

<b>Committee:</b>	<b>Date:</b>
Planning and Transportation	26 March 2018
<b>Subject:</b> Former Richard Cloudesley School Golden Lane Estate London EC1Y 0TZ  Demolition of the former Richard Cloudesley School, City of London Community Education Centre, garages and substation; erection of a 3 storey building with rooftop play area (Class D1) (2300.5sq.m GEA) and a single storey school sports hall (Class D1) (431sq.m GEA) to provide a two-form entry primary school; erection of a 14 storey (plus basement) building to provide 66 social rented units (Class C3) (6135sq.m GEA), and affordable workspace (Class B1a) (244sq.m GEA), landscaping and associated works (Duplicate application submitted to the London Borough of Islington as the majority of site falls within Islington Borough).	<b>Public</b>
<b>Ward:</b> Cripplegate	<b>For Decision</b>
<b>Registered No:</b> 17/00770/FULL	<b>Registered on:</b> 25 July 2017
<b>Conservation Area:</b> No	<b>Listed Building:</b> NO

### Summary

This planning application is for a school, nursery, school hall, work space and 66 social housing units.

Identical applications have been submitted to the City of London Corporation (CoL) and the London Borough of Islington (LBI). 96.65% of the site is with the LBI and 3.35% of the site is within the City of London(City) boundary. The element located in the City is a small part of the single storey school hall and the southern boundary of the site located adjacent to the Golden Lane Estate.

On the 1 March the LBI resolved to grant planning permission for that part of the development within its area subject to conditions and S106 covenants.

As a cross boundary application, the P&T Committee are required to consider the application as made to the CoL.

144 objections have been made to the scheme and the majority of these have been received from Golden Lane residents who are the most affected by the proposals. Their grounds of concern are outlined in the report and are included in a separate bundle. They include residential amenity, loss of daylight, noise and the setting of listed buildings. A petition has been received in objection to the application. The petition contains 1240 signatures.

42 comments supporting the scheme have been received including grounds of the need for the school and social housing. These are in the separate bundle.

Most of the environmental effects from the scheme arise from the residential tower and the school use. All the residential and the vast majority of the school site are in the LBI and it is a material consideration for your determination that the LBI resolved to grant planning permission.

When considering the whole scheme, it is considered that the less than substantial harm to the significance of relevant heritage assets and the impact on daylight to dwellings in Basterfield and Hatfield Houses in the City and Banner House in Islington, whilst noticeable can be weighed against the public benefits of delivering a school on this former education site and social housing, for which there is a demonstrable need. When balancing harm to the setting of listed buildings against public benefits, considerable importance and weight should be given to the desirability of preserving the setting of listed buildings. Although some policies are not complied with the scheme accords with the CoL's Local Plan and the London Plan when considered as a whole.

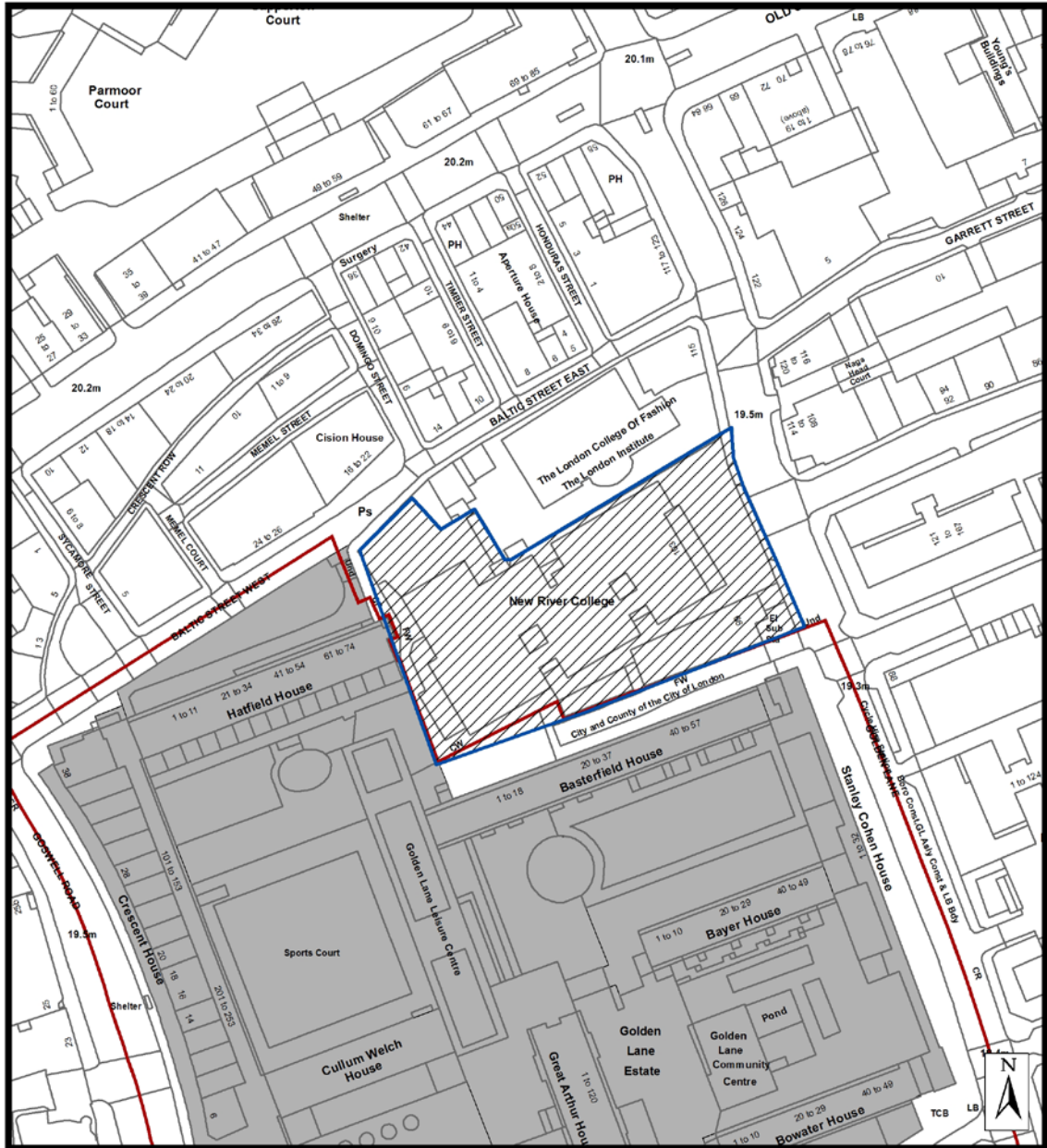
It is recommended that the planning permission be granted (insofar as it relates to land in the City), subject to Conditions and S106 covenants as set out in the report.

### **Recommendation**

- A. That the committee resolve to grant planning permission subject to:
  - 1. The imposition of the conditions set out in the Schedule appended to this report
  - 2. Any direction by the Mayor of London to refuse the application or call it in for his own determination
  - 3. A planning obligation being entered into to secure the matters set out in the Heads of Terms in paragraph 245.
  
- B. To delegate to the Chief Planning Officer authority to agree the terms of the planning obligation, to make any necessary minor changes to the

conditions she deems appropriate, whether by addition, deletion or amendment, to draw up a statement of reasons for granting planning permission, and to issue the decision notice.

# City of London Site Location Plan







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## ADDRESS:

Former Richard Cloudesley School,  
Golden Lane Estate

CASE No.  
17/00770/FULL

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



DEPARTMENT OF THE BUILT ENVIRONMENT



View west from Golden Lane



View East from Basterfield House



View West from Basterfield House





## **Main Report**

### **Assessing a cross-boundary planning application**

1. Duplicate planning applications for 'Demolition of the former Richard Cloudesley School, City of London Community Education Centre, garages and substation; erection of a 3 storey building with rooftop play area (Class D1) (2300.5sq.m GEA) and a single storey school sports hall (Class D1) (431sq.m GEA) to provide a two-form entry primary school; erection of a 14 storey (plus basement) building to provide 66 social rented units (Class C3) (6135sq.m GEA), and affordable workspace (Class B1a) (244sq.m GEA), landscaping and associated works'. The whole development has been submitted to the LBI and the CoL. Leading Counsel's advice has been obtained on the proper approach to be taken by the City as local planning authority in determining the application. The proper approach is for each authority to determine the application as made, in accordance with the considerations below. (However, any permission issued by the CoL would only be granted insofar as it relates to land in the City).
2. Town and Country Planning Act 1990 S70 provides that in dealing with a planning application the local planning authority should have regard to the development plan, any local finance consideration and any other material considerations. Planning and Compulsory Purchase Act S38 (6) provides that where regard is to be had to the development plan the determination should be in accordance with the development plan unless material considerations indicate otherwise. When assessing the application as made to the CoL the development plan to which regard is to be had is the development plan for the CoL. Members should take into account LBI's development plan as another material consideration along with LBI's observations. The LBI officers' report, and update report, is appended to this report. The LBI officers' report identifies relevant policies in the development plan for Islington and other policies which apply in Islington. Your officers advise that you should take account of all the policies referred to in the Islington officers' report and that, insofar as those policies relate only to Islington you should have regard to them as material considerations when dealing with the application before you, and that you should proceed on the basis of the advice given by the Islington officers to the Islington members on the application of those policies. You are advised to rely upon the advice given in this report by your own officers when considering the application of policies in the CoL's Local Plan, the London Plan and other policies which apply in the City as referred to in this report. The LBI officers' report considers the impact of the proposed development on heritage assets, residential amenity and all other relevant issues; your officers accept the analysis of those issues undertaken by the LBI officers and invite you to rely upon it and accept it as it relates to the LBI's administrative area. The LBI



Planning Committee has accepted the advice of the LBI officers and resolved to grant planning permission. You should take that resolution into account as a material consideration.

3. If both authorities grant planning permission, each authority will grant permission in so far as it relates to land in their respective administrative area.

### **Site Location and Current Buildings**

4. The 0.4 hectare site is currently occupied by predominantly single storey buildings comprising the former Richard Cloudesley School, garages, the City of London Community Education Centre and a sub-station. The majority of the site falls within the LBI and a small part of the site falls within the CoL.
5. The current site comprises a single-storey low-slung building with surrounding tall boundary walls. The site is further detailed in LBI's attached report, in paragraphs 5.1-5.14.
6. The boundary between the CoL and LBI is shown on the attached site plan. It can be noted that a very small element of the site is within the City, which includes a small part of the school hall and the southern boundary wall.

### **Proposals**

7. It is proposed to redevelop the site to provide a 3 storey primary school building with rooftop play area (which will give the appearance of a 4 storey building) and a single storey (double height) school sports hall to accommodate a 2 form entry primary school. The proposals also seek to erect a part 4 storey, part 14 storey building to provide 66 affordable (social rented) residential units fronting Golden Lane. The residential building now includes a basement to accommodate cycle parking and plant and small/micro workspace units are proposed at ground floor level.

### **School and Nursery**

8. The proposed primary school would occupy a three storey school building on the northern boundary of the site with a formal entrance on Baltic Street West and a main school entrance on Golden Lane underneath the proposed residential building fronting Golden Lane.
9. There would be two cores within the school, one designated for Key Stage 1 pupils (Years 1 and 2) and the other for Key Stage 2 (Years 3-6).
10. The ground floor would comprise the nursery classrooms and reception classrooms with separate toilets and washrooms. There

will also be a separate room designated for group work and two designated Special Education Needs Rooms (SEND), a hygiene room, changing facilities and toilets for staff and visitors. Administrative facilities including the formal school reception will be located on the ground floor fronting Baltic Street East.

11. The first floor would comprise six classrooms accommodating Years 1, 3 and 4 pupils along with a Learning Resource Centre (LRC), two group work rooms, general store and a staff meeting room. The second floor would comprise six classrooms accommodating Years 2, 5 and 6 pupils, a special teaching room, two group work rooms, a general store and a second staff meeting room.
12. The following play areas for the school and nursery are proposed:
  - 1,838 m<sup>2</sup> general play space at ground floor;
  - 470m<sup>2</sup> general play space at roof level;
  - 330m<sup>2</sup> Multi Use Games Area (MUGA) (area excludes space around the pitch); and
  - 195m<sup>2</sup> nursery play area (separated from the main school playground).
13. A new separate multi-purpose hall is proposed. The hall has been designed with kitchen facilities and space to accommodate 228 children for lunch. There would be storage in the hall for the dining room tables and separate storage for PE equipment.
14. It is proposed to remove 4 existing trees (Category C) (two silver birches, a cherry tree and a butterfly bush), one area of scrub, and one group of C category trees would require removal. One area of climbing plants would need to cut back to the common boundary. The landscaping proposals show that 20 new trees would be planted across the site (including 5 to the site frontage on Golden Lane).

#### Residential Block

15. A 14 storey residential block (measuring 47m in height) is proposed and would comprise the following unit mix:
  - 35 one bedroom units (including 6 wheelchair accessible and 5 wheelchair adaptable units);
  - 26 two bedroom units (including 1 wheelchair accessible and 1 wheelchair adaptable units); and
  - 5 three bedroom units.
16. The entrance to the residential block will be located at ground floor level on the Golden Lane frontage. Three small/micro workspace units, refuse storage, a new substation and a generator would be

provided at ground floor level. Cycle storage, mechanical plant, space to facilitate future connection to the Bunhill District Heating Network and a storage room for play equipment would be provided at basement level. The residential units will have deck access and will all be dual aspect with private amenity space provided in the form of balconies.

17. The 14 storey building will comprise a 4 storey podium with a tower above. This podium is intended to relate to the predominantly 4-6 storey development along Golden Lane, including the 4 storey Stanley Cohen House. The tower is set away from the southern boundary of the site and Stanley Cohen House to seek to achieve a better relationship in townscape terms with this building and to seek to avoid undue harm to the residential amenities of occupants of this block. The facing material of the podium would include a red brick with concrete columns whilst the tower would be constructed from a lighter colored reinforced concrete.
18. It has been agreed that the nomination rights for the proposed social rented units will be split on a 50/50 basis (by unit number) between the CoL and LBI. The allocation by unit size is based upon the actual housing need of the two boroughs and LBI generally require larger family sized units whilst the CoL generally have a requirement for smaller units. The CoL will have nomination rights for 26 one bedroom units, 6 two bedroom units and 1 three bedroom unit and LBI will have 9 one bedroom units, 20 two bedroom units and 4 three bedroom units.
19. Public realm improvements are proposed including new paving, street furniture, bollards and flush kerbs on Baltic Street West. Tree planting is proposed on Golden Lane and green wall planting is proposed on the Basterfield Service Road.

### Revisions

20. The proposed development was amended with revised details submitted and received by the CoL on 23 October 2017. The amendments included the following:
  - Revised ground floor layout to the residential building (changes included an enlarged cycle store, a reduced lobby and relocation of the future Bunhill District Energy
  - Network connection room to front the building to provide display space)
  - Revision to location of the school gates on Golden Lane to reduce the size of the recess under the building to reduce the opportunity for antisocial behaviour outside of school hours;
  - Details of revised elevational treatment to the residential podium to better relate it to the facade of the tower. The revisions included an

amendment to the brickwork treatment and the introduction of concrete columns.

- Details of brickwork facing material in place of concrete cladding along the access decks
- Detailed design information including details of balustrading.
- Introduction of a parapet to the top of the tower.
- Detailed construction design drawings for key elements of the residential building to demonstrate quality in delivery;
- Details of proposed palette of materials.

21. The proposal was further amended following the submission of revised details on 26 January 2018. The further amendments included the following:

- Creation of a basement under part of the residential building for plant and storage areas (bicycles and residential play equipment);
- Introduction of improved active frontage on to Golden Lane in the form of Class B1a workspace suitable for small/micro enterprises; and
- Alteration to the location and enlargement of the MUGA, facilitated by the sprinkler tank being moved to the basement.

### **Planning History**

22. There is no planning history for the application site considered to be of relevance to this application.

### **Consultations**

23. Letters were sent to occupants of the Golden Lane Estate, and the Jewin Welsh Church on 3rd August 2017, 29th August 2017, 27th November 2017, and 31st January 2018. Site notices were displayed on 10th August 2017 and 24th August 2017, and a press advert was placed on 15th August 2017.

24. The views of other CoL departments have been taken into account in considering the amended scheme and detailed matters will be covered under conditions and the Section 106 covenants.

25. The LBI has not commented on the application. However, the LBI's Planning Committee determined the application on 1st March 2018 and the Officers report, Update Note and the minutes of that meeting are attached.

26. The Twentieth Century Society object to the application on the grounds that they do not consider that the benefits outweigh the harm caused. "Although we recognise that the proposed scheme will provide public benefit it is our consideration that that this will be seriously undermined by what is a clear overdevelopment of the site in question. There is great potential for a less massive, less dense

development that would cause less or no harm to the adjacent listed buildings, and that would provide a better quality of space for the new users and the existing Golden Lane Estate residents”.

