

Planning Statement
DP9 Limited

July 2024



70 GRACECHURCH STREET



70 Gracechurch Street

Planning Statement

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DP9 Ltd

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100 Pall Mall
London
SW1Y 5NQ



Contents

Executive Summary.....	3
1. Introduction.....	5
2. Site Context	11
3. Planning History.....	13
4. Pre-Application Discussions and Consultation	15
5. Application Proposals.....	18
6. Planning Policy Framework and Overview	23
7. Planning Policy Assessment.....	31
8. Planning Obligations and Section 106.....	77
9. Conclusions.....	79



Executive Summary

The City of London remains one of the most important clusters of economic activity in London, the UK and the world. As the City and London seeks to continue growing and diversifying to become a seven day a week economy, offices continue to play a vital role within the Destination City initiative with complimentary active uses, transformative public realm, culture in its widest sense, social value, inclusivity and accessibility. The 70 Gracechurch Street proposals exemplify the aspirations of the Destination City and seek to provide a significant quantum of office accommodation.

The project brief seeks to bring forward a transformation and extension of the existing building, creating a low carbon, sustainable workplace with complementary public uses. The Applicant aspires to be recognised as a responsible industry leader in everything that they do and have set ambitious targets for ESