façade to no 85, together with the proposed restoration of decorative detail conserves the positive contribution of the site and resolving the rather plain appearance of the ground floor. While visible, the tall building addition is considered typical of the existing backdrop setting, which as existing features dramatic change of scale. Therefore, officer's disagree with the GLA conclusion, finding the setting to not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unharmed, as per the consented scheme within both baseline and cumulative scenarios.

Former Ship Tavern, Lime Street (Grade II):

Significance and Contribution of Setting:

411. The Classical mid-19th Century public house is located east of the application site in Lime Street and is of architectural and historic interest, through its characteristic stock brick upper façade and traditionally proportioned and detailed frontage below. On the main, significance is drawn from the physical fabric and prominent principal elevation to Lime Street, and to a lesser but still significant extent from setting.
412. Setting makes a lesser, moderate contribution to significance, in particular an appreciation of it. This derives from the group value with the adjacent complementary historic buildings to the eastern side of the street, as well as the red brick frontage of the market visible on Lime Street Passage, the latter echoing the proportions and Victorian

character of the listed building (View 5a). The rear elevation of the site as existing is seen from the listed building rising significantly over the market. These views appear incidental and utilitarian, creating a 'back of house' character which detract from the views towards the market.

Impact:

413. The GLA consider the proposals would result in less than substantial harm, at a very low level due to a change in backdrop and intervisibility with the listed building.
414. The high-quality architecture of the proposed building would replace the existing poor quality rear facades of the existing building in the wider setting, albeit appreciated peripherally to the experience of, the Ship Tavern. While it is acknowledged the visible extent of the site would increase, this is consistent with the wider character of the listed building's setting, which presently takes in a number of tall buildings. Therefore, the setting is found to not be adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed, both from the existing situation and the consented scheme and cumulative scenario.

7-9 Gracechurch Street (Grade II):

Significance and Setting:

415. Built in 1919 by W Campbell-Jones as a bank, 7-9 Gracechurch Street is a steel framed building clad in Portland Stone in a French/ Beaux Arts style, creating high historic and architectural interest. It is located on the west side of Gracechurch Street opposite the application site. Its wider setting features a mix of buildings in age, materials, style, and height, retaining a group value with a number of Portland Stone fronted buildings in the immediate surroundings. The building enjoys a green setting to the rear set around Castle Court.
416. As above, the existing site contributes positively through the materiality and decorative detail of the second and third storeys of its façade. The roofline of the site however terminates significantly above that of the listed building in a series of stepped additions. This roofscape is seen together with the listed building in views north-south along Gracechurch Street, undermining this otherwise positive contribution. Similarly, the modern shop fronts and frontage at ground floor of the site appear rather plain and detract from the more evident decorative detail of the surroundings.

Impact:

417. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting.
418. The juxtaposition of heights and architecture, including the City Cluster of tall buildings has been found to form part of the character of the setting of this listed building. While the proposal would be highly visible in views east from the listed building, this is not inconsistent with the existing character of the surroundings, which already takes in a number of structures seen over the roofline. The enclosure to Castle Court is such that views of the listed building from this location are considered to be unaffected. Taken together therefore with the improvement to the reinstated façade, officers disagree with the GLA, considering this results in no adverse impact on the setting of the listed building and its contribution to significance within both baseline and cumulative scenarios, as the per the consented scheme.

Cannon Street Towers (Grade II):

Significance and Contribution of Setting:

419. The pair of towers at Cannon Street Station, at Cousin Lane and All Hallow's Lane, were built 1865-6 possibly by E M Barry and used to mark the junction of the train shed with the bridge. The brick towers feature open arched upper parts, square domed roofs with squat lanterns and spire. Their significance lies in their townscape landmark presence in river views, their architectural quality and functional association.
420. The setting of the towers is characterised by a mix of building styles, heights and periods, which allude to the substantial rebuilding along the northern bank of the Thames during the twentieth century. The riverside setting however makes a strong positive contribution, enabling the landmark quality of the station and its important contribution to its significance. The tall buildings of the City Cluster are seen in the wider backdrop, creating a dramatic composition in which the station towers appear as a prominent gateway.

Impact:

421. The change in scale within the site as a result of the proposal would not change the character of the backdrop setting, where the towers are appreciated with the tall buildings of the City Cluster seen directly behind. Therefore, while the proposals would be visible in views of towers, the proposal is not considered to detract from the setting of the listed

towers within both baseline and cumulative scenarios. The significance of the listed towers would not be affected by the proposals, as per the consented scheme.

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

Setting and Significance:

422. Built 1912 – 22 by Sir Edwin Cooper, this monumental Portland stone landmark building in the Greek classical style features a richly embellished tower. Its setting includes a broad range of buildings in terms of period, style, height and materiality. It forms part of the setting of the Tower of London and is a clearly identifiable landmark feature in river prospect views. Its significance lies in its architecture and historic Port of London civic function, and to a lesser degree its setting including the Tower of London.

Impact:

423. Views 11, 13c and 16 of the HTVIA show the proposed development would appear in views with the PLAB but would not obscure the existing appreciation of its silhouette or decorative detail, forming part of a backdrop of tall buildings within the City Cluster. The cumulative scheme further shows the proposals screened from view in views 11 and 13c, with the proposals seen as part of a gradual amplification of height within the City Cluster seen in view 16. Therefore, the robust architectural form and contrasting materiality of the PLAB when compared to the Cluster buildings would remain a prominent element in these views. There would be no harm to the setting of this listed building within both baseline and cumulative scenarios, or the ability to appreciate its significance, as result of the proposed development, as per the consented scheme.

Lloyds Bank, 39 Threadneedle St (Grade II)

424. Designed in the late nineteenth century by G H Hunt, the building is a stone classical building with rounded corner. Historic and architectural interest is created through elaborate decorative detail and the polychromatic effect of the oxford and Portland stone of the main façade. The building has a local landmark presence, holding a responsive character to the road junction. Its setting is varied, comprising the sombre Portland stone buildings to Threadneedle Street and the western side of Gracechurch Street. These are of a similar scale and decorative quality, creating a sense of consistency in the streetscape which underscores the listed building's architectural interest. In contrast, the tall buildings to the eastern side of Gracechurch Street, including 22 and 10 Bishopsgate,

possess a firm contemporary character and relatively monumental height, creating distinct duality and sense of drama within the surroundings.

425. The GLA has found a low level of less than substantial harm to the significance of the listed building through changes within its setting. This is addressed below.
426. The site is visible in views which take in the listed building from the junction, seen in the middle distance. These views include the front façade of the site as well as the stepped additions to the roof, creating a considerable mass of structure above the roof line. The proposals would be visible in these views (View 1 within the HTVIA) but seen and appreciated as a continuation of the tall buildings to the west. As such officers disagree with the GLA, finding that the proposals are considered to maintain the existing sense of duality appreciable within the listed building's setting. There would be no harm to the setting of this listed building, or the ability to appreciate its significance within both baseline and cumulative scenarios, as result of the proposed development, as per the consented scheme.

Royal Exchange (Grade I):

Significance and Setting:

427. The Royal Exchange is one of the most recognisable buildings within the City, located prominently at Bank junction. Designed by Sir William Tite the building possesses a richness of style which exemplified the wealth of Empire as well as the end of the Georgian Neoclassical revival period. Its historical use and commanding presence create a very high architectural and historic interest.
428. The setting of the listed building comprises the grand cluster of Portland stone buildings facing Bank junction, including the Bank of England and No 1 Cornhill. The alignment of the group towards the junction contributes to a sense of arrival which compliments the richness of their architectural detail. The Royal Exchange appears centrally within this composition, drawing the eye through its grand temple frontage. Views east from the junction take in, the tall buildings of the City Cluster seen in the backdrop. The duality of this view has come to symbolise the continued success and evolution of the City and contributes greatly to the listed building's setting. The overall contribution of setting to the significance of the building is high.

Impact:

429. The GLA have considered the proposals to result in less than substantial harm, ranging between a low to middle level of harm, due to changes in backdrop and intervisibility between this building and the site.
430. The site is presently not visible from the listed building, making a neutral contribution. The proposals would be seen in views east from Bank Junction taking in the Royal Exchange (view 31). In the baseline scenario, the site would appear part of the City Cluster, adjacent to the Scalpel. As such the proposals would appear consistent with the existing tall building backdrop setting. The isolation of the proposals in this view would be softened in the cumulative scenario, specifically seen together with 1 Leadenhall. Given the compliance with the existing setting, officers disagree with the GLA and it is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance, as result of the proposed development, as per the consented scheme.

1 Cornhill (Grade II):

Significance and Setting:

431. A grand Classical building of rusticated Portland stone with an iconic rounded corner supporting dome, built in 1905. Its significance lies in its high architectural quality and landmark presence in views looking east from Bank Junction and Cheapside. It is situated at the junction of Cornhill and Lombard Street and the surrounding heritage buildings of distinction make up its immediate setting and contribute to its significance. The wider setting is characterised by the visibility of tall, modern buildings which is part of its character and does not detract from the significance of the listed building.

Impact:

432. The GLA has found a low to mid-level of less than substantial harm to the significance of the listed building through intervisibility with the proposals and alterations to the listed building's backdrop. This is addressed below.
433. View 30 within the HTVIA takes in the dome of no.1 Cornhill looking east along Cheapside, taking St Mary-le-Bow into the view towards Bank Junction. The proposed development would appear in the background of this view, rising above the dome but only appreciable above and adjacent to other taller development that is presently seen

behind the dome. This is considered to make a neutral contribution to its setting compared with the existing context.

434. In view 31, looking east from Bank Junction, the view takes in the curved corner formed by no.1 Cornhill. The proposed development would appear in the background of this view, well away from its dome. The significance of the listed building and the ability to appreciate it are considered to be unaffected, with the proposals remaining identifiably part of the existing City Cluster of tall buildings which presently form a backdrop within this view. Therefore, it is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance within both baseline and cumulative scenarios, as result of the proposed development, as per the consented scheme.

3-14, 23-27, 28-30, 33-35, 39, 48 50 Cornhill (Grade II) and 15-22 Cornhill (Grade II*):

Significance and Contribution of Setting:

435. This group of listed buildings is seen to the southern side of Cornhill, comprising a sedate row of Portland stone buildings, with the exception of the pink and grey polished granite frontage to No 39.
436. 15-22 Cornhill is the largest building within the group, occupying a substantial plot. Built in 1927 by Sir John Burnet as the Lloyd's Bank Headquarters, the building is of much historic and architectural interest, awarded a RIBA award in 1932, with well-preserved interiors. The façade design has a palatial quality, with a series of double height arched windows at ground floor and giant order of Corinthian columns above.
437. The decorative treatment of the group varies, but each is of a consistently high quality and roof height, so that the sense of a cohesive eighteenth to early twentieth century townscape is appreciable. The close proximity of this cluster of listed buildings creates considerable group value, experienced sequentially and in longer range views east along Cornhill. The overall architectural and historic interest of the buildings are high.
438. The setting of the group includes the buildings around Bank junction, with a number of landmark structures such as the Royal Exchange and 1 Cornhill creating an emphasis to this important junction location. These buildings frame the view east along Cornhill, terminating in glimpses of the Lloyds Building and the Scalpel. Views west centre on No 1 Poultry, the grade II* postmodern building by Sir James Stirling. The tower of St Michael Cornhill is seen fleetingly above this group when walking east along Cornhill, creating a point of interest, and signposting the historic origins of the street. The City Cluster is also

seen in eastern views along this road, creating a backdrop that comes in and out of view as the viewer progresses east. The setting of the listed group therefore comprises the strong interrelationship between the buildings within the terrace, set against taller more modern buildings which terminate these views and appear within the wider backdrop.

Impact:

439. The GLA has found a low level of less than substantial harm to the significance of the listed buildings through alterations in their setting, finding a low to middle level with reference to 13-14 and 15-22 Cornhill specifically. . This is addressed below.
440. The site is presently not visible from the listed group, as illustrated in view 31 of the HTVIA. The proposals would result in an increase in visibility, appearing above the prevailing building height of the group. This is however consistent with the existing character of the setting of the group, with the terrace experienced alongside views of tall buildings within the City Cluster. Officers therefore disagree with the GLA, finding the overall impact is therefore considered to be neutral. It is considered there would be no harm to the setting of this listed building, or the ability to appreciate its significance within both baseline and cumulative scenarios as result of the proposed development, as per the consented scheme.

Credit Lyonnais, 39-40 Lombard Street (Grade II):

Significance and Contribution of Setting:

441. Built 1868, by Frederic John and Horace Francis, this Portland Stone building is completed in an ornate Italianate palazzo manner. Comprising a tall ground floor, thought to be a former banking hall, the main facades are richly carved with classical detailing. It is of architectural, artistic and to a slightly lesser extent historical interest. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings which are evidently modern in character. A historic setting is better preserved along Lombard Street, but the overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the city cluster are seen to the north, including 6-8 and 22 Bishopsgate, further cementing a modern architectural character to the surroundings.
442. The site is seen obliquely from the listed building, visible within the middle distance of views north. It makes a low positive contribution to the setting and significance of the listed building, with the main façade seen forming a cohesive and attractive group with the neighbouring Portland stone buildings to either side.

Impact

443. The GLA considers that the proposal would result in less than substantial harm, at a low level, due to changes within its setting. .
444. The proposals would be appreciated in open northward views along Gracechurch Street; however, this would be viewed in the context of the existing office developments in the immediate setting, and tall buildings of the City Cluster in the background. The rebuilt façade of the existing building ensures the positive contribution that the site makes to the setting of the listed building is preserved. As such the proposals are considered to be consistent with the existing character of the setting of this listed building. Therefore, officers disagree with the GLA, finding no harm would be caused to the special interest, significance or setting of 39-40 Lombard Street, within both baseline and cumulative scenarios as per the consented scheme.

445. **St Paul's Cathedral (Grade I):**

Significance and Contribution of Setting:

446. London's and one of the nation's most famous landmarks, it was London's first cathedral and one of the earliest sites of Christian worship in Britain, now identified as one of one of London's two Strategically Important Landmarks, being also the seat of the Bishop of London, the mother cathedral of national and international Anglican church, a ceremonial centre and the backdrop of royal and state ritual and pomp and the final resting place of figures central to the national story, a place of national commemoration and celebration. It is the masterpiece of seminal national figure and architect Sir Christopher Wren (with input from other notable designers and crafts people overtime) and of the distinct English baroque style. It was central to the adoption of classical architecture in Britain, and symbolic of the restoration of London post Great Fire as a major European political, cultural and economic capital. It is of outstanding national and even international heritage significance. That significance is architectural, historic, artistic, archaeological, evidential and communal (social, commemorative, spiritual and symbolic). This significance is inherent in the iconic architectural form and composition, and in its plan form, fabric and those memorialising fixtures comprising statuettes to mausoleums.
447. In terms of setting, for hundreds of years it was the tallest building in London. It was strategically sited atop Ludgate Hill, a rare topographical moment in City of London and one of its highest points, with a commanding position overlooking the River Thames. Following the great rebuilding act (1667), Wren had little influence over the even

immediate, never mind wider, setting. The setting has been substantially altered over time often with the setting of the Cathedral at its heart, and to various degrees those elements together make a substantial contribution to significance and an appreciation of it, in particular the architectural, artistic, historic and communal significance. Those contributing elements are deemed in descending order of importance.

448. Those wider strategic plan-London riparian views from the Thames, its embankments and bridges which are often iconic and London defining, and where St. Paul's rises above the immediate surrounding townscape, strategically sited atop Ludgate Hill, and can be seen alongside contributing landmarks on the skyline, including the Wren churches. These make a substantial contribution to significance and an appreciation of it.
449. The ancient processional route of royal and state national significance along The Strand/ Fleet St, a 'national spine' of celebration and contemplation, along a route between the heart of government in Westminster and commerce in the city, where St. Paul's is the pre-eminent culmination and destination of a picturesque sequential townscape experience at the heart of London's and the Nation's identity. This makes a substantial contribution to significance and an appreciation of it
450. Those wider pan London views and approaches where the Dome offers a skyline presence in broad identity defining London panoramas, for example those from strategic views identified in the LVMF, including Parliament hill, Primrose Hill, Greenwich Park, Blackheath and Alexandra Palace, amongst others, some of which are subject to local designations.
451. These include old and newer high-level appreciations of the London skyline which allow the cathedral to be better understood as part of London's wider natural and cultural topography, including from the monument and higher level public viewing gallery such as the Sky Garden at 20 Fenchurch street, The Garden at 120 Fenchurch Street, One New Change, Horizon 22, and other emerging viewing terraces in the City Cluster. These make significant to moderate contributions to significance and an appreciation of it.
452. Those more immediate, often incidental, some more planned, townscape appreciations, which have resulted in ad hoc and some active townscape curation over the generations, in particular from St Peter's walk (South transept axis), Cannon Street, the Paternoster Square development, amongst others, where the cathedral soars above and dominates its immediate surrounding as the defining skyline presence. This makes a moderate/significant contribution to significance and an appreciation of it.

Impact:

453. The GLA have identified a very low level of less than substantial harm to the Cathedral, through change within its setting. This is discussed below. The surveyor to the fabric of the Cathedral also requested confirmation of the visibility of the proposals along Fleet Street. The height and form of the proposals have been shaped with reference to the long-term strategic skyline curation of the City which, in turn, has been directly informed by St Paul's. The overall height and form of the designs, which has been reduced from the consented scheme, have been sculpted in order to preserve the skyline setting of St Paul's from the processional approach along Fleet Street in particular. The proposed building has also been designed to assist in the long-term consolidation and singular coherence of the City Cluster, where this is visible in strategic riparian views, assisting and subduing the isolated bulk of 20 Fenchurch Street. Assisting the consolidation of the City Cluster would in turn soften the backdrop impact on the Cathedral. At no point would the Cathedral's pre-eminent location of the wider skyline, in broad panoramas or close up views, be prejudiced by the proposal. The enormous significance of the Cathedral would be preserved by the proposal, in view of both the baseline and cumulative scenarios.

454. The HTVIA has exhaustively tested views where the proposals will have an impact upon the setting of the Cathedral, including relevant LVMF viewpoints. In all cases the proposal has been designed to be either occluded by the cathedral dome, or where visible, seen to form part of the established cluster of tall buildings, and read a distant feature on the City's skyline. The view from Fleet Street as provided in the HTVIA therefore reflects a worst case scenario. The impact of the proposals on the significance of the listed building is therefore considered to be neutral, preserving the contribution of setting, as per the consented scheme.

No 37 & 39 Lime Street (Grade II):

Significance and contribution of Setting:

455. 37-39 Lime Street hold modest architectural and historic significance, comprising a 1920s office building constructed in a neo-classical style. Designed by Leo Sylvester Sullivan, the building is of Portland stone, and features decorative details of note including a pedimented doorway with mounted acroteria and acanthus stone leaves, Tuscan piers as well as brown metal aprons to the fenestration.

456. Group value is created with the adjacent buildings to the eastern side of the street with the consistency of scale and tight curve of the road enhancing the sense of an enclosed historic streetscape within the immediate vicinity. The wider surroundings include views of tall buildings, including 20 Fenchurch Street seen prominently to the south, and the Lloyd's Building seen to the west. Views of the eastern entrance into the market are glimpsed along Leadenhall Place. The rear elevation of the site is just seen behind the Lloyds building, rising over the market. These views appear incidental and utilitarian, creating 'back of house' character which detract from the views towards the market. The overall contribution of setting to the significance of the listed building is considered therefore to be mixed, both positive and neutral.

Impact:

457. The GLA considers that the proposal would result in less than substantial harm, of a very low level.
458. While it is acknowledged the visible extent of the site would increase as a result of the proposals, this is consistent with the wider character of the listed building's setting, which presently takes in a number of tall buildings, as well as the consented scheme. Therefore, officers disagree with the conclusions of the GLA, finding that the setting is not adversely affected by the proposals and the contribution of the setting to the significance of the listed building would be unchanged and unharmed from both the existing and cumulative scenarios and the consented scheme.

7 & 9 Bishopsgate & The Royal Bank of Scotland (Grade II):

Significance and Contribution of Setting:

459. Nos. 7 and 9 Bishopsgate and The Royal Bank of Scotland are notable for their striking facades. 7&9 Bishopsgate possesses a polychromatic character, created through the use of stone and pink marble whereas the Royal Bank of Scotland uses a double height ionic colonnaded arcade to the main frontage with foliate swags above. Both are nineteenth century in date and hold high architectural and historic interest, contributing to their overall significance.
460. The setting of the buildings is varied, comprising the sombre Portland stone buildings to the western side of Bishopsgate and Gracechurch Street. These are of a similar scale and decorative quality. In contrast the tall buildings to the eastern side of Gracechurch

Street, including 22 and 10 Bishopsgate possess a robust contemporary character and relatively monumental height, creating distinct duality within the surroundings.

Impact:

461. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting. The site is visible in views that take in the listed buildings from the junction with Threadneedle Street and along Bishopsgate, seen in the middle distance. These views include the front façade of the site as well as the stepped additions to the roof, seen to add a considerable mass of structure above the roof line. The proposals would be visible in these views (View 1 within the HTVIA) but appreciated as a continuation of the tall buildings to the east, preserving the existing sense of duality within the setting. Officers therefore disagree with the GLA finding there would be no harm to the setting of this listed building, or the ability to appreciate its significance, as a result of the proposed development within both baseline and cumulative scenarios, as per the consented scheme.

2a Eastcheap (Grade II):

Significance and Contribution of Setting:

462. Built in 1910-11 by Frank Sherrin, the building retains high architectural and historic interest through its characteristic early twentieth century appearance, including retained ground floor shopfronts. Decorative features include crouching Atlantes on Ionic pilasters, supporting semi-circular pediment above and octagonal turret with ogee lead roof and weathervane.
463. Its immediate setting is characterised by a number of contemporary Portland Stone commercial buildings several of which are evidently modern in character. The building is seen together with the Monument, seen in views down Fish Hill, making a positive contribution to the setting. The overall contribution of the setting to the significance of the listed building is considered to be moderate. The tall buildings within the city cluster are seen to the north, further cementing a modern architectural character to the surroundings.
464. The site is seen obliquely within the middle distance of views north. It makes a neutral contribution to the setting and significance of the listed building, with the main façade seen forming a cohesive and group with the neighbouring Portland stone buildings to either side, and the towering form of 122 Leadenhall above.

Impact:

465. The GLA considers that the proposal would result in less than substantial harm, at a low level, through change in the setting. The proposals would be appreciated in open northward views along Gracechurch Street, however this would be viewed in the context of the existing office developments in the immediate setting and tall buildings of the City Cluster in the background. The reinstated façade of the existing building ensures the existing proportions and material character of the sites lower floors continue to be appreciated. As such the proposals are considered to be consistent with the existing character of the setting. Therefore, officers disagree with the GLA, finding no harm would be caused to the special interest and significance of the building within both baseline and cumulative scenarios through alteration within its setting, as per the consented.

7-8 Philpot Lane (Grade II*) and 23 and 25 Eastcheap (Grade II):

Significance and Contribution of Setting:

466. 7-8 Philpot Lane reflects a much altered terrace, dating from the late 17th century, substantially redeveloped in c.1984 and again refurbished in 2018 leaving little authentic fabric. Italianate style, stucco-fronted brick terraces, with clay tile clad hipped roofs. The principal significance lies in the basement interior, a rare and unique late Medieval vaulted undercroft. It is of high architectural, historic, and archaeological significance, less so artistic. It draws a moderate degree of significance from setting, in particular, as a group around Brabant Court and in association with 4 Brabant Court, 2-3 and 5 Philpot Lane. Together these form a rare and unique ensemble of the form and urban grain of the pre-industrialised, pre and immediately post-Fire City of London – comprising smart brick-faced terraced commercial fronts and quieter, intimate off-street domestic/cottage industry courtyards. 23 and 25 Eastcheap showcase the opulence and eclectic style of high Victorian architecture. built in 1861-62 by John Young and Son, the buildings feature a Lombardic Gothic design with polychromatic brickwork, terracotta detailing on round-headed windows, twisted columns, and carved animals adorning the façade. The building has architectural interest as a mid-19th century commercial building, in an Italianate style as well as historic interest as a representation of the rapid growth in purpose built, larger scale commercial premises in the City during the 19th century.

Impact:

467. The GLA considers that the proposal would result in less than substantial harm, at a very low level, through change in the settings of these listed buildings. The proposal would be appreciated in the context of the emerging Cluster in the immediate and wider setting from Philpot Lane. These dramatic contrasts in scale between the old and new are an established character trait of this setting which, otherwise, in terms of physical form, layout and appearance would be undiluted – that relationship between the ensemble remaining appreciable. In closer views, the listed buildings would continue to dominate. Officers therefore disagree with the GLA finding the proposal would preserve the special interest/significance, and the contribution made by setting to the significance of the listed buildings within both baseline and cumulative scenarios, as per the consented scheme.

St Mary Woolnoth (Grade I):

Significance and Contribution of Setting:

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

469. Its prominent siting at the junction between King William Street and Lombard Street from the heart of the City at Bank Junction, is set amongst a panorama of fine classical commercial, civic and in this case, religious, monuments from all eras. This makes a medium contribution to the significance of the Church.

Impact:

470. The GLA considers that the proposal would result in less than substantial harm, at a low to middle level, through change in the setting. The proposal will appear in the backdrop of the Church in views from the west, in particular in views along Lombard Street. The foreground of Portland Stone classical buildings are presently backdropped by Cluster of tall buildings behind, creating a theatrical contrast in scale and character between the old and new City. The Church in part is backdropped by 20 Fenchurch Street and the proposal would form part of that wider backdrop, forming a kinetic and transient relationship. From the junction of Lombard Street and King William Street the Church would remain the pre-eminent foreground monument with a skyline presence. Given the

transient nature of the impact, officers disagree with the GLA and it is considered that the magnitude of impact would be minor and that no harm to the significance or setting of the church would arise within both baseline and cumulative scenarios, especially given the significant distance of the proposal to the east. The Church would still have a sky-backed skyline presence in important local views, and it would remain a prominent City landmark and skyline feature, as per the consented.

Bank Conservation Area:

471. The proposal would be visible from a number of vantage points within the Bank Conservation Area.
472. The majority of the Conservation Area interior comprises a dense, tight-knit urban grain with a strong sense of enclosure to the street, establishing the sense of an intact historic townscape. High historic interest stems from notable surviving buildings from the 18th and 19th centuries, with a strong sense of group value expressed through the shared use of solid masonry facades, abundant classical modelling, and surface detail. A long-held concentration of banking and commercial activities has created a historic nexus of financial power and with its high historic associative interest. This is expressed through the sense of dramatic arrival at bank junction, experienced as a central node within the historic urban realm, and enhanced by the palatial quality of the Royal Exchange and Bank of England, which face onto the junction.
473. The setting of the Conservation Area is as varied and diverse as the overarching character of the City. Its most obvious border is with the City Cluster on the eastern edge, where there is a striking contrast in scale on opposite sides of Bishopsgate/Gracechurch Streets, mitigated. The wider setting of the Conservation Area is characterised by a backdrop of tall buildings to the east and strong juxtapositions between old and new. The character of Bank junction as a historical centre is therefore presently offset by views of tall buildings within the City Cluster to the east. The setting of the conservation area therefore makes a range of contributions to its significance, both neutral and low positive.
474. The site at present makes a neutral contribution to the setting of the conservation area, seen in north south views along the eastern boundary of the conservation area at Gracechurch Street. The decorative quality of the upper floors to the main façade is undermined by the loss of the original ground floor and indifferent, plain design of the extensions above parapet level.

Impact:

475. Historic England have identified harm to the Bank Conservation Area due to, what they perceive as, harm to St Michael-upon-Cornhill from “the prominence of the church tower and its filigree detailing becoming lost against the proposals”, where they consider that the Church makes a significant positive contribution to the Bank Conservation Area. The GLA considers that the proposal would result in less than substantial harm, ranging between a low to middle level of harm, due to a change in backdrop to the conservation area and intervisibility. This is addressed below.
476. The proposal would be visible from Bishopsgate/Gracechurch and Threadneedle Streets, Bank Junction, as well as east along Cornhill. In those views, north and south along Bishopsgate/Gracechurch Street, the proposal would read as part of the cumulative Cluster of tall buildings, including emerging developments at 1 Leadenhall Street, 60 and 70 Gracechurch Street. Here, the proposals are considered to contribute a high-quality contemporary addition that, while of a differing scale, retains a positive dialogue with the scale and proportions of the Conservation Area opposite. This is achieved through the retention of the existing façade to Gracechurch Street and set back of floors immediately above the existing parapet. Therefore, the proposal would form part of that prevailing contrast in scale on the eastern border of the Conservation Area, whilst retaining those aspects of the site which currently make a positive contribution to its setting.
477. It is acknowledged that the upper floors of the proposals extend beyond the existing building line, and this would be appreciable, however as illustrated in views 6 and 7 when considered alongside consented schemes, the projecting quality of the proposals would be softened, seen to be sitting within a visual envelope already defined by contemporary architecture.
478. In views east from Bank Junction (view 31) the proposal would be visible in the backdrop, seen alongside the buildings of the city cluster including 1 Leadenhall Street. Comments received from Historic England have considered that the impact to views east along Cornhill (view 32) diminish the positive contribution of the tower of St Michael-upon-Cornhill and its associated contribution to the significance of the conservation area, creating a harmful impact to the conservation area. Specifically, this is in light of the proposals creating a fleetingly appreciable backdrop to the tower of St Michael Cornhill, at the junction of Cornhill where it meets the Royal Exchange Buildings. This interaction between old and new is not an unusual relationship in the Conservation Area, with views

of the City cluster frequently seen in dynamic contrast with the historical City in the foreground. The reduction in height of the proposals from the consented scheme would enable a greater appreciation of the spires of the tower of the Church and allow them a greater degree of retained dominance on the skyline in this view, with the current proposals not rising above the height of the tower of the Church in this view, as they had done previously. Nonetheless, there would still be a degree of harm from the fleeting backdropping of the proposals behind the tower in this specific view.

479. Fundamentally, the current appreciation of a tightknit historic streetscape within the conservation area would remain undiluted, the same as the consented scheme. Additionally, the proposals would preserve the majority of views towards St Michael Cornhill. Nevertheless, despite the reduction in height over the consented scheme, such is the contribution of the specific viewpoint identified above to the church's setting and significance, and in turn, its contribution to the conservation area, that the proposal is considered to cause a very slight, low level of less than substantial harm to the significance of the Conservation Area.

Chapel Royal of St Peter ad Vincula (Grade I):

Significance and contribution of setting:

480. Constructed in ragstone rubble and flint with worked stone dressings, the site of the chapel has been a place of worship since the 9th century, with the current iteration of the building dating to the sixteenth century. Its high architectural interest stems from its rarity value as a 16th century chapel with retained flint covered tower and 17th century wood bell cupola. Beyond the high archaeological interest in the church's fabric, including preserved Tudor liturgical furniture to the interior, the church holds exceptional associative historic value as the resting place of Anne Boleyn, Thomas More and Lady Jane Grey amongst others.
481. The setting of the chapel makes an exceptionally high positive contribution to the significance of the listed building. The historic associative and commemorative value noted above is amplified through proximity to the White Tower and the location within in the Inner Ward. This yard is intimately connected with an appreciation of the building's historic interest, comprising the dramatic staging of execution for many of those interred in the chapel. The chapel's placement within an otherwise military and fortified setting is also powerfully illustrative of the theocratic nature of Tudor London. More generally the immediate verdant setting of Tower Green also provides a pleasing open approach to

the chapel. Views from within the Inner Ward are enclosed by the surrounding walls, but more distantly to the south of the chapel these views take in the City Cluster, with tall buildings comprising an established part of the chapel's wider setting in the baseline, and especially in the cumulative scenario.

Impact:

482. As with the consented scheme Historic England have raised concerns over impacts to the setting of the church and views towards its tower from certain viewpoints within the Inner Ward, and officers have inferred HE has concluded level of less than substantial harm, although this is not explicitly stated. It is noted that similar, even greater, impacts in the cumulative scenario have not attracted concern from HE, including the consented (now implemented) 1 Leadenhall, 1 Undershaft or 22 Bishopsgate.
483. The proposed development will be visible from the Inner Ward seen as part of the backdrop of the City Cluster, between 20 Fenchurch Street, assisting in the consolidation of the City Cluster as a singular urban form. The proposals will be visible behind the Chapel bell tower, terminating below the tower parapet, but joining with its eastern flank and merging with its silhouette. The lantern bellcote of the Chapel would however be unaffected and remain seen against an open sky backdrop, with the proposals appearing lower against the church tower in comparison to the consented scheme. It is noted this view is transient and fleeting, with the proposals disappearing from sight as the chapel is approached and when the green to the south of the chapel is reached.
484. When considered in alongside the cumulative scenario, the proposals no longer constitute the loss of an unbroken silhouette, with consented proposals at 70 Gracechurch Street also appearing to the tower's left and reaching above its parapet.
485. The impact of change to this view is considered to be mitigated due to its fleeting quality and more general compliance with the wider and evolving tall building context. As such the proposal is considered to result in a neutral impact to the significance of the Chapel Royal of St Peter ad Vincula, preserving the existing contribution of setting described above.
- 486.

Non-Designated Heritage Assets

487. A scoping of the wider setting has been made to ascertain whether, in Officers view, the proposed development has the potential to affect the significance of any building/structure which is of itself of sufficient heritage significance to warrant consideration as a non-designated heritage asset. The following assets were identified as a result of that scoping exercise.

Nos. 1-4 Bull's Head Passage

Significance and Setting:

488. This modest early-mid nineteenth century range of shops, with office and ancillary accommodation above holds architectural interest by virtue of their characteristic late Georgian/early Victorian appearance. Constructed of stock brick with retained sash windows and a rounded corner to their eastern end, they are illustrative of the small-scale mixed use commercial development common to the City and wider capital prior to Victorian and later rebuilding. Additional historic associative value is established through connection to the Skinner's Company. The building therefore retains moderate historic and architectural interest and is considered a positive contributor to the surrounding Conservation Area sufficient to be considered a Non-Designated Heritage Asset.

489. The setting of the buildings comprises the very narrow lanes surrounding Leadenhall Market, establishing a sense of intimacy and enclosure and limiting the extent within immediate surroundings where the shop row is appreciable. The buildings hold group value with the market itself, forming part of a wider nineteenth century townscape overlayed onto a medieval street pattern. To the north and east, views into the entrance of the lane take in the tall buildings of the City Cluster, creating a backdrop to the immediate Victorian townscape of the lane itself. The overall contribution of the setting to the significance of the non-designated heritage asset is significant and moderate.

Impact:

490. The proposed alterations to the party wall would be minor and would present a clean, simple backdrop to the buildings. Full details of these interfaces are to be reserved via condition.

491. Despite its relative proximity, the site is not appreciable within the lane, due to the considerable sense of enclosure along the passage, only coming into view beyond the lane's eastern entrance, towards the junction of Lime Street and Lime Street Passage. These views take in the indifferent upper floor and rear façade of the existing structure, making an adverse contribution to the setting of the shop group beyond the passage.

While the proposals will introduce a change within this view, this is not inconsistent with the current character of the surroundings beyond the immediate setting of the lane interior. Views within the lane themselves, where the architectural quality of the buildings are best appreciated, are considered to be preserved due to the narrow field of view created by the lane width. The impact upon the contribution of setting and significance of 1-4 Bulls Head Passage is therefore considered to be neutral and it would be unharmed within both baseline and cumulative scenarios.

85 Gracechurch Street, Principle of Redevelopment

492. The existing, unlisted building on the site was completed in 1935 as an office building to designs by E. Howard and Partners. The façade to Gracechurch Street possesses a degree of architectural interest, recognised by the building's inclusion in the Leadenhall Market Conservation Area; its status as a Conservation Area building has been assessed in detail. Otherwise, the building has been considered against the relevant criteria in Historic England Advice Note 7 as a potential non-designated heritage asset. It is considered that the building's elevations are unexceptional and are not considered to possess sufficient architectural interest; moreover, the building is not considered to hold any associations with events, individuals or organisations of historic interest. It is not of an age, landmark status or rarity above the norm; it does not possess standout group value. As such, it is not considered to be a non-designated heritage asset in its own right.

493. As such, the proposed demolition of the existing building and reconstruction is considered acceptable, in principle.

Other Heritage Assets

494. Setting of a heritage assets is defined in the NPPF as "The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral." Given the dense central London location, the site is within the setting of a large number of heritage assets. As part of the application process a scoping exercise was conducted so as to identify heritage assets the setting of which may be affected.

495. The HTVIA includes a list of heritage assets which were scoped in and out. The designated heritage assets considered included:

- Custom House, Grade I
- Old Billingsgate, Grade I Church of St Clement, Grade I
- Merchant Taylors Hall, Grade II*
- Adelaide House, Grade II
- 2 Royal Exchange Buildings, Grade II
- 6 and 7 St Mary at Hill, Grade II
- 123 Old Broad Street, Grade II
- 66 and 67 Cornhill, Grade II
- Gateway to the yard of Church of St Peter, Grade II
- 48 Bishopsgate, Grade II
- 40 Threadneedle Street, Grade II
- 2-3 Philpot Lane Grade II,

496. amongst others, including all the various listed buildings which substantially comprise the Eastcheap, Guildhall, Finsbury Circus, St Helen's Place and Tower Conservation Area (London Borough of Lambeth).

497. It is the view of your officers that the proposed development would not harm the setting or the contribution that the setting makes to the significance of these heritage assets. Other assets have been scoped out of consideration for the reasons given in the HTVIA (your officers agree with that scoping exercise). Your officers consider that the identification of heritage assets which may be affected, and the assessment of impact on significance as set out in the HTVIA and in this report, are proportionate to the significance of the assets and to the nature and extent of the proposed development.

Conclusion on Heritage

498. Overall, a low level of less than substantial harm has been found to the significance of the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I). Otherwise, the significance and contribution of setting of a broad range of designated heritage assets would be preserved. Accounting for the unique site-specific circumstances and facts of

the case, the proposal in this instance (considered in its entirety) would preserve and result in a minor enhancement to the heritage significance of the Leadenhall Market Conservation Area.

499. The scheme is design-led and has accounted for strategic heritage considerations, having been designed to accentuate the unique characteristics and spirit of the place, whilst preserving strategic views from Fleet Street and the river. It has been found that the proposal would result in minor enhancement of a number of strategic views. The benefits and harms will be considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report. Overall, in view of the heritage harm identified the proposal would draw conflict with Local Plan Policies CS12 (1), CS14 (2), DM 12.1 (1), DM 12., draft City Plan 2040 policies S11 and HE1, and London Plan HC1. Special regard is paid to the desirability of preserving the listed buildings, their settings or any features of special architectural or historic interest which they possesses, under the duty set out in Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and relevant NPPF 2025 policies.

Transport

500. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.
501. The existing site is a mixed-use building with retail at the ground floor and office use across upper storeys fronting Gracechurch Street and with rear access from Lime Street Passage. The existing consists of 7,671 sqm (GIA) of office space and 364 sqm (GIA) of retail space and has no off-street car parking, nor vehicle access for deliveries and servicing which currently takes place from the public highway.
502. In October 2023, a proposal for mixed used development, (ref: 22/01155/FULEIA) was approved for this site, predominantly an office use development and retail space, exhibition space and heritage garden. The proposal included provisional details of vehicle crossover on 85 Gracechurch Street to allow vehicular access for deliveries and servicing overnight. The consented development included a public hall, through which a pedestrian link was created from Gracechurch Street to Lime Street passage.
503. This proposed development is for demolition of existing building and construction of a mixed use development, 29 storeys building, with ground floor with two basements

levels. The land uses of this development are: office space (Use Class E), café/retail space (Use Class E), and cultural / exhibition space (Sui Generis Use Class).

504. The proposed ground floor is publicly accessible hall and it includes the retail unit. The office use is on the upper floors with a lobby and office entrance from Gracechurch Street. The dedicated exhibition space is located at the basement level one, whereas the viewing gallery is provided at level 5. The exhibition space is created following the archaeological discovery of a section of the first roman London basilica. Table 1.1 shows the existing and the proposed GEA.

Land Use	Existing (GIA) sqm	Consented (GEA) sqm	Proposed (GEA) sqm
Office (Class E(g)(i))	7,671	37,098	36,450
Retail (Class E)	364	620	360
Sui Generis (Exhibition/Culture use)	-	892	644
Sui Generis (Public hall)	-	946	624
Total	8,035	39,557	38,078

505. Table 1.1 - Existing (GIA), Consented (GEA) and Proposed (GEA)

506. The development site is located within the Leadenhall Market area, bounded by Gracechurch Street to the west. Gracechurch Street is part of the Transport for London Road Network (TLRN) of which TfL is the highway authority. Access from the east is from Lime Street Passage, operating between Leadenhall Market to the north and Lime Street to the south and it provides connection with Fenchurch Street to the south. Lime Street

and Lime Street Passage are restricted for access to cars and motorcycles between the hours of 08:00-18:00 Monday-Friday.

- 507. Public Transport Accessibility Level (PTAL) for this development is 6b which is the highest PTAL level. This score was derived using TfL's WebCAT service.
- 508. The site benefits from excellent transport connections, with Bank Station at approximately 400 meters to the west facilitating connections to London Underground (LU) lines Waterloo & City, Central and Northern line. The site is also served by the Docklands Light Rail (DLR) services operating from this station. Monument LU station is a short walk away, approx. 300 m south of the site, facilitating connections to the District and Circle line. The area where this site is situated is highly pedestrianized, with surrounding streets forming part of key walking routes through the City.
- 509. The site is well-served by London Buses, with the nearest bus stop in Fenchurch Street located 160m from the site on Gracechurch Street, which serves buses on routes 21, 35, 43, 47, 141, 149, 344, 388.
- 510. Parking restrictions operate on the CoL's nearby streets on Monday to Friday, 7AM - 7PM, and Saturday, 7AM - 11AM (except Christmas Day, Good Friday or Bank Holiday). The current demand and occupancy levels for car parking spaces on the public streets was not surveyed.

Site Access

- 511. In order to facilitate activities associated with deliveries and servicing, including off-street waste and recycling collections, a vehicular access is proposed from Gracechurch Street. This access is restricted at specific times and days, allowing activities to take place from 23:00 till 07:00 on Tuesday, Wednesday, Thursday, Friday and Saturday evenings, and from 21:00 till 07:00 on Sunday and Monday, and it aligns with servicing strategy of the consented development.
- 512. The proposed changes to create vehicular access from the public highway—where TfL is the Highway Authority (HA), require separate approval. The submission for HA approval must be supported by a Road Safety Audit (RSA). The applicant must enter into a Section 278 agreement with TfL and agree to cover the full costs of implementing the required highway works. Access for the cargo bikes is located in a section of the public hall and is unrestricted.

513. A pedestrian through route is proposed from Gracechurch Street to Lime Street Passage on the newly created public hall.
514. Further details are required regarding the status of the pedestrian route created through the public hall, including whether it is permissive access only or subject to other arrangements, how access is secured, any restrictions on its use, who is responsible for managing and maintaining the space.
515. The public hall is proposed as a flexible Sui Generis use to facilitates temporary market stalls, public events, or exhibition space for artworks or museum pieces.
516. The public hall provides direct access through lifts and stairs to the basement level 1 exhibition space, as well as two dedicated cycle lifts that provide access to the fourth floor for short and long-stay cycle parking, and third-floor end for trip facilities.
517. This application is supported with Transport Assessment (TA) that includes the Active Travel Zone (ATZ) assessment. The TA states that this assessment was carried out in line with TfL Transport Assessment guidance to support Vision Zero and the Healthy Streets approach.
518. In August 2020, TfL introduced several changes along Bishopsgate (A10) as part of the corridor improvement scheme aimed at enhancing safety for walking, cycling, and public transport use, in line with Vision Zero. The scheme included new vehicle restrictions on weekdays between 07:00 and 19:00, wider footways, and a few banned turns. Additional interventions to improve safety are currently being explored by TfL.

Trip Generation (All modes)

519. The trip generation methodology was based on the TRICS database and comparable sites, with adjustments to mode shares informed by the 2011 Census 'Method of Travel to Work' data and the relevant MSOA layer. These adjustments reflect local characteristics, including the high provision of public transport and the fact that this is a car-free development. The office and exhibition/cultural uses were assessed as the primary contributors to trip generation, while retail trips were excluded on the basis that they are secondary trips, such as those made by passers-by or as part of linked journeys.
520. The net change in trips generated from existing to proposed, during AM and PM peaks for all travel modes, is shown on the table below (extract from the submitted TA Table 5-13).

Mode	AM Peak			PM Peak		
	In	Out	2-Way	In	Out	2-Way
Underground	+186	+16	+202	+18	+204	+222
Train	+270	+23	+293	+26	+296	+322
Bus	+37	+3	+40	+4	+41	+45
Taxi	+3	0	+3	+1	+3	+4
Motorcycle	0	0	0	0	0	0
Car Driver	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0
Bicycle	+22	+2	+24	+2	+24	+26
Walk	+30	+3	+33	+6	+35	+40
Total	+547	+47	+595	+57	+603	+659

521. Table 1.2. - Net change in Trip generation (existing- proposed)

522. This development is predicted to generate a total of 595 (All modes) two-way trips during the AM peak and 659 during the PM peak, with significant increases in public transport trips (534 additional during AM peak and 589 additional during PM peak).

523. When comparing the consented development with this proposal, there is a slight decrease in the overall number of trips generated. Table 1.3 illustrates the changes.

Mode	AM Peak			PM Peak		
	In	Out	2-Way	In	Out	2-Way
Underground	-3	0	-4	-1	-4	-5
Train	-4	0	-4	-1	-5	-6
Bus	-1	0	-1	0	-1	-2
Taxi	0	0	0	0	0	0
Motorcycle	0	0	0	0	0	0
Car Driver	0	0	0	0	0	0
Car Passenger	0	0	0	0	0	0
Bicycle	0	0	0	0	0	0
Walk	-2	0	-2	-1	-3	-4
Total	-11	-1	-12	-4	-13	-17

524. Table 1.3 - Consented development vs the proposal

Trip Generation for Deliveries and Servicing

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

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

- Designing and managing streets in accordance with the City of London Street hierarchy;
- Minimizing the impact of freight and servicing trips through measures such as the provision of on-site servicing facilities, timing deliveries outside peak hours, adopting area-wide solutions, freight consolidation, and promoting deliveries by foot or bicycle;
- Facilitating essential traffic, including emergency service vehicles, buses, freight, and private transport for people with particular access needs, while minimizing the environmental impact of these modes;
- Requiring the provision of infrastructure for alternative-fuel vehicles and zero-emissions vehicles, such as off-street vehicle charging points.

527. In addition, Part H of this Policy states that developers must demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans, and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimized as a result of their development. This includes promoting best practices such as direct vision standards and zero-vision policies to minimize the danger of travel and servicing, including through the use of river transport. This aligns with the adopted policies of the Local Plan 2015, Strategic Policy CS16.

528. In line with applications approved by the City of London (CoL), trip generation for servicing and delivery activities is based on the assumption that 0.22 deliveries are required per 100 sqm for Class E (office use), while the rate for retail use is calculated at 1.35 deliveries per 100 sqm.

529. Applying this methodology to the proposal—with 36,450 sqm GIA of office space—an estimated 80 trips per day are generated. For the 360 sqm (GIA) of retail/commercial use, approximately 5 trips per day are expected. This results in a total of 85 trips per day, covering the main land uses of the development.

530. If 50% consolidation is applied, two way trips are 43 trips per day, covering all activities associated with delivery and servicing. Taking into account that each delivery requires two trips, (one IN and one OUT movement), the expected number of deliveries/servicing (includes refuse and recycling) is 22 within the 24h period.

531. Table 1.4 below shows the modal split for office and retail covering scenarios with and without consolidation.

Mode	% Modal split (office)	Trips No consolida tion	Trips With 50% consolida tion*	% Modal split (retail)	Trips No consolida tion	Trips With 50% consolidat ion*	Deliveries Total developme nt*
Motorcycle /scooter	4	3	1.5	0	0	0	1
Car	34	27	13.5	25	1	0.5	7
LGV	53	42	21	25	1	0.5	11
Rigid 3 axle (HGV)	9	7	3.5	50	3	1.5	3
Rigid 4 axle (HGV)	0	0	0	0	0	0	0
Total	100	80	40	100	5	3	22

*some of the numbers in the columns are adjusted to make even numbers

532. Table 1.4 - Trips generated and mode split (with and without consolidation)

533. Therefore, number of deliveries/servicing is capped at 22 per day with the transport mode split as shown on the table 1.4 , secured though the s106 Delivery and Servicing Management Plan (DSMP). Deliveries by cargo bikes are permitted at all times in the area dedicated on the public hall, managed by the facilities management.

534. There are agreed restrictions on timings for deliveries and servicing of this development, allowed only between the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings and 21:00-07:00 on Sunday and Monday evenings.

535. In addition, a booking system is required to manage and allocate delivery/servicing slots for all land uses of this development, secured via S.106. This ensures that safety on the public highways is not compromised during pedestrian peak times and that no queuing happens in and around this development. The booking system must keep records of trips generated following the first occupation and records presented to the CoL upon request to ensure compliance.

536. Refuse/recycling collections are recommended to be part of the same booking system that manages the delivery and servicing slots to ensure no conflicts and in order to comply with the restrictions on days/ hours for vehicular access to this development. Allocated slots for refuse/recycling can be reeak in the ed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development. This ensures that loading/parking area is managed within the allocated times and that it facilitates different requirements.
537. All terms above to be secured though s106 obligation, requiring the submission and agreement of a Delivery and Servicing Management Plan (DSMP).

Pedestrian Comfort Levels

538. The Pedestrian Comfort Level (PCL) assessment was provided to determine the existing and proposed levels in the vicinity of this development. TfL guidance 'Pedestrian Comfort Level Guidance v2' (2019) has PCL levels that range from A to E to represent differing levels of suitability on different areas of pedestrian movements and are categorised as: comfortable, acceptable, at risk and unacceptable /uncomfortable. For the areas (office and retail development) where the PCL level is C, this is considered at risk, whereas PCL below level C are unacceptable and require highways improvements and widening of the footways or crossings.
539. The detailed PCL Assessment was undertaken for the consented development, while using pedestrian survey data at different locations along Gracechurch Street, as shown on the figure below.
540. It assessed the 'existing' and 'do nothing' options alongside the proposed development, including two 'do something' options related to the proposed development. The PCL Assessment indicated that, under a 'do nothing' scenario, future pedestrian footfall associated with the consented development would result in a comfort level of C- at the narrowest section of Gracechurch Street adjacent to the site.



Table 6.1: Existing Site 2025 - Gracechurch Street PM Peak			
Location	Clear Width (m)	2025 Flow	PCL Rating
1 - Gracechurch Street	2.20	2,476	C+
2 - Gracechurch Street	2.25	2,476	C+
3 - Gracechurch Street	2.40	2,476	B-
4 - Gracechurch Street	2.25	2,476	C+
5 - Gracechurch Street	2.90	2,476	B

Table 6.2: Proposed Development 2029 - Gracechurch Street PM Peak			
Location	Clear Width (m)	2029 Flow	PCL Rating
1 - Gracechurch Street	2.20	3,166	C-
2 - Gracechurch Street	4.60	3,166	B+
3 - Gracechurch Street	5.10	3,166	B+
4 - Gracechurch Street	5.20	3,166	B+
5 - Gracechurch Street	5.30	3,166	B+

541. (Extract from the TA, Tables 6.1 and 6.2, show the PCL's at different locations during the PM peak)

542. Table 6.1 shows the PCLs in the existing scenario with C+ levels at three of the points that were assessed along the Gracechurch Street.

543. Table 6.2 shows the PCLs with footway widening taken into consideration. The footway widening improvements along Gracechurch Street, secured through the Section 278 agreement, would accommodate the increase in pedestrian flows and improve pedestrian comfort levels—except at the southern entrance to Leadenhall Market (Location 1), where footway widening may not be possible due to site constraints.

Cycle Parking

544. Policy DM 16.3 of the Local Plan, requires applicants to provide on-site cycle parking spaces in accordance with the London Plan standards and exceed the standards when feasible.

545. The London Plan, Policy T5 Cycling indicates that development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle, through:

- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.

- securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.

546. The level of the cycle parking provision is dependent on the location of the proposed development. City of London (CoL) is within the area where higher minimum cycle parking standards apply.

547. To comply with policy standards this proposal is required to provide a minimum of 499 long-stay cycle parking spaces and 47 short-stay cycle parking. The policy also requires that short-stay cycle parking must be available for customers and visitors at convenient and readily accessible space, have step-free access and located within 15 metres of the main entrance wherever possible.

548. The policy also requires 5% of the minimum number of long-stay parking spaces to be accessible.

549. Table 1.5 below, shows the standard requirements to comply with the London Plan.

Use Class	Floor Area sqm (GEA)	Long Stay	Short Stay
Former B1 business offices	36,450	1 space per 75 sqm (GEA) 486	First 5ksqm=1 spaces per 500sqm; 10 thereafter 1 space per 5k sqm (GEA) 6
Former A1 Food retail above 100sqm	360	1 space per 175 sqm (GEA) 2	areas with higher cycle parking standards: 1 space per 20 sqm (GEA) 18
Sui Generis (SG) (exhibition/culture and public hall)	1,268	1 space per 8 FTE staff (staff number unknown- allowance of 11)	1 space per 100 sqm (GEA) 13
Total	38,078	499	47

550. Table 1.5 - Minimum Cycle Parking Standards and proposed provision.

551. This proposal includes a total of 399 (long stay) which is 20% less than the London Plan minimum requirements, and 43 (short stay) cycle parking spaces of the required 47 spaces.

552. The policy requirements for cycle parking supporting facilities are: changing rooms, maintenance facilities, lockers (at least 2 per 3 long-stay spaces are recommended) and shower facilities (at least one per 10 long-stay spaces recommended).
553. This proposal provides 24 showers which is less than the policy requirement of 50 showers, one DDA compliant shower, changing facilities and 2 lockers per 3 longstay cycle parking spaces.
554. The under-provision of long-stay and short-stay cycle parking—relative to the minimum London Plan standards—as well as the lower-than-recommended provision of some end-of-journey facilities and the placement of short-stay cycle parking on upper floors, is considered acceptable due to the unique circumstances of the site. These circumstances arise from archaeological findings in the basement and the allocation of space for displays that will benefit the public. This approach has been agreed upon with TfL.
555. Nevertheless, it is recommended that the applicant explores possibilities of placing 3 to 4 cycle parking spaces on each office floor space to deal with the shortfall of 100 long stay provision, and placing the short stay spaces for visitors at more convenient locations, as required by the London Plan and CoL adopted policies, through travel plan measures.
556. The proposed cycle parking by type is, as follows: 5% accessible Sheffield Stands, 85% two-tier cycle stands and 10% folding cycle lockers.
557. The entrances and lifts used by cyclists must be large enough to ensure that cyclists can be fully accommodated.
558. Further details are required on cycle parking and its facilities (locations, type and dimensions), secured through condition.
559. Further clarification is needed to understand the journey from entering the development to the areas designated for cycle parking. Additional information on how visitors can access these spaces, as well as the measures planned to encourage cycling as a mode of transport, would help provide a clearer picture of the user experience.
560. Nevertheless, these details should be addressed and included in Part 2 of the Travel Plan (TP), which will focus on promoting cycle parking and associated facilities. The TP Cycle Promotion Plan should outline initiatives in the form of an action plan with SMART targets. Targets for cycle parking are to be agreed upon with the City of London (CoL)

and are expected to be achieved within five years. The applicant is required to submit an annual report for review as part of the TP, which is secured via the Section 106 agreement.

Car parking

561. London Plan Policy T6 sets out car parking standards and provides strategic direction to ensure new developments include appropriate levels of parking. In accordance with Policy T6.5, disabled persons' parking for Blue Badge holders must be provided for non-residential elements of the development. The policy requires that all non-residential parts of a development provide access to at least one disabled parking bay, either on- or off-street, as outlined in Table 10.6. While car-free developments are not required to provide standard parking, they must still include provision for disabled users.
562. City of London (CoL) Policy DM16.5 states that developments in the City should be car-free, except for designated Blue Badge spaces.
563. Policy VT3 of the emerging CoL Local Plan reinforces this, stating that developments should be car-free except for designated Blue Badge spaces. Where other car parking (including motorcycle parking) is exceptionally provided, it must not exceed London Plan standards.
564. This proposal is a car-free development and does not include any disabled car parking. As such, it does not meet the policy requirement for disabled parking provision.
565. A Travel Plan (TP) is required to provide alternative arrangements for disabled staff and visitors to access the site and to mitigate increased demand for disabled parking on public streets. These measures must be secured through a Section 106 (s106) Agreement.
566. The primary objective of the TP should be to support disabled people—both staff and visitors—to ensure the development is inclusive. Disabled staff should receive a tailored travel plan upon joining any of the occupiers of the development, along with support initiatives to assist with commuting.
567. Similarly, disabled visitors should be able to request assistance for accessing the site, particularly where public transport does not meet their needs. Not all nearby Underground stations offer step-free access, meaning some users may require additional support. Measures such as arranging pick-up from nearby step-free stations or pre-arranged accessible locations should be considered and included in the TP.

568. The distance from proposed drop-off points and local transport nodes exceeds the recommended 50 metres. Therefore, opportunities for rest and recovery should be identified at intervals of no more than 50 metres between Blue Badge parking bays, drop-off points, and transport nodes. A request will be made that the feasibility of providing this be included in the scope of works agreed between the applicant and TfL within the s278 agreement between these parties.
569. The applicant must maintain records and provide alternatives to mitigate the impact of increased demand for disabled parking. Details of these alternatives for all land uses within the development must be included in the TP. An action plan with specific initiatives should be submitted annually to the Local Planning Authority (LPA) for review.

Deliveries/Servicing/Refuse /Recycling Strategy

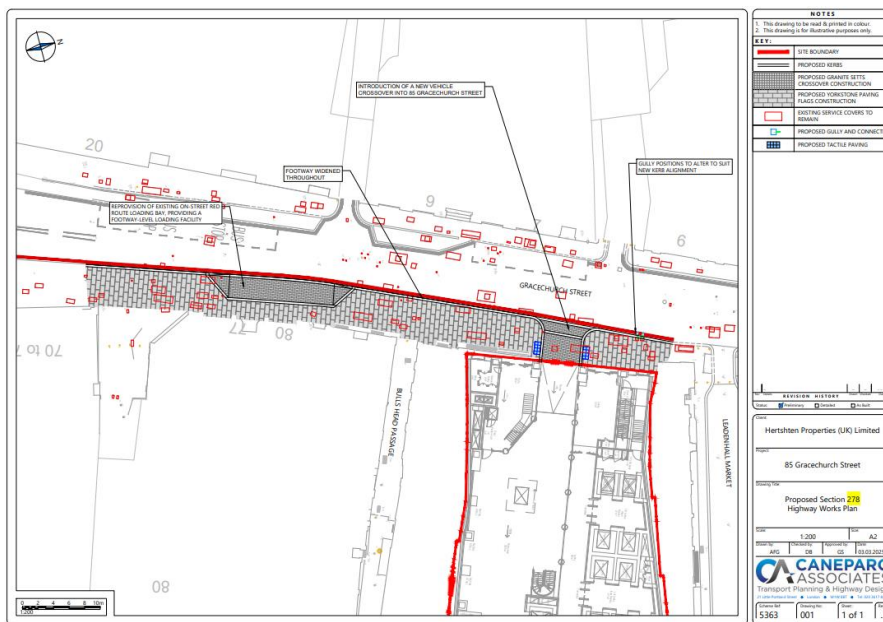
570. Under the current City's Transport Strategy and its proposals and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's transport infrastructure will be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions. Refuse and recycling vehicle trips to be made outside of peak hours: 7:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00. For proposals near residential areas, further restrictions are applicable, for example during evenings and early morning hours.
571. The existing deliveries and servicing arrangements are currently carried out on-street, utilising the loading bay on the Gracechurch Street.
572. The servicing strategy is proposing that deliveries and servicing takes place within dedicated area on the public hall, between the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday, Friday and Saturday evenings and 21:00-07:00 on Sunday and Monday evenings. The days and timings are as per the consented scheme, therefore acceptable. Deliveries by cargo bikes are not restricted at any time.
573. Swept path analysis is showing movements for 7.5t vehicles associated with delivery/servicing/ refuse/recycling, included on the TA, appendix B. There is capacity for two vehicles to carry deliveries/servicing at times, however activities in this area must be managed to ensure that safety procedures are in place in a coordinated and controlled manner. Facilities management is likely to be appointed in a role for managing deliveries and servicing and arrange booking slots.

Stopping Up/Oversail and Undersail

574. This proposal does not include the stopping up of public highways, or any oversailing or undersailing that would affect public highways.

Highways Works - Section 278 Agreement

575. This proposal includes alterations to the public highway to facilitate vehicular access, which in turn necessitates additional changes along Gracechurch Street.
576. The footways along Gracechurch Street were previously widened in response to COVID-19 measures, using temporary surfacing materials and bollards. Transport for London (TfL) has confirmed that these changes are to be made permanent and is seeking to secure these works via a Section 106/Section 278 Agreements.
577. The proposed changes to this section of the public highway require approval from TfL. The highway scheme, which is similar to the one previously accepted in principle by TfL for the consented proposal, must be designed in accordance with the Healthy Streets principles and secured through a s278/s106 agreement. The applicant is required to cover the full cost of designing and implementing the highway works.
578. The figure 3.7 below, extract from TA, the plan shows the proposed s278 works.



579. An important consideration for the highway scheme should be improving accessibility and removing barriers for disabled people traveling to and from the development. For

example, this could include a review of rest points at 50-metre intervals from key public transport arrival points.

Demolition/Construction Logistics Plan (CLP)

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

Conclusion of Highways and Transportation

- 584. The proposal benefits from high levels of public transport accessibility, is car-free and promotes cycling and walking as sustainable modes of transport.
- 585. Non provision of disabled parking bays is the same as the proposal with granted consent by the CoL in 2023. The use of the ground floor is intrinsically linked to the public benefit of improving pedestrian permeability and accessibility in this area, and it allows the public hall to be used during the day as a market or facilitates other functions.
- 586. Lower provision for cycle parking and its facilities is a direct consequence of findings of the archaeological remains of first roman London basilica, following the excavations to implement the consented proposal, which then lead to revising of the approved scheme.

587. This proposal is considered acceptable in transport terms, provided that the applicant enters into the S106/s278 agreement and complies with planning conditions, as listed below.

- Planning condition requiring the provision of cycle parking spaces designed to London Cycle Design Standards and including end of trip facilities, with details to be submitted to and approved by the LPA
- Planning condition to secure the detailed demolition and Construction Logistics Plan (CLP). The condition shall state that the detailed CLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the CLP has been approved by the planning authority.
- S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) with details on restrictions as referenced in this report. The clause shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be adhered to.
- S106 obligation to secure a Travel Plan (TP) for the development. The TP shall be approved prior to the occupation of the site and monitored for at least 5 years and until the SMART targets are met.

588. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies, Policy T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction. And it also accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2 and emerging policies of the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3.

Wind Microclimate

589. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

590. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

591. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists. The City of London Lawson criteria define the safety limit as a once-a-year exceedance of 15m/s mean wind speed. This safety limit captures the effects of rare but very strong storm-fronts that periodically impact the UK and attempts to identify areas where vulnerable pedestrians (e.g. elderly) would start to feel unsafe. The threshold would be breached if wind speeds exceed 15m/s for more than 1.9 hours of the year (0.022% of the time).

592. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For offsite measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.

593. There are four criteria for determining the sensitivity of a receptor:

- High: seating areas, entrances, and terraces
- Moderate: thoroughfares
- Low: high pedestrian traffic thoroughfares
- Negligible: roads and areas of no pedestrian access

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

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

595. Assessments have been carried out for both the windiest season and the summer seasons, and this is covered in Chapter 11 of the Environmental Impact Statement, Wind Microclimate.

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

Configuration 1: The existing site with the existing surrounding buildings;

Configuration 2: Proposed Development with the existing surrounding buildings;

Configuration 3: Proposed Development with proposed landscaping and existing surrounding buildings;

Configuration 4: Proposed Development with proposed landscaping, wind mitigation measures and existing surrounding buildings;

Configuration 5: The existing site with consented cumulative surrounding buildings (future baseline);

Configuration 6: Proposed Development with the consented cumulative surrounding buildings;

Configuration 7: Proposed Development with proposed landscaping, wind mitigation measures and consented cumulative surrounding buildings; and

Configuration 8: Proposed Development with consented cumulative surrounding buildings and 70 Gracechurch Street scheme (non-consented at the time of assessment).

597. The following consented cumulative schemes were identified within the 400m radius of the site and assessed in the wind tunnel model (Configurations 5-7) are as follows:

- 75 London Wall (Planning Application Reference: 23/01270/FULMAJ);
- 55 Broadgate (Planning Application Reference: 23/00469/FULEIA);
- 99 Bishopsgate (Planning Application Reference: 24/00836/FULEIA);
- 55 Bishopsgate (Planning Application Reference: 22/0098/FULEIA);
- 1 Undershaft (Planning Application Reference: 23/01423/FULEIA);
- 100 Leadenhall Street (Planning Application Reference: 22/00790/FULEIA);
- 70 Gracechurch Street (Planning Application Reference: 20/00816/FULEIA);
- 150-152 Fenchurch Street (Planning Application Reference: 23/01016/FULL);
- 60 Gracechurch (Planning Application Reference: 24/00743/FULEIA); and
- 47-50 Mark Lane (Planning Application Reference: 22/01245/FULMAJ).

598. The newest 70 Gracechurch scheme (Planning Application Reference: 24/00825/FULEIA) was not consented at the time of assessment and so was included in the assessment of Configuration 8.

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

Wind Conditions at Street Level

600. In the existing baseline conditions (configuration 1) the wind tunnel tests and CFD show that conditions around the site are suitable for their intended use, primarily occasional sitting or standing. Most of the spill-out seating amenity spaces along Leadenhall Market

and Lime Street Passage have wind conditions suitable for frequent sitting use during the summer season. These conditions are suitable for the intended use. Occasional sitting conditions on Lime Street Passage and the seating provisions along the passage to the west of Lloyd's of London are one category windier than suitable for spill-out seating use. Leadenhall Market and Lime Street Passage have been assessed with the inclusion of existing non-porous screens to simulate demarked spill out seating locations, replicating the existing condition where licencing requirement dictate the use of such screens. These screens do serve to improve the baseline condition – when winds do blow through those spaces, they would be providing localised shelter to those areas where they are present.

601. The testing undertaken when assessing the completed development as part of the 2023 proposal (ref: 22/01155/FULEIA), found that in most locations the wind conditions would remain either in the same categories as existing or become windier by one category but would continue to fall within a category suitable for the intended use. Additionally, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level, and so no additional mitigation above that proposed is required.
602. The effects of the proposed development with existing surrounding buildings (Configuration 2) on wind conditions would range from suitable for frequent sitting to walking use during the windiest season to suitable for frequent sitting to standing use during the summer season. During the summer season, the wind conditions would generally be one category calmer, suitable for frequent sitting use to walking use. There would be no instances of strong winds exceeding the safety threshold at any probe location at the proposed development and the nearby surrounding area. There would be an instance of strong winds exceeding the 15m/s threshold in Leadenhall Street to the north; however, these exceedances are not considered significant as they were also recorded for the baseline.
603. Testing of the effects of the proposed development, against the current baseline, on wind microclimate has shown one area of the proposed development which would require wind mitigation measures to improve wind conditions to be suitable for the intended occupant uses. This is the spill out seating spaces with occasional sitting within Leadenhall Passageway (measurement location 63). Configuration 4 shows the proposed development with proposed landscaping, wind mitigation measures and

existing surrounding buildings. The area identified would be one category windier than suitable for spill out seating use.

604. It is proposed that incorporating 2 metre high partition screens within Leadenhall Passageway would mitigate this impact and result in the spill out seating having wind conditions suitable for frequent sitting use, representing a Negligible effect.

Cumulative Effects Assessment

605. Wind conditions for Configuration 5 (the future baseline scenario) show the wind conditions during the windiest and summer season respectively in relation to the consented cumulative surrounding schemes within the 400m radius of the site.
606. In the future baseline scenario, wind conditions would range from suitable for frequent sitting use to walking use. During the summer season, wind conditions would be one category calmer at ground level compared to the windiest season, suitable for frequent sitting use to standing use. Most spill-out seating areas in the vicinity of the site are suitable for the intended use during the summer season, however, the spill-out seating on Lime Street Passage and along the passage to the west of Lloyd's of London would still experience occasional conditions that are one category windier than suitable for spill-out seating use.
607. In terms of pedestrian comfort for Configuration 5, wind conditions at and surrounding the site in the context of the cumulative surrounding buildings would be the same or one category windier than those in the baseline scenario (Configuration 1) during the windiest season. During the summer season, wind conditions would be the same or one category calmer than those in the baseline scenario.
608. Wind conditions for Configuration 6 (Proposed Development with Consented Cumulative Surrounding Buildings) would be suitable for frequent sitting to walking use during the windiest season, with generally calmer conditions in summer. The inclusion of surrounding cumulative schemes would improve shelter across the site, particularly to Lime Street Passage. All key areas, including entrances, thoroughfares, and terraces, would remain suitable for their intended use, with no significant adverse effects identified.
609. Configuration 7 introduces proposed landscaping and wind mitigation measures and shows broadly similar wind conditions to Configuration 6, with most areas remaining in the same or calmer comfort categories. The landscaping measures are not expected to alter wind conditions across the majority of the site. However, some localised differences

are present between the two configurations. A small number of on-site and off-site thoroughfares and entrances would be one category windier or calmer than in Configuration 6, though all would remain suitable for their intended use. The key exception is spill-out seating at measurement location 258, which would continue to experience windier-than-desired conditions during the summer season and represent a Major Adverse (Significant) effect. This area remains flexible in terms of seating layout, and mitigation, such as café screens, would be expected to address the issue effectively.

Mitigation

610. As identified in Configurations 3, 6 and 7, one area of the Proposed Development would require wind mitigation measures to improve wind conditions to be suitable for the intended occupant uses: the spill out seating spaces with occasional sitting (measurement location 63) conditions would be windier than suitable for this use.
611. The area identified above with windier conditions would be one category windier than suitable for spill-out seating use. However, as noted earlier in this ES chapter, only the known spill out seating areas have been assessed in this assessment. The seating within Lime Street Passage and the quantity and position of these seating spaces are variable. As such, most of the areas identified with occasional sitting use conditions would only be one category windier than suitable for frequent sitting use. These areas would be suitable for thoroughfare use, which represents the common use of this space throughout the year. However, with the retention of the existing 1m high screens used to demark spill-out seating for future seating spaces and the introduction of 2m high screens to demark seating at location 63, these areas would be expected have wind conditions suitable for the intended spill-out use during the summer season.
612. The newest 70 Gracechurch scheme (Planning Application Reference: 24/00825/FULEIA) was not consented at the time of assessment and so has only been included in Configuration 8. Configuration 8 (Proposed Development with Consented Cumulative Surrounding Buildings and the 70 Gracechurch Street scheme) shows wind conditions broadly consistent with the earlier configurations, remaining suitable for walking use or calmer throughout the year. No strong winds exceeding safety thresholds were identified, and most areas would continue to experience conditions appropriate for their intended use.
613. The addition of the 70 Gracechurch scheme does not materially alter the wind environment, though spill-out seating areas at locations 63, 93, and 258 remain one

category windier than desired for occasional sitting use, consistent with Configurations 6 and 7. These areas would require mitigation. Other locations, including 60 and 61, would experience calmer conditions than in Configuration 5, representing a Moderate Beneficial (not significant) effect.

Wind Microclimate Conclusion

614. In conclusion, with the proposed wind mitigation measures in place, where wind conditions become windier at ground level, they remain suitable for the intended uses in the proposed and cumulative scenarios, and there are no unacceptable wind impacts at street level.
615. Where there have been off-site exceedances identified (locations 63 and 258) which would have windier than suitable conditions in the context of the existing surrounding buildings which are windier than the baseline scenario, these would be alleviated with the inclusion of mitigation measures.
616. In the instance that not all cumulative schemes are built out, potential wind mitigation measures identified earlier in this report would be secured in the S106 Agreement.
617. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the Environmental Statement.
618. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan Policy 7.6, London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
619. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.

Daylight, Sunlight and Overshadowing

620. Policy D6(D) of the London Plan states that the design of development should provide sufficient daylight and sunlight to (new) and surrounding housing that is appropriate for its context.
621. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
622. Emerging City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby dwellings and other sensitive receptors, including open spaces, is appropriate for its context and provides acceptable standards taking account of the Building Research Establishment's guidelines.
623. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the draft City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
624. The BRE guidelines 'Site layout planning for daylight and sunlight – A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where the occupants have a reasonable expectation of natural light:
- Daylight: Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.

- Sunlight: Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

Interpreting Results

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

Overshadowing

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

Assessment

627. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the BRE Guidelines and considered applying the policies set out in policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.

628. The application is supported by a Daylight, Sunlight and Overshadowing assessment, which forms part of the submitted Environmental Statement.

629. When referring to the degree of adverse impact (negligible, minor, moderate etc.) in this report, Officers have adopted the terminology used in the Environmental Statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact.

630. The criteria set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment in the environmental statement In forming a judgement on whether the design of the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (London Plan policy D6D), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan policy DM 10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (draft City Plan policy DE7) it is appropriate to have regard to the assessment carried out in accordance with the BRE guidelines.

Daylight and Sunlight

631. The following sensitive receptors were identified with regards to daylight and sunlight:

- 7-12 Gracechurch Street
- 2-4 Bulls Head Passage
- St. Peter Upon Cornhill Church
- The Bunch of Grapes, 14 Lime Street
- Jamaica Buildings
- St Michael Cornhill Church
- 50 Cornhill

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

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

634. Each of the identified sensitive receptors is considered in this context below.

7-12 Gracechurch Street

635. This property is a commercial hotel to the west of the proposed site, and standing eight storeys in height. 128 windows were assessed, serving 98 rooms, along the eastern façade of the building and within its southern lightwell. Of these windows, 79 windows (or 61.7%) meet the BRE guidance for VSC and therefore would experience no effect or a negligible effect.
636. Concerning the other 49 windows, 13 would retain at least 15% VSC which is considered appropriate for a dense urban environment, and all 49 windows would serve bedrooms which are considered lesser expectors of daylight within the BRE guidelines.
637. The assessment for these windows and NSL concluded that 80 of the 98 rooms would meet the BRE's guidance, and therefore experience no effect or a negligible effect. Of the 18 remaining rooms, eight would retain at least 50% NSL which is considered to be a good retention of daylight distribution in dense urban environments such as this site. It also must be noted that the use is considered to be a commercial use, being a hotel, with the rooms themselves serving a transitory use. In this context, the daylight and sunlight impacts to this building are considered acceptable.
638. With regards to sunlight, 89 of the 98 rooms assessed (90.8%) would meet the BRE Guidelines for APSH and WPSH. Four of the remaining nine rooms would retain at least 20% APSH which is considered a good level in a dense urban environment, and all but one room would see no reduction in WPSH. As above, all rooms would serve as bedrooms and the property is commercial in nature with a transitory use of each room. In this context, the sunlight impacts of the proposal on this property are considered acceptable.

2-4 Bulls Head Passage

639. This site is in residential use, across four levels, and lies to the south of the site. Fives windows were assessed, with three of these windows meeting the BRE guidance. Of the remaining windows, one falls within a lightwell and experiences a low existing VSC of 1.2%, and the other window serves a room with other apertures. Turning to NSL, one of three rooms assessed would meet the BRE guidance. The other rooms would fall outside of the BRE guidance, with one experiencing a low NSL value in the existing circumstance (0.2%) and a 0.2% absolute reduction which would be unlikely to be perceptible, and the other room being a kitchen of c. 13m². The latter room would not be considered a habitable room. This property would therefore experience a Minor Adverse impact which, in this context, is considered acceptable.

640. Regarding sunlight, the property achieves full adherence against BRE Guidelines compliant sunlight testing.

St. Peter Upon Cornhill Church

641. This church consists of two levels and is located on the western side of Gracechurch Street, north east of the subject site. Of the 20 windows assessed, 10 would meet the VSC standards of the BRE Guidelines. All 10 windows remaining serve the same space, and the room would face an average absolute VSC loss of 1.1%. All three rooms then meet the BRE Guidelines for NSL. As such, it is considered to experience a Minor Adverse impact.

The Bunch of Grapes, 14 Lime Street

642. This property meets the VSC and NSL recommendations of the BRE Guidelines, and full adherence to the sunlight tests.

Jamaica Buildings

643. This property meets the VSC and NSL recommendations of the BRE Guidelines. Sunlight testing shows five rooms of nine would meet the BRE recommendations as to APSH and WPSH. The four remaining rooms would see a minor adverse impact on APSH, and no reduction for WPSH. These rooms are also bedrooms and kitchens, with the BRE outlining at paragraph 3.2.3 of the Guidelines that “bedrooms are less important” and “normally loss of sunlight need not be analysed to kitchens and bedrooms”. As such, the impact of the proposed development on the sunlight of this property is considered acceptable.

St Michael Cornhill Church

644. This religious building is located to the north-west of the site. 55 of the 56 windows would meet the BRE Guidelines when assessed for VSC, and the room assessed would meet the BRE Guidelines with regards to NSL. This is considered a Minor Adverse impact. Turning to sunlight, the property fully adheres with the BRE Guidelines on sunlight testing.

50 Cornhill

645. This site is in residential use, and is located to the north west of the site. 94 of the 95 windows tested meet the BRE guidance for VSC, with all rooms satisfying the BRE recommendations for NSL. It is considered that this represents a Minor Adverse impact. For sunlight, 11 of the 12 rooms assessed would meet the APSH and WPSH

recommendations of the BRE Guidelines. The remaining room serves as a bedroom which, as set out above, is considered a lesser expector of sunlight and would not normally need to be analysed. In this context, the impacts are considered acceptable.

Cumulative Impact

646. A Tier 1 cumulative scenario has been assess and provided as a part of the Environmental Statement's technical information concerning light impacts. A Tier 2 cumulative scenario was not considered appropriate, as the sole additional scheme identified was that at 60 Gracechurch Street and this site sits behind 70 Gracechurch Street and as such would have no impact relevant to the cumulative scenario.

647. In the cumulative scenario tested, 7-12 Gracechurch Street, 2-4 Bulls Head Passage, and St Peter Upon Cornhill Church would be identified as experiencing a Moderate Adverse impact, while a Minor Adverse impact would be caused to Jaimaica Buildings, St Michael Cornhill Church, and 50 Cornhill. This is taken in context with the daylight and sunlight impacts of the consented scheme, and the Environmental Statement identifies the chief impacts which result in these changes is the consent at 70 Gracechurch Street.

648. Overall the daylight and sunlight available will be sufficient and appropriate to context and would not be reduced to unacceptable levels, and acceptable living standards would be maintained. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with, London Plan policy D6, Local Plan Policy DM10.7 and Policy DE7 of the draft City Plan 2040.

Overshadowing

649. The BRE guidelines advise that sunlight amenity is measured on 21st March (spring equinox) and the result is expressed as a percentage of the amenity area that receives at least two hours of sunlight on 21st March, measured through a Sunlight Hours on Ground analysis. The sunlight amenity and transient overshadowing analysis was undertaken in accordance with the Guidelines. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed against the Baseline Scenario.

650. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the different times of the day and year when shadow would be cast over a surrounding area. A

transient overshadowing analysis has been undertaken, identifying the change in shadows cast throughout the year with regards to each identified sensitive receptor.

651. Concerning Sunlight Hours on Ground, 16 of the 17 receptors tested would pass the BRE Guidelines recommendations. Furthermore, 15 of these receptors would experience no noticeable impacts between March and September as would therefore experience a Negligible effect. The outstanding sensitive receptors are St Peter upon Cornhill Churchyard and the public terrace at One Leadenhall.
652. The St Peter upon Cornhill Churchyard would see that the northernmost portion of the amenity space would see a reduction from May to August. This is considered a Minor Adverse impact. The public terrace at One Leadenhall would see a more substantial impact, facing a relative reduction in sunlight hours of 73% against the BRE criteria. This is identified as a Major Adverse impact. The terrace itself is within the Cluster, being an amenity area at a low level in an area identified as being suitable for tall buildings. It is inset, being covered, and therefore at a greater risk of having its sunlight impacted by surrounding developments. Furthermore, it is not considered that the proposed development has any greater impact than would be caused by the extant permission at the site. As such, the sunlight impacts to these spaces are considered acceptable.

Solar Glare

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

655. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.
656. The BRE guidelines suggest the following in relation to solar glare at paragraph 5.8.3 – 5.85: “If it is likely that a building may cause solar dazzle the exact scale of the problem should be evaluated. This is done by identifying key locations such as road junctions and railway signals, and working out the number of hours of the year that sunlight can be reflected to these points”
657. A Solar Glare assessment has been carried out and forms a part of the Environmental Statement, assessing 17 locations considered sensitive in terms of solar glare.
658. At five locations, a negligible impact was identified. At these locations, instances of reflection would occur on small areas of glazing and/or occur outside of 30 degrees of a road user’s line of vision, the result of which being that any reflection would occur for a short time and be within the peripheries of any driver’s vision.
659. At the location GS2 (Gracechurch Street travelling north), a Minor Adverse impact was identified. The impact to this location would be reflections visible within 10 degrees to 30 degrees of a road user’s vision. This would occur across different portions of the southern elevation between the hours of 08:00 and 11:00 from September to March.
660. A Minor Adverse impact was also identified at location GS2 (Junction between Gracechurch Street and Lombard Street travelling north). The assessment found potential reflections within 10 to 30 degrees of the driver’s line of sight, from 11:00 to 13:00 on the lower floors of the southern elevation from September to March. This reflection would occur above the visor line and therefore be shielded when a visor would be used.
661. For the instances of minor adverse impacts it should be noted that the assessment for solar glare assumes the worst-case scenario, that the sun will shine every day during daylight hours. Climate data indicates that this is not the case in the UK generally. Overall, it is considered that the effects on solar glare would be acceptable. The development would comply with policy D9 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Spill

662. Light spillage is defined as any light emitting from artificial sources into spaces where it is unwanted, such as spillage of light from commercial buildings onto residential accommodation, where this would cause nuisance to the occupants. It is measured through light intrusion assessments – this is the spilling light beyond the boundary of a proposed development, and it is assessed through vertical illuminance in lux, measured flat at the centre of the sensitive receptor.
663. Local Plan Policy DM15.7 and draft City Plan 2040 policy HS3 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers. Draft policy HS3 (Residential Environment) states that light spill from development that could affect residential areas should be minimised in line with policy DE8 and the Lighting SPD.
664. The Site and its surroundings are defined as a high distinct brightness, which the Institute of Lighting Practitioners (ILP) Guidance Notes classify as Environmental Zone 4 (E4). Within E4, the recommended limit of light spillage is 25-lux pre-curfew (11pm) and 5-lux post-curfew
665. Sensitive receptors identified within the submitted light spillage assessment comprise:
- 2-4 Bulls Head Passage
 - Jamaica Buildings
 - St Michael Cornhill Church
 - St Peter Cornhill Church
 - 7-12 Gracechurch Street
 - 50 Cornhill
666. All sensitive receptors tested excepting one experience levels of light trespass within the guideline values for both pre- and post-curfew lux limits. The remaining sensitive receptor is 7-12 Gracechurch Street which would experience no transgressions of the 25-lux threshold during pre-curfew times. The property would experience a transgression beyond the post-curfew 5-lux threshold. The assessment does not take into account the mitigation and control possible through a Lighting Strategy, with such a document to be secured via condition, and with any such Lighting Strategy would be expected to comply with the guidance within the City of London Lighting Strategy SPD. There are also

potential transitory impacts on light spillage caused by the deconstruction and construction phases of the development. These impermanent impacts would be addressed through a Deconstruction and Construction Environmental Management Plan as secured via condition. As such, the light spillage impacts of the proposed development are considered acceptable.

Thermal Comfort

667. London Plan Policy D8 and D9 and Policies S8, S12 and S21 of the Emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood, must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
668. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared using high resolution Computational Fluid Dynamics (CFD). The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the site, by comparing the predicted felt temperature values and frequency of occurrence
669. The assessment was graded against the City of London Thermal Comfort Criteria, as set out in “Thermal Comfort Guidelines for Developments in the City of London”. Categories are based upon the seasonal percentage for which thermal conditions are acceptable (UTCI values of between 0° and 32°).

670. The thermal comfort conditions have been assessed for entrances, bus stops and amenity spaces, including terraces and balconies. The same spaces have been tested as those assessed for Wind Microclimate. The purpose of the tests is to compare conditions with and without the proposed development. To assess those conditions the following conditions have been tested:

- Configuration 1: Existing Site with existing surrounding buildings;
- Configuration 2: Existing Site with consented cumulative schemes;
- Configuration 3: Proposed Development with existing surrounding buildings;
- Configuration 4: Proposed Development with consented Cumulative Schemes;
- Configuration 5: Proposed Development with Consented and Non-Consented Cumulative Schemes.

671. Consented cumulative schemes within 400m of the proposed site were considered in the configurations as above, and it should be noted that in this circumstance the sole non-consented scheme added to the cumulative scenario was 70 Gracechurch Street (ref: 24/00825/FULEIA) which has since been subject to resolution to grant by the Planning Application Sub-Committee earlier this year.

Configuration 1: Existing Site with existing surrounding buildings

672. In the existing condition, entrances, bus stops and amenity spaces satisfy the target condition, while the 1 Leadenhall north roof terrace is suitable for a mix of seasonal and short-term use meaning it ranges from one category less comfortable than the target condition and satisfying the target condition. The podium level terrace and south roof level terrace at 1 Leadenhall satisfy the target condition.

Configuration 2: Existing Site with consented cumulative schemes

673. The results in this configuration are similar in that the tested spaces mostly satisfy the target conditions in the same way, excepting a change in condition at the 1 Leadenhall south roof terrace which would be one category less comfortable than the target condition. The north roof terrace would remain at conditions ranging from one target less comfortable than the target condition to satisfying the target condition.

Configuration 3: Proposed Development with existing surrounding buildings

674. The assessment notes that overall the introduction of the scheme would generally result in a lessening of comfortability conditions similar to that following the introduction of cumulative schemes undertaken in configuration 2. It also notes that while less comfortable conditions would be caused to Gracechurch Street and within Leadenhall Market to the north of the site, it would make conditions more comfortable on Lime Street to the south east of the site, reducing the area only suitable for short-term use.
675. Entrances on-site and off-site would meet the target condition, the bus stop on Gracechurch Street would meet the target condition, as would the eating area along Lime Street Passage and Leadenhall Market.
676. On-site terraces would meet the target condition, as would the south podium level terrace at 1 Leadenhall, and the north roof terrace at 1 Leadenhall would be consistent with the baseline and the conditions as described in the cases of Configuration 1 and 2. The south roof terrace at 1 Leadenhall would be one to two categories less than the target condition, while the assessment notes that this is driven by a change in winter conditions and with 52% of the season recorded as acceptable in the baseline and 48% of the season recorded as acceptable in Configuration 3. Given the scale of this change, and as the terrace is likely to see reduced use during the winter season, this is considered acceptable.

Configuration 4: Proposed Development with consented Cumulative Schemes

677. In this configuration, on-site and off-site entrances meet the target condition, as does the tested bus stop on Gracechurch Street, and the spill out seating area along Lime Street and Leadenhall Market. On-site terraces also meet the target condition, as well as the southern podium level terrace at 1 Leadenhall. The north and south roof terraces at 1 Leadenhall are one category less comfortable than the target condition.

Configuration 5: Proposed Development with Consented and Non-Consented Cumulative Schemes

678. No material change was found in thermal comfort conditions when compared to earlier configurations.

Conclusion

679. On-site conditions are suitable for the intended uses without landscaping or mitigation measures for all proposed entrances, ground level amenity, thoroughfares and terraces.

680. Off-site conditions for all entrances, bus stops, thoroughfares, crossings, ground level spill out seating and mixed amenity and roof terraces were suitable for the intended use or consistent with the baseline. The inclusion of consented cumulative schemes made conditions generally less comfortable, but did not alter the suitability of any thermal comfort receptor. The inclusion of non-consented cumulative schemes did not have a material impact on thermal comfort conditions.
681. In light of the above, it is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan Policy D8, Policy D9 and emerging City Plan 2040 policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.
682. Gracechurch Street forms part of the Transport for London Road Network for which Transport for London (TfL) is the Highway Authority.

Contaminated Land

683. Local Plan policy DM15.8 and draft City Plan 2040 policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential of pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.
684. Policy S1 of the emerging City Plan 2040 expects developers to address land contamination.
685. A Phase 2 has been submitted as part of the application, which sets out that chemical testing has been undertaken identifying no elevated contaminants above the proposed end use criteria, and no presence of asbestos was detected. Ground conditions were identified through introduction of ten exploratory bore holes across the site, with shallow monitoring well installations to establish the underlying ground has regime.
686. The ground conditions were found to be primarily made ground underlain by river terrace deposits, the latter being superficial deposits over the solid geology of the London clay formation. Groundwater was generally indicated to present at between 5.07m and 7.68m

below basement level. Low to negligible concentrations of methane/carbon dioxide were found on site, and low to negligible gas flows.

687. On the above basis, it concludes that no ground gas protection measures would be required subject to completion of further ground gas monitoring, and no remediation works are considered necessary to enable the end use of the site. The report recommended that given the presence of elevated lead in the made ground across the site, appropriate dust control measures should be employed during excavation and construction, and personal and respiratory protection measures provided to all relevant workers. This would be secured via condition. Also secured via condition would be a risk assessment for construction workers, and a condition in respect of the process/remediation if contamination is found when carrying out the proposed works. Subject to the imposition of these conditions, the proposal is in accordance with Local Plan policy DM15.8 and policies S1 and HL4 of the draft City Plan 2040.

Air Quality

688. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts, and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.
689. The application submission includes an assessment of the likely impact of the proposed development on air quality as a result of the demolition, construction, and operational phases of the development.
690. The Air Quality Positive approach as recommended by policy HL2 of the emerging City Plan 2040 has been undertaken throughout the design of the proposed development in line with the GLA Air Quality Positive Guidance 2023, and an Air Quality Positive Statement has been submitted with the application.
691. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in

the Construction Environmental Management Plans to be submitted and approved under conditions attached to the planning permission.

692. The proposed development would be car-free, and the energy strategy including heating and hot water is all-electric. No combustion plant is proposed for the primary energy strategy, while four generators are proposed. Three of these generators would be for life-safety purposes, only routinely used for testing and maintenance, and one would be used for business continuity. Exhausts would be located 1.5m above roof level in a good dispersion environment. Furthermore, the generators would use hydrotreated vegetable oil, reducing NO_x emissions compared to similar generators using diesel as a fuel source. While the Air Quality Assessment recognises that the proposed generators, during testing and maintenance, may lead to high 1-hourly mean NO₂ concentrations, there is a very low probability of the 1-hour mean concentration objective being exceeded as a result of this, and testing would be carried out outside of normal business hours to minimise impacts so far as practicable. Additionally, the dispersion of these emissions would take place at roof top level where dispersion is high and ground floor level concentrations would be minimal.
693. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment. Measures that were considered during the design phase to have a positive impact on air quality include minimising traffic generated, and utilising a low or zero emission energy strategy.
694. The City's Air Quality Officer has no objections to the proposals. Conditions are recommended in relation to the requirement for a revised Air Quality Positive Assessment to ensure that the proposed development maximises benefits to air quality, to Non-Road Mobile Machinery Register details, details of ventilation and extraction equipment specifically in relation to the market, and the requirement for a Local NO₂ Monitoring Strategy as part of the Construction Environmental Management Plan.
695. Subject to conditions, the proposed development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040, and policy SI of London Plan which all seek to improve air quality.

Noise and Vibration

696. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
697. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.
698. In most City redevelopment schemes one of the main noise and vibration issues occur during demolition and construction phases. The relevant chapter within the Environmental Statement states that a construction method will be adopted to reduce noise levels. Plant and generators will be carefully selected and should be operated and maintained appropriately. Noisy activities will be limited to certain times to minimise their overall impacts on existing receptors and working hours will comply with the CoL restrictions. Several noise and vibration control measures and monitoring are proposed to be incorporated.
699. Noise and vibration mitigation during the deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Demolition, and a Construction and Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.
700. The proposed development provides for active uses at lower levels, including retail, food and beverage, and cultural uses. At this stage specific users have not been identified so the precise commercial activity and associated noise level cannot be accurately defined however, the levels of noise generated from the likely type of commercial activity are expected to be relatively low when appropriately controlled via condition.
701. A series of conditions are proposed to be attached in respect of the hours of use of the office amenity terraces and balconies, as well as a restriction on the use of amplified music on these terraces. Operational management plans for each of the commercial elements and the proposed public hall, Roman forum-basilica exhibition space and

Heritage Walkway would be secured via a S106 agreement, and these will be expected to set out the appropriate noise control measures to minimise disturbance to nearby sensitive receptors. The appropriate noise control measures are likely to be largely based around opening hours and effective security.

702. Environmental health officers have confirmed, that subject to the recommended conditions, they would have no objections with regard to the noise impacts.
703. The submitted Environmental Statement considers the impact of the development on the noise environment. Subject to a series of conditions to mitigate noise and vibration during the deconstruction/construction and operational phases of the development, the proposed development would comply with policies D13 and D14 of the London Plan and policy DM15.7 of the Local Plan (2015).

Health Impact Assessment

704. Policy HL9 of the draft City Plan 2040 requires major developments to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments. Policy GG3D of the London Plan states that “to improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments”.
705. The application is accompanied by a Health Impact Assessment (HIA) (produced by Quod) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health impacts.
706. The HIA is based on known links between health determinants and health outcomes. The methodology has informed by the Institute of Environmental Management and Assessment’s (IEMA) guidance on Determining Significance for Human Health in EIA (2022). Key principles of the IEMA guidance include assessing effects on health at population level, as opposed to individual level, and consideration of effects on health inequalities and vulnerable groups. Changes in health determinants are defined as positive, negative or neutral with a low, moderate, or high magnitude of change.

Furthermore, the performance of the proposed development against the health themes and issues included in the CoL Health Impact Assessment Checklist has been considered.

707. The baseline, in terms of demographics (including density, age, ethnicity, deprivation, health and wellbeing, education and employment), environmental aspects (including air quality, green spaces, noise and townscape) and vulnerable groups (including such as people with existing health problems or disabilities, people who are homeless, people living in poverty, older people and children) have been assessed to understand the existing situation in the area. In terms of the future baseline, it is noted that rate of growth in the area is expected to be reduced materially.

708. The submitted HIA concludes that the proposed development is likely to have an overall positive impact on health, highlighting the positive health impacts specifically related to:

- Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment.
- Excellent cycle facilities which will encourage and support active transport by building users.
- Servicing and logistics strategy has been designed to minimise delivery vehicle trips to the Site.
- The Site is well located with good pedestrian and cycle routes, promoting users to choose active modes of travel coming to and from the Proposed Development.
- The Proposed Development provides greening across the terraces, to create a relaxing working environment and help with wind discomfort.
- Provision of high-quality public realm at the ground floor, a new public hall and a new route through the Site improving the physical environment and contributing to social cohesion.
- A car-free development minimising vehicles travelling to the Site and reducing emissions.
- Building design considering the context of the Site and maximising benefits including employing systems to reduce energy usage. The Proposed Development targets a BREEAM Outstanding rating.
- Consideration to sustainability and inclusive design.

709. In light of the above, it is considered that the impacts of the development on health and wellbeing are largely positive. In order to achieve further health benefits, it is recommended that the proposed development should implement a Local Procurement and Local Training, Skills and Job Brokerage strategy to promote construction and operational jobs to people within the local community and including disadvantaged groups, which would be secured via planning obligation. This would be alongside the imposition of a condition requiring a Construction and Environmental Management Plan, reference elsewhere in this report, and as recommended by the submitted Health Impact Assessment.

Sustainability

710. After the approval of the previous scheme, the discovery of archaeological remains below the current basement of the site introduced significant challenges in terms of programming as well as for the rearrangement of the proposed basement in size and relocation of basement uses to other areas above ground within the proposed building, in order to retain the ruins of the discovered Roman basilica. As part of updated proposals for the site, the surviving remains will be incorporated into a new public exhibition, event space, and immersive experience, in partnership with the London Museum. This resulted in the adaptation of the structure and efficiency considerations for the cores. Consequently, the tower is now approximately 8 meters shorter, and structural frame bridging over the archaeological remains had to be incorporated.

Circular Economy

711. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1 set out the City's support for circular economy principles. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City

Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 Strategic Policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options. The Planning for Sustainability SPD, adopted in February 2025, contains further guidance about how applicants are expected to address the GLA's Circular Economy guidance and the Whole Life-Cycle Assessment guidance, and how to fulfil the current and emerging Development Plan Policies on circular economy and whole life-cycle carbon emissions.

712. To address these policies, the application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site. An independent reuse and materials audit that covers the GLA's pre-redevelopment audit requirement has been undertaken for that purpose.

713. The existing 8-storey building was constructed in 1935 and most recently refurbished and extended in 1997. The existing structure is steel framed with hollow pot floors and concrete toppings. The steel columns are cased in masonry, and the only structural internal walls are those of the cores. The constraints of the existing building can be summarised as follows:

- layout characterised by irregularly shaped floorplates that are reliant upon a series of lightwells with overall poor natural light levels across office spaces
- ground floor retail units without level access
- no existing outdoor amenity spaces
- low floor to ceiling heights (c.2.6m on typical office levels)
- cluttered roofscape
- facades of poor condition and energy efficiency
- outdated building services.

Pre-redevelopment audit optioneering

714. The reuse and materials audit includes an options assessment that details how different development options would address circular economy, establish the potential of retention, reuse and carbon impacts of different materials. Whole life-cycle carbon impacts of the options are set out in the whole life-cycle carbon emissions section of this report which includes an options evaluation with regard to opportunities for wider environmental sustainability benefits and other planning benefits in order to address the

economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2024, chapter 2, paragraph 8.

715. For the reuse and materials audit, the following options were assessed:

- Option 1: Minor refurbishment (no replacement MEP); 100% retention
- Option 2: Major refurbishment (new MEP and upgrade to facades, no extension); retention of 100% substructure, 95% superstructure and 60% facades
- Option 3: Major refurbishment (as option 2, lightwell infill, demolition of 8th floor and 6-storey extension); retention of 40% substructure, 63% superstructure and 60% facades
- Option 4: New construction, 32 storeys; 3% front façade

716. The optioneering assessment demonstrates that options 1 and 2 would retain the building's structure and facades. In option 1, due to the limited number of interventions, only the finishes, fittings and some internal walls associated with a new tenant fitout would be replaced. Its longevity would be compromised by the need for potential replacement of all building services in the near future which option 2 would provide from the start, accounting for its higher embodied carbon impact.

717. Option 3 would partially retain existing structure and facades, and it would provide additional, high quality floorspace but this would result in significant structural intervention, carbon emissions and costs. Options 1-3 would come with limitations to the quality of the retained floorspaces and commercial viability on this City Cluster site. These options would also lack the longevity, flexibility and adaptability of Option 4 and only reduce demolition and construction waste in the short term without the benefits the site could deliver for futureproofing the wider City. The applicants therefore consider option 4 as preferred approach for the site, along with a strategy to encourage maximum reuse of the deconstruction material as detailed in the demolition audit accompanying this application.

718. The explored optioneering is considered to comply with the GLA's Circular Economy Statement Guidance and the Corporation's Carbon Options Guidance Planning Advice Note that provides the tool for maximising retrofit and reuse as set out in the Planning for Sustainability Supplementary Planning Guidance. The assessment of the carbon intensity of the options and their evaluation in the round is set out in the whole life-cycle carbon emissions section of this report.

The application proposal

719. The submitted Circular Economy Statement describes the strategic approach, including the incorporation of circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Guidance.
720. The proposed development is a new build with a rebuilt and adapted historic façade. A pre-demolition audit with a detailed material inventory has been submitted that estimates that 10% of material by weight can be reused on site, 85% can be recycled offsite, and 5% can be re-used offsite. The largest quantities by weight that can be reused are Portland stone and face bricks, rockwool insulation, timber framing, structural steel, marble, ceiling tiles, doors and carpet tiles. The largest quantities by weight for recycling are concrete, masonry, structural steel, plasterboard, glazing, insulation and aluminium window frames.
721. The audit includes detailed quantification of materials, split by building element, clearly identified links and contacts for reuse marketplaces that can be taken up by any demolition contractor. The condition and recovery potential of key materials and products are clearly identified and set out for future consideration and to support decision-making. The applicants commit to meeting all mandatory GLA waste requirements.
722. The circularity approach for the new building incorporates principles of:
- Longevity
 - Durable materials, such as glass reinforced concrete, and durable, unitised curtain wall panels
 - Robust substructure and lightweight superstructure
 - Flexibility through designated riser spaces for tenants that can accommodate a variety of services
 - Flexibility and Adaptability
 - Modular design of small format 1.5m wide curtain wall panels with easy to replace or maintain glazing and gaskets, and easy to adapt to changes in internal layouts
 - Highly adaptable superstructure to enable modifications and alterations
 - Integration of building services via penetrations in the steel beam that allow for easy modifications or replacements
 - Flexibility in floor layouts
 - Disassembly, recoverability and reusability

- Mechanical connections between elements, e.g. bolted connections of the composite steel system
- Pre-fabricated, pre-cast concrete balcony panels that can be disassembled
- Ease of disconnection and dismantling of building services and of access for replacement

Designing out waste

- pre-fabrication to optimise material use and construction efficiency
- use of high strength steel to reduce material quantity
- Proposal to develop a Disassembly Guide to be requested by condition.

723. A condition is recommended for an update to the Circular Economy Statement prior to the commencement of construction, and a post-completion update, to confirm that high aspirations can be achieved.

Operational energy strategy and carbon emissions

724. The Energy Statement outlines the operational energy strategy in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed development has been designed to achieve an overall 18% reduction in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building (the 'Part L baseline').

725. A passive design approach is adopted to achieve 13% 'Be Lean' savings beyond the Part L baseline. The design of the building incorporates enhanced thermal performance and natural ventilation as well as self-shading through deep columns and overhangs and a higher framing ratio where needed. Energy efficient building services have been specified, including ventilation heat recovery between exhaust/return air, and for unregulated energy uses such as lifts.

726. There are currently no available or proposed district heating networks in the local area. The for the previous application agreed provision of a potential heat exchanger location in basement 1 can no longer be provided as it would conflict with the ability to retain the archaeological remains in-situ as agreed with Historic England and the Greater London Archaeological Advice Service. This has therefore been omitted from the design.

727. A system of 71 photovoltaic (PV) panels, providing 2.1% of the total annual operational energy demand, and air source heat pumps are proposed as low and zero carbon (LZC)

technology solutions. The total 'Be Green' savings beyond the Part L baseline currently stand at 5%.

728. The proposed energy strategy demonstrates that the proposed building would achieve a 18% reduction in regulated carbon emissions under Part L 2021. It does not meet the GLA's 35% target, and the GLA acknowledges that the 35% carbon reduction target relative to Part L 2021 will be initially challenging for non-domestic buildings. Due to the proposed building's form, limitations to available space for PV panels and its unique mix of uses, the energy efficiency of the design cannot be reflected appropriately in the Building Regulations Part L methodology. In addition, limitations of the Part L methodology arise from comparing the building's performance with a notional building performance rather than basing the operational carbon performance on the actual, modelled whole building energy use intensity (EUI). As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations section of this report.

Energy Use Intensity (EUI)

729. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m²(GIA)/year and a space heating demand of 15 kWh/m²(GIA)/year (regulated). The estimated EUI of the proposed development is 68.6 kWh/m²/year and for the space heating demand 8.0 kWh/m²/year.
730. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - is dependent on the level of occupancy and operation of the building.
731. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

732. The proposed development has been pre-assessed under BREEAM 208 New Construction v3 - shell & core (office). The development is targeting an 'outstanding' rating with a weighted score of 87.63% for the pre-assessment and an aspiration to improve the score at post construction. The pre-assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.

733. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. A post construction BREEAM assessment is required by condition.

NABERS UK

734. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposed NABERS Design for Performance target is a minimum of 5 stars (out of 6 possible) rating and a detailed Design for Performance assessment will be carried out through RIBA stages 3 and 4.

Whole life-cycle carbon emissions

735. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as their embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon carbon target.

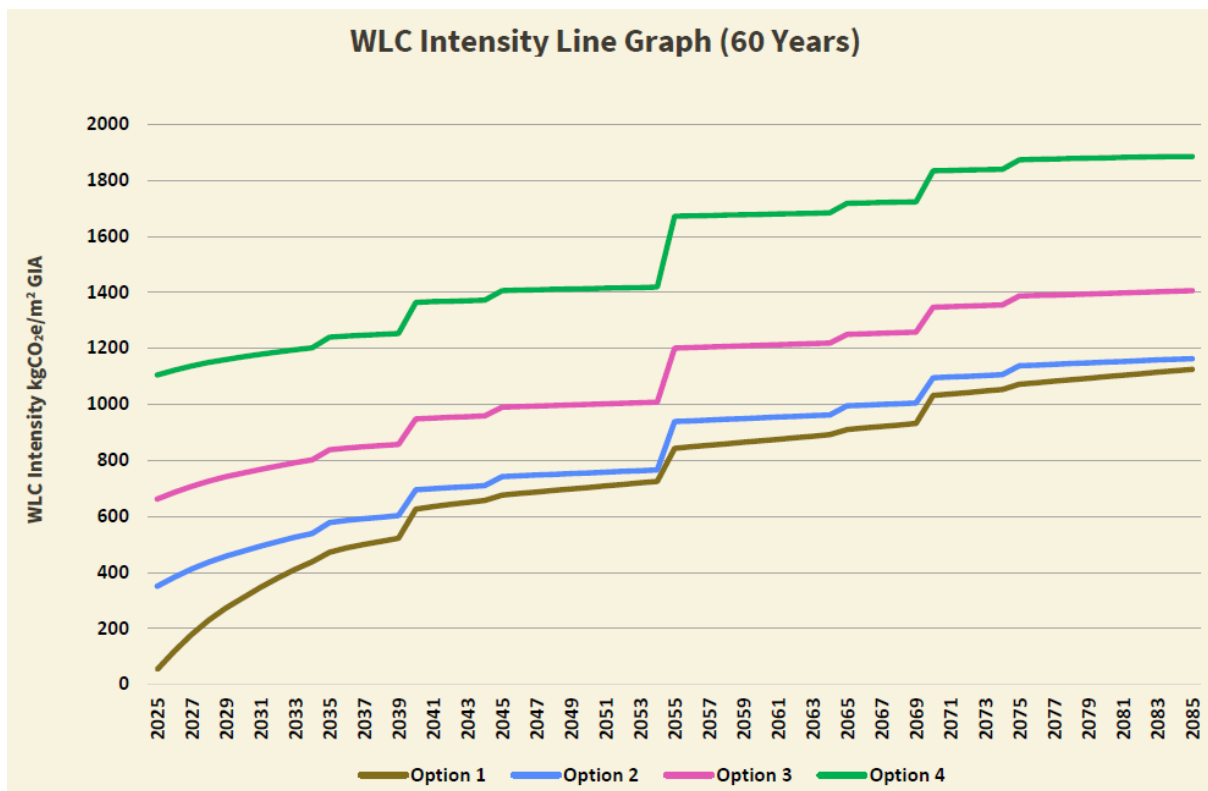
Carbon options

736. The GLA's Whole Life-Cycle Carbon Assessment guidance requires applicants for referable applications to confirm that options for retaining existing buildings have been fully explored. The emerging City Plan 2040 requires all major development to undertake an options assessment of in line with the City Corporation's Carbon Options Guidance Planning Advice Note, to establish the most sustainable and suitable approach for the site.

737. The carbon optioneering exercise undertaken for the site includes the following 4 options:

- Option 1: Minor refurbishment (no replacement MEP); 100% retention; 8,589 sqm GIA
- Option 2: Major refurbishment (new MEP and upgrade to facades, no extension); retention of 100% substructure, 95% superstructure and 60% facades; 8,238 sqm GIA
- Option 3: Major refurbishment (as option 2, lightwell infill, demolition of 8th floor and 6-storey extension); retention of 40% substructure, 63% superstructure and 60% facades; 14,105 sqm GIA
- Option 4: New construction, 32 storeys; 3% front façade; 36,306 sqm GIA

738. The following graph and table present the whole life-cycle carbon results of the options:



	Minor Refurbishment	Major Refurbishment	Major Refurbishment With Extension	New Build
Option Reference	Option 1	Option 2	Option 3	Option 4
Project Reference Period	60	60	60	60
Gross Internal Area (m2 GIA)	8,589	8,238	14,105	36,306
Net Internal Areas (m2 NIA)	6,458	Unknown	10,758	23,310
Change in GIA vs. Existing	-	351	5,516	27,717
Change in NIA vs. Existing	-	Unknown	4,300	16,852
Substructure % retained by mass	100%	100%	0%	0%
Superstructure % retained by mass	100%	95%	63%	0%
Total WLCA (incl. B6 & pre-demolition) kgCO2e/m2 GIA Module B7 is not considered	1,125	1,168	1,411	1,898
Upfront Embodied Carbon excl. sequestration (kgCO2e/m2 GIA)	54	351	662	1,105
In use and End of Life Embodied Carbon excl. B6 & B7 (kgCO2e/m2 GIA)	355	463	485	602
Estimated Whole Building Operational Carbon for building life time (B6) kgCO2e/m2 GIA)	711	347	258	179
Total WLCA (incl B6 & pre-demolition) (tCO2e) Module B7 is not considered	9,659	9,625	19,903	68,896
Total existing building demolition (tCO2e)	43	58	85	436
Upfront Embodied Carbon (A1-A5) (tCO2e)	464	2,892	9,338	40,118
In Use Embodied Carbon (B-C) (tCO2e)	3,049	3,814	6,841	21,856
Operational carbon for building lifetime (B6) (tCO2e)	6,104	2,862	3,640	6,486

739. Due to the light touch nature of the refurbishment in option 1, this will overall be the lowest carbon option, although the much higher operational carbon impacts - as only minor upgrades to the MEP systems are included – would result in a steeper increase of carbon impacts compared to option 2, almost reaching the level of option 2 after 30 years. The consultants consider higher embodied carbon impacts than shown would be likely due to the need for further façade and MEP interventions sooner than in the other options.
740. Option 2 presents a more comprehensive retrofit with, compared to option 1, a doubling of embodied carbon through new MEP installations, and only half of operational carbon impact due to new MEP and façade upgrades. Option 2's WLC graph after 60 years would be at a very similar level as option 1, but any higher economic feasibility due to improving the internal quality and energy efficiency for occupiers would need to be balanced against the loss of net internal floorspace caused by the upgrading of wall insulation and plant space requirements.

741. In option 3, the existing 8th floor is replaced by 6 new storeys, along with a lightwell infill, structural strengthening, all new fit-out and MEP. This option can also include a public and flexible ground floor to provide permeability into Leadenhall Market, as well as incorporate alterations to the basement footprint and depth to protect the archaeological finds. Compared to option 2, this option would cause a significant increase in embodied carbon impact due to the higher level of new build, however, its operational carbon would reduce further due to higher efficiencies of the MEP services systems across existing and proposed floor levels and due to replacement glazing, overall resulting in 243kgCO₂ higher WLC carbon impact per square meter, and with an overall improved commerciality compared to options 1 and 2. Option 3 provides more opportunities for sustainability improvements such as the incorporation of a roof terrace, urban greening, climate resilience measures, photovoltaics, building efficiency and high quality of the new build elements over options 1 and 2.
742. Option 4 represents a new build with re-instated front façade to protect the historic character of the street frontage. This option maximises the floorspace potential of the site in the City Cluster, including 2 basements and 32 storeys above, and therefore it would have the highest absolute WLC emissions and the highest WLC carbon impact per square meter compared to the other options. However, the operational carbon intensity would be the lowest of all options throughout the lifetime of the development as the highest façade and MEP efficiencies can be achieved in new builds.
743. Option 2 and 3 could delay the high carbon investment of a redevelopment until the decarbonisation of the grid and of industry processes will bring embodied carbon emissions closer to the net zero target. However, these options would not be able to deliver on the significant opportunities of this development to drive the wider sustainability of the City context and supplement Leadenhall Market with a high quality, flexible, public space and to integrate a Museum of London facility linked to the recently discovered archaeology and the market as major visitor destination, in addition to creating high quality office space with well-being benefits. Option 4 would facilitate greywater and rainwater harvesting, extensive urban greening, photovoltaics, accessible outdoor spaces, blue roofs, optimised facades and MEP systems and long-term climate resilience. The applicants therefore consider Option 4 the preferred approach for the site to achieve long term improvements to the sustainability of the site and to futureproof the wider City context, as set out in the final conclusion of this report.

744. The optioneering approach summarised in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City Corporation's Carbon Options Guidance to establish and evaluate the carbon impact of development options.
745. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in Policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2024 stating in paragraph 161 that the planning system should support the transition to net zero by 2050 and paragraph 164 that new development should be planned for in ways that help reduce greenhouse gas emissions. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the development of the application scheme including maximising retention of existing structure.

The application proposal:

746. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. As the base carbon value of the proposal, due to its building typology, is high, the applicants have at this stage committed to implementing the low-carbon opportunities listed below that were verified as achievable by the 3rd party reviewers:
- high contents of cement replacements in the substructure elements with up to 70-90% cement replacements, or any other measure confirmed at RIBA stage 4 to meet or exceed the proposed embodied carbon specification for concrete
 - low carbon (hydroelectrically produced) extruded aluminium elements of the façades
 - 40% re-used or other low carbon raised access floors
 - site activities, targeting 30 kgCO₂e/m²GIA A5 (excluding waste) by minimising the use of fossil fuels
 - steel mix for rolled steel sections that includes reduced carbon made products, such as electric arc furnace produced steel.
747. The existing façade would be dismantled and rebuilt using the existing stone elements and cast iron spandrel panels.

748. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development's embodied carbon emissions can be reduced significantly but fall short of the GLA's Standard Benchmark for upfront embodied carbon emissions. The measures listed below could contribute to achieving embodied carbon emissions that would help to meet the Standard Benchmark. These will be considered during the detailed design stages and include:

- low carbon plate steel and rebar for concrete
- reducing carbon from transport emissions for rebar
- maximising the use of low carbon steel for rolled steel sections
- maximise utilisation of reused raised access floor tiles or low carbon Calcium Sulphate alternatives.

749. The GLA Guidance requires applicants to use the (original) methodology developed by RICS (Royal Institution of Chartered Surveyors). RICS have published the 2nd edition which has come into full effect on 1 July 2024, requiring to follow this Version 2's requirements when completing a whole life-cycle carbon assessment. The GLA has indicated that it would not update its guidance to reflect these changes for now. The applicants therefore created a hybrid modelling approach (called 'RICS version 1 assessment with appropriate amendments') which is aligned with RICS Version 1's methodology but makes necessary updates to modelling items such as baseline material assumptions, transport distances and waste rates. These would typically result in a approx. 10% higher carbon intensity compared to using the Version 1 assumptions, and the results would ensure that the modelling will be relevant and fit for purpose for new schemes. The GLA did not comment on this approach in their response to the WLCA, and this approach therefore is considered to be acceptable.

750. The table below shows baseline whole life-cycle carbon emissions per square meter (using the modelling approach as set out in the previous paragraph) for the building in relation to the GLA benchmarks for offices at planning application stage.

Scope	Proposed (RICS V1 with appropriate amendments)	Benchmark	GLA benchmark
RICS components	kgCO2/m2	kgCO2/m2	
A1-A5	1,110	< 950	GLA standard
		< 600	GLA aspirational
A-C (excluding B6-B7)	1,557	< 1,400	GLA standard
		< 970	GLA aspirational
B6+B7	548		

A-C (including B6-B7)	2,104		
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751. The WLC RICS Version 1 Assessment Spreadsheet calculates that the proposed development would result in 76,444,192 kg CO₂e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 19,889,590 kg CO₂e (26% of the building's whole life-cycle carbon), and the embodied carbon emissions for 56,554,602 kg CO₂e (74% of the building's whole life-cycle carbon).
752. A detailed whole life-cycle carbon assessment and a confirmation of the post construction results are required by conditions.
753. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan Policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic Policy CS15 Sustainable Development and Climate Change and the emerging City Plan 2040 Policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to net zero by 2050 in accordance with NPPF (2024) paragraph 161.

Climate Resilience

754. As referenced above, significant urban greening along the east, west and upper south elevations from levels 8 to 28 where 1.5m deep planters are proposed. The Level 05 terrace would feature woodland inspired planting and climbing plants on steel trellis would provide vertical greening to buildings columns, whilst larger shrubs with high wind tolerance are placed at terrace edges to provide shelter. Greening of the edge of the level 30 terrace is also proposed, and greening as a whole is a fundamental part of the architectural approach. The development achieves an Urban Greening Factor (UGF) 0.37 which exceeds the exceeds the London Plan (2021) Policy G5(B) UGF target of 0.3.
755. In line with the extant consent, the proposed façade design has considered an optimised glazing ratio, and minimises solar gain during summer months with the recesses and

overhangs across each elevation providing a degree of solar shading. Ventilation is provided through heat recovery units. The use of green infrastructure at vertical locations will also contribute to resilience against overheating to some degree, provided this is well-chosen and remains maintained.

756. Turning to flooding, the proposed development is predicted to be of low risk of flooding from all sources, including surface water flooding. A blue/green roof system is proposed in order to attenuate stormwater, alongside other Sustainable Drainage Systems such as greywater harvesting and rainwater harvesting.
757. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.
758. A carbon options study has been carried out based on a thorough analysis of the existing building on site to establish carbon impacts, opportunities and constraints for environmental sustainability and to inform the intended transformation of the site including making the recently discovered archaeological remains of the Roman basilica publicly accessible which required the redesign of the tower's substructure and superstructure. Significantly lower WLC carbon impacts below the GLA's Standard Benchmark would be achievable only by the much lower retrofit options, however, none of these would be able to deliver significant public benefits such as the cultural offer, including public access to archaeology, of the Museum of London, and only the retrofit with extension could facilitate the addition of a new market hall with Leadenhall Market for extended permeability and amenities in the City Cluster.
759. Highest quality floorspaces with high amenity and wellbeing values can only be delivered by a redevelopment option on this site. The proposed development would optimise the quantity of floorspace for offices and for a mix of cultural and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the

City of London against a range of environmental, social and economic sustainability challenges.

760. The proposed development would reach close to the GLA's Standard Benchmark for life-cycle embodied carbon, with benefits relating to improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for recycling and reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in 18% carbon emissions beyond the Part L baseline, and an estimated low energy use intensity (EUI), as well as targeting a BREEAM "outstanding" rating. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the potential performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, and it cannot avoid demolition in accordance with Policy CS15(3), it complies with it would (taking account of the mitigation measures proposed) comply with London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

Archaeology

761. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and makes the conservation of archaeological interest a material planning consideration. Paragraph 207 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest. The City of London Local Plan 2015 states that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks

762. The site lies over part of the buried remains of the first century AD forum and basilica of Roman Londinium, which was superseded by a much larger second forum-basilica complex between AD 100 and AD 130. 85 Gracechurch Street overlies the north-east corner of the first forum and basilica and a section of the eastern parts of the second forum courtyard and eastern range of second forum buildings. The forum-basilica has very high archaeological and historical significance for its role in the history of the day to day government and economic life of London and the Roman province of Britannia. The basilica would have been home to the civic administration and the forum was the central marketplace from the late 1st to the 3rd century. The forum-basilica complex has been rediscovered in a series of archaeological excavations and 'rescue' recording exercises conducted through the 19th and 20th centuries.
763. Since the granting of the extant consent, initial investigations carried out by MOLA at the site have revealed areas of high survival of the original forum and basilica which far exceeded the extent originally anticipated. These most recent works have established that the remains of the first Roman forum-basilica have a good survival on site, although some truncation is expected from the current and previous buildings on site. In addition, remains of the second forum are also likely to be present, potential remains of a medieval building called the Garner, and remains from the post-medieval period related to the Spread Eagle Inn. The Environmental Statement describes the retention of display of the remains as a beneficial effect of the development with regards to archaeology, alongside the proposed synthesis and re-examination of all records previously produced for the forum-basilica.
764. GLAAS have provided their response, confirming that the remains of the first forum-basilica, and potentially any remains found of the second forum, would be considered nationally important while also not a formally Schedule Ancient Monument and therefore appropriate to manage under the planning system. They set out their view that an unacceptable level of harm has been avoided by the proposed retention of the first forum Tribunal remains, and that they consider the overall harm caused by the minor loss of archaeological remains necessary to construct the building cause a moderate level of less than substantial harm. They describe this as residual harm, largely offset by the significant public benefits from revealing and interpreting the site's significant. They also recommend conditions concerning investigation, excavation, evaluation, preservation, basement and foundation design, public engagement, and a management plan, all of which would be attached to any decision. A Archaeological Exhibition Space Management Plan would also be secured via s106 obligation.

765. Officers agree that the remains of the Roman Forum-Basilica are of comparable significance to be considered as a scheduled monument (per NPPF fn 75). The significant, substantive elements of these remains would be preserved, conserved and revealed to public view. This would be a major benefit that would far outweigh the impact of the scheme on the residual archaeological deposits, which would in any case be appropriately managed and mitigated through a programme of recording, excavation, evaluation and publication.
766. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.

Public Access and Inclusivity

Policy Context

767. Accessible and inclusive design is covered by NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and emerging City Plan 2040 policy HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.
768. Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.
769. The site is well-served by public transport, including London underground from Bank and Monument, national rail links from Fenchurch Street and buses from Leadenhall Street and Bishopsgate. It is noted that neither Bank or Monument are step free and the closest step free underground station is Liverpool Street Station, all underground stations exceed the recommended 50m travel distances without a rest.
770. Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. No specific drop-off points are

identified with informal drop-off anticipated along Cornhill and Leadenhall Street which are both circa 120m or on Lime Street which is 70m from the site.

- 771. Due to the limited space at ground floor, it has not been possible to provide any off-street accessible car parking. There are two blue badge car parking spaces located within George Yard located over 50m away from the site. However, it is acknowledged that these are not substitutes for an off-street bay, for example due to the parking controls which limit the hours that they can be used, they cannot be booked in advance and are a distance away.
- 772. The walking distances from key public transport nodes, safe drop-off points and on-street carparking exceed the recommended 50m without a rest. It is therefore recommended that opportunities for such resting points with accessible seating are explored, at maximum intervals of 50m along the approaches to the building from key points of arrivals. A request has been made to TfL to include within the scope of the s278 agreed with the application the exploring of opportunities to provide such resting points.
- 773. A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.
- 774. Continuing provision of the existing Blue Badge space in the area during construction is important provided it is safe for use, and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

Office Entrance

- 775. London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm. Further detail will be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes, and door furniture are designed to in line with inclusive-design best practice guidance.
- 776. The primary office entrance from Gracechurch Street is formed by two drum barrel doors and the secondary entrance off Lime Street Passage is formed by double swing doors. Providing entrances into the office which are easily identifiable and allows everyone to

use the entrance independently without additional effort, separation or special treatment.

- 777. Security barriers between the reception and main core would feature at least one barrier in each location with a minimum clear-opening width of 1000mm.
- 778. Due to limited space at ground floor office visitors would be guided through the security barriers upon arrival with the primary reception facilities located on the office floors. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2. Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through condition.
- 779. An Inclusive Access Management Plan (IAMP) for visitors and building users on points of arrival and entrances would be required and would be secured by condition.

Cycle and End of Trip Facilities

- 780. The long and short stay cycle parking would be accommodated at level four and is access via east end of the public hall. The internal access to the cycle store is via cycle lift, two lifts are provided. All gates and doors along the route would be automated and sized in accordance with Approved Document M. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users. Further detail will be secured via condition.
- 781. Two further short stay accessible cycle spaces would be provided within the public hall in close proximity to the cultural entrance and retail space.
- 782. It is noted that 5% of long stay cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. Full details of the cycle stand types and the setting out of the bike store, and end of trip facilities are reserved for condition to ensure these are well-detailed and are useable promoting a safe, inclusive and welcoming environment.
- 783. Routes from the cycle store to end of trip facilities, located on level 03, and into the primary office accommodation would be logical and doors along routes would be

automated or power assisted. Accessible end of trip facilities would be provided centrally within the floor plate in close proximity to the lifts, providing an accessible shower, toilet and lockers, further detail would be secured by condition.

Vertical Movement

784. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. All lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure. Both the cultural and office accommodation will be served by two FF lifts and four EVAC lifts. A platform lift would provide additional access from the public hall to the mezzanine retail space. Further detail regarding the design, management and maintenance of all lifts will be secured via condition.

Horizontal Movement

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

Cultural Space

786. The proposal includes cultural use within the basement and a public terrace at level 05. Access will be from the public hall via a lift serving both the basement and level 05 terrace and there will also be a staircase providing direct access to the basement from the public hall. The access to both the basement and the public viewing terrace at level 05 has been designed to be welcoming, inviting and inclusive with security at a minimum under the current security threat. The access and experience will be required to meet the aspirations of the Mayors Public London Charter and further details on inclusion measures will be provided within the IAMP.
787. The internal arrangement of the cultural space should be designed to meet the highest standards of access and inclusion, creating buildings which meet the needs of the existing and future population in line with London Plan D5 3.5.9. Further detail will be secured condition and an IAMP.
788. An end-user has not been identified for the culture use and conditions are imposed to ensure that the cultural offer is inclusive of the greatest range of people at all levels of

operation with opportunities for co-creation, co-curation, mentoring and volunteering for relevant groups.

Evacuation and Fire Safety

789. Details of the management protocol for people who require Personal Emergency Escape Plans (PEEPs), including staff training and guidance, should be reserved by condition.

Public Realm and Amenity Terraces

790. Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer.
791. The detailed design for the level 05 terrace should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.

Public Realm and Amenity Terraces

792. The office terraces are accessed via single leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via IAMP.
793. Spend areas for assistance animals are not currently identified but will be reserved by condition. It recommended that details of all landscaping are reserved by condition including surface materials, planting, seating (with options to include seating with backs and arm rests for support).

Sanitary Facilities

794. Building regulations say that wheelchair users should not have to travel more than 40m to reach sanitary facilities, including any transfer between floors (AD M 2 5.10) and there should be sanitary facilities at the point of entry. This has not currently been demonstrated, and further detail is reserved by condition.
795. The sanitary provision for the office floor accommodation would provide a mixture of gendered and non-gendered WC's in accordance with approved document Part T and at least one accessible WC and two ambulant WC's per floor.
796. The cultural space provides accessible, ambulant toilets and baby changing facilities at basement level, no sanitary facilities are provided at level 05 and users of the terrace are expected to use the facilities in the basement. Further detail will be secured via condition
797. A mixture of left- and right-hand transfer options would be provided throughout the building to accommodate a wider range of users. Further detail will be secured via condition.

Signage and Wayfinding

798. Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of 'two senses'. Details of signage and wayfinding will be secured by condition.

Inclusive Co-curation of Archaeological Exhibition Space

799. An obligation for inclusive curation would be secured in the Section 106 including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

Access and Inclusivity Conclusion

800. The proposal has been designed to ensure that the site meets the highest standard of inclusive design in line with Local Plan DM10.8 and London Plan Policy D5. In order for the proposed office and cultural uses to fulfil its goal of being an inclusive and welcoming place to work and visit high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the accessibility of the site in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Inclusive Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.
801. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

Security

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

805. The security proposals to protect the building, its users, and new areas of public realm have been developed in consultation with the City of London Police at pre-application stage, application stage, in addition to the consultation and liaison carried out with the City of London Police in the extant scheme.
806. The site would be protected HVM resistant bollards located at the building entrances at ground floor level. The bollards would be automated at these vehicle entrances to enable vehicles to access the building. These would be on private land within the site. The office entrances and public through-route are now separate, distinct from the extant scheme, while the office entries would be manned by security personnel preventing pedestrians from accessing the office lift lobbies at ground floor. Between 19:00 and 07:00 the office entries would be secured and require swipe card access, preventing any unauthorised access.
807. Concerning the public spaces at basement level and level 05, the check-in strategy would comprise of an initial ticket validation, at the ground floor before visitors can access the lower level and therefore access to these public spaces. Appropriate security checks would be undertaken, and further details of the operational and management elements of the overall security strategy would be secured via condition, and a Visitor Management Plan secured as an s106 obligation.
808. The proposal, subject to conditions and s106 obligations, is considered to be in accordance with London Plan Policy S11, Local Plan Policy DM3.2 and draft City Plan Policy S2.

Suicide Prevention

809. The City Corporation has an approved guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near the edges of balconies and terraces, as well as erecting balustrades. Policy DE4 of the emerging City Plan 2040 advises that appropriate safety measures should be included in high rise buildings, to prevent people from jumping or falling. Building Regulation K2 states the following: K2 – (A) Any stairs, ramps, floors and balconies and any roof to which people have access, Shall be provided with barriers where it is necessary to protect people in or about a building from falling. Further details about suicide prevention measures for the Public Viewing Deck will be secured via condition.

810. Those areas at specific risk within the proposal include the amenity space at higher levels of the building, and the publicly accessible space at level 05. At each of these spaces, defensive planting and balustrading which would appropriately mitigate risk is proposed and further details of suicide prevention measures alongside an associated risk assessment would be secured by condition.

Fire Safety

811. London Plan Policy D12 requires that all developments achieve the highest standards of fire safety to ensure the safety of occupants and efficient evacuation in case of an emergency. London Plan Policy D5 further mandates that the building design incorporates provisions for safe and dignified emergency evacuation for all users, including those with reduced mobility.

812. A Fire Statement, prepared by Arup, was submitted with this application, in line with London Plan Policy D12 B for major developments. The statement outlines a comprehensive fire safety strategy for the building, which includes:

1. A phased evacuation strategy;
2. Refuge locations with emergency voice communication systems provided on each level within each fire-fighting shaft;
3. Evacuation lifts, used to assist occupants who cannot evacuate independently using the stairs;
4. Fire-fighting shafts with mechanical smoke protection;
5. Fire-fighting stairs with wet riser provision;
6. An automatic fire detection and alarm system throughout the building;
7. An automatic sprinkler system throughout;
8. All elements of structure achieving a period of 120 minutes fire resistance;
9. Compartment floors throughout the building, achieving a period of 120 minutes fire resistance;
10. External fire spread protection from neighbouring structures; and
11. The basement being provided with a mechanical smoke clearance system.

813. Details of inclusive emergency procedures would be requested under the Inclusive Access Management Plan to ensure escape routes and staff training has been considered for disabled people including where there is not a separate firefighting and evacuation lift.
814. The City's District Surveyor has reviewed the Fire Statement and raised no objection, confirming that the proposal complies with London Plan Policies D5 and D12. A condition would ensure the development is undertaken in accordance with the approved Fire Statement. Accordingly, officers consider the proposed development is acceptable in terms of fire safety.

Assessment of Public Benefits and paragraph 215 NPPF balancing exercise

815. Under s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess. Under Section 72 of the same Act, the Corporation also has a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of a conservation area. Considerable importance and weight must be given to the duties in sections 66 and 72 when carrying out the balancing exercise set out in paragraph 215 of the NPPF.
816. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paragraphs 212 and 213).
817. A low level of less than substantial harm is found to the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I).
818. Given the proposal would result in harm to the significance of a Conservation Area, and of listed buildings, including Grade I listed buildings, there is a strong presumption

against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits. Paragraph 215 of the NPPF, which states 'where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use'. Paragraph 216 of the NPPF states that 'the effect of an application of the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset'.

819. Paragraph 218 then sets out that 'local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible'.

820. Within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a designated heritage assets and weighing that harm against the benefits. The decision maker does not have to go about balancing harm against benefits in a particular way.

821. The National Planning Practice Guidance states that "public benefits...could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits".

822. The key social, environmental, and economic public benefits of the proposal are considered to be as follows:

Economic Benefits

823. Securing a strategic mixed-use development within the City, that would provide land uses which support the diversification, vitality and growth as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including the provision of an uplift of c. 24,000 sqm delivering approximately 1.5% towards the total office floorspace target (1.6 million sqm gross) to be achieved by 2040 as aspired to by the City Plan 2040, which is estimated to

accommodate between 1,700 and 2,205 full-time equivalent (FTA) jobs, an uplift of 1,260 to 1,630 FTE jobs, and increased spending in the locality boosting local businesses and a post-covid resurgence including job creation through construction. This is a benefit which should be afforded moderate to high weight.

824. The provision of a unique retail offering through the Public Hall and its associated spaces, supporting and diversifying its primary business function complemented by attractive overspill external space, will enhance the quality, vibrancy, and activity of the area and so contribute to the City's economy and character and provide amenities for its visitors, businesses, workers and residents, particularly in this important location adjacent to Leadenhall Market.
825. The proposed cultural and exhibition space would create a compelling and inclusive public offer in the area in line with the Destination City agenda and increase spend, as well as drive daytime, evening and weekend footfall and provide a more diverse leisure opportunity for workers, residents and visitors.
826. The overall quality of the development would transform and regenerate this important site within the City Cluster, with attractions further enriching the distinct local character through improved public realm, wayfinding and cultural proposals and would improve worker wellbeing and productivity as well as encourage wider investment and complement existing neighbourhood leisure experiences.
827. Collectively, their nature and extent, the aforementioned benefits, are attributed moderate to high weight.

Environmental Benefits

828. The proposed building, its east west through route, its improvements to Gracechurch Street, and the provision of the Public Hall, result in an exemplary modern building of high architectural quality, considered to build on the spirit of the place, its local history and its distinctiveness.
829. The proposals result in slight enhancements to the Conservation Area as follows:
- (i) the restoration of the principal historic façade of 85 Gracechurch Street;
 - (ii) the reinstatement and reinterpretation of a historic space through the site; and

(iii) the further activation of the streetscape surrounding the market, amplifying a sense of the historic experiential setting to the market which would have been defined by the bustle of diverse commercial trade and consumption (D9 C:1;d-e).

830. The proposal would deliver significant commercial floor space in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy and would promote active travel for a range of users.

831. The significant increase and extent of urban greening on the buildings and in the public spaces would provide a healthy, sustainable and biodiverse environment for all to access. The urban greening would achieve a UGF score of 0.37, in line with the emerging City Plan Policy targets.

832. Securing a development that is environmentally responsible in that it would seek to reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles, including an all electric energy strategy.

833. The abovementioned benefits should be afforded moderate weight.

Social Benefits

834. The proposals will improve this part of the city by delivering a more inviting, pleasant, safer and easily accessible, inclusive and well-connected place for all through the reinstatement of an east west through route, improving permeability in the area and creating an additional link between Leadenhall Market and Gracechurch Street, attracting a greater and more diverse range of people to the City at different times of the day and on different days of the week.

835. The proposed Heritage Walkway provides an attractive elevated public space offering unique views across this part of the City, given its proximity to the Grade II* listed Leadenhall Market and its views towards the Grade I listed Lloyds of London, linking together the surrounding context of London through different eras and the Roman forum-basilica at basement level.

836. This unique and compelling mix of public cultural uses would attract visitors, increase tourism, support and enhance the aspirations of Destination City. The above social benefits are collectively afforded moderate weight.

837. The public exhibition of the for the nationally significant archaeological find of the first Roman forum-basilica of London in-situ, and associated spaces for educational purposes as well as display of other archaeological remains found on site, constitutes a significant social benefit.

Conclusion

838. A When applying paragraph 215 of the NPPF, the above-mentioned public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report.
839. When carrying out the balancing exercise, the less than substantial harm caused to the Church of St Michael Cornhill and Tower Bridge as Grade I Listed Buildings and as such designated heritage assets of the highest order, and to the Bank Conservation Area must be taken into account and afforded great weight.
840. When carrying out the Para 215 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable importance and weight should be given to the desirability of preserving the listed buildings or their setting and to the desirability of preserving or enhancing the character or appearance of the conservation area. Giving the statutory duties considerable importance and weight, in this case it is the view of officers that there is clear and convincing justification for the harm and the collective package of the public benefits secured, which flow from the development proposals, would outweigh the heritage harms identified to the designated heritage assets some of which are of the highest calibre, thus complying with Para 215 of the NPPF.

CIL and Planning Obligations

841. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
842. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

843. The proposed development is a phased application. Regulation 8(3a) of the Community Infrastructure Levy (Amendment) Regulations 2014 allows for each phase of the development to be treated as a separate chargeable development for levy purposes. In this instance, the applicant proposes phases which would mean Mayoral and City CIL would only be payable upon implementation of construction, the first stage of which is installation of the basement level 2 slab, because the earlier phase would not create any additional floor space.
844. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy Regulations 2010 (as amended).
845. CIL contributions and City of London planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excluding indexation)	Forwarded to the Mayor	City's charge for administration and monitoring	Payment Terms
MCIL2 payable	£5,129,344.98	£4,924,171.18	£205,173.80	Upon installation of the basement level 2 slab

City CIL

Liability in accordance with the City of London's policies	Contribution (excluding indexation)	Available for allocation	Retained for administration and monitoring	Payment Terms
City CIL	£2,121,750.00	£2,015,662.50	£106,087.50	Upon installation of the basement level 2 slab

Section 106 Obligations

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

Planning Obligations (excluding indexation)	Contribution (excluding indexation)	Available for allocation	Retained for administration and monitoring	Payment terms
Affordable Housing	£1,414,500.00	£1,400,355.00	£14,145.00	Upon implementation of the development
Local, Training, Skills and Job Brokerage	£848,700.00	£840,213.00	£8,487.00	Upon implementation of the development

Carbon Offset Contribution (as designed) Not indexed	£261,915.00	£261,915.00	£0	Upon completion of the development
Security Measures Contribution (Eastern City Cluster)	£282,900.00	£280,071.00	£2,829.00	Upon implementation of the development
S106 Monitoring Charge	£5,500.00	£0	£5,500.00	Upon commencement of the development
Total liability in accordance with the City of London's policies	£2,813,515.00	£2,782,554.00	£30,961.00	

- Local Procurement Strategy – Demolition and Construction Phases
- Employment and Skills Plan
 - Demolition Employment and Skills Plan (to be submitted to the City no later than six weeks prior to first preparatory operations)
 - Construction Employment and Skills Plan (to be submitted to the City no later than six weeks prior implementation of the development)
- Delivery and Servicing Plan – to include but not limited to the following provisions:
 - No servicing outside the hours of 23:00 – 07:00 on Tuesdays, Wednesdays, Thursdays, Fridays and Saturdays
 - No servicing outside the hours of 21:00 – 07:00 on Sundays and Mondays
 - All servicing to be undertaken within the public hall
 - A restriction of vehicles no heavier than 7.5 tonnes and no larger than 8 metres in length permitted to service the site, with cargo bikes to be used whenever possible
 - A requirement for all deliveries using goods vehicles to use a pre-booking system
 - A restriction of no more than 22 two-way trips per day by goods vehicles
 - Details of the goods vehicle servicing booking system
 - Submission no later than six months prior to anticipated occupation

- Travel Plan (to incorporate a Cycling Promotion Plan including guidance to promote responsible cycling)
 - Submission no later than six months prior to anticipated occupation
- Construction Monitoring Contribution
 - £53,820 for the first year of construction, due upon commencement of the development
 - £46,460 for each subsequent year of construction, due on each anniversary of commencement until practical completion
- 'Be Seen' Energy Performance Monitoring Submissions
- Utility Connection Requirements
- TfL Section Agreement
- Carbon Off-Setting Document Submissions
- Provision of Viewing Deck, to include but not limited to the following provisions:
 - Provision of the Viewing Deck no later than upon occupation of the development
 - Submission of Viewing Deck Management Plan no later than six months prior to occupation
 - Free of charge daily public access to the whole of the Viewing Deck between the hours of 10:00 and 19:00 or nautical dusk, whichever is later, excluding Christmas Day, Boxing Day and New Year's Day (save for circumstances of force majeure, requirement to carry out essential cleaning, maintenance, fit-out or other structural or non-structural alteration or occasional temporary closure not exceeding one day per calendar year to assert rights of proprietorship)
 - No private events to take place in any area on the viewing deck between the hours of 10:00 and 19:00 or nautical dusk, whichever is later
 - All necessary and reasonable costs relating to fit-out and landscaping covered
 - Provision of the viewing deck for the lifetime of the development
 - Review of the Viewing Deck Management Plan for the first five years post-occupation and upon request of the City of London Corporation each year thereafter
- Provision of Archaeological Exhibition Space and submission of Archaeological Exhibition Space Management Plan, to include but not limited to the following provisions:
 - Provision of the Archaeological Exhibition Space no later than upon occupation.

- Submission of Archaeological Exhibition Space Management Plan no later than six months prior to occupation
- Free of charge daily public admission (including for restricted free of charge public events in the bookable area which may require booking for public groups such as school trips) to the exhibition space between the hours of 10:00 to 17:30 seven days a week, excluding Christmas Day, Boxing Day and New Year's Day (save for circumstances of force majeure, requirement to carry out essential cleaning, maintenance, fit-out or other structural or non-structural alteration or occasional temporary closure not exceeding one day per calendar year to assert rights of proprietorship)
- No private events to take place in any part of the Archaeological Exhibition Space between the hours of 10:00 to 17:30
- All necessary and reasonable costs relating to full fit-out covered
- Details of the curation process for the space
- Provision of Archaeological Exhibition Space for the lifetime of the development
- Review of the Archaeological Management Plan for the first five years post-occupation and upon request of the City of London Corporation each year thereafter, including case studies and visitor numbers.
- Bull's Head Passage Residential Construction Impact Fund (up to £20,600, indexed, with provision to increase by up to 25% if required)
- Provision of Business Innovation Space
- TFL Cycle Infrastructure Contribution (£90,000.00, indexed)
- Provision of Public Route and Hall, to include
 - Specification
 - Public Hall and Route Access and Management Plan
 - Public access available 24 hours a day seven days a week (save for circumstances of force majeure, requirement to carry out essential cleaning, maintenance, fit-out, servicing or other structural or non-structural alteration or occasional temporary closure not exceeding one day per calendar year to assert rights of proprietorship)
- Television Interference Survey
 - First Television Interference Survey to be carried out no later than three months prior to commencement
 - Second Television Interference Survey to be carried out no later than three months post completion of the development
- Wind Audit (if requested within five years past completion of the development)

- Solar Glare Assessment (if requested within five years past completion of the development)

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

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

1. Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
2. Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
3. Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

848. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. A detailed assessment of inclusivity and access benefits and constraints is provided in the Public Access and Inclusivity section above. As noted in that section a number of conditions are recommended to ensure that the proposed benefits are delivered and that further details are submitted for approval to ensure that the development meets best practice and provides for a highest standards of accessible and inclusive design as required by policy. It is the view of officers that a decision to grant permission in this case would reduce barriers to access for disabled people through the provision of a well-designed building (including publicly accessible spaces), and an enhanced and step-free public realm. The absence of a blue badge parking space is considered acceptable in this circumstance given the unique site constraints the building faces as described throughout the report above, and the accessibility and inclusivity sections of this report and transport sections of this report address this matter further. Officers also consider that the provision of accessible floorspace, and publicly accessible garden, learning space, ambulant toilets and baby changing facilities would advance equality of opportunity for a number of groups sharing protected characteristics.

849. The proposed development would not result in an adverse impact on the ability to use the surrounding churches as places of worship and religious observance. As such, there

would be no impact on those who share a protected characteristic relating to religious beliefs and practices.

Human Rights Act 1998

850. It is unlawful for the City, as public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR)).
851. Insofar as the grant of planning permission would result in interference with right to private and family life (Article 8 of the ECHR), particularly regarding residential amenity of neighbouring properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme, and therefore necessary in the interests of the economic well-being of the country. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby residential properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policies DM10.7 and DM15.7 and emerging City Plan 2040 Policies DE7, HS3 and HL3.
852. Insofar as the grant of planning permission would result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

Conclusions and Overall Planning Balance

853. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies including the NPPF and guidance, SPDs and SPGs and relevant advice, the draft Local Plan and considering all other material considerations. The determination must be made in accordance with the development plan unless material considerations indicate otherwise.
854. The application relates to a site located at the northern end of Gracechurch Street, bounded by Gracechurch Street to the west, the New Moon Public House to the north, Bulls Head Passage to the south, and Leadenhall Market to the north and east. The site is located within the Leadenhall Market Conservation Area, and there are a number of other designated heritage assets in the surrounding area, including Leadenhall Market

itself (Grade II*), St Michael Cornhill (Grade I), St Peter Upon Cornhill (grade I), Lloyds Building (grade I), Nos. 12 & 14-19 Leadenhall Street (grade II), Nos. 81-82 Gracechurch Street (Grade II), Former Ship Tavern, Lime Street (Grade II), Nos. 7-9 Gracechurch Street (Grade II), and the Tower of London World Heritage Site.

855. The proposal is for the 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. The development has a maximum height of 147.9m above ordnance datum (AOD) and would be 31 storeys high inclusive of plant levels.
856. An associated listed building consent application (25/00548/LBC) has submitted for partial demolition and reconstruction works to the party walls between 83-87 Gracechurch Street, 81-82 Gracechurch Street, and Leadenhall Market, stabilisation of retained sections and integration of the party wall to the proposed Development at 83-87 Gracechurch Street, currently under consideration.
857. Objections have been received from statutory consultees including Historic England and the CAAC in relation to the overall scale and height of the proposed development, which they consider would cause harm to the Grade II* Leadenhall Market, Leadenhall Market Conservation Area, Bank Conservation Area, St Michael's Church Cornhill and the Chapel of St Peter ad Vincula. Historic England have also found low level less than substantial harm to the Tower of London World Heritage Site and referred to harm to the ability to appreciate attributes of the OUV of the World Heritage Site and the contribution that this development would make to a greater cumulative impact. They have however noted that the harm would be less than the consented scheme.
858. The site is within the Central Activities Zone in a highly sustainable location, and within the City Cluster. The proposal would deliver a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.

859. The proposal provides a significant increase in office floorspace – an uplift of c. 24,000 sqm delivering approximately 1.5% towards the total office floorspace target (1.6 million sqm gross) to be achieved by 2040 as aspired to by the City Plan 2040, which is estimated to accommodate between 1,700 and 2,205 full-time equivalent (FTA) jobs, an uplift of 1,260 to 1,630 FTE jobs. Additionally, the lower floors are designed to be capable of being taken up by SME or flexible working operators while the upper floors provide larger more regular floor plates suitable for a range of office occupiers.
860. Architecturally, the proposal strikes the overarching balance of growth need and heritage conservation, which is at the heart of the strategic balance of the Plan-led approach to growth in the CoL. This is in line with the long-term Plan-led approach to consolidating substantial uplift in commercial uses in the defined City Cluster of tall buildings, allowing for the capacity of the site to be optimised relative to strategic heritage constraints, whilst allowing for higher densities commensurate with the uniquely high levels of economic agglomeration and public transport connectivity in this part of the CoL and wider CAZ.
861. The plan form and cranked and fluted detailing of the tower above all derive from the surroundings. Whilst some conflict has been found with some heritage assets (addressed in detail within this report), it is considered that overall the proposals would very much build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness in accordance with NPPF policies.
862. The proposal to preserve the remains of the Forum-Basilica in-situ, conserve them and reveal them to public view within the new exhibition space would be a unique and significant benefit of the scheme. Conditions are recommended concerning investigation, excavation, evaluation, preservation, basement and foundation design, public engagement, and a management plan. A Visitor Management Plan and Cultural Strategy would also be secured via s106 obligation. Subject to the imposition of the aforementioned conditions, the proposed development would comply with policies DM12.4 of the Local Plan, HE1 and HE2 of the emerging City Plan 2040 and HC1 of the London Plan.
863. A low level of less than substantial harm is also found to the Church of St Michael Cornhill (Grade I), and slight levels of less than substantial harm to the Bank Conservation Area and Tower Bridge (Grade I).

864. The proposal would optimise the use of land, delivering high quality office space, and a substantial proportion of publicly accessible space which includes public access and exhibition of what is a nationally significant archaeological find in the Roman forum-basilica remains. The proposals would constitute thoroughly Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3, 5 and 6.
865. A carbon options study has been carried out to establish carbon impacts, opportunities and constraints for environmental sustainability and avoiding demolition. It concludes that the intended transformation of the site, including making the recently discovered archaeological remains of the Roman basilica publicly accessible, providing highest quality floorspaces with high amenity and wellbeing values and climate resilient design, along with a range of urban greening measures and benefits relating to the activation and diversification of the local area, can only be fully delivered by a redevelopment on this site, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.
866. The proposed development would reach close to the GLA's Standard Benchmark for life-cycle embodied carbon. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for recycling and reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in 18% carbon emissions beyond the Part L baseline, and an estimated low energy use intensity (EUI), as well as targeting a BREEAM "outstanding" rating. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the potential performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, and it cannot avoid demolition in accordance with Policy CS15(3), it complies with (taking account of the mitigation measures proposed) London Plan Policies SI 2, SI 7, Local Plan Policies CS15 (as a whole) and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies

with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

867. In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Cycle parking and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. A lower quantum of cycle parking than is required by development plan policy has been accepted in this instance given the unique nature of the site, where tall buildings would typically be serviced via extensive basements which are limited in the context of the need to preserve and exhibit the nationally significant archaeological finds at the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistics guidance. The building is proposed to be serviced overnight using the Public Hall, with details of the delivery and servicing secured by planning obligation. It is considered at this stage that the proposed servicing arrangement would be acceptable.
868. In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed and are considered acceptable subject to mitigation, conditions and planning obligations where relevant. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant.
869. Any potential impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.

870. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

871. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design (including London Plan tall building policy D9), culture, environmental and public realm related policies, as well as relevant policies related to sustainability and including Policy CS15 as a whole (while noting that demolition cannot be avoided in accordance with Policy CS15(3)).

872. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, and public realm would be complied with that notwithstanding the conflict with CS12 (Historic Environment), DM12.1 (Managing Change affecting all heritage assets and spaces), DM12.2 (Development in Conservation Areas), DM16.3 (Cycle Parking) and London Plan Policy T5 (Cycle Parking), and CS15 (Sustainable Development and Climate Change) clause (3) ; Emerging City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets), AT3 (Cycle Parking) and London Plan HC1 (Heritage Conservation and Growth), the proposals comply with the development plan when considered as a whole.

873. Other than the significant effect that the proposal will have to advance Local Plan Strategic Objective 1 to maintain the City's position as the world's leading international financial and business centre by providing c. 34,000 sq.m (GIA) of sustainable Grade A office floorspace, there are other benefits that would weight in favour of the proposed development when assessed against the local and national planning policies, as set out below:

- Securing a strategic high-quality mixed-use development within the City, that would provide land uses which support the diversification, vitality and growth of the City which contributes to the Destination City objectives;

- Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM 'Excellent' and reduce waste;
- Delivering a proposal which would build on the spirit of the place, local history and distinctiveness through its detailed design approach and, overall, enhancing local history and distinctiveness;
- Reinstating an east-west route through the site, increasing permeability, appropriately and effectively improving links to Gracechurch Street and Leadenhall Market;
- The provision of a Public Hall, envisioned as an extension to Leadenhall Market, providing a flexible mixed-use space achieving laudable activity which aspires to foster movement, socialising and public engagement;
- The provision of a Heritage Walkway at fifth floor level, offering public views over the rooftops of Leadenhall Market, the Grade I-listed Lloyd's of London, and the surrounding Conservation Area;
- The preservation of the nationally significant archaeological find of London's first Roman forum-basilica, in-situ;
- A public, immersive and engaging exhibition of these remains; and
- Wider improvements to the public realm on Gracechurch Street.

874. As noted above less than substantial harm has been found to a number of heritage assets. Giving considerable importance and weight to the statutory duties in Section 66 and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990, including the desirability of preserving the significance of listed buildings, it is considered that this harm would be outweighed by the heritage and public benefits of the scheme. The public benefits include the delivery of commercial growth in a highly sustainable location, the retention of the nationally significant remains of the first Roman forum-basilica in London and its subsequent opening to the public through an exhibition space, alongside the new Public Hall and Heritage Walkway at fifth floor level, all resulting in a compelling and unique cultural offer. Additionally, the proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality, particularly at Leadenhall Market nearby. As discussed above, the paragraph 215 NPPF heritage balance is considered in this instance to be struck in favour of the scheme as the public benefits outweigh the less than substantial harm identified.

875. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S.106 agreement. The previous planning permission granted in October 2023 for a tall building on the site, is also a material consideration which weighs in favour of granting planning permission.
876. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.
877. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

- Landscaping Design and Access Statement (27th March 2025)
- Design and Access Statement (27th March 2025)
- MOLA Cultural Plan (27th March 2025)
- Environmental Statement Non-Technical Summary (27th March 2025)
- Environmental Statement Volume 1 (27th March 2025)
- Environmental Statement Volume 2 (27th March 2025)
- Environmental Statement Volume 3 (27th March 2025)
- Heritage Townscape and Visual Impact Assessment (27th March 2025)
- Ventilation and Extraction Statement (27th March 2025)
- Infrastructure and Utilities Statement (27th March 2025)
- Planning Statement (27th March 2025)
- Detailed Circular Economy Statement (27th March 2025)
- Whole-Life Cycle Optioneering Report (27th March 2025)
- Whole-Life Cycle Optioneering Spreadsheet (27th March 2025)
- Whole-life Cycle Carbon Assessment (27th March 2025)
- GLA Circular Economy Spreadsheet (27th March 2025)
- GLA Be Seen Spreadsheet (27th March 2025)
- GLA Carbon Emission Spreadsheet (27th March 2025)

- WLCA Spreadsheet (27th March 2025)
- Transport Assessment(27th March 2025)
- Cycling Promotion Plan (27th March 2025)
- Equality Statement (27th March 2025)
- Flood Risk and Drainage Assessment (16th May 2025)
- Phase 2 Contaminated Land Assessment (27th March 2025)
- Geotechnical Geo-Environmental Deskt Study (27th March 2025)
- Fire Strategy (27th March 2025)
- Statement of Community Involvement (27th March 2025)
- Arcaheological Desk-Based Assessment (27th March 2025)
- Health Impact Assessment (27th March 2025)
- Ecological Assessment (27th March 2025)
- BREEAM Ecological Appraisal (27th March 2025)
- Outdoor Thermal Comfort Assessment (27th March 2025)
- Economic Statement (27th March 2025)
- Construction Environmental Management Plan (27th March 2025)
- Workplace Travel Plan (27th March 2025)
- Delivery, Servicing and Waste Management Plan (27th March 2025)
- Constructions Logistics Plan (28th March 2025)

Representations – Members of the Public

14/05/2025	Will Ryan
03/06/2025	Dr Chris Blatchley
16/06/2025	Dr Chris Blatchley

Representations/Consultation Responses

16/04/2025	Heathrow Airport Ltd.
17/04/2025	London City Airport
17/04/2025	NATS Safeguarding
22/04/2025	Natural England
22/04/2025	Natural England
28/04/2025	Environment Agency
28/04/2025	London Borough of Tower Hamlets
02/05/2025	Historic England

02/05/2025	Transport For London
02/05/2025	Historic England
	City of London Conservation Area Advisory Committee
05/05/2025	
06/05/2025	Thames Water
06/05/2025	Thames Water
07/05/2025	London Borough of Camden
12/05/2025	Southwark Council
16/05/2025	Surveyor To The Fabric - St Paul's Cathedral
19/05/2025	Royal Borough of Greenwich
05/06/2025	Westminster City Council
05/06/2025	Thames Water
11/06/2025	London Museum
12/06/2025	Transport For London
13/06/2025	City of London Archaeological Trust
23/06/2025	Greater London Authority

APPENDIX A – Reasoned Conclusions on Significant Effects

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

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

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

The applicants determined and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, archaeology, noise & vibration, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual impact, climate change, greenhouse gas emissions, and cumulative effects.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space, a Public Hall, and cultural uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to be implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide (all figures GIA excluding plant):
 - Office (Class E(g)(i)) – 34,771sq.m
 - Flexible Retail/Food and Beverage (Class E (a/b), drinking establishments, and hot food takeaway use) – 344sq.m
 - Public Hall (Sui Generis) – 596sq.m
 - Cultural Exhibition, Basement Level (Sui Generis) – 478sq.m
 - Public Cultural Space, Level 05 (Sui Generis) – 136sq.m

REASON: To ensure the development is carried out in accordance with the approved plans.

2. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant), or for use as a drinking establishment, or for use as a hot food takeaway, and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order

1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.

3. The areas within the development marked as cultural floorspace at basement level, and at level 05, as well as the Public Hall, as indicated on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that the public benefits of the cultural offer are provided and retained throughout the Pavilion Building in accordance with Local Plan Policy CS11. The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

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

APPENDIX B - Policies

Relevant London Plan Policies

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspace
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views

- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Planning for Equality and Diversity in London SPG (October 2007);
- All London Green Grid SPG (March 2012);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Transport, Walking and Cycling LPG (November 2022)
- Sustainable Design and Construction SPG (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- London World Heritage Sites SPG (March 2012);
- Social Infrastructure SPG (May 2015);

- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016);
- Mayor's Transport Strategy (2018);
- Public London Charter LPG (September 2021);
- Optimising Capacity – A Design Led Approach LPG (June 2023);
- Urban Greening Factor LPG (February 2023);
- Characterisation and Growth Strategy LPG (June 2023); and
- Draft Fire Strategy LPG (February 2022).

Emerging City Plan 2040

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

- Policy OF3 Temporary 'Meanwhile' Uses
- Strategic Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy RE3 Specialist Retail Uses and Clusters
- Strategic Policy S6: Culture and Visitors
- Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5 Evening and Night-Time Economy
- Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Policy N1 Infrastructure Provision and Connection
- Policy IN1: Infrastructure Capacity
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and Elevated Public Spaces
- Policy DE5: Shopfronts
- Policy DE6: Advertisements
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- Strategic Policy S9: Transport and Servicing
- Policy VT1: The impacts of development on transport
- Policy VT2 Freight and Servicing
- Policy VT3: Vehicle Parking
- Policy VT5: Aviation Landing Facilities
- Strategic Policy S10: Active Travel and Healthy Streets
- Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Policy AT2: Active Travel including Cycling
- Policy AT3: Cycle Parking

- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to Historic Environment Development
- Policy HE2: Ancient Monuments and Archaeology
- Policy HE3: Setting of the Tower of London World Heritage Site
- Strategic Policy S13: Protected Views
- Strategic Policy S14: Open Spaces and Green Infrastructure
- Policy OS2: City Urban Greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5 Trees
- Strategic Policy S15: Climate Resilience and Flood Risk
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR3 Sustainable Drainage Systems (SuDs)
- Policy CR4 Flood Protection and Flood Defences
- Strategic Policy S16: Circular Economy and Waste
- Strategic Policy S26 Planning Contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023
- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017

- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

Relevant Local Plan Policies

CS1 Provide additional offices

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

CS2 Utilities infrastructure

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

CS3 Security and Safety

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

CS4 Planning contributions

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

CS10 Design

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

CS11 Visitor, arts and culture

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

CS12 Historic environment

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

CS13 Protected views

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

CS15 Sustainable development and climate change

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

CS16 Public transport, streets and walkways

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

CS17 Waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Flood risk

To ensure that the City remains at low risk from all types of flooding.

CS19 Open spaces and recreation

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

CS20 Retailing

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS22 Social infrastructure and opportunity

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

- a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
- b) reasonable gas and water supply considering the need to conserve natural resources;
- c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
- d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
- e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;

- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

- a) the amenity of residents and other noise-sensitive uses;
- b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises,

customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and

their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

- a) immediately overlook residential premises;
- b) adversely affect rooflines or roof profiles;
- c) result in the loss of historic or locally distinctive roof forms, features or coverings;
- d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

DM12.4 Ancient Monuments and Archaeology

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in

the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;

b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;

c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;

d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered.

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land and water quality

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

- a) road dangers;
- b) pedestrian environment and movement;
- c) cycling infrastructure provision;
- d) public transport;
- e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

- a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
- b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

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

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM 18.3 Flood protection and climate change resilience

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

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

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.

2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

Policy DM 22.2 Provision of public toilets

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the

incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

APPENDIX C – Conditions and Informatives

CONDITIONS

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

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

- 2 (a) Prior to demolition of the development: full details of the pre- demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

(b) Prior to commencement of the development, excluding demolition: a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages reuse and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

- 3 Prior to the commencement of Phase 1 of the development, a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON: To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

- 4 Prior to the commencement of Phase 1 of the development, a Leadenhall Market Plant Rationalisation Study must be submitted and approved in writing by the local planning authority. It must set out:
 - a. The steps taken to engage with Leadenhall Market regarding potential plant rationalisation within an enclosure attached to the north elevation of 85 Gracechurch as shown as safeguarded on drawing ref P3200 Rev. 5.
 - b. If applicable, a detailed design of the plant enclosure for approval.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2.

- 5 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DMI0.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 6 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 7 No cranes shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport.

REASON: To ensure that the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or London City Airport through penetration of the regulated airspace

- 8 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 9 Prior to the commencement of Phase 1 of the development, a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate

measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

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

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

- 11 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 12 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of

vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

- 13 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

- 14 Prior to the commencement of Phase 1 of the development, the detailed design of all wind mitigation measures will be submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 15 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site

is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 16 Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 17 The development shall incorporate such measures as are necessary within the site to resist structural damage and to protect the approved new public realm within the site, arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby

permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 18 Prior to the commencement of Phase 1 of the development, the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.7 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 100m³;
 - (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works; and
 - (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

- 19 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) A Lifetime Maintenance Plan for the SuDS system to include:
 - A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - A Maintenance Inspection Checklist/Log;
 - A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required, and the costs incurred to maintain the system.

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.

- 20 Prior to the commencement of Phase 1 of the development, details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

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

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DMI0.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 22 Prior to the commencement of Phase 1 of the development details of the structural design and reduction of embodied carbon emissions of the proposed superstructure shall be submitted to and approved in writing by the local planning authority.

REASON: To ensure whole life-cycle carbon emissions are further reduced in compliance with Policy SI 2 of the London Plan.

- 23 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E and sui generis) and any Class E (office) kitchens. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place and retained for the life of the building.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

- 24 No cooking shall take place within any Class E or sui generis use hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Flues must terminate at roof level or an agreed high-level

location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. Any works that would materially affect the external appearance of the building will require a separate planning permission.

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

- 25 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' 2nd Edition dated May 2022 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

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

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

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

- 27 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter. A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

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

- 28 Prior to first occupation confirmation shall be provided that either: all water network upgrades required to accommodate the additional flows to serve the development have been completed; or a housing and infrastructure phasing plan has been agreed with Thames Water to allow occupation. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing 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.

- 29 No later than 3 months after completion of the building and prior to the development being occupied, a post-completion Circular Economy Statement, to include details of material passports for the retained and proposed materials, shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

- 30 Prior to the installation of any generator a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing necessary to meet that purpose and shall not be used at any other time.

REASON: In order to ensure that the generator does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan Policies SI1 and SD4 D.

- 31 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

- 32 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall

be submitted to and approved in writing by the Local Planning Authority.

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

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

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

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

- 34 A post-construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or a minimum rating of 'Excellent' as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Outstanding' rating) shall be submitted as soon as practicable after practical completion.

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

- 35 No later than 3 months after completion of the building to shell and core and prior to the development being occupied, the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment shall provide an update to the detailed Whole Life-Cycle Carbon Assessment submitted after RIBA Stage 4, including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance, unless otherwise agreed. The developer shall use the post construction tab of the GLA's WLC assessment template and the relevant forms must be completed accurately and in their entirety in line with the criteria set out in the latest GLA's WLC assessment guidance.

REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

- 36 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 399 long stay pedal cycle spaces, and a minimum of 43 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and

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

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

- 37 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24.

- 38 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.

REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and London Plan policy: TS

- 39 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 24 showers and 266 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

- 40 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

- 41 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.

REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.

- 42 Servicing of the premises shall only be carried out between the hours of 23:00-07:00 on Tuesday, Wednesday, Thursday and Friday evenings and 21:00-07:00 on Saturday, Sunday and Monday evenings. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM21.3.

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

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

- 44 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

- 45 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DMI 7.1.

- 46 No doors, gates or windows at ground floor level shall open over the public highway.

REASON: In the interests of public safety and to accord with Section 153 of the Highways Act 190

- 47 Unless otherwise approved by the Local Planning Authority, no plant or telecommunications equipment shall be installed on the exterior of the building, including any plan or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 48 With the exception of the public terrace at Level 5, the terraces hereby permitted shall not be used or accessed between the hours of 22:00 (or nautical dusk, whichever is later) on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

- 49 No live or recorded music shall be played on the level 5 terrace between the hours of 22:00 on one day and 08:00 on the following day.

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

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

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

- 51 Live or recorded music shall not be in excess of 65dBA at the Gracechurch Street or Lime Street Passage entrances and the edge of the terrace at level 5.

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

- 52 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

- 53 The development shall be carried out in accordance with the approved details within the Fire Strategy. Document titled: 85 Gracechurch Street Fire Statement dated 4th March 2025 by ARUP

REASON: To ensure that the development incorporates the necessary fire safety measures.

- 54 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:

Approved drawings: P-1100 Rev 03, P1100 Rev 03, P-1102 Rev 01, P-1200 Rev 03, P-1201 Rev 03, P-1202 Rev 03, P-1203 Rev 03, P-1204 Rev 03, P-1205 Rev 03, P-1206 Rev 03, P-1207 Rev 03, P-1208 Rev 03, P-1209 Rev 03, P-1210 Rev 03, P-1211 Rev 03, P-1212 Rev 03, P-1213 Rev 03, P-1214 Rev 03, P-1215 Rev 03, P-1216 Rev 03, P-1217 Rev 03, P-1218 Rev 03, P-1219 Rev 03, P-1220 Rev 03, P-1221 Rev 03, P-1300 Rev 03, P-1301 Rev 03, P-1302 Rev 03, P-1303 Rev 03, P-1304 Rev 03, P-1305 Rev 03, P-1306 Rev 03, P-1307 Rev 03, P-2200 Rev 03, P-2201 Rev 03, P-2202 Rev 03, P-2203 Rev 03, P-2204 Rev 03, P-2205 Rev 03, P-2206 Rev 03, P-2207 Rev 03, P-2208 Rev 03, P-2209 Rev 03, P-2210 Rev 03, P-2211 Rev 03, P-2212 Rev 03, P-2213 Rev 03, P-2214 Rev 03, P-2215 Rev 03, P-2216 Rev 03, P-2217 Rev 03, P-2218 Rev 03, P-2219 Rev 03, P-2220 Rev 03, P-2221 Rev 03, P-2222 Rev 03, P-2223 Rev 03, P-2224 Rev 03, P-2225 Rev 03, P-2226 Rev 03, P-2227 Rev 03, P-2228 Rev 03, P-2229 Rev 03, P-2230 Rev 03, P-2231 Rev 03, P-2232 Rev 03, P-2233 Rev 03, P-2234 Rev 03, P-2235 Rev 03, P-3200 Rev 03, P-3201 Rev 03, P-3202 Rev 03, P-3203 Rev 03, P-3204 Rev 03, P-3205 Rev 03, P-3206 Rev 03, P-3207 Rev 03, P-3208 Rev 03, P-3209 Rev 03, P-3400 Rev 03, P-3401 Rev 03, P-3402 Rev 03, P-3403 Rev 03, P-3404 Rev 03, P-3405 Rev 03, and P-3406 Rev 03.

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

Access

55. Before any works thereby affected are begun, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, flexible uses, including cultural, retail, office and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.

56. Prior to the commencement of Phase 1 of the development, and notwithstanding the approved plans, details, including drawings at a scale of no less than 1:20, shall be submitted to and approved in writing by the local planning authority of:
- a) Wheelchair accessible and ambulant accessible toilet and baby changing facilities at basement level within the building hereby approved; and
 - b) associated signage

The approved facilities shall be made available to the general public at all times of the operation of the building and be free of charge for the lifetime of the development. The signage informing the general public of the public toilet facilities

onsite, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development.

REASON: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with Policy DM22.2 of the Local Plan.

57. Before any works thereby affected are begun, details of all proposed internal lifts including the platform lift, shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

58. Prior to first occupation, a Lift Management and Maintenance Plan (LMMP) shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall include details of:
- a) A schedule of routine inspection and maintenance;
 - b) Arrangements for emergency repair and response, including maximum repair timeframes in the event of a breakdown;
 - c) A contingency plan for providing alternative temporary access during lift downtime;
 - d) Provisions for the safe evacuation in the event of fire when the lift is out of operation in line with the building's fire safety strategy and Personal Emergency Evacuation Plans (PEEPs); and
 - e) A designated responsible party for overseeing compliance with the plan.
- The lift shall thereafter be managed and maintained in full accordance with the approved Lift Management and Maintenance Plan for the lifetime of the development.

REASON: To ensure continuous, reliable access to the building for the lifetime of the development in accordance with Policy DM 10.8.

59. Before any works thereby affected are begun, the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- a) Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate;
 - b) Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;

- c) Security measures including provision of wider aisle gates at all controlled points of entry;
- d) Details of the cycle stand types and setting out of long stay cycle spaces, including swept paths, and end of trip facilities and access routes;
- e) Planting to level 05 public terrace and all office terraces including path widths and seating and demonstrating how unwelcome touch and scent can be avoided;
- f) Irrespective of approved drawings landscaping details of spend areas for assistance animal;
- g) Details of left and right hand transfer wheelchair accessible WC facilities in the new office building;
- h) Details of sanitary provision for the cultural space

REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

60. Prior to the occupation of the relevant part of the development, an Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:

Website information including photos and an easy read version with information on:

- a) Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m
- b) Location of dropped kerbs
- c) Facilities available on-site including dimensions and photos for (as appropriate):
- d) Step-free entrance points and entrances and lift access
- e) Sanitary provision including but not exclusively accessible toilets, ambulant toilets and baby changing facilities.
- f) facilities for assistance animals
- g) equipment loan
- h) assistive listening system and other assistive technology
- i) rest and recovery facilities/ quiet room
- j) room for reflection/prayer
- k) plant species
- l) Inclusive Entrances Strategy
- m) Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering

Booking information for visiting the cultural space including arrangements for:

- a) Alternatives to online booking
- b) queuing eg for people who are not able to stand for period

- c) Security
- d) essential companions
- e) assistance animals
- f) places for rest and recovery
- g) Inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs)

The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.

REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.

Design and Heritage

61. Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- (a) particulars and samples of the materials to be used on all external and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
- (b) details of the proposed new facades including details of a typical bay of the development for each facade and fenestration;
- (c) details of the rooftop including details of the sedum roof and plant enclosure;
- (d) details of canopies;
- (e) typical masonry details, including jointing and any necessary expansion/movement joints for all external and internal elevations ;
- (f) details of ground and first floor elevations including all entrances, integrated seating, information boards;
- (g) details of semi-internal elevations fronting the ground floor public routes;
- (h) full details of the Heritage Walkway, including all elevations, flooring, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;

(i) full details of the Ground Floor Public Hall, including all elevations, flooring, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation, vehicle lifts, roller shutters and any infrastructure required to deliver programming and varied uses including any security infrastructure such as desks, scanners and queuing barriers;

(j) details of soffits, hand rails and balustrades, including those soffits in the Public areas of the ground floor, level 5 and museum;

(k) full details of the museum and learning spaces at basement including: elevations, seating, planters, walkover glazing specifying build-up, flooring, storage and reception areas, all built in display cases, screens and vitrines, lighting and feature stair detail design.

(k) details all party wall treatments;

(l) details of junctions with adjoining premises, including any new or reinstated chimney stacks or other roofline features to the Market;

(m) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;

(n) details of all drainage, irrigation and rainwater harvesting;

(o) details of the integration of M&E and building services into the external envelope;

(p) details of the enclosure on the north elevation for Leadenhall Market plant equipment.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DMI0.1, DMI0.5, DM12.2. DM10.8

62. Before any works thereby affected are begun details of the proposed works to the rebuilt Gracechurch Street frontage including:

(i) methodology for its adaptation

(ii) details of the treatment of existing fenestration

(iii) details of the new fenestration including materiality, 1:10 detailed drawings indicating glazing specification, colour and reflectivity, glazing bars and casements

(iv) details of the enlargement of the main entrance portal including samples of stone selected

(v) details of any requisite cleaning and

(vi) repair works shall be submitted to and approved in writing by the Local Planning authority and all development pursuant to this permission shall be carried out in accordance with the approved details

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2

63. Before any works thereby affected are begun, details of the proposed interpretation, content and displays of the Public Hall, Museum and the Heritage Walkway, including signage, to interpret and explain the Roman Basilica Forum, the archaeology and history of the site shall be submitted to and approved in writing by the Local Planning Authority demonstrating equitable and accessible design.

REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.4 DM 10.8.

64. Before any works thereby affected are begun, details of all balustrades to external terrace areas, and associated risk assessment, including any other means necessary to mitigate the risk identified within the risk assessment, shall be submitted to and approved in writing by the Local Planning Authority and the balustrades shall be delivered as approved and retained for the life of the building, unless otherwise approved in writing.

REASON: To ensure that the Local Planning Authority may be satisfied that there are appropriate safety measures in place in accordance with the guidance in the 'Preventing Suicide in High Rise Buildings and Structures' Planning Advice Note (2022) and the following policy of the Local Plan: CS3; and DM3.2.

65. Before the works thereby affected are begun, sample panels of agreed sections of the facades shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

66. Prior to the commencement of Phase 1 of the development, All unbuilt surfaces, including the podium, terraces, balconies, roof terrace and new public route and all trees, shall be treated by a landscaping scheme to be submitted to and approved by the Local Planning Authority, including details of:

(a) Irrigation;

(b) Provision for harvesting rainwater run-off from roof to supplement irrigation;

- (c) Spot heights for ground levels around planting pit;
- (d) Soil;
- (e) Planting pit size and construction;
- (f) Tree guards; and
- (g) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development. to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced.

All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DMI0.1, DM19.2.

67. Before any works hereby affected are begun, details of a holistic urban greening strategy, including hard landscaping, materials and an appropriate maintenance regime for:

- (a) the cascade of roof terraces and surfaces, to include green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
- (b) the incorporation of blue roofs into roof surfaces; and
- (c) the landscaping of the public realm.

Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.

REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

68. Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the

approved details. REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.

69. Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:

- a) lighting layout/s;
- b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
- c) a lighting control methodology;
- d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;
- e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; and
- f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.

All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036.

70. Prior to occupation of the building the following details relating to signage shall be submitted to and approved in writing by the Local

Planning Authority and all signage placed on the development site shall be in accordance with the approved details:

- (a) A Signage strategy for the retail units within the development shall be submitted;
- (b) A Signage strategy relating to the Heritage Walkway shall be submitted and this strategy shall make provision for clear signs to be placed in prominent positions on the development site, including signage indicating the access point for the publicly accessible free space and culture offer; and
- (c) The signage relating to the Heritage Walkway and cultural space shall also be included within the overall strategy.

All signage relating to the public spaces including Hall and Walkway, Museum (as approved in the signage strategy) must be erected and in place on the development site prior to occupation of the building.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DMI0.1, DMI0.5, DMI0.8, DM12.1, DM12.2 and DM15.7 .

Air Quality

71. Prior to the commencement of Phase 1 of the development, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. Where it is not possible to deploy alternatives, diesel generators must be the latest Euro standard available. Details of the appliance/plant must be submitted to and agreed by the LPA before installation. Any generator shall be used solely on brief intermittent and exceptional occasions when required in response to an emergency and for the testing necessary to meet that purpose, and shall not be used at any other time.

REASON: To demonstrate that local air quality is maintained and operational carbon emissions have been minimised in accordance with Local Plan policies CS15, DM15.1, DM15.2, DM15.6, London Plan policies SI 1, SI 2, SD 4, and emerging City Plan 2040 policies S1, HL2, S8, DE1.

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

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

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

REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution,

particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

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

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

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

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

Environmental Health

76. Drainage serving commercial kitchens within this development shall be fitted with a grease separator complying with BS EN 1825-:2004 and designed in accordance with BS EN 1825- 2:2002 or other effective means of grease removal. The details of the grease separator shall be provided to the planning authority prior to the operation of the kitchen. The grease separator shall be retained and kept in serviceable condition so long as the commercial food use continues.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8.

Flooding/water

77. 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.

78. 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.

79. 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.

80. 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.

81. 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.

82. Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan:, CS3, DM3.2 DM10.1 and DM12.2

83. Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.

REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.

84. The development shall provide (all figures GIA excluding plant): REASON: To ensure the development is carried out in accordance with the approved plans.

- Office (Class E(g)(i)) – 34,771sq.m
- Flexible Retail/Food and Beverage (Class E (a/b), drinking establishments, and hot food takeaway use) – 344sq.m
- Public Hall (Sui Generis) – 596sq.m

- Cultural Exhibition, Basement Level (Sui Generis) – 478sq.m
- Public Cultural Space, Level 05 (Sui Generis) – 136sq.m

REASON: To ensure the development is carried out in accordance with the approved plans.

85. The areas within the development marked as Retail/Food and Beverage on the floorplans hereby approved, shall be used for retail purposes within Class E (a)/(b) (cafe or restaurant), or for use as a drinking establishment, or for use as a hot food takeaway, and for no other purpose (including any other purpose in Class E of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development, and to ensure that active uses are retained on the ground floor in accordance with Local Plan Policy DM20.

86. The areas within the development marked as cultural floorspace at basement level, and at level 05, as well as the Public Hall, as indicated on the floorplans hereby approved, shall be used only for the purposes below and for no other purpose (including any other purpose in Class E or Class F of the Schedule to the Town and Country Planning (Use Classes) Order 1987) (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification.

87. The proposed development must be carried out in accordance with the approved phasing plan, setting out the phases of development as follows:

- Phase 0: Deconstruction and Archaeological Investigation
- Phase 1: Main Construction Works

REASON: To ensure that the development is carried out in a satisfactory manner, is phased for the purposes of the Community Infrastructure Levy (2010, as amended) and to ensure that the planning benefits of the scheme are delivered in accordance with the approved development.

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

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

89. 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.

REASON: To ensure the preservation and display of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

90. 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.

REASON: To ensure the preservation and display of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

INFORMATIVES

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

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

a full pre application advice service has been offered;

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

- 2 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.

- to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;

- aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;

- or where the procurement of goods and services is contracted out ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').

For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning

Further guidance can be obtained by contacting the 'City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk

- 3 The Mayor of London has adopted a new charging schedule for Community

Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

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

Office 185GBP per sq.m

Retail 165GBP per sq.m

Hotel 140GBP per sq.m

All other uses 80GBP per sq.m

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

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

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

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party

is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

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

- 4 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 5 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 6 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.
- 7 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.
- 8 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:
 - (a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.
 - (b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure

the design of the building provides for the inclusion of street lighting.

(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Connections to the local sewerage and surface water system.

(g) Carriageway crossovers.

(h) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".

9 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

(a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.

(b) Installation of engine generators using fuel oil.

(c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.

(d) Alterations to the drainage and sanitary arrangements.

(e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:

- the identification, encapsulation and removal of asbestos in accordance with a planned programme;
- provision for window cleaning (internal and external) to be carried out safely.

(f) The use of premises for the storage, handling, preparation or sale of food.

(g) Use of the premises for public entertainment.

(h) Approvals relating to the storage and collection of wastes.

(i) The detailed layout of public conveniences.

(j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.

(k) The control of noise from plant and equipment;

(l) Methods of odour control.

10 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust (a)

The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work.

Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)

Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d)

Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

Air Quality (e)

Compliance with the Clean Air Act 1993

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

Boilers and CHP plant (f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread

use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators (j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers (l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities.

These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level

away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety (p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

- 11 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.
- 12 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.
- 13 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.

- 14 The investigation and risk assessment referred to in condition 6 must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:

- human health,
- property (existing or proposed) including buildings, open spaces, service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

- 15 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification: London
Fire Brigade, Fire Prevention Branch 5-6 City
Forum
City Road
London EC1N 2NY

(b) Public houses, wine bars, etc.
City of London Corporation
Trading Standards and Veterinary Service PO
Box 270
Guildhall
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)
London Fire Brigade, Petroleum Department 5-6
City Forum
City Road

London EC1N 2NY

(d) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships Transport
for London

Windsor House

42-50 Victoria Street

London, SW1H 0TL

(e) Works affecting a GLA road:

Borough Integration and Partnerships Transport
for London

Windsor House

42-50 Victoria Street

London, SW1H 0TL

- 16 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.
- 17 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.
- 18 Access for disabled people is a material consideration in the determination of planning applications. The City of London's Access Advisor has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and Draft City Plan 2036 Policy HL1. The Access Advisor promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 19 All reasonable endeavours are to be used to achieve a BREEAM 'Outstanding' rating and The City of London Corporation as Planning

Authority requests early discussion with the Applicant should it appear that the rating is likely to fall below outstanding.

- 20 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.
- 21 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.
- 22 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 pilling 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.
- 23 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
- 24 Historic England's Guidelines for Archaeological Projects in Greater London provides advice on popular interpretation and presentation options.