27. Save Britain’s Heritage object on the grounds that “the proposals will have a harmful and detrimental impact on adjacent and surrounding heritage assets, notably the Grade II\* and Grade II Listed Golden Lane Estate”.
28. Historic England have responded by forwarding the pre-application advice they provided to the applicant. The summary of this advice is as follows: “Whilst I do not object in principle to a taller building on this site, it will clearly impact on the designated heritage assets on the Golden Lane Estate and neighbouring streets within the conservation area. These impacts should be fully explored as part of the design process in order to understand, and where possible mitigate against, any harmful impacts. This is particularly important where the proposal is of a similar height to Great Arthur House. Exceeding the height of the listed tower would require a high level of justification and require further scrutiny to assess its acceptability in principle. The design quality of any proposals on this site will be key and whilst it should not seek to replicate the listed buildings, it is, in my view, important that it seeks to respond to it and reflect this in its design as far as possible”.
29. A total of 172 representations have been received across the four rounds of consultations objecting to the application. The issues raised are as follows:

Topic	Objection
<b>The principle of residential development</b>	<ul style="list-style-type: none"> <li>• Insufficient number of social housing units proposed</li> <li>• Is there demand for key worker housing considering the closures of accommodation</li> <li>• Lack of family homes</li> <li>• Loss of caretaker’s house is loss of housing</li> <li>• The City is undertaking 'social cleansing'</li> <li>• Failure to achieve mixed communities</li> </ul>
<b>The principle of the</b>	<ul style="list-style-type: none"> <li>• No need for school</li> <li>• School is too big for the</li> </ul>



<p><b>provision of a school and the loss of the Adult Education Centre</b></p>	<p>site</p> <ul style="list-style-type: none"> <li>• Site should be used as a Further Education College for children from Richard Cloudesley School</li> <li>• School hall should be at the front of the site for better public access</li> <li>• School hall is not a beneficial resource to the local area. Already have a community hall</li> <li>• Community Education Centre will not be replaced</li> </ul>
<p><b>Design: Height, Bulk, Massing, Form, Architectural Expression, Urban Grain, Streetscene and Landscaping, and impact on Heritage Assets</b></p>	<ul style="list-style-type: none"> <li>• Unsympathetic to the listed Golden Lane Estate and other heritage assets</li> <li>• The proposal is not assessed against the Golden Lane Estate Listed Building Management Guidelines in the application</li> <li>• The east side of the Golden Lane Estate is designed to allow views into the estate. The proposal should follow this principle. The proposal blocks views into estate</li> <li>• Overdevelopment/ Too dense</li> <li>• Outside LBI's tall buildings area</li> <li>• Height and bulk is out of proportion with the surrounding buildings</li> <li>• Harm to views across the estate</li> <li>• Misleading CGIs - show tower with white façade but the details state that it would be coloured</li> <li>• Historic England are considering listing the garages and workshops that are to be demolished</li> <li>• Sterile ground floor of residential block. Services</li> </ul>

	<p>should be in a basement</p> <ul style="list-style-type: none"> <li>• Building a basement would give more design options</li> <li>• Lack of natural surveillance from the ground floor of the tower</li> </ul>
<b>Open space and urban greening</b>	<ul style="list-style-type: none"> <li>• No children's play space</li> <li>• Lack of open space</li> <li>• Fortune Street Park will be dark and overcrowded</li> <li>• Fortune Street Park should be extended</li> <li>• The wall and fencing on the southern boundary of the site should be fully greened up to its full height</li> <li>• How can the new residents' use of the school's play areas be guaranteed</li> </ul>
<b>Noise</b>	<ul style="list-style-type: none"> <li>• School hall will be hired out - noise</li> <li>• Noise from playground</li> <li>• Noise and odour from school hall</li> <li>• Noise</li> </ul>
<b>Residential amenity</b>	<ul style="list-style-type: none"> <li>• Overlooking</li> <li>• Impact on Basterfield House</li> <li>• Residential tower will block views</li> <li>• Light pollution</li> <li>• No defensible space in front of Basterfield House flats</li> <li>• Unacceptable sense of enclosure to Basterfield House</li> </ul>
<b>Impact on daylight and sunlight</b>	<ul style="list-style-type: none"> <li>• Loss of light to the allotments</li> <li>• Loss of light to neighbouring properties</li> <li>• Loss of light to the Golden Lane Estate children's play area</li> <li>• School will be dominated by the tower and the playground will get no morning light</li> </ul>

	<ul style="list-style-type: none"> <li>• Loss of light to neighbouring properties</li> </ul>
<b>Traffic and parking</b>	<ul style="list-style-type: none"> <li>• Air quality</li> <li>• Safety of pedestrians and cyclists</li> <li>• Increased traffic</li> <li>• Traffic congestion caused by school as children will be travelling in from outside area</li> <li>• Servicing hours</li> <li>• Siting of the school and hall will make deliveries and rubbish collection inconvenient and inadequate</li> <li>• No provision for off-street parking</li> <li>• Loss of parking including disabled parking</li> <li>• Inadequate cycle parking spaces</li> <li>• Cycle parking on decks will create an unsafe and unmanageable situation for elderly and disabled people</li> <li>• Service access and out of hours access to the school and the hall will cause disturbance to Hatfield House</li> <li>• The access road is a vital route for council contractors and is not regularly used without permission</li> <li>• Increase in footfall</li> <li>• Risk of collisions on Baltic Street West</li> </ul>
<b>Trees and biodiversity</b>	<ul style="list-style-type: none"> <li>• Loss of trees</li> <li>• Impact on biodiversity</li> </ul>
<b>Quality of the proposed residential accommodation</b>	<ul style="list-style-type: none"> <li>• Walkways will be too windy to use</li> <li>• Poor living accommodation. Communal access route passes by bedroom windows</li> </ul>

	<ul style="list-style-type: none"> <li>• Overcrowded housing</li> <li>• Balconies at the top of the tower won't be used</li> <li>• High rise housing is bad for the people living in it and expensive to maintain</li> <li>• Bedrooms face the access deck resulting in no natural surveillance and compromised privacy, safety, natural ventilation and noise protection</li> </ul>
<b>Impact on allotments</b>	<ul style="list-style-type: none"> <li>• Boundary wall between site and the Golden Lane Estate should be retained as it defines the edge of the estate and supports plants on allotments</li> <li>• No mitigation measures for damage to allotments or impact on use during demolition/construction</li> </ul>
<b>Other Material Considerations</b>	<ul style="list-style-type: none"> <li>• The access road is to be narrowed. How will 24hr fire access be maintained</li> <li>• Cumulative impact of other developments</li> <li>• Strain on local amenities</li> <li>• Potential for significant archaeology on the site</li> <li>• No additional health provision has been made - the local service is heavily oversubscribed</li> <li>• Security issues</li> <li>• Query notices (certificates)</li> <li>• The workspace adds to the intensification of use of the site</li> <li>• Refuse store for the school is inadequate</li> <li>• Roof of the school is a playground and not a roof terrace as stated</li> </ul>
<b>Miscellaneous</b>	<ul style="list-style-type: none"> <li>• Consultation period in August</li> <li>• Too little consultation and too late in the design process</li> </ul>

	<ul style="list-style-type: none"> <li>• Proposals are politically driven</li> <li>• Cross boundary application makes the process more confusing</li> <li>• Why is London College of Art not incorporated</li> <li>• It is not clear if this is an extension of the Golden Lane Estate. If it is additional funding is needed.</li> <li>• If the access road is gated leases will need to be renegotiated</li> <li>• To minimise public access into the Estate the wall by Basterfield Service Road access gate should not be lowered</li> <li>• As Members are on the board of the City of London Academy Trust, I presume they will be declaring an interest and absenting themselves from the Planning &amp; Transportation Committee</li> <li>• School could be housed in the building currently occupied by the London School of Fashion leaving more land for housing and open space</li> <li>• Inadequate fire escape especially following the Grenfell Tower tragedy</li> <li>• The City doesn't maintain the Golden Lane Estate and won't maintain the new building</li> <li>• How will the structure of the first floor of the school be supported?</li> <li>• Social housing should have been provided at Bernard Morgan House</li> <li>• The site boundary is wrong</li> </ul>
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	<p>as it doesn't include the Basterfield Service Road where works are taking place</p> <ul style="list-style-type: none"> <li>• Statement of Community Involvement fails to mention the petition</li> <li>• The number of school staff stated on the application form is incorrect</li> <li>• School - internal circulation space is inadequate and playground area is less than Department of Education guidelines</li> <li>• Land grab means that the bin store cannot be accessed - loss of right of way</li> <li>• Community response to public consultation misrepresented</li> <li>• A school could be provided on the Bernard Morgan House site</li> <li>• If the estate is to be used as a service route leases will need to be rewritten</li> <li>• Provision should be made for reinforcing and the repairing the estate access road</li> <li>• Double glazing should be provided for Basterfield House and Hatfield House</li> </ul>
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30. A petition has been received in objection to the application. The petition contains 1240 signatures, and is made on the following grounds:

*"Save Golden Lane Estate AND Build Decent Homes  
I call on Islington Council and the City of London to reject the proposed development at the Grade II and Grade II\* listed Golden Lane Estate, and to bring forward a new proposal that respects the scale and quality of the Golden Lane Estate and provides sustainable, inclusive social housing for families. The Golden Lane Estate is an internationally important post-war housing scheme in the City of London by architects Chamberlin, Powell and Bon who went on to design the landmark Barbican Estate. This development*

*threatens its architectural significance and integrity. The City of London and Islington Council have brought forward sub-standard proposals for an overpowering extension to the Estate that includes a school, a school hall placed in the centre of the estate and a 14 storey tower block that does not respect the design, scale or quality of the Estate. It exceeds planning policy on density and height by a factor of three times and has no outdoor green space. This over-development goes against the spirit and letter of the London Plan and of Islington's planning policy."*

31. 43 representations have been received in support of the application. The following issues have been raised:

The need for the school;

- The high quality of the education provided by CoLPAI
- The lack of choice of state schools in the local area;
- The need for affordable housing; and
- High quality design.

32. A number of comments were made to LBI, which were not made to ourselves and these are outlined in LBI's report in section 9.

### **Policy Context**

33. The development plan, so far as material, consists of the London Plan, and the CoL Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report. The Mayor's draft London Plan and SPG are material considerations, as are the SPDs produced by the CoL the main ones being the Golden Lane Guidelines, the Barbican Guidelines, Air Quality Guidance and, Freight and Servicing Guidelines, and Planning Obligations Guidance.

34. Although LBI development plan, and other policies relevant to the LBI Application do not form part of the development plan for the City, for the purposes of determining the CoL Application, they are a material consideration and should be taken into account. As set out above, your officers recommend that you have regard to all the Islington development plan, and other Islington specific policies, identified in the Islington officers' report, and that you accept the advice given by Islington officers to Islington members on their application to the development proposed in this planning application.

35. Government Guidance is contained in the National Planning Policy Framework (NPPF). A revised NPPF draft is out for consultation as of 5th March 2018, which has a focus on the delivery of housing. The draft revised NPPF is a material consideration, however little weight can be given to it as it is still subject to consultation.

## Considerations

36. The CoL, 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 any local finance considerations so far as material to the application, 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 other material considerations indicate otherwise (Section 38(6) of the Planning and Compulsory Purchase Act 2004);*

*(The relevant development plan is the London Plan and the City's Local Plan,)*

37. As the development affects the setting of listed buildings, the CoL is required 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).; part of that part of the development site lying within the LBI's administrative area lies within a conservation area. The effect of Section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1909 is to require LBI when determining the application made to them, to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area.

38. Paragraph 131 of the NPPF advises, "In determining planning applications, local planning authorities should take account of:

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

39. The NPPF states at paragraph 14 that "at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking. For decision-taking this means: approving development proposals that accord with the development plan without delay..." It further 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”.*

40. It states at paragraph 7 that sustainable development has an economic, social and environmental role.
41. In considering the planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
42. The Human Rights Act 1998 incorporates the key articles of the European Convention on Human Rights into domestic law. These include:

Article 8: Right to respect for private and family life:

1. Everyone has the right to respect for his private and family life, his home and his correspondence.
2. There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

Article 14: Prohibition of discrimination. The enjoyment of the rights and freedoms set forth in this Convention shall be secured without discrimination on any ground such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.

Article 1 of the First Protocol: Protection of property. Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.

43. It is unlawful for the CoL, as a public authority and in particular when dealing with this planning application, to act in a way which is incompatible with a Convention right. However, most Convention rights are not absolute and set out circumstances when an interference with a person's rights is permitted. Any interference with any of the rights contained in the Convention must be sanctioned by law and be aimed at pursuing a legitimate aim and must go no further than is necessary and be proportionate.

44. The Equality Act 2010 provides protection from discrimination in respect of certain protected characteristics, namely: age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs and sex and sexual orientation. It places the CoL under a legal duty to have due regard to the advancement of equality in the exercise of its powers including planning powers. The Committee must be mindful of this duty inter alia when determining all planning applications. In particular the Committee must pay due regard to the need to: (1) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act; (2) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (3) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

### **Principal Issues**

45. The principal issues in considering this application are:

- The principle of the provision of a school and the loss of the Adult Education Centre;
- The principle of residential development;
- The principle of the provision of work space;
- Design: Height, Bulk, Massing, Form, Architectural Expression, Urban Grain, Streetscene and Landscaping;
- Impact on Heritage Assets;
- Access and inclusive design;
- Servicing, Transport and impact on public highways;
- The impact of the proposal on neighbouring residential and commercial buildings and spaces, including loss of daylight and sunlight, wind microclimate, air pollution, overlooking, noise, odour and security;
  
- Open space and biodiversity and loss of trees
- Energy and sustainability;
- Archaeology; and
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan.



## **The principle of the provision of a school and the loss of the Adult Education Centre**

### Provision of a school

46. Paragraph 72 of the NPPF states that:

*“The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education:*

- *Give weight to the need to create, expand or alter schools; and*
- *Work with school promoters to identify and resolve key planning issues before applications are submitted.”*

47. London Plan policy 3.18 states that:

*“A: The Mayor will support provision of childcare, primary and secondary schools and further education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, including in parts of London with poor educational performance.*

*B: The Mayor strongly supports the establishment of new schools, including free schools and opportunities to enable local people and communities to do this.”*

48. Policy CS22 requires that adequate educational facilities and services are provided to meet the community’s needs. Policy DM22.1 states that “the development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use; in locations which are convenient to the communities they serve; in or near identified residential areas, providing their amenity is safeguarded; as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.”

49. The site is in a residential area, was previously in educational use and the proposal would not result in the loss of offices or be prejudicial to the business city. There is an identified need for a school in this location. Without the CoLPAI scheme, there would be a shortfall of 438 school places in the south of the LBI, equating to over 14 forms of entry. Within the City, school place planning is complicated by the fact that there is only a single state funded primary school, the Sir John Cass Foundation Primary School, which is a Church of England School, and other schools are

independent. This combination of faith and/or fee-paying schools provides an extremely limited choice of school within the City. 66% of places at Sir John Cass are taken by Tower Hamlets residents and residents from other boroughs and Tower Hamlets primary reception classes are expected to reach full capacity in the early 2020s which will place greater pressure on primary school demand in the City.

- 50. Population change is increasing potential demand for primary school places from families within the City. GLA 2016-based demographic projections show a 45% increase in the numbers of children under 11 years of age in the City between 2011 and 2026, with actual numbers increasing from 475 to 688.
- 51. The proposed Academy would have a significant benefit for residents by providing a new state school which has no entry restrictions. It is proposed that the school hall would be available for community use, fulfilling the requirement for the facility to be a multi-use space.

#### Loss of the Adult Education Centre

- 52. The proposal would result in the loss of an Adult Education Centre on the site which is currently operating.
- 53. Policy DM22.1 states the loss of social and community facilities should be resisted unless “replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or necessary services can be delivered from other facilities without leading to, or increasing, and shortfall in provision; or it has been demonstrated that there is no demand for another similar use on site”.
- 54. The services in the adult education centre, will be retained within the City of London and relocated partly to the Golden Lane Community Centre (which is being refurbished and anticipated to re-open in March 2018) and the CoL’s business library. This accords with the exception in DM22.1 above that
- 55. It is considered that the proposals comply with London Plan policy 3.18, and policies CS22 and DM22.1 of the CoL Local Plan.
- 56. Further details in relation to educational provision are set out in sections 11.14 to 11.31 of LBI’s report and officers accept its contents.

## **The principle of residential development**

57. Policy CS21 of the Local Plan is to protect existing housing and amenity and provide additional housing in the City. CS21.1 explains that the City Corporation aims to exceed the London Plan's minimum annual requirement by guiding new housing development to and near identified residential areas...and refusing new housing where it would prejudice the primary business function of the City or be contrary to Policy DM1.1 (protection of office accommodation).
58. Policy DM21.1 of the Local Plan states that new housing should be located on suitable sites in or near identified residential areas. The site is adjacent to the Golden Lane area and is an appropriate location for residential development.
59. Policy DM21.1 of the Local Plan further states that new housing will only be permitted where development would not: prejudice the primary business function of the City; be contrary to policy DM1.1 (protection of office accommodation); inhibit the development potential or business activity in neighbouring commercial buildings and sites; and result in poor residential amenity within existing and proposed development, including excessive noise or disturbance. The proposed development would not prejudice the primary business function of the City, it does not involve the loss of office accommodation, and would not impact on the development potential of neighbouring commercial buildings. The impact the proposal has on residential amenity will be addressed in the relevant sections of this report.
60. In 2016, the City Corporation commissioned a Strategic Housing Market Assessment (SHMA) to provide information on existing and emerging housing need, including affordable housing need, to inform the review of the City of London Local Plan. The SHMA was published in June 2016, with an addendum in July 2016 to take account of new Government housing projections. The SHMA identifies a housing need for the City of 2,776 dwellings over the period 2014-2036, an annual average of a minimum of 126 dwellings per year. Included within this overall target, the SHMA estimated the affordable housing need to be 69 dwellings per year, 88% of which should be social or affordable rented accommodation. The SHMA recommends that 50% of the affordable housing should be 1-bed, 30% 2-bed, 15% 3-bed and 5% 4+-bed. A separate measure of housing need is provided by information on the number of people on the City of London Housing Register. At 1 April 2017, there were 853 people on the Register.

## Density

61. London Plan policy 3.3 recognises the need to provide additional housing in London and sets a minimum annual target for the City of London of 141 additional dwellings during the plan period (2015-2025). Policy H1 of the Draft London Plan sets a minimum annual target for the City of 146 additional dwellings. Policy DM21.5 of the Local Plan states that all new housing must be designed to a standard that facilitates the health and wellbeing of occupants and takes account of the London Plan's space standards and complies with the London Plan's Density Matrix standards.
62. The site is within a 'central setting', which is defined as 'an area with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800m walking distance of an International, Metropolitan or Major town centre. The site has a Public Transport Access Level (PTAL) of 6a (excellent), which recommends that the site is developed at a density of 650-1100 habitable rooms/hectare or 215-405 units/hectare considering the size of the dwellings proposed. The proposed residential development is at a density of 930 units/hectare (2437 habitable rooms/hectare) which is higher than recommended. However, paragraph 3.28 of the London Plan explains that the density matrix should not be applied mechanistically 'enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure, open space and play'. The London Plan Housing Supplementary Planning Guidance further explains that in appropriate circumstances it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed'. To be supported, schemes which exceed the ranges in the matrix must be tested against the following considerations: design, local context and character, public transport connectivity, the quality of the proposed accommodation and its compliance with the housing quality standards (found in the London Plan Housing Supplementary Planning Guidance), and the management of refuse storage and cycle parking facilities. When these considerations are satisfactorily addressed the London Plan provides sufficient flexibility for such higher density schemes to be supported. It is common for new development in central London to exceed the ranges in the density matrix.
63. The Draft London Plan, Policy D6, seeks to optimise housing density, with a focus on the key elements required to deliver sustainable residential development rather than a reliance on numerical density standards. Under this approach, the optimum residential density should be driven by design, taking account of site

context, proximity and access to services and capacity of existing and planned infrastructure.

64. As regards compliance with policy CS21, the scheme provides housing close to a residential area albeit not within the City's administrative area. Paragraph 3.21.5 recognises that land within the City "is an expensive and limited resource and that the CoL will work with housing partners to deliver new affordable housing on sites in the City fringe and in neighbouring boroughs utilising commuted sums from commercial and housing developments within the City. This approach is supported by the London Plan". It is considered that the proposals comply with London Plan Policy 3.3 and partially comply with policy CS21 of the CoL Plan. There is a significant level of housing need from within the City of London, including affordable housing need, with a priority for 1-bed and 2-bed social or low cost rented housing. CoL will have nomination rights to half the units. The proposed new provision, although not providing additional housing within the City, will contribute towards meeting the overall quantum of housing need in London, particularly delivering additional affordable housing. The criteria for new housing in policy DM21.1, are considered to be met insofar as the site is considered suitable and it does not interfere with the primary business function of the City, nor interfere or inhibit commercial sites. Policy DM21.1 also requires that new housing would not result in poor residential amenity within existing and proposed development. The quality of the proposed development is considered acceptable. As regards the amenity of existing residential accommodation, it is acknowledged that (particularly in terms of daylight and sunlight and noise), there will be some diminution, but it is not considered that the proposals will result in poor residential amenity. The proposals are considered compliant with policy DM21.1.

65. Further details in relation to the need for housing and the need for affordable housing are set out in Section 11.36 to 11.56 of the LBI's report and its contents are accepted.

### **Quality of the proposed residential accommodation**

66. Policy DM3.1 states that "where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained". The residential block is entirely separate from the school and school hall, and the flats and workspace have separate entrances. The proposals comply with policy DM3.1.

67. Paragraphs 2.1.17-2.1.18 of the London Plan Housing Supplementary Planning Guidance explains that 'the standards set out the minimum level of quality and design that new homes should

meet. The extent to which proposed developments depart from the standards should be taken into account in planning decisions. Application of standards through the planning system (as they are through this SPG) provides some flexibility. Consideration should be given to these standards alongside achievement of other policies of the London Plan. In particular, regard should be had on the one hand to overall viability and the need to ensure an appropriate level of housing supply in changing economic circumstances. On the other hand, consideration should be given to the fact that the homes and living environments we build today will frame the lives of those who live in new homes or use the neighbourhoods now and into the future. Failure to meet one standard would not necessarily lead to an issue of compliance with the London Plan, but a combination of failures would cause concern'.

### Space standards

68. The DCLG Technical Housing Standards sets out the requirements for the Gross Internal Area (GIA) of new dwellings at a defined level of occupancy. Standard 26 of the London Plan Housing Supplementary Planning Guidance states that a minimum of 5 sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sqm should be provided for each additional occupant. All of the proposed dwellings meet the technical space standards for internal space and private amenity space set out in the London Plan and supplementary guidance and is therefore in compliance with policy DM21.5 of the Local Plan.

### Communal open space – the MUGA

69. Standard 4 of the London Plan Housing Supplementary Planning Guidance states that where communal open space is provided, development proposals should demonstrate that the space is overlooked by surrounding development; is accessible to disabled people including people who require level access and wheelchair users; is designed to take advantage of direct sunlight; and has suitable management arrangements in place. The MUGA would be overlooked by the flats within the development ; it would be accessible to disabled people as step free access is provided; and due to its positioning, it would get good sunlight in the late morning and early afternoon. Standard 4 is considered to be complied with.

### Entrances and Active Frontages

70. Standard 8 of the London Plan Housing Supplementary Planning Guidance states that all main entrances should be visible, clearly identifiable and directly accessible from the public realm. Standard 10 of the London Plan Housing Supplementary Planning Guidance states that active frontages should be maximised and inactive frontages minimised on the ground floor or buildings. The main

entrances to the building are accessed from the street. The frontage on Golden Lane would be activated by the ground floor workspace and the pupil entrance to the school. Details of the treatment of the elevation to the workspace and the school entrance are secured by condition by LBI. Subject to the condition Standard 8 is considered to be complied with.

### Privacy and Aspect

71. Standard 28 of the London Plan Housing Supplementary Planning Guidance states that proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring properties, the street and other public spaces. The units have deck access. There are concerns over privacy to bedrooms immediately adjacent to the communal deck access. Access to the decks is secured by a condition imposed by LBI, which limits access by ensuring that key or fob access is required from the core to the deck coded per floor. Subject to the condition Standard 28 is considered to be complied with.

72. Standard 29 of the London Plan Housing Supplementary Planning Guidance states that development should minimise the number of single aspect dwellings. None of the proposed flats are single aspect.

### **Fire Safety**

73. The application is accompanied by a Fire Strategy which includes a number of points in relation to the residential building. LBI have analysed this in their attached Update Note and have concluded that the provision of a single stair core is in line with all current guidance and considered reasonable based on the outlined approach including extensive compartmentation, balcony approaches and ventilation to the fire-fighting lobby and stair. The CoL has no applicable planning policy. It is considered appropriate to place weight on LBI's view that the arrangements are satisfactory.

### **The principle of the provision of workspace**

74. Policy DM1.3 encourages the promotion of small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses or occupiers; and office designs which are flexible and adaptable to allow for subdivision to create small and medium sized business units. The proposed introduction of 244sq.m of affordable workspace provided in three units on the ground floor of the residential tower is welcomed.

75. Paragraph 11.60 of LBI's report states that "the proposed small/micro office units are strongly supported".

## **Design considerations**

### Height, Bulk and Massing and Urban Grain

76. The podium of the tower proposes a brick-clad base, of four storeys (14m to eaves), broadly following, although sited proud of (by approx. 3m), the strong orthogonal building line on Golden Lane defined by the four-storey (11m to eaves) Stanley Cohen House, in prominent views along Golden Lane (north and south). It would also respond to the size of the six-storey Golden Lane Estate maisonettes blocks, such as Basterfield House running perpendicular opposite. It is considered that the building line and height of the podium, and the setting in of a podium would provide an appropriate townscape response which would add an appropriate scale to Golden Lane relative to its neighbours.
77. The remainder of the lower blocks, a four-storey 'L'-shaped school/nursery block and 1.5 storey school hall, are of a disposition and layout which continues, if not in architectural language, in the townscape tradition and urban grain of the Golden Lane Estate: rectilinear, horizontal blocks of human scale following the clean orthogonal building lines defined by Hatfield House and Basterfield House, of perimeter maisonettes blocks enclosing and opening up to a series of raised and sunken courts.
78. The main school/nursery block would follow the building line of Hatfield House, while following through with a matching clean eaves line. The return dog-leg would better enclose and address the wedge of Baltic Street West, consolidating the scale of the street which is defined by the north elevation of Hatfield House, to which it would be subservient.
79. The proposed school hall, at 1.5 storeys tall with set-back upper part, is in the manner, if not style, of the community facilities of the Golden Lane Estate: low slung simple rectangular boxes flowing into surrounding recreational space, continuing the strong east-west line through the Estate between Golden Lane and the leisure centre, running parallel with Basterfield House opposite.
80. Overall, it is considered that the podium, school/nursery block and school hall are of a height, scale massing and disposition which are a good response to the setting of to the Golden Lane Estate.
81. The residential tower is 14 storeys in height. The CoL's tall buildings policy applies to those buildings which significantly exceed the height of their general surroundings. CS14, which applies, permits tall buildings in suitable locations where they are of world class



architecture and are sustainable and accessible and take full account of the character of their surroundings. CS14 (3) that tall buildings should only be permitted where they are considered suitable having regard to: “the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features”. London Plan Policy 7.7 also concerns tall or large buildings and includes requirements that they enhance the quality of street level and long distance views, conserve and enhance heritage assets and their setting, exhibit exceptional architecture, and provides public space.

82. The tower element would have the most significant impact in the wider setting in terms of siting, height, bulk and massing. Tall buildings comprise part of the surrounding townscape, including the 16 storey Great Arthur House, 13-storey Peabody Tower, 17 storey Blake Tower and the taller Barbican towers to the south. These towers are set back from the street, often in a generous landscaping.
83. The proposed residential tower would rise flush, without setback, from the west and the east elevation which addresses Golden Lane, whilst it would comprise over two thirds of the width of the podium. Given the building line, lack of set-back and height relative to the podium, it is considered that the tower element would impact on the human/domestic scale of Stanley Cohen House and the other six-storey maisonette blocks making it more prominent from much of the Golden Lane Estate than Great Arthur House.
84. The siting, height, bulk and mass of the proposed building would be dominant in views along Golden Lane. To a degree, this could be addressed through detailed design.

#### Detailed Design

85. The four-storey podium to the tower, school/nursery block and school hall are proposed to be clad in a plum-coloured brick with ‘punched’ fenestration set in a reveal to the side elevations and deeply recessed double balconies addressing Golden Lane. The proposed double height inset at first and second floor level with deeply inset brick piers, use of a vernacular brick and projecting balconies echo the core vocabulary of the Golden Lane Estate maisonette blocks. The crowning of the principal elevation is an aluminium stick balustrade, bolted to the rear of a shallow parapet. This could be better terminated, helping create better definition between podium and tower. This could be more emphatically crowned with a clean raised brick with accentuated GRC capping – similar to the surrounding Golden Lane Estate blocks. The LBI intend to secure this by condition.

86. The brick referenced is the Ketley-type recently used at the Barbican and which is a dynamic, high-quality baked brick with warm mottled tones. This could create a building of high quality which references its distinctive surroundings. Its delivery should be ensured by condition, which the LBI intend to impose.
87. The nursery/school block and school hall would follow the same architectural language, with some subtle difference in vocabulary to add diversity and interest, with incised fenestration and reveals, shadow gap rainwater runs and perforated aluminium accents within a robust solid-to-void ratio. This approach ensures an overarching homogeneity with the Golden Lane Estate.
88. It is considered that the architectural concept of a clean slab block in silhouette, with a simple modernist form, in the manner of Great Arthur House, is appropriate. It will have a glass reinforced concrete (GRC) 'skin', in the form of an expressed frame. The regular rhythm of square profile columns and rounded 'pilot', borrowing the latter from the Golden Lane Estate ties the principal elevations together with the aim of creating a distinctive sculptural frame. It is considered that if well executed this architectural concept could complement the adjacent Golden Lane Estate.
89. On the residential block it is considered that the proposed depth provided in the balconies and decking of 1.5-2m would be sufficient to relieve and express the frame. This will require the depth of the frame and soffit and the balcony treatment to be well detailed, which is reserved by condition by the LBI. It is considered that visible expansion/movement joints, both horizontal and vertical, could significantly undermine the delivery of the architectural concept of a clean and robust sculptural 'skin'. This is conditioned by the LBI.
90. There is a high balcony-to-frame ratio. A cross section shows that the balconies and decking would have a short upstand with stick baluster balconies attached or clasped to the rear of it. In addition, the soffit of the decking/balconies would be flush with the upper frame, giving it less relief. These details are reserved by condition by the LBI.
91. The treatment of the flank elevations are important to the coherence and integrity of the architectural concept and in reducing the apparent bulk, mass and height of the building, in particular on the sensitive approaches along Golden Lane. It is proposed to continue the GRC frame alongside regularly aligned fenestration and brick infill panels. No detail has been submitted of junctions or reliefs and this detail is conditioned by the LBI.
92. A detail has been added at roof parapet level, an implied shadow gap, providing a subtle 'incident', a characteristic feature of

Chamberlain, Powell and Bon. Whilst not clear from the submission, it is apparent that balustrading would potentially need to be provided for health and safety reasons which, in addition to potential plant (including photovoltaic tiles), could breach the clean parapet line, undermining the architectural whole. Conditions 3 and 4 as proposed to be imposed by LBI require further details to be submitted to and approved by the local planning authority. It is considered that, subject to the proposed conditions, the design is accomplished but not world-class or exceptional and there is therefore a degree of conflict with policy CS14 of the Local Plan and policy 7.7 of the London Plan.

93. Policy DM 10.1 requires all new developments to be of a high standard of design and to avoid harm to the townscape by ensuring the listed criteria are adhered to. Amongst those criteria is that external illumination of buildings is carefully designed to ensure visual sensitivity, the discreet integration of light fittings, and minimal energy use and light pollution, and the discreet integration of light fittings into the building design.

94. The nocturnal character of the adjoining Golden Lane Estate is one of relatively low levels of ambient light. A detailed cross section of the proposed balconies or decking has not been provided. The tower would be prominent in views into and from within the Golden Lane Estate. It is considered that the tower's lighting will have a major influence on the character of the Golden Lane Estate. It is considered that the architectural frame, which would appear to have the frame flush with the decking/balcony soffits, misses an opportunity for the integration of discreet lighting. This detail will need to be considered carefully and can be reserved for condition. The treatment of the school entrance on Golden Lane should be conditioned to ensure adequate lighting. A detailed Lighting Strategy is reserved by condition by LBI in order to ensure compliance with Policy DM 10.1.

#### Public Realm and Landscaping

95. The boundary wall between the School and Basterfield Service route on the Golden Lane Estate would comprise an approximately 3m brick (and possibly timber) wall, with planting, including trees, on the school side. The proposed low level planting beds and green wall on the proposed school hall are welcomed. Details would be dealt with as part of both a CoL and the LBI landscaping condition and S106 if required.

96. A row of new trees is proposed on Golden Lane, in accordance with the aspirations of the Public Realm SPD, which will soften and improve the streetscape of Golden Lane. The LBI have imposed a condition to ensure that trees are delivered.

## **Summary: Design Considerations:**

97. Overall, on balance, it is considered that the proposals demonstrate a good architectural response to the site and surroundings, and an improvement to the public realm surrounding the site in compliance with London Plan Policies 7.1-7.6 and Policies CS10, DM10.1 and CS14 of the Local Plan.

## **Impact on Heritage Assets in the City of London**

### **Historic Environment Context**

98. The site adjoins the Golden Lane Estate which comprises the series of buildings and surrounding landscape which together form the Estate and are listed grade II and II\* (Crescent House). The whole of the Golden Lane Estate is being considered for potential conservation area designation. At present, it is not a conservation area.
99. The site is in the wider setting of the Barbican Estate, which is a grade II listed building with a grade II\* registered landscape, the former Cripplegate Institute (grade II) and the Jewin Chapel which is considered a non-designated heritage asset. The site is in and adjoins the St Luke's Conservation Area, which is in the London Borough of Islington.
100. The impact of the proposal on the heritage significance of the heritage assets in the City of London are addressed in this section of the report.

### **Legislation and Policy**

101. As the development will affect the setting of listed buildings section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires the CoL 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. The effect of this duty under Section 66(1) is that in making the decision on this application considerable weight and importance should be placed on the desirability of preserving the setting of listed buildings. In particular when balancing public benefits against harm to the significance of listed buildings, considerable importance and weight should be given to the desirability of preserving the setting of the listed buildings.
102. Policy 7.8 of the London Plan states that "Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail." Paragraph 7.31A of the supporting text

states “Substantial harm to or loss of a designated heritage asset should be exceptional, with substantial harm to or loss of those assets designated of the highest significance being wholly exceptional. Where a development proposal will lead to less than substantial harm to the significance of a designated asset, this harm should be weighed against the public benefits of the proposal, including securing its optimal viable use. Enabling development that would otherwise not comply with planning policies, but which would secure the future conservation of a heritage asset should be assessed to see if the benefits of departing from those policies outweigh the disbenefits.”

103. Policy CS12 of the Local Plan seeks to conserve or enhance the significance of the City’s heritage assets and their settings by (amongst other things): safeguarding the City’s listed buildings and their settings, while allowing appropriate adaptation and new uses, and preserving and enhancing the distinctive character and appearance of the City’s conservation areas, while allowing sympathetic development within them.

104. Policy DM12.1 of the Local Plan relates to managing change affecting all heritage assets and ensuring that the proposals sustain and enhance heritage assets, their settings and significance.

105. Furthermore that “Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings”. (12.1.4)

106. Chapter 12 of the NPPF is relevant in this instance as it sets out key policy considerations for applications relating to designated and non-designated heritage assets. Other relevant guidance is provided by Historic England including the documents Conservation Principles, Good Practice Advice Notes, including Note 1, Conservation Area Designation and Management, Note 3 The Setting of Heritage Assets and Building in Context (HE/CABE)

107. The NPPF, Core Principle 10 (paragraph 17), seeks to conserve heritage assets in accordance with their significance. It establishes, at paragraph 132, that great weight should be given to conservation and that the significance of an asset can be harmed by development in the setting of that asset. Depending on the level of harm, either paragraph 133 or 134 are triggered.

108. Paragraph 133 states that:

*“Where a proposed development will lead to substantial harm to or total loss of significance of designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

- *The nature of the heritage asset prevents all reasonable uses of the site; and*
- *No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- *Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *The harm or loss is outweighed by the benefit of bringing the site back into use”*

109. Paragraph 134 states that:

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

110. Paragraph 135 of the NPPF states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly 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.”

111. The setting of a heritage asset is described 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.*

112. The National Planning Practice Guidelines state that when assessing the setting of an asset, whilst visual considerations are important, the way an asset is experienced can also be influenced by other factors such as noise or use and, whilst two places might not be visible from one another, they may still have a historic or aesthetic connection that amplifies the experience of the significance of each.

## **Principle of Demolition**

113. The proposal will result in the total demolition of the current building comprising the former vacant Richard Cloudesley School, garages and Adult Learning Centre. Other than the use of a complementary plum brick in the school, the development in architectural or urban design terms does not contribute to the significance of the adjacent Golden Lane Estate.

114. It is noted that Historic England have welcomed the redevelopment of the site, in principle.

115. The principle of the demolition is considered acceptable.

### **Impact on the Special Architectural and Historic Interest and Significance of the Golden Lane Estate**

#### The Significance of the Golden Lane Estate

116. The Golden Lane Listed Building Management Guidelines Supplementary Planning Document (the Guidelines) (September 2013) identifies the nature and extent of the special architectural and historic interest of the Estate. The Guidelines are a material consideration in assessing the current planning application.

117. The Golden Lane Estate is an exemplar of post-war comprehensive redevelopment following the Blitz, executed on a pioneering and cohesive scale under the auspices of a single ambitious landowner, the City of London Corporation. The Guidelines acknowledge that much of the character and special interest derives from the architects' pursuit of a modern exemplar of high-density urban living. This expresses itself on a macro-level through the meticulously planned townscape and generous open landscape and on micro-level through the detailing and layout of individual flats. It should, as acknowledged in the Guidelines, be viewed in its entirety as an ensemble: a piece of architecture, urban design and townscape. The qualities of light, space, transparency, function and communality run through the Estate, from the (unique) large curtain wall landscape window of the community centre raised above the ornamental sunken garden to the finely detailed 'picture frame' curtain wall windows defining the principal aspects of the flats providing views over the generous landscaping.

118. The height and disposition of the blocks was meticulously considered to create varied public/private space, delivering a comfortable sense of enclosure while also feeling open and permeable. The pioneering use of glass curtain walls, in striking primary colours, add light and energy, while the overarching use of a pleasant plum brick ties the architectural whole together.

119. The blocks are disposed to maximise daylight, sunlight, privacy and a sense of spaciousness and transparency. These spatial qualities continue inside where all flats are defined, where possible, by a principal south-aspect, dual aspect, floor-to-ceiling glazing overlooking well-landscaped courts and private balconies on flats which are orientated to avoid direct overlooking from directly facing principle aspects - revolutionary at its time. This openness and the extensive glazing creates a seamless transparency between inside

and out, creating internal spaces defined by the relationship with the landscape outside.

120. Great Arthur House was, on completion in 1957, the tallest residential building in Britain and a pioneer of high-rise urban living which came to define post-war urban Britain. It anchored the Estate, from which the open space and maisonette blocks pivot, acting as its landmark centrepiece. The height allowed Chamberlain, Powell and Bon to achieve the required density, allowing the generous open landscape and human-scale of the remainder of the Estate. The refined aluminium-framed glass curtain wall with striking yellow 'Muro' glass still to this day is striking. Its rectilinear slab silhouette is enlivened by the foil of its curvilinear canopies, which mark the innovative formal communal garden at roof level, inspired by Le Corbusier's Unité d'habitation.
121. Crescent House is listed at grade II\* rather than II as it is a transitional building, where Chamberlin, Powell and Bon experimented with High Brutalism, more expressed structure and exposed raw bush-hammered concrete, as well as the later Modernist principles of segregating pedestrian and vehicular traffic and greater mixed use, all of which done in a manner which respected the historic street pattern, presenting a gracious curve to Goswell Road.

#### The Contribution Setting makes to that Significance

122. The NPPF states that elements of the setting of a heritage asset can make a positive, neutral or negative contribution to its heritage significance and a viewer's ability to appreciate that significance.
123. There is no specific section in the Guidelines dedicated to the Estates' setting, or which seeks to identify particular elements of that setting which are deemed to make a positive, negative or neutral contribution to it. However, in Part 2 (section 1.2.1), "Key conclusions and recommendations", under Holistic Significance, it states:
124. The views from – as well as into – the estate are important. Part of the special architectural interest of the estate lies in its relationship with adjacent buildings, their height, scale, mass, form, materials and detailing could, for example, have an impact on that special interest.
125. Part 1.2.1.2 of the Guidelines continues:

*The estate should be appreciated in its entirety: not only its various components – residential, community, recreational, commercial and the external spaces between buildings – but also its setting within the surrounding urban fabric. The views from and into the estate*



*have become important, and part of its special architectural interest lies in its relationship to adjacent buildings. Any developments on the immediate boundaries of the listed area should take into account the significance of the estate's setting.*

126. The Guidelines acknowledge that the Estate was planned with a strong sense of enclosure and, in the words of the architect, was “inward looking”, given the bleak wasteland setting following WWII.
127. It should be acknowledged that the setting of the Estate has changed significantly since the 1950s, and will continue to change. The Peabody Towers, Braithwaite Tower, Cripplegate House (as extended), Blake Tower and 121-167 Roscoe Street are all visible above the perimeter blocks from views within the Estate, placing it in an evolving and dynamic urban context. To the south it can be viewed with the backdrop of the Barbican tower and podium composition; reflecting continuity in architect and the development of Modernism.
128. In this regard, the only specific reference in the Guidelines to an important aspect of setting is reference to the view along Goswell Road of Crescent House with the backdrop of the Barbican Towers, identified as being of (fortuitous, if not intended) interest, given the continuity in architect and an appreciation of the development of Modernism. The Barbican towers and podium dominate the skyline to the south, providing an important visual reference and transition, contributing to the significance of Golden Lane Estate.
129. It is considered that the following elements of the setting of the Golden Lane Estate contribute to its significance:
- The visual relationship with the Barbican to the south; in particular in the views from Goswell Road of Great Arthur House, Crescent House and the Barbican towers and the north-south axis view from the Bastion through the central piazza towards the tower of the Jewin Chapel on alignment with the Shakespeare Tower;
  - The strong sense of enclosure and unity felt in the sunken gardens, on a whole unfettered by looming development in the immediate vicinity;
  - The retention of open diagonal views across the whole site with *limited bulky development in the immediate setting to break up the* unity and inter-visibility of the enclosing residential blocks;
  - An ability to appreciate the Estate from outside views in, the dominance of Great Arthur House, in contrast to the humbler scale of the perimeter blocks;
  - An ability to appreciate the interrelationship between the interior of the maisonette flats and the external spaces.

### Impact on the significance of the Golden Lane Estate

130. The residential tower would be visible on approach to the Estate from Aldersgate Street, Goswell Road, Baltic Street West, Golden Lane and Viscount Street in the City of London. It would also be visible from in the Estate from the western forecourt to Great Arthur House, the former community piazza, the bastion, Basterfield Lawn, the tennis courts and associated circulation space enclosed by Cullum Welch House, Crescent House and Hatfield House.
131. It is considered that, by reason of its height, bulk and mass, the proposed tower would appear dominant on the principal approach to the Estate from Golden Lane (north and south), and from views within the Estate, in particular from the bastion and raised circulation space around Basterfield Lawn. On approach, and to a lesser degree from within the Estate, it is considered that the bulk/mass of the proposed tower would to a degree diminish the primacy of Great Arthur House on the skyline of the Estate. The siting, alignment, grain, height, scale, massing and detail of the lower podium, 'L'-shaped school block and school hall are considered an appropriate response to the Estate. This harm is considered "less than substantial", and should be weighed against the proposed public benefit.
132. The emerging view from Old Street is currently defined by the human scale of Basterfield and Stanley Cohen House, of the strong rectilinear orthogonal blocks and a skyline defined by Great Arthur House and the Barbican tower and podium composition. This offers a rich appreciation of a multi-layered and comprehensive Post-War townscape by a single notable architectural practice. This view would be impacted by the proposed tower, restricting views of Great Arthur House and the Barbican Tower and impacting on the scale of the perimeter blocks.
133. On approach from the south, from Beech Street, the proposed tower element, again due to its siting, terminating the strong horizontality of Stanley Cohen House, and significant height, bulk and mass, would diminish the prominence of Great Arthur House and an appreciation and understanding of its significance, but to a lesser extent than from the north.
134. The View referred to in the Guidelines, that of Crescent House from the junction between Old Street and Goswell Road, would be unaltered, other than a non-prominent glimpsed oblique view down Baltic Street West from Goswell Road. The proposal would not interfere or detract from an appreciation of the view which juxtaposes the gracious curve of Crescent House terminating in the striking silhouette of the Barbican towers, or detract from an ability to understand the development of Modernist architecture inherent in that view.

135. The proposal would have a less significant impact on the east-west approaches, where Great Arthur House would retain its primacy, in particular in views from Goswell Road and Fortune Street/Fortune Street Park.
136. From within the Estate, it is considered that the overall sense of enclosure, openness, light and sightlines would be preserved, but the sheer height, and in particular the bulk and massing of the proposed tower, would have an apparent overbearing impact on views from the raised circulation spaces surrounding the Bastion/Basterfield Lawn, the space around the children play area the tennis courts. From these, it would challenge the primacy of Great Arthur House, diminish an appreciation of the scale of the blocks and reduce the integrity of their clean parapet lines. It is acknowledged that these views would be transient, in places fleeting/glimpsed and generally oblique, whilst from significant spaces such as the community piazza, sunken ornamental garden, community centre and western piazza, the impact would at times be removed or much diminished.
137. Overall, it is considered that in the majority of instances, Great Arthur House would continue to define the Estate, not least because of its distinctive silhouette and striking primary yellow Muro glass curtain wall façade, and that the disposition of the maisonette blocks and strong enclosure of its spaces would still allow it to retain a significant degree of primacy over the Estate as a whole. The proposed tower would be no higher or wider than Great Arthur House, whilst its more understated design would not detract from an appreciation of it.
138. The 'L'-shaped nursery/school and school hall would be of a disposition, orientation, scale and appearance which would complement the Estate – providing a continuation of scale, building lines, views and routes through the Estate. The overarching use of a complementary brick, defining rectilinear horizontal blocks with a consistent rhythm of cross walls and balcony modelling, would be distinct, but sensitive to the estate, whilst not competing with it.
139. Overall, it is considered that the proposal would result in less than substantial harm to the significance of the Golden Lane Estate as listed buildings and a very limited degree of harm (also less than substantial) to Crescent House,

## **Impact on the Special Architectural and Historic Interest and Significance of the Barbican**

### The Significance of the Barbican and the Contribution Setting makes to that Significance

140. The principal significance of the Barbican, including the associated landscape, is as a leading example of a Modernist project in the High Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned Post-War, mixed-use, Modernist community.
141. It comprises a series of long slab blocks at a raised podium level, separating pedestrians from vehicular traffic, and a composition of towers which encloses private and public landscaped open spaces centred on a lake which incorporates formal planting and ancient monuments in a Le Corbusian manner.
142. It is necessary to consider the contribution of setting to the significance of the Barbican. The Estate was designed to be like a modern 'fortress', defining its own setting, and whilst there had originally been planned relationships with its surroundings, many were never implemented.
143. The Barbican has 'hard edges' with the surrounding townscape and, other than the Blake Tower, it does not form a strong architectural relationship with surrounding buildings or landscapes. However, as discussed, the clear juxtaposition between the Golden Lane Estate and the Barbican is an important relationship which contributes to the significance of these 20th Century landscapes. An appreciation of the Barbican, on approach from the north from Golden Lane and Goswell Road, is important.

### Impact on the Barbican

144. As discussed, the Barbican tower and podium composition was designed with an approach from the north in mind. When approached from Golden Lane (via Old Street), the towers provide a dramatic silhouette when appreciated against clear sky with their deep modelling and serrated profile. When contrasted with the manner of the Golden Lane Estate, there is a strong appreciation for the development of Modernism post-war.
145. An important approach, identified in the Golden Lane Estate Listed Building Management Guidelines, is the approach to the Barbican from Goswell Road with the view of Crescent House, its gracious curve of experimental bush-hammered concrete culminating in the dramatic verticality of the Barbican's Lauderdale Tower in confident bush-hammered concrete. The view, as it

emerges from Clerkenwell Road, has been tested as part of the submission and the proposed tower would have limited visibility and would not exert significant influence over this view. It is considered that the impact would be neutral.

146. Otherwise, given the scale, strength and robustness of the Barbican, which would still predominate in many views of it from its setting, it is not considered that in wider views the proposed tower would detract from its significance, or an appreciation or understanding of it.

147. Overall, it is considered that the proposal, because of the diminished view in the approach from Golden Lane, would cause slight, less than substantial harm to the significance of the Barbican as a listed building and registered landscape.

### **Impact on the Special Architectural and Historic Interest and Significance of Cripplegate House**

#### The Significance of Cripplegate House and the Contribution its Setting makes to that Significance

148. Built in 1893-96, and by architects Sidney R.J. Smith, it was built as a grand late-Victorian civic philanthropic venture for the betterment of the working poor of the Cripplegate Ward. It is an isolated remainder of Victorian Cripplegate that was altered following conversion to offices in 1987-92.

149. Though much altered, extended and stretched behind a part retained facade, it displays a handsome front facade of red brick with Portland stone dressings in an eclectic free-Jacobean manner with some good detail. The rear red brick 1980s part is of no architectural or historic interest.

150. Cripplegate House's historic setting, as part of a cohesive Victorian townscape of warehouses, workshops, terraces, alleys and courts has been lost. In terms of height, architectural form, style and materials it has little relationship or dialogue with its neighbours. However, its prominent townscape position on Golden Lane assists in allowing an appreciation and understanding of its architectural and historic interest.

#### Impact on Cripplegate House

151. The proposed tower would be visible on approach to Cripplegate House from Beech Street/Golden Lane. Given the substantial distance between the two, and the scale of Cripplegate House within its immediate townscape, it is not considered that the proposal would harm the significance of Cripplegate House, or an appreciation or understanding of it.

## **Impact on the Heritage Significance of the Jewin Chapel as a Non-Designated Heritage Asset**

### The Significance of the Jewin Chapel and the Contribution its Setting makes to that Significance

152. The Jewin Welsh Chapel is not listed but is considered a non-designated heritage asset because of its strong architectural and historic interest.
153. Built in 1956-61, contemporaneous with the adjacent Golden Lane Estate, by noted ecclesiastical architects Caroe and Partners, it replaced a former Gothic Revival church of 1879 bombed in the Blitz. It is an interesting example of Scandinavian-influenced Modernism termed “New Humanism”, popularised during the Festival of Britain. Of pink/plum brick (with matching neat flush pointing) with Portland stone dressings and a copper-clad roof.
154. The brick (colour and finish) is a clear reference to the Golden Lane Estate brick, whilst the imposing west tower forms the southern termination to the principal north-south axis view from the bastion garden through the central ‘piazza’, which was conceived as the social focus of the Estate: a townscape ploy which would seem deliberate, rather than fortuitous. It is known that Gordon Cullen, who was developing his concept of ‘townscape’ at the time, had advised on the Golden Lane Estate. The tower is a local landmark with a belfry stage gallery of deeply splayed slit windows crowned by a socketed copper roof with stylised urn finial, terminating one of the only ‘closed’ vistas in the Golden Lane Estate.
155. The Jewin Church is considered to be of local architectural, historic and communal heritage interest, inherently as a building and in its positive contribution to the setting of Golden Lane, especially in terminating the principal north-south axis view.

### Impact on the Jewin Chapel

156. The chapel would be viewed in the context of the proposed tower in views from Fann Street and, to an extent, Viscount Street. In Viscount Street, given the scale of the church and tower relative to the enclosing built environment, it is considered that the proposed tower would not diminish the church. From Fann Street, it is considered that the impact would be neutral.
157. Overall, the significance of the Jewin Chapel as a non-designated heritage asset would not be harmed by the proposed development.

## **Impact on St Luke's Conservation Area within the London Borough of Islington**

158. St. Luke's Conservation Area was designated by the LBI in 1975 and extended in 2002. The St Luke's Conservation Area Design Guidelines describe the area as follows:

*'Lying in the south of the borough, straddling the ancient thoroughfares of Whitecross Street and Old Street, the St. Luke's Conservation Area is an important surviving part of historic Finsbury, with a special character and appearance which is desirable to preserve and enhance. Whitecross Street is a medieval lane which ran from the Cripplegate to Old Street, home of London's oldest surviving street market and fronted by a number of domestic-scale properties from the 18th and 19th centuries. Either side, the narrow side streets contain a wide range of 19th century commercial buildings and one of the largest late 19th century Peabody housing estates.*

*Central and pivotal to the conservation area St. Luke's Church, dating from 1733, designed by John James and Nicholas Hawksmoor, is one of London's most important churches. The church is now refurbished as a rehearsal, concert and education centre for the London Symphony Orchestra. The unusual obelisk spire is a major local landmark, with important views down Whitecross Street. Surrounding the church is the churchyard and burial ground, now a public open space, with fine plane trees, railings and tombs. Fronting onto these spaces are several important groups of Georgian and Victorian buildings which are of architectural and historic interest and which contribute to the setting of the church.'*

159. The LBI conclude that the introduction of a highly prominent tall building will result in some harm to the St Luke's Conservation Area from certain views, but have concluded that the impact on it and the undesignated heritage assets within it is less than substantial harm, which can be weighed against the public benefits of the scheme. The CoL agrees with this conclusion. In view of the location of St. Luke's Church (Grade I Listed) in relation to the application site it is not considered that there will be an adverse impact.

### **Summary of Impacts**

160. The proposal has been assessed in relation to the relevant heritage policies of the London Plan and Local Plan. The proposals would result in some harm to the setting of Golden Lane Estate, the Barbican and the St Luke's Conservation Area and significant buildings within it. As such Policy CS12 is not complied with. It is considered that the harm is less than substantial, therefore triggering NPPF paragraph 134 (see above) and not paragraph 133. Whilst giving considerable importance and weight to the desirability of preserving the setting of listed buildings, your officers are of the

view that the public benefits of the scheme (as referred to in paragraphs 50, 63 and 64) outweigh the less than substantial harm to the significance of the relevant heritage assets.

## **Amenity of neighbouring residents**

### **Daylight and Sunlight**

#### Policy Background

161. Paragraph 1.3.45-46 of the Mayor of London's Housing SPG states that:

*'Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree of flexibility needs to be applied when using BRE guidelines to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.'*

*The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.'*

162. Local Plan Policy DM10.7 Daylight and Sunlight resists 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 (BRE) guidelines. The policy requires new development to provide acceptable levels of daylight and sunlight for occupiers. 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. Unusual existing circumstances, such as the presence of balconies or other external features which limit the daylight and sunlight that a building can receive, will be taken into account. Policy DM21.3 of the Local Plan requires development proposals to be designed to avoid overlooking and



seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation.

163. In general, for assessing the sunlight and daylight impact of new development on existing buildings, Building Research Establishment (BRE) criteria is adopted. In accordance with both local and national policies, consideration has to be given to the context of the site, the more efficient and effective use of valuable urban land and the degree of material impact on neighbours. The BRE states:

*“The advice given here is not mandatory and the guide should not be seen as an instrument of planning policy; its aim is to help rather than constrain the designer. Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design...In special circumstances the developer or local planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings”.*

164. BRE guidelines consider a number of factors in determining the impact of development on daylight and sunlight on existing dwellings:

165. Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. Paragraph 2.2.11 states: Existing windows with balconies above them typically receive less daylight. Because the balcony cuts out light from the top part of the sky, even a modest obstruction may result in a large relative impact on the VSC, and on the area receiving direct skylight.” The paragraph goes on to recommend the testing of VSC with and without the balconies in place to test if it the development or the balcony itself causing the most significant impact.

- Daylight Distribution (DD): No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that

this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

- Sunlight: sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

166. Developers may also consider Average Daylight Factors (ADF). ADF is the ratio of internal light level to external light level. BRE advise that ADF is not generally recommended to assess the loss of light to existing buildings, but is appropriate to consider daylight and sunlight to new dwellings. Guidance on the levels of daylight to be provided are set out in the British Standard on daylight, which recommends minimum values for ADF of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. The British Standard recommends that where a living room includes a kitchen, the higher minimum average daylight factor of 2% should apply.

167. Paragraph 123 (c) of the draft NPPF states that:

*“c) local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site.”*

#### Daylight and sunlight assessment

168. The applicant's consultant has undertaken a study of the impact of the proposed development on the relevant rooms in the surrounding residential and educational buildings and on sunlight to neighbouring amenity spaces in the City of London and the LBI. (No assessment has been carried out of impacts on sunlight to Basterfield House and Hatfield House. This is considered appropriate due to the north facing orientation of Basterfield House and all south-facing windows of Hatfield House continuing to meet BRE guidelines). The study has been reviewed and its assessment of the extent of the impact is considered sound.

## Daylight and Sunlight to Existing Neighbouring Buildings in the City of London

### *Golden Lane Estate Allotment*

169. The BRE Guidelines state that it is good practice to check the sunlighting of open spaces where it will be required and would normally include: *'gardens to existing buildings (usually the back garden of a house), parks and playing fields and children's playgrounds, outdoor swimming pools and paddling pools, sitting out areas such as those between nondomestic buildings and in public squares, focal points for views such as a group of monuments or fountains'*.
170. At paragraph 3.3.17 it states: *"It is recommended that for it to appear adequately sunlit throughout the year, at least half of a garden or amenity area should receive at least two hours of sunlight on 21 March. If as a result of new development an existing garden or amenity area does not meet the above, and the area which can receive two hours of sun on 21 March is less than 0.8 times its former value, then the loss of sunlight is likely to be noticeable. If a detailed calculation cannot be carried out, it is recommended that the centre of the area should receive at least two hours of sunlight on 21 March.* The Daylight and Sunlight Report submitted as part of the application demonstrates that this space would be fully BRE compliant, with over half of the area receiving at least two hours of sunlight on 21st March.

### *Other neighbouring premises*

171. It can be noted in the LBI's report that the other residential premises impacted by the scheme within the LBI in relation to daylight and sunlight is Banner House, Peabody Estate. They concluded that because they are bedrooms that the impact was acceptable when taking the benefits of the scheme into account. The CoL's officers agree with that conclusion.

### *Basterfield House*

172. Basterfield House, to the south, faces the proposed development across the service road. The affected elevation contains duplex flats with kitchens on the ground, second and fourth floors and bedrooms on the first, third and fifth floors. The affected kitchen windows have projections/overhangs above them that limit the light received from the sky. In such circumstances, BRE guidelines recommend an additional assessment assuming the balconies are not present.

173. As set out in the LBI's report an assessment has been undertaken of the impact of the development on the windows in the affected façade. The building itself poses a large obstruction to its own light due to its own design. When looking at the daylight (VSC) results for this building, this impact is illustrated by the fact that often a significant failure for the kitchen (due to its recessed positioning) is starkly contrasted on two accounts when compared to the bedroom windows which aren't recessed but sit flush on the elevation.

174. For those reasons the kitchens currently receive a very limited amount of daylight to the window face, any change is therefore shown (in percentage terms) as a significant proportion or loss. Comparing this to the bedroom windows, they (on the whole) receive very high levels of daylight to the window due to the low heights of the existing school buildings on the site. The losses in some cases are high, but in many cases the resultant actual levels of VSC retained would be considered to be similar to that of nearby properties, given the urban location of the site.

175. The living rooms, which are considered to be the most important rooms (as stipulated within the BRE Guidelines) are located on the opposite elevation from the application site (facing south) and are therefore unaffected by the development,

176. In terms of bedroom windows, there are 15 bedroom windows that would experience losses in excess of BRE guidelines for VSC ranging between 21% and 51% losses. These relate to 15 individual flats that are all dual aspect and over two levels. Of those 15 windows, 2 windows experience losses of 51% and 43% respectively (flats 01 and 20), 6 windows experience losses of between 31% and 39% and 7 windows experience losses between 21% and 28%. The actual levels of retained VSC to these bedroom windows vary from:

- 8.68% (Flat 17 which is reduced by 21% from the former VSC value and is obstructed by the structure in front of this window which is an integral part of the building itself)
- 16.42% (Flat 01 experiencing a 51% reduction)
- 20.33% (Flat 20 experiencing a 43% reduction)
- 26.68% (Flat 24 which almost retains the 27% target of the BRE Guide but experiences a loss of 26% from the original very high level.

177. In terms of kitchen windows there are 42 windows that fail the VSC test ranging between 23% and 65% losses. These all relate to individual flats as set out below. Of these 42 windows that fail 4 kitchen windows experience losses of between 60% and 65% (flats 01, 12, 17 and 20), 9 windows experience losses between 51% and

59% (flats 02, 08, 11, 13, 14, 15, 16, 21 and 40), 12 windows experience losses between 41% and 50%, 8 windows experience losses between 31% and 40% and 9 windows experience losses between 21% and 30%.

178. Looking at the worst affected flat (Flat 01) in relation to VSC to the bedroom window, it is located over the ground and first floors with ground floor kitchen (R2) and first floor bedroom (R1). The bedroom window (W1) is flush and has a VSC of 33.76% (noting that the most VSC a window could possibly achieve is 40%). In this regard this is an extremely high level of daylight received by this window. Compare this to the kitchen (R2) window (W2) at ground floor level and whilst this window would receive less daylight as it is located at a lower level, due to the significant obstruction from its own building design its existing VSC by comparison is 6.19%. This can be compared to the maisonette at the floors above, where Flat 20 second floor kitchen (R2) window (W2) has an existing VSC of 9.97% (changing to 3.70% being a 63% reduction) compared to the VSC of the bedroom (R1) window (W1) at third floor of 35.96% (altered to 20.33% or a 43% reduction). These results do demonstrate that the inherent building design is causing significant restriction to existing VSC with respect of the kitchens.
179. Flat 01 would experience a reduction of VSC to the kitchen window of 60% (a change from 6.19% to 2.28%) and the bedroom window would experience a loss of VSC of 51% (a change from 33.76% to 16.42% of actual VSC). Whilst these changes are considerable and will be extremely noticeable and cause harm it should be noted that the retained level of VSC to the bedroom would still remain comparable to central London locations after the development being in place at 16.42%. Whilst the percentage loss to the kitchen is significant, as quoted above from the BRE Guidance this is clearly significantly influenced by the design of the building itself (. In terms of daylight distribution, both rooms would retain complying levels of daylight within the respective rooms.
180. It should be noted that these two flats (01 and 20) would not experience a loss of daylight distribution beyond the BRE guidance. Given these considerations and as the living room (and 2 additional bedrooms) would maintain existing daylight levels these impacts are in this instance not considered to result in significant or unacceptable impacts to the overall residential amenity of these flats as a whole. Having regard to the considerations above, it is considered that whilst the losses of VSC will be noticeable they would not be significantly at odds with levels of light in properties within central London locations such as this. The retention of existing daylight levels to the living rooms is a particularly important consideration and maintains overall an acceptable amenity level for each of these flats.

181. Flats 02, 04, 06, 21 and 23 would experience losses of both VSC and daylight distribution in excess of BRE Guidelines to both the bedroom and kitchens. Flats 08, 10 and 27 would experience losses in excess of BRE guidelines of both VSC and daylight distribution to the kitchens only (it should be noted that the bedroom to flat 10 would retain more than 27% VSC after the development which exceeds the BRE Guidelines). Flat 41 would experience losses in excess of BRE for both tests just in relation to the bedroom. It should be noted that the kitchens are small (less than 5sqm) and would not be considered as 'habitable' for the purposes of applying the policies in the Mayor of London's Housing SPG – paragraph 1.3.19).

182. As discussed above, the retained VSC levels for the bedrooms (Flats 02, 04, 06, 08 and 10) would be 20.63%, 22.64%, 24.60% and 26.17%, 26.40%. As discussed above, these retained levels are very good for an urban location and whilst they may be reduced by more than 20% that is reflective of the very low scale of buildings on the application site. Whilst the change will be noticeable, having regard to the urban location of the site these VSC levels are not considered to be unacceptable for the site's location. Whilst these bedrooms would experience daylight distribution losses of 40%, 29%, and 27% and the change would be noticeable, given the starting point was light reaching the working plane within almost the entire extent of these rooms, the retained light within the room would remain at least 60% and as bedrooms have a lesser requirement for light (in particular in relation to this test – as stipulated by the BRE Guidelines) in these instances the impacts are considered to be acceptable, owing to the dual aspect, split level nature of the units and given the south facing unaffected living rooms.

183. Moving to the kitchens losses of daylight distribution of 41%, 40%, 34%, 28% and 21% would be experienced by flats 02, 04, 06, 08 and 10 respectively. As quoted from the BRE Guidelines above, the existing obstructions of the building themselves cause an increase in sensitivity to DD changes. All kitchens but flat 02 would retain direct skylight to the working plane of more than 50% of the kitchen area and given its small size, non-habitable room status and the mitigating factors outlined above, these losses (particularly 41%, 40% and 34%) whilst noticeable would not cause such harm to the amenity of the flat overall.

#### *Hatfield House*

184. Hatfield House is positioned to the west of the application site, closest to the proposed school building (which is close to the equivalent of 4 storeys in height once the rooftop play area and plant enclosure is taken into account). The building is a similar design to Basterfield House, comprising a series of two storey

maisonettes, with additional single storey flats located at lower ground floor level. The maisonettes have their kitchens located on the north side of the building on their lower level, and bathrooms and bedrooms are above. As for Basterfield House, the kitchens are recessed from the façade such that their view of sky is limited by the projecting balconies above and projecting bays to either side. The building itself therefore poses a large obstruction to its own light due to its design as indicated below.

185. There are 6 windows that fail the VSC test within Hatfield House. Of those 6 windows, 4 serve kitchens and the losses range from 27% to 51% and two relate to bedrooms both of which are located at basement level and experience losses of 46% and 64% respectively. The two basement bedrooms experience such a limited amount of light to the window because of their positioning that the loss is shown as a significant percentage change, however it is likely that the change, whilst regrettable, would not be noticeable within the room. These rooms would lose 98% and 88% of daylight. However given existing obstructions and the sensitivity to any change it is not considered that the proposed school building is of such unacceptable siting or massing that these impacts would warrant a refusal of the application. Additionally, those flats have a combined living/kitchen/dining room that are unaffected in terms of both VSC and daylight distribution due to the southerly aspect of those rooms and this is a significant mitigating factor when considering the overall harm to these flats.
186. The 4 kitchen windows that are affected, serve small (5.5sqm rooms) kitchens behind. Whilst the VSC losses range from 27% to 51% the design is similar to that of Basterfield House with the windows set beneath projecting balconies and partially obscured by projecting side elements. The existing VSC levels to these windows are low 2.55% to 6.51% as a result of obstructions by the building itself. As you move up the elevation the kitchen window VSC improves as would be expected and the relative loss of VSC is lower at second floor level (being 27% and 29% respectively). This is a particularly urban location and the degree of enclosure and relationship between buildings in this part of Baltic Street East and West is considered to be of such a character and tight urban grain where actual retained VSC levels are not uncommon.
187. The model for the school building indicated within the Daylight and Sunlight Assessment indicated a rooftop plant enclosure which appears to differ in scale to that indicated in the proposed plans. The applicant's daylight and sunlight surveyors have advised that the slight increase in height of the plant enclosure would have a minor impact on some of the results obtained for the properties to the north. However, they advise that the scale of change is unlikely to represent a material change and would not be of a scale that

would affect their overall conclusions. This advice is considered sound.

### *Conclusions on Daylight and Sunlight*

188. The proposals reduce noticeably daylight available to dwellings. Policy DM10.7 of the City of London Local Plan resists development which would reduce noticeably day light and sunlight to nearby dwellings and open spaces to unacceptable levels taking account of the BRE's guidelines. The BRE guidelines recognise that ideal daylight conditions may not be practicable in densely developed city centre locations. The proposals are not considered to reduce daylight and sunlight to unacceptable levels. Policy DM10.7 is considered to be complied with.

### **Overlooking**

189. Policy DM21.3 of the Local Plan states that all development proposals should be designed to avoid overlooking.
190. On the podium part of the residential block there are windows on the southern elevation (looking towards Basterfield House) serving a bedroom at first floor level and a bedroom, the living room/kitchen and the balcony at third floor level. The separation distance between these buildings is approx. 8.5m. The windows on Basterfield House serve bedrooms. The LBI have recommended a condition that requires obscure glazing and its maintenance for the life of the building.
191. On the 4th-6th floors the windows on the southern elevation serve a bedroom and living room/kitchen. The separation distance here is approx. 18.2m. Considering the separation distance between the two buildings this is an acceptable relationship. The upper floors of the residential tower would look over the roof of Basterfield House.
192. The southern elevation of the school hall is blank. The main school building is 27m from the boundary and is not considered to give rise to an overlooking issue.
193. It is considered that subject to conditions the proposals comply with policy DM21.3 of the City of London Local Plan.



## **Noise**

### During the demolition and construction periods

194. Noise and vibration issues occur during demolition and early construction phases. The LBI have suggested conditions to protect nearby residents and commercial occupiers from noise, dust and other environmental effects attributable to the development, and it is recommended that the CoL impose similar conditions in relation to that element in the City.

### From the proposed flats and workspace

195. Local Plan policy DM15.7 states that 'developers will be required to consider the impact of their developments on the noise environment. 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'. It is considered that whilst the proposed increase in the number of residents could lead to an increase in noise it is not considered that this would result in an adverse impact on the occupiers of neighbouring properties. It would not be reasonable to restrict the use of private balconies, which will to some degree be managed by the occupiers themselves. Environmental Health have raised no concerns.
196. Residents' access to the MUGA outside school hours and community use of the school hall would be secured through the S106 covenants, which would include the requirement for a management plan for both facilities. The LBI have recommended that opening hours are to be controlled as part of the management plan.
197. The small micro workspaces below the residential area are B1 uses suitable in a residential area and are not anticipated to give rise to noise nuisance.

### School

198. It is not anticipated that any breakout noise from the school buildings would be sufficiently loud to cause nuisance. The proposed play ground noise level predictions are set out in the applicant's Noise Assessment and this is reviewed in detail in the LBI's report and update note (attached). The LBI have suggested that the rooftop play area is screened by a solid, imperforate barrier and further details are required by condition. The applicant's acoustic consultant had recommended that an acoustic barrier is installed along the southern boundary of the site. Whilst an acoustic barrier would mitigate some of the noise there is a balance to be struck between noise mitigation and other impacts upon residential

amenity. The LBI have taken the view that “a 2m high acoustic barrier, for example, may mitigate some noise to the ground floor kitchens within Basterfield House but the noise would still be expected to carry upwards to accommodation on the upper floors. A higher acoustic barrier would have implications in terms of outlook from the Basterfield House flats and the daylight amenities of these dwellings.”

199. The LBI have concluded that “objections have been received from neighbouring residents in terms of the noise impact of the proposed development and...there is likely to be a noticeable and intrusive increase in noise at some locations during some activities. The School uses, by their nature, generate noise and it should be noted that the site was previously in use as a school, albeit that the play area was located within a central courtyard. The most significant noise impacts from the proposed development would be likely to occur during the school day and would not occur during evenings nor weekends when a greater proportion of neighbouring dwellings would be likely to be occupied. It is considered that the proposed development would not result in an unduly adverse noise impact upon the amenities of the occupants of neighbouring residential dwellings, having regard to the previous lawful use of the site and having regard to proposed conditions”. The CoL’s Environmental Health Officers have confirmed that they agree with this view and that they are satisfied that subject to the conditions recommended by the LBI, noise conflicts will be minimised and mitigated. Schools are most frequently located in residential areas.

200. It is considered that, subject to conditions and the S106 covenants, the proposals comply with policy DM15.7 of the City of London Local Plan.

### **Odour from the proposed school kitchen**

201. Concerns have been raised by residents regarding the potential for cooking odours from the school kitchen which is to be located in the hall. Ventilation systems for extracting and dispersing any emissions and cooking smells must be discharged at roof level and designed, installed, operated and maintained in accordance with the manufacturer’s specification in order to prevent them adversely affecting neighbours. It is considered that appropriate mitigation measures can be secured by the LBI and CoL’s conditions to prevent undue odours from affecting residential amenity.

### **Light pollution**

202. The LBI have recommended conditions requiring a lighting plan for the school development and a lighting plan for the residential/commercial development, which should prevent any adverse impact arising from light pollution issues.

## **Wind**

203. The residential block should be tested in terms of its impact on the local wind microclimate (including the balconies), in accordance with policy 7.6B(d) of the London Plan and the City of London Planning Advice Note: Wind Effects and Tall Buildings. The LBI have imposed a condition requiring details of wind mitigation measures in accordance with our approach.
204. It is considered that, subject to conditions, the proposals comply with policies DM3.1 and DM21.5 of the City of London Local Plan and policy 7.6B(d) of the London Plan.

## **Access and Inclusive Design**

205. London Plan Policy 7.2 states that development should achieve the highest standards of accessible and inclusive design, ensuring that developments can be used safely, easily and with dignity by all regardless of disability, age gender ethnicity or economic circumstances.
206. London Plan Policy 3.8 states there should be genuine housing choice which meets requirements for different sizes and types of dwellings in the highest quality environments.
207. London Plan Policy 3.8 (Housing Choice) to require that 90% of new housing be built to Category 2 and 10% to Category 3. A total of 7 of the units (10%) are wheelchair accessible.
208. Local Plan policy DM10.8 requires that developments meet the highest standard of accessibility and inclusive design.
209. The Access Officer has commented on the application and those comments have been passed to the applicant and LBI. LBI's Accessibility Officer's comments are addressed in paragraph 11.225 and 11.226 of their report. Officers consider that the arrangements are acceptable and do not conflict with City's policy DM10.8.

## **Transport, Servicing, and Impact on Public Highways**

### During demolition and construction

210. The application is accompanied by a Draft Construction Management Plan. The LBI have imposed conditions requiring Demolition and Construction Logistics Plans and Demolition and Construction Environmental Management Plans. It is recommended that similar conditions are imposed on that part in the City.

### Servicing

211. Policy DM16.5 states that “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”. Both the residential block and the school would be serviced from the street, which means that the proposals do not meet this objective. The school would be serviced from Baltic Street West and deliveries/collections would consist of a weekly bin collection, a biweekly recycling collection, a daily kitchen delivery, a daily post-delivery (made on foot); and a further daily delivery. As Baltic Street has no turning head, deliveries and collections would need to be carefully managed to avoid conflict with school drop-off and pick up times. The LBI has required by condition a Delivery and Servicing Plan. The relevant highways are in the LBI. It is a material consideration that the LBI’s view is that the arrangements are acceptable, subject to a Delivery and Services Plan. In the circumstance and giving considerable weight to LBI’s view, officers consider that the arrangements are acceptable notwithstanding the conflict the City’s policy DM16.5.

### Disabled parking

212. Policy DM16.5 states that “designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements”. The applicant has stated that disabled parking spaces would be provided on street and not on site and would be provided on a case by case basis. Provision on street would be subject to orders being made after consultation. The LBI operates a Blue Badge scheme. The relevant highways are in LBI. It is a material consideration that LBI’s view is that the arrangements are acceptable, subject to a 106 covenant to secure “provision of 2 accessible (Blue badge) Parking Bays with all costs to be borne by the Developer with works to be carried out by the Council including Traffic Management Orders”. LBI’s Traffic and Safety Manager is also satisfied that there is capacity to reduce the existing school “Keep Clear” sign from its current 55m to provide 2 Blue Badge spaces in front of the residential block. LBI’s Highways Manager has indicated this is acceptable provided a minimum 29m “Keep Clear” sign is retained, no increase in danger or obstruction is caused, and sight lines are retained. In the circumstance and giving considerable weight to LBI’s view, officers consider that the arrangements are acceptable notwithstanding the conflict the CoL’s policy DM16.5.

213. There are two existing disabled parking spaces within the garages on the application site which would be displaced by the development and will need to be provided within proximity of the residential unit, which they serve. As such, the applicant’s transport

consultant has indicated that some spaces on Golden Lane (City side) could be converted to disabled parking, with other permit holders provided spaces elsewhere within the Estate.

214. Accordingly, it is recommended pursuant to the CoL's permission that 'The re-provision of the two parking bays to suitable alternative locations elsewhere within the Golden Lane Estate car parking areas' is secured through a covenant provided by the applicant. One of the users of the existing disabled parking space has recently written to the applicant copying the planning officers. His letter explains the mobility difficulties that would arise, including in travelling to work and maintaining his livelihood, if suitable alternative provision is not made. He proposes alternatives and these are being explored by the applicant. On the basis of the proposed covenant it is considered that adverse impacts for the users of the existing parking can be acceptably mitigated.

#### Cycle parking and facilities

215. Policy DM 16.3 of the Local Plan requires cycle parking provision for residential development to meet London Plan standards. Policy DM 16.3 states that the City Corporation encourages these standards to be exceeded and encourage on-street cycle parking in suitable locations.
216. It is proposed that 102 cycle parking spaces are provided for the residential block. The number of cycle parking spaces provided for the residential block exceeds the London Plan requirements (of 98 long-stay spaces and one short-stay space) and is acceptable.
217. It is proposed that 48 long-stay and 12 short-stay cycle parking spaces are proposed for the school. The provision for the school numerically meets the number required by the London Plan but the split of short-stay and long-stay does not meet the London Plan requirement (56 long-stay and 4 short-stay spaces). This is accepted by LBI and a condition to secure the cycle parking spaces has been imposed.

#### **Waste Management**

218. Policy DM17.1 states that "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".
219. The CoL's Community Facilities Manager has raised concerns about the refuse arrangements due to trundle distances. However, it is LBI which will be responsible for refuse arrangements for the development and LBI's Waste Advisor has reviewed the proposed

refuse collection arrangements and advises that they are acceptable. It is considered appropriate for the CoL to conclude that the arrangements are acceptable in accordance with LBI's view and the CoL's policy DM17.1 is considered to be complied with.

### **Open space, biodiversity and loss of trees**

220. Policy DM19.1 states that "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."
221. Policy DM19.4 states that "the City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas identified as deficient by...requiring external play space and facilities as part of new residential developments which include 20 or more family units (those with 3 or more bedrooms) or more affordable units of 2 or more bedrooms." Policy 3.9 of the London Plan requires 440 sqm of play space to be provided for a scheme of this scale. The scheme does not include any on-site children's play space except for the use of the MUGA by residents outside school hours.
222. The application includes (as part of the Planning Statement Addendum) a justification for the lack of on-site formal children's play space. The justification given is the proximity of play provision close to the site (Golden Lane Estate playground, Fortune Street Park, Quaker Gardens), facilities available in the Golden Lane Children's Centre, the Early Bird Breakfast Club and the after-school Enrichment Club; and community use of the school hall. The Early Bird Breakfast Club and the after-school Enrichment Club and community use of the school hall cannot be used as justification as these are not free of charge. The MUGA would provide 440sqm of play space, which meets the London Plan requirement, but would only be available outside school hours. The area is not floodlit. This is not in complete compliance with policy. LBI have required access to this space through the S106 covenants.
223. Each flat would have private amenity space in the form of a balcony. Policy DM10.3 states that roof gardens and terraces will be encouraged where they do not immediately overlook residential premises. The balconies would not directly overlook neighbouring residential premises and Policy DM10.3 is complied with.
224. Policy DM10.2 states that the installation of green roofs should be encouraged. "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". It is proposed that the school hall and the podium level of the residential block have sedum roofs, and that the southern elevation of the school hall (facing Basterfield House) is a green wall. The roof of the main school building cannot be green as outdoor playspace would be situated here. It is considered that the maximum practicable coverage of green roofs has been achieved. LBI have imposed a condition requiring details of the green roofs and their maintenance and it is recommended that the City impose a similar condition.

225. Policy DM19.2 states that "developments should promote biodiversity and contribute to urban greening by incorporating: green roofs and walls, soft landscaping and trees; features for wildlife, such as nesting boxes and beehives; a planting mix which encourages biodiversity; planting which will be resilient to a range of climate conditions; maintenance of habitats within Sites of Importance for Nature Conservation."
226. A Preliminary Ecology Appraisal Report has been submitted as part of the application, which provides details of a desktop study and site survey. The site is not subject to any statutory or non-statutory ecological designations.
227. The report concludes that the trees and vegetation in the unmanaged planted beds along the western boundary provide suitable habitat for nesting birds, however this is limited and it is unlikely that nesting birds would utilise the site in great numbers. A precautionary approach to vegetation removal is considered adequate to safeguard the species.
228. Following the initial assessment, the site was not considered to provide a suitable habitat for roosting bats, dormice, water voles, great crested newts, reptiles or badgers and further surveys in respect of these species are not considered to be necessary.
229. In order to avoid any potential impacts on breeding birds any vegetation clearance, particularly within the planted beds along the western site boundary should be carried out outside of the main bird nesting season which runs from March to August inclusive. If any nests are found during the works, all activities in the vicinity of the nest must cease and the nests should be protected until such time as the young have fledged and left the nest. If any nesting birds are found at any time during clearance works, work should stop immediately and an ecologist consulted. It is recommended that an update habitat survey is undertaken if more than 12 months have elapsed between the survey and the point at which any development decisions have been made at the site. These would be secured by conditions on LBI and CoL decisions.

230. Bird boxes, log piles and a bug hotel are a feature of the school playground, which would support the site's ecology, and would be approved as part of the landscape plans secured by condition by LBI.

#### Loss of trees

231. An Arboricultural Impact Assessment has been submitted as part of the application. To facilitate the development, four category C trees (low quality and value with at least 10 years remaining life expectancy or young trees with a stem diameter of less than 150mm) (two silver birches, a cherry tree and a butterfly bush), one area of scrub, and one group of C category trees would require removal. One area of climbing plants would need to cut back to the common boundary. The landscaping proposals show that 20 new trees would be planted across the site and on the site frontage on Golden Lane. The proposed development would result in a net gain in tree numbers. LBI have imposed conditions requiring details of the tree pits, details of the replacement species, maintenance for two years and the replacement of any trees that die or become severely damaged or diseased within five years of completion. It is considered that, subject to the conditions imposed by LBI, policy DM19.2 of the Local Plan is complied with

#### **Energy and Sustainability**

232. London Plan Policy 5.2 requires residential development to be zero carbon, with a 35% reduction in carbon emissions being achieved on site. The interpretation of carbon reduction targets in London Plan Policy 5.2 is found in the Mayor's Sustainable Design and Construction SPG. The Energy and Sustainability Statement submitted as part of the application demonstrates that the residential block has been designed to achieve an improvement of 38.59% over the 2013 Building Regulations requirements. This would be achieved through energy efficiency measures and on-site CHP. A carbon offsetting payment is required through the S106 covenants to meet the zero carbon target.
233. For non-residential development London Plan Policy 5.2 requires an overall 35% improvement in carbon emissions. The school has been designed to achieve a 40.6% improvement over the 2013 Building Regulations through energy efficiency measures and on-site CHP.
234. Policy CS15 requires the highest feasible and viable sustainability standards to be applied to all development and, therefore, renewable energy measures such as solar Photovoltaic panels should be included in the development regardless of



whether the London Plan targets have been met with other measures.

235. The London Heat Map shows that this site is close to two District Heating networks: Citigen and Bunhill Row. London Plan and City Local Plan policies require that a connection to an existing District Heating network should be prioritised ahead of on-site CHP. Such a connection is likely to improve the carbon performance of this development with additional benefits for air quality in the vicinity.
236. The development should include connection to a local District Heat Network. If there are exceptional circumstances which make this impossible then this should be fully justified and mitigation for carbon emissions and air quality impacts should be put into place. This will be secured by LBI and the CoL by condition and S106 covenants.
237. The BREEAM 2014 New Construction Design Stage Tracker submitted as part of the application demonstrates that the development has been designed to achieve a BREEAM rating of Excellent in line with Policy CS16. A post construction BREEAM assessment is secured by LBI and the City by condition. Subject to the imposition of conditions and covenants it is considered that policies CS15 and CS16 of the Local Plan and London Plan Policy 5.2 are complied with.

### **Flooding and drainage**

238. A Flood Risk Assessment has been submitted as part of the application. The site is within Flood Zone 1 and has a low risk of flooding from groundwater, pluvial or sewers and has a low to negligible risk of flooding from all other sources. The report concludes that the development proposals should not increase flood risk on or off site.
239. The Flood Risk Assessment includes a Surface Water Drainage Strategy, which sets out appropriate measures for the site. The existing site is currently drained to the existing Thames Water combined sewers. There are no separate adoptable foul and surface water sewers in the vicinity of the site. In addition, the existing ground conditions are not suitable for infiltration techniques.
240. The proposed drainage network for the residential development and the school have been designed to be independent entities. As such the proposed runoff rate for each network will be 5l/s, and will therefore discharge to the existing combined sewer at 10l/s. To achieve the proposed discharge rates for storm events up to the 1:100 year + CC (40%), it is proposed to use a geo-cellular system to provide 166m<sup>3</sup> of storage for the school and 30m<sup>3</sup> of storage for the residential development. LBI have conditioned details of

landscaping, SuDs components and measures to prevent flooding to ensure compliance.

241. It is considered that, subject to conditions, the proposals would comply with policies CS18, DM18.2 and DM18.3 of the Local Plan.

### **Air quality**

242. Section 7.14 of the London Plan requires that major developments are at least air quality neutral in terms of their overall impact on air quality. An Air Quality Report has been submitted as part of the application.
243. The future air quality predictions in the report are stated to be worse case and that air quality would be significantly below the annual mean objective; however, these predictions seem overly optimistic. As such, given the nature of the school environment, possible exceedances of the air quality objectives, traffic impacts at drop off and pick up time, for example idling engines. LBI have imposed a condition requiring a further Air Quality Assessment and it is recommended that the CoL impose a similar condition.
244. The report should consider: ventilation/filtration requirements for the development occupiers, information for staff/pupils to reduce exposure; reference to the travel plan which promotes walking/cycling, public transport and discourages private car use; measures to stop idling engines; specification of ultra-low NOx boilers and CHP; any greening measures to reduce exposure; and any other relevant measures
245. As details relating to site combustion plant is not known, the air quality report does not include an impact assessment of the proposed CHP and the report states this will be done when more information is available. The applicant should note that the CHP assessment should include the roof-top play area as a receptor location. In addition, the air quality neutral assessment does not include an assessment of building emissions. Both of these elements will be included in the Air Quality Assessment required by LBI and the City by condition.
246. During construction dust emissions would increase and would require control through the implementation of good practice mitigation measures, which would be part of the which should be required by conditions as part of the Demolition and Construction Environmental Management Plans required by LBI and the City by condition.
247. It is considered that, subject to conditions, the proposals would comply with policy DM15.6 of the Local Plan.

## **Unexploded ordnance**

248. The application is accompanied by a Detailed Unexploded Ordnance (UXO) Threat and Risk Assessment which identifies that there is a medium risk of unexploded ordnance on the site.

249. The following risk mitigation measures are recommended:

- Site specific unexploded ordnance awareness briefings to all personnel conducting intrusive works;
- Unexploded ordnance specialist on-site support;
- Intrusive Magnetometer Survey of all borehole and pile locations/clusters down to
- maximum bomb penetration depth.

250. These recommendations are secured by LBI by condition.

## **Archaeology**

251. The site is in an area of archaeological potential where remains from all periods may be expected to survive, and particularly from the medieval and post-medieval periods. There is low to medium potential for Roman remains, including Roman burials, to survive.

252. The existing building structures within the City are single storey, do not have a basement and part of the site is not built on. There is evidence that the previous pre-war buildings on the site had basements and part of the site is over a former road. The archaeological survival will be affected by the existence of previous basements and building foundations and bomb damage. The proposed development on the site within the City would not have a basement and any archaeological impact would be from the proposed ground floor slab, new foundations and drainage.

253. An Archaeological Desk Based Assessment has been submitted with the application. Archaeological evaluation is required to provide further information on the nature, character and date of archaeological survival and to design an appropriate mitigation scheme to record any remains affected.

254. LBI have imposed conditions to cover archaeological evaluation, a programme of archaeological work and details of the proposed ground floor slab and below ground works including drainage and foundation design.

255. It is considered that, subject to conditions, the proposals would comply with policies DM12.4 of the Local Plan.

## **Planning Obligations and Community Infrastructure Levy**

256. The development would require planning obligations to mitigate the impact of the proposal and make it acceptable in planning terms. The Community Infrastructure Levy (CIL) Regulations 2010, part 11 introduced the requirement that planning obligations under section 106 must meet three statutory tests, i.e. that they (i) necessary to make the development acceptable in planning terms, (ii) directly related to the development, and (iii) fairly and reasonably related in scale and kind to the development.

257. The following Planning Obligations will be required by both planning authorities:

- On-site provision of 66 affordable (social rented) housing units with nomination rights split between the CoL and LBI in line with agreed principles.
- Community Use agreement and management plan for the school hall.
- Contribution in lieu of on-site children's play space of £134,676.
- Residents of the residential building to have unrestricted access of the school's MUGA outside of school hours in accordance with an agreed management programme.
- The relocation of the Adult Community Education Centre.
- Public realm improvements along the public right of way between the site and Basterfield House and on Golden Lane and Baltic Street West.
- Submission of a Green Performance Plan and a post-occupation Green Performance Plan.
- Future proofing for connection to a local energy network if a viable opportunity arises in the future.
- Contribution of £155,991 towards offsetting projected residual CO<sup>2</sup> emissions of the development.
- Compliance with the Code of Employment and Training.
- Facilitation of 3 work placements during the construction phase of the development, lasting a minimum of 26 weeks, or a fee of £15,000 to be paid to LBI.
- Compliance with the Code of Local Procurement.
- Compliance with the Code of Construction Practice, including a monitoring fee of £6,000 and submission of site-specific response document to the Code of Construction Practice Plan for approval of LBI Public Protection, which shall be submitted prior to any works commencing on site.
- The repair and re-instatement of the footways and highways adjoining the development, including the removal of redundant footway crossovers. The cost is to be confirmed by LBI Highways, paid for by the applicant/developer and the work carried out by LBI Highways. Condition surveys may be required.

- Provision of 2 accessible (blue badge) car parking bays.
- Provision of a contribution of £10,000 towards provision of on-street bays or other accessible transport initiatives.
- Submission of a draft full Travel Plan for Council approval prior to occupation, and of a full Travel Plan for Council approval 6 months from first occupation of the development or phase.
- Removal of eligibility for residents' car parking permits.
- Payment of the LPAs' fees in preparing and monitoring the S106.
- Improved signage to school and wider Golden Lane Estate.

258. Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy (CIL) Regulations 2010 (as amended), the Mayor of London's and LBI's CIL will be chargeable on this application on grant of planning permission. This will be calculated in accordance with the Mayor's adopted Community Infrastructure Levy Charging Schedule 2012 and the LBI adopted Community Infrastructure Levy Surcharge 2014.

259. Under the CoL's CIL Charging Schedule July 2014 that element of the scheme which is within the City boundary is in education use and the CIL rate is nil. Therefore no CIL is payable to the City.

## **Conclusion**

260. The proposed development is largely located within the LBI with a small part of the school within the City boundary.

261. The application was considered by the LBI on 1 March 2018 who considered the application as a whole and who resolved to grant planning permission for the major part of the development (all of the housing, work space and the substantial element of the school) (being that part within their area) subject to the imposition of conditions and S106 covenants being entered into. The LBI resolution to grant planning permission is a key material consideration in your determination of the application.

262. The scheme provides 66 new residential units all of which will be social housing in a high-quality purpose-built block. The units meet space standards and provides a balance of different sized units. The scheme provides less amenity space than a policy compliant scheme would though this is made up for, to a degree, by the availability of the school MUGA for out of school hours use by the residents and access to existing facilities in the neighbourhood.

263. New work space on the ground floor of the residential block will provide new employment uses and will enliven the frontage.

264. The scheme provides a much needed purpose built primary school on an existing educational site, with play areas and with a school hall which will also be available for community use. Its operation and hours of use will be managed through S106 covenants requiring a Management Plan.

265. Many aspects of the proposal are consistent with policy whilst a number of matters are not, or cause some degree of harm. The policies that are not fully complied with are London Plan policy 7.7; and Local Plan policies CS14, DM16.5, and CS21. The matters that cause some degree of harm are:

- The less than substantial harm to the setting of the listed Golden Lane Estate. This less than substantial harm cannot be mitigated without a substantial reduction in the height of the tower and thereby impacts on the deliverability of a significant number of residential units. It is considered that this less than substantial harm can be balanced against the benefits of the scheme. Any impact on other heritage assets is either less than substantial or not detrimental.
- The loss of daylight to a number of flats on the Golden Lane Estate. The losses in Basterfield House, whilst significant, are to bedrooms and kitchens, to rooms in part impacted by balconies and which the BRE standards state are of less significance than living rooms. Whilst this loss has is noticeable and significant in some cases it is considered that it can be weighed against the provision of new social housing.
- The lack of off-street servicing arrangements for the school and residential. This has been judged acceptable by the LBI. Due to the sensitive nature of the school use and site this will need to be carefully managed and will need to be part of a Management Plan in the S106 covenants.
- The shortfall in open space (when assessed against relevant standards) for the residents. This will require management of the play areas to ensure that they are made available by S106 covenant and the imposition of conditions to ensure that that the balconies are well designed.

266. Other matters which have been identified as requiring further information or detailing are capable of being dealt with by the imposition of appropriate conditions either by the LBI or by the CoL in respect of the relevant parts of the scheme and by S106 covenants to ensure that the benefits of the proposals are realised.

267. On balance it is considered that the scheme results in positive benefits to the community as a whole through the provision of social housing, school and community facilities, and work space and

accords with much of the City of London plan and the London Plan. The benefits are considered to outweigh the harm and non-compliance with policy. It is the recommendation of officers that planning permission should be granted subject to the imposition of conditions and securing planning covenants under S106.

### **Background Papers**

#### **Internal**

Memo 10.08.2017 Department of Markets and Consumer Protection

Email 23.08.2017 Air Quality Team

#### **External**

Email 09.08.2017 Thames Water

Letter 11.08.2017 Historic England

Letter 22.08.2017 Twentieth Century Society

Letter 06.09.2017 Save Britain's Heritage

#### **Residents and interested parties**

Name	Date
Jacek Krauze	18.08.2017
Fred Rogers	09.08.2017 05.12.2017
Marcus Sabetian	11.08.2017
Victoria Jakeman	15.08.2017
Christopher Petit	15.08.2017
John Whitehead	16.08.2017
William Pimlott	16.08.2017
Chamoun Issa	17.08.2017 04.09.2017 12.11.2017 24.11.2017 22.02.2018
P J Haben	17.08.2017
Debbie Swallow	21.08.2017

Flora Page	21.08.2017
Holger Mattes	22.08.2017
Neil Prior	22.08.2017
Billy Mann	22.08.2017 12.02.2018
Elizabeth Jobey	23.08.2017
Adam Ohringer	23.08.2017
David Butcher	23.08.2017
Iain Meek	23.08.2017
Mark Wilson	23.08.2017
Phoebe Unwin	23.08.2017
Jessica Farrell	24.08.2017
Sarah Batty Smith	24.08.2017 21.11.2017
Leila Sadeghee	24.08.2017 15.11.2017
Michael Blair	25.08.2017
Christine Clifford	25.08.2017
Ben Langlands	30.08.2017
Christopher Makin	01.09.2017
John Allan	01.09.2017
Jale Forrest	02.09.2017
Claire Healey	03.09.2017
Ryan Dilley	04.09.2017
Mark Waller	05.09.2017
Liz Davis	05.09.2017
Reiko Yamazaki	05.09.2017
Roy Lonergan	05.09.2017 06.11.2017
Dean Coyne	05.09.2017
Katerina Christofylaki	06.09.2017
Daniel Monk	06.09.2017
Amelie Chollet	06.09.2017
Tim Godsmark	06.09.2017



	11.02.2018
S Sahraoui	06.09.2017
Robert Cooper	07.09.2017
Mike Fox	07.09.2017
Greg Turner	08.09.2017
Tessa Sheridan	08.09.2017
Pablo Casais Solano	09.09.2017
Nathalie Malinarich	09.09.2017 14.02.2018
Fred Scott	11.09.2017
Liz Davis	11.09.2017
Sarah McKinnon	11.09.2017
Anne Corbett	11.09.2017
London Advertising Ltd	11.09.2017
Polly Wong	11.09.2017
Amra Vainio	12.09.2017
Damon Mannion	12.09.2019
Hugh Partridge	12.09.2017
Emma Matthews	12.09.2017 12.02.2018
Deborah Phillips	13.09.2017 13.05.2018
David Henderson	13.09.2017 16.11.2017
Nigel Smith	13.09.2017 14.02.2018 08.03.2018
Jane Carr	13.09.2017 15.11.2017 13.02.2018
M. S Gillian	13.09.2017
Kate Sandle	13.09.2017
Nicholas Lynch	13.09.2017
Radim Pesko	13.09.2017

Jillian Jones	13.09.2017
Anthony Best	13.09.2017
Nicky Tricks	13.09.2017
Matthew Carter	13.09.2017
Martin Edwards	13.09.2017 14.11.2017 11.02.2018
Julie Crofts	14.09.2017 04.12.2017
Eva Stenram	14.09.2017 12.02.2018
Jacqueline Swanson	14.09.2017 14.02.2018
Paul Drinkwater	14.09.2017
Roger Luckhurst	14.09.2017 04.12.2017 11.02.2018
James Dunnett	21.09.2017 07.11.2017
Charles Humphries	22.09.2017 12.02.2018 16.02.2017
Patricia Niven	03.10.2017
Sonia Hehir	25.10.2017
Sarah Davies	25.10.2017
Andrew Corden	25.10.2017
Alex Lu	25.10.2017
Emily Blake	26.10.2017
Charitini Fameli	26.10.2017
Jean Edwards	26.10.2017
Mark Sladen	27.10.2017
Khairoun Abji	29.10.2017
R Nightingale	29.10.2017
Reiko Yamazaki	06.11.2017

Aoibhe Stanciulescu	08.11.2017
Cosmin Stanciulescu	08.11.2017
Maliya Price	08.11.2017
Capucine Perrot	09.11.2017
James Soane	09.11.2017
Katie Doyle	10.11.2017
Jack Doyle	10.11.2017
Karen Newitt	10.11.2017
Bas Raijmakers	12.11.2017
Michele Webb	12.11.2017
Julia Chalkley	12.11.2017
Peter Luckham	13.11.2017 14.02.2018
Georgia Dehn	13.11.2017
Carola Leegwater	13.11.2017
Tom Martin	14.11.2017 12.02.2018
Christopher Hyndman	14.11.2017
Daniel Swallow	14.11.2017
David Howarth	14.11.2017
Sarah Winman	14.11.2017
Sarah Whitney	14.11.2017 08.02.2018
David ISh Howowicz and Rosamund Diamond	15.11.2017
Phillipa Collins	15.11.2017 08.02.2018
Martha Mundy	15.11.2017
Paul Gladstone	15.11.2017
Richard Saumarez Smith	15.11.2017
Ryan Dilley	15.11.2017
Toni Vainio	15.11.2017
Jana Hasegawa	15.11.2017
Jessica Gladstone	15.11.2017

Tessa Sheridan	15.11.2017
Nancy Honey	16.11.2017
Simon Bradley	16.11.2017
Dawn Frampton	16.11.2017
Anthony Best	16.11.2017
Edward Evans	16.11.2017
Justin Francis	16.11.2017
Anna Parkinson	16.11.2017 12.02.2018
Jennifer Withers	16.11.2017
Secil Ozgur and Bruce Mennell	16.11.2017
Elena Symeou	16.11.2017
Frederika Whitehead	16.11.2017 06.12.2017 13.02.2018
Jillian Jones	17.11.2017
Lisa Scott	17.11.2017
Christine Clifford	17.11.2017 28.01.2018
Steven Mailes and Paul Lincoln	20.11.2017 09.03.2018
Sonia Dellepiani	04.12.2017
William Lau	06.02.2018
Jana Hasegawa	08.02.2018
Tracey George	08.02.2018
Andy Bell	09.02.2018
Kate Edwards	11.02.2018
Claudia Marciante	12.02.2018
Joao Bravo da Costa	13.02.2018
Benjamin Ketley	14.02.2018
Brian Warby	14.02.2018
Ryan Dilley	14.02.2018
Jana Ketley	14.02.2018
Heather Sutton	15.02.2018

## **Appendix A**

### London Plan Policies

The London Plan policies which are most relevant to this application are set out below:

Policy 2.18 Protect, promote, expand and manage the extent and quality of and access to London's network of green infrastructure.

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

Policy 3.3 Ensure the housing need identified in the London Plan is met, particularly through provision consistent with at least an annual average of 32,210 net additional homes across London which would enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.

Policy 3.5 the design of all new housing should enhance the quality of local places. Minimum space standards should be incorporated.

Policy 3.11 Maximise affordable housing provision and seek an average of at least 13,200 more affordable homes per year in London over the term of the London Plan.

Policy 3.16 Protection and enhancement of social infrastructure - additional and enhanced social infrastructure provision to meet the needs of a growing and diverse population.

Policy 3.18 Support the provision of education facilities to meet growing demand and to enable educational choice..

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance.

Policy 5.6 Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

Policy 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

Policy 5.9 Reduce the impact of the urban heat island effect in London and encourage the design of places and spaces to avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change and the urban heat island effect on an area wide basis.

Policy 5.10 Promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

Policy 5.11 Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.

Policy 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences would be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 5.18 Encourage development waste management facilities and removal by water or rail transport.

Policy 6.1 The Mayor would work with all relevant partners to encourage the closer integration of transport and development.

Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.

Policy 6.5 Contributions would be sought from developments likely to add to, or create, congestion on London's rail network that Crossrail is intended to mitigate.

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:

ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.3 Creation of safe, secure and appropriately accessible environments.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character,

development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.5 London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Policy 7.13 Development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards.

Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

Policy 7.15 Minimise existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals and separate new noise sensitive development from major noise sources.

Policy 7.18 Resist the loss of local protected open spaces unless equivalent or better quality provision is made within the local catchment area.

Policy 7.19 Development proposals should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

Policy 7.21 Trees should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced.

#### Relevant Local Plan Policies

##### **DM3.1 Self-containment in mixed uses**

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

##### **DM3.2 Security measures**

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

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

##### **CS4 Planning Contributions**

To manage the impact of development, seeking appropriate contributions having regard to the impact of the contributions on the viability of development.

##### **CS5 The North of the City**

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

##### **CS10 Promote high quality environment**

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.



### **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 of 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.

## **CS12 Historic Environment**

To preserve and enhance those buildings and areas which make an important contribution to the City's historic and archaeological heritage and provide an attractive environment for the City's communities and visitors.

### **DM12.1 Managing Change affecting all heritage assets and spaces**

- 1. To sustain and enhance heritage assets, their settings and significance.
- 2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
- 3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
- 4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
- 5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

### **DM12.4 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.

## **CS14 Tall buildings**

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

## **CS15 Creation of sustainable development**

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

### **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 (NO<sub>x</sub>).
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**

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.

### **DM16.3 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.

### **DM16.5 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.

#### **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.

#### **DM18.3 Flood protection and climate**

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.

#### **CS19 Improve open space and biodiversity**

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.

#### **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.



### **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.

### **DM19.4 Play areas and facilities**

1. The City Corporation will protect existing play provision and seek additional or enhanced play facilities or space, particularly in areas identified as deficient, by:
  - a) protecting existing play areas and facilities and, on redevelopment, requiring the replacement of facilities either on-site or nearby to an equivalent or better standard;
  - b) where the creation of new play facilities is not feasible, requiring developers to work with the City Corporation to deliver enhanced provision nearby;
  - c) requiring external play space and facilities as part of new residential developments which include 20 or more family units (those with 3 or more bedrooms) or 10 or more affordable units of 2 or more bedrooms;
  - d) promoting opportunities for informal play and play within open spaces where it is not possible to secure formal play areas.
2. Play areas and facilities should not be located where they would cause undue disturbance to neighbouring occupiers.

### **CS21 Protect and provide housing**

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

#### **DM21.1 Location of new housing**

1. New housing should be located on suitable sites in or near identified residential areas. Within these areas a mix of appropriate residential and commercial uses will be permitted.
2. New housing will only be permitted where development would not:
  - a) prejudice the primary business function of the City;
  - b) be contrary to policy DM 1.1;

- c) inhibit the development potential or business activity in neighbouring commercial buildings and sites; and
- d) result in poor residential amenity within existing and proposed development, including excessive noise or disturbance.

### **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.

### **DM21.5 Housing quality standards**

All new housing must be designed to a standard that facilitates the health and well-being of occupants, and:

- a) takes account of the London Plan's space standards and complies with the London Plan's Density Matrix standards;
- b) provides acceptable daylight to dwellings commensurate with a city centre location;
- c) meets standards for Secured by Design certification;
- d) maximises opportunities for providing open and leisure space for residents.

### **CS22 Social infrastructure and opportunities**

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.

#### **DM22.1 Location and protection of social and community facilities**

- 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.

## SCHEDULE

APPLICATION: 17/00770/FULL

### **Former Richard Cloudesley School Golden Lane Estate London**

**Demolition of the former Richard Cloudesley School, City of London Community Education Centre, garages and substation; erection of a 3 storey building with rooftop play area (Class D1) (2300.5sq.m GEA) and a single storey school sports hall (Class D1) (431sq.m GEA) to provide a two-form entry primary school; erection of a 14 storey (plus basement) building to provide 66 social rented units (Class C3) (6135sq.m GEA), and affordable workspace (Class B1a) (244sq.m GEA), landscaping and associated works (Duplicate application submitted to the London Borough of Islington as the majority of site falls within Islington Borough).**

## CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 No demolition or construction works relating to the school development shall take place unless and until a Demolition and Construction Logistics Plan (DCLP) has been submitted to and approved in writing by the Local Planning Authority.

The DCLP shall assess the impacts during the demolition and construction phase of the development on surrounding streets and include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk.

The DCLP should address all vehicular movements to and from the site during demolition and construction phases of development and also demonstrate that vehicular activity associated with construction will be co-ordinated with activity associated with the redevelopment of neighbouring sites in order to manage the cumulative impact on the local highway network.

The development shall be carried out strictly in accordance with the approved DCLP throughout the demolition and construction period.

REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

- 3 No construction works relating to the residential/commercial development shall take place unless and until a Construction Logistics Plan (CLP) has been submitted to and approved in writing by the Local Planning Authority.

The CLP shall assess the impacts during the demolition and construction phase of the development on surrounding streets and include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk.

The CLP should address all vehicular movements to and from the site during demolition and construction phases of development and also demonstrate that vehicular activity associated with construction will be co-ordinated with activity associated with the redevelopment of neighbouring sites in order to manage the cumulative impact on the local highway network.

The development shall be carried out strictly in accordance with the approved CLP throughout the demolition and construction period.

REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

- 4 A Demolition and Construction Environmental Management Plan (DCEMP) assessing the environmental impacts (including (but not limited to) noise, air quality including dust, smoke and odour, vibration and TV reception) of the development shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition works commencing on site. The report shall assess impacts during the demolition and construction phases of the development on nearby residents and other occupiers together with means of mitigating any identified impacts. The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall

take place without the prior written consent of the Local Planning Authority.

THE DCEMP should pay reference to BS5228:2009, LBI's Code of Construction Practice, CoL's Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites (and arrangements for liaison set out therein), the GLA's SPG on construction dust and emissions (including the Non-Road Mobile Machinery register) and any other relevant guidance.

The DCEMP shall include details of a telephone contact for neighbouring residents in relation to queries or concerns regarding construction management.

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.

- 5 A Demolition and Construction Environmental Management Plan (DCEMP) assessing the environmental impacts (including (but not limited to) noise, air quality including dust, smoke and odour, vibration and TV reception) of the development shall be submitted to and approved in writing by the Local Planning Authority prior to any demolition works commencing on site. The report shall assess impacts during the demolition and construction phases of the development on nearby residents and other occupiers together with means of mitigating any identified impacts. The development shall be carried out strictly in accordance with the details so approved and no change therefrom shall take place without the prior written consent of the Local Planning Authority.

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The DCEMP shall include details of a telephone contact for neighbouring residents in relation to queries or concerns regarding construction management.

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.

- 6 Prior to the commencement of works on the development hereby permitted, a site report detailing steps to minimise future occupiers' exposure to air pollution shall be submitted to and approved by the Local Planning Authority. The approved scheme is to be completed prior to occupation of the development and shall be permanently maintained thereafter.  
REASON: To protect the building occupants against poor air quality in accordance with the following policies of the City of London Local Plan D15.6 and London Plan 7.14.
- 7 Prior to the commencement of works below ground the following assessment in response to the NPPF and in accordance with CLR11, BS10175:2011 and the requirements of DEFRA shall be submitted to and approved in writing by the Local Planning Authority.  
a) A land contamination investigation and risk assessment to establish if the site is contaminated and to determine the potential for pollution.

Following the agreement to details relating to point a); details of the following works shall be submitted to and approved in writing by the Local Planning Authority prior to the relevant works commencing on site:

b) A programme of any necessary remedial land contamination remediation works arising from the land contamination investigation 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. 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.

The development shall be carried out strictly in accordance with the investigation and any scheme of remedial works so approved and no change therefrom shall take place without the prior written approval of the Local Planning Authority.

c) Following completion of measures identified in the approved remediation scheme a verification report, that demonstrates the effectiveness of the remediation carried out, must be produced which is subject to the approval in writing of the Local Planning Authority in accordance with part b).

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.

- 8 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.  
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 9 No works except demolition to ground slab level shall take place before details of the new ground floor slab and all below groundworks including drainage and foundation design, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.  
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 10 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.  
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.
- 11 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:  
(a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces.  
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: CS10 and DM10.1.
- 12 A No CHP plant shall at any time be installed in the building unless the air quality impact of the CHP has been assessed and a report



detailing the assessment has been submitted to and approved in writing by the Local Planning Authority. Notwithstanding plant size, the NOx emissions of the CHP shall not exceed part B of this condition.

B No CHP plant in the thermal input range 50kWth to 20MWth with NOx emissions exceeding that specified in Band B of Appendix 7 to the GLA Sustainable Design and Construction Supplementary Planning Guidance published April 2014 (or any updates thereof applicable at time of installation) shall at any time be installed in the building.

C Prior to any CHP plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority:

The results of an emissions test demonstrating compliance with Part A and B of this condition and stack discharge velocity carried out by an accredited laboratory/competent person; and

An equipment maintenance schedule demonstrating that the emission standard would always be met.

D The CHP plant shall at all times be maintained in accordance with the approved schedule.

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan

- 13 The design and installation of new items of fixed plant shall be such that when operating 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. The measurement and/or prediction of the noise should be carried out in accordance with the methodology contained within BS 4142: 2014.

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.

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.

- 14 Details of the biodiversity (green) roofs as shown on plans COL-HBA-00-00-DR-A-00\_202 Rev. P4 and COL-HBA-00-00-DR-A-00\_204 Rev. P4 shall be submitted to and approved in writing by the Local Planning Authority prior to relevant works. The biodiversity (green) roofs shall be:

- a) biodiversity based with extensive substrate base (depth 80-150mm); and
- b) planted/seeded with an agreed mix of species within the first planting season following the practical completion of the building works (the seed mix shall be focused on wildflower planting, and shall contain no more than a maximum of 25% sedum).

Details of the irrigation and maintenance regime for the proposed green roofs shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun.

The biodiversity (green) roof shall not be used as an amenity or sitting out space of any kind whatsoever and shall only be used in the case of essential maintenance or repair, or escape in case of emergency.

The biodiversity roofs shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

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.

- 15 No cooking shall take place within the kitchen in the school hall until fume extract arrangements and ventilation have been installed to serve that kitchen 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 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.

- 16 A landscaping scheme for the school development shall be submitted to and approved in writing by the Local Planning Authority prior to relevant works. The landscaping scheme shall include the following details:
- a) specification to ensure successful establishment and survival of new planting;
  - b) a schedule detailing sizes, species and numbers of all new trees/plants;
  - c) a biodiversity statement detailing how the landscaping scheme maximises biodiversity;
  - d) existing and proposed underground services and their relationship to both hard and soft landscaping;
  - e) proposed trees: their location, species and size;
  - f) soft plantings: including grass and turf areas, shrub and herbaceous areas;

- g) specifications, plans sections and details including earthworks, ground finishes, top soiling with both conserved and imported topsoils, levels, drainage and fall in drain types;
- h) enclosures: including types, dimensions and treatments of walls, fences, screen walls, barriers, rails, retaining walls and hedges;
- i) hard landscaping: including ground surfaces, kerbs, edges, rigid and flexible pavings, unit paving, furniture, steps
- j) bird boxes, log piles and a bug hotel
- k) any other landscaping features forming part of the scheme.

All landscaping in accordance with the approved scheme shall be completed / planted during the first planting season following practical completion of the development hereby approved. The landscaping and tree planting shall have a two year maintenance / watering provision following planting and any existing tree shown to be retained or trees or shrubs to be planted as part of the approved landscaping scheme which are removed, die, become severely damaged or diseased within five years of completion of the development shall be replaced with the same species or an approved alternative to the satisfaction of the Local Planning Authority within the next planting season.

The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.

REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 17 A landscaping scheme for the public realm on Golden Lane and Baltic Street West and for the Basterfield Service Road shall be submitted to and approved in writing by the Local Planning Authority prior to relevant works. The landscaping scheme shall include the following details:
- a) specification to ensure successful establishment and survival of new planting;
  - b) a schedule detailing sizes, species and numbers of all new trees/plants;
  - b) a biodiversity statement detailing how the landscaping scheme maximises biodiversity;
  - c) existing and proposed underground services and their relationship to both hard and soft landscaping;
  - d) proposed trees: their location, species and size;
  - e) soft plantings: including grass and turf areas, shrub and herbaceous areas;
  - f) specifications, plans sections and details including earthworks, ground finishes, top soiling with both conserved and imported topsoils, levels, drainage and fall in drain types;
  - g) enclosures: including types, dimensions and treatments of walls, fences, screen walls, barriers, rails, retaining walls and hedges;
  - h) hard landscaping: including ground surfaces, kerbs, edges, rigid and flexible pavings, unit paving, furniture, steps
  - i) any other landscaping features forming part of the scheme.

All landscaping in accordance with the approved scheme shall be completed / planted during the first planting season following practical completion of the development hereby P-RPT-COM-Main approved. The landscaping and tree planting shall have a two year maintenance / watering provision following planting and any existing tree shown to be retained or trees or shrubs to be planted as part of the approved landscaping scheme which are removed, die, become severely damaged or diseased within five years of completion of the development shall be replaced with the same species or an approved alternative to the satisfaction of the Local Planning Authority within the next planting season.

The development shall be carried out strictly in accordance with the details so approved and shall be maintained as such thereafter.  
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

- 18 Prior to the removal of any vegetation on site an updated Habitat Survey including mitigation measure shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.  
REASON: To promote biodiversity in accordance with the following policy of the Local Plan: DM19.2.
- 19 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved for the school and commercial development (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.  
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 20 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.  
REASON: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.
- 21 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

REASON: In order to ensure that the proposed development 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 2015 and the Local Plan DM15.6.

- 22 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.

- 23 No boilers that have a dry NO<sub>x</sub> emission level exceeding 40 mg/kWh (measured at 0% excess O<sub>2</sub>) shall at any time be installed in the building

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.

- 24 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: COL-HBA-00-00-DR-A-00\_0010 Rev. P2; COL-HBA-00-00-DR-A-00\_0011 Rev. P1; COL-HBA-00-00-DR-A-00\_0012 Rev. P1; COL-HBA-00-00-DR-A-00\_0013 Rev. P1; COLHBA-00-00-DR-A-00\_0014 Rev. P1; COL-HBA-00-00-DR-A-00\_0015 Rev. P2; COL-HBA-00-00-DR-A-00\_0020 Rev. P1; COL-HBA-00-00-DR-A-00\_0021 Rev. P1; COL-HBA-00-00-DR-A-00\_0022 Rev. P1; COL-HBA-00-00-DR-A-00\_0050 Rev. P1; COL-HBA-00-00-DR-A-00\_0051 Rev. P1; COL-HBA-00-00-DR-A-00\_0052 Rev. P1; COL-HBA-00-00-DRA-00\_200 Rev. P2; COL-HBA-00-00-DR-A-00\_201 Rev. P5; COL-HBA-00-00-DR-A-00\_202 Rev. P5; COL-HBA-00-00-DR-A-00\_203 Rev. P5; COL-HBA-00-00-DR-A-00\_204 Rev. P5; COL-HBA-00-00-DR-A-00\_205 Rev. P5; COL-HBA-00-00-DR-A-00\_206 Rev. P5; COL-HBA-00-00-DR-A-00\_207 Rev. P4; COL-HBA-00-00-DR-A-00\_208 Rev. P4; COLHBA-00-00-DR-A-00\_209 Rev. P2; COL-HBA-00-00-DR-A-00\_0220 Rev. P4; COL-HBA-00-00-DR-A-00\_0221 Rev. P3; COL-HBA-00-00-DR-A-00\_0222 Rev. P3; COL-HBA-00-00-DR-A-00\_0223 Rev. P4; COL-HBA-00-00-DR-A-00\_0224 Rev. P4; COL-HBA-00-00-DR-A-00\_0225 Rev. P3; COL-HBA-00-00-DR-A-00\_0226 Rev. P3; COL-HBA-00-00-DRA-00\_0227 Rev. P3; COL-HBA-00-00-DR-A-00\_0240 Rev. P3; COL-HBA-00-00-DR-A-00\_0241 Rev. P3; COL-HBA-00-00-DR-A-00\_0242 Rev. P2; COL-HBA-00-00-DR-APL\_0560 Rev. P2; COL-HBA-00-00-DR-A-PL\_0561 Rev. P2; COL-HBA-00-00-DR-APL\_0562 Rev. P2; Planning Statement (July 2017); Planning Statement Addendum

P-RPT-COM-Main(October 2017); Heritage Townscape and Visual Impact Assessment (July 2017); Design and Access Statement (July 2017); Design and Access Statement Addendum (October 2017); Sustainability and Energy Statement (July 2017); Sustainability and Energy Statement Addendum (October 2017); Ecology Report (July 2017); Transport Assessment (July 2017); Transport Assessment Addendum (October 2017); Transport Technical Note (February 2018); Draft Travel Plan (Residential & School Uses) (July 2017); Statement of Community Involvement (July 2017); Flood Risk Assessment (July 2017); Site Drainage Report (July 2017); Noise Assessment (July 2017); Noise Assessment Addendum (October 2017); Daylight and Sunlight Assessment (July 2017); Daylight and Sunlight Addendum (October 2017); Archaeological Assessment (July 2017); Utilities and Foul Sewerage Assessment (July 2017); Unexploded Ordnance Survey (July 2017); Draft Construction Management Plan (July 2017); Arboricultural Impact Assessment (July 2017); Fire Strategy (July 2017); Fire Strategy Addendum Technical Note (February 2018); Air Quality Assessment (July 2017); Phase 1 Ground Condition Assessment (July 2017); Housing and Educational Need Statement (January 2018); School Green Performance Plan (October 2017); Residential Green Performance Plan (October 2017).

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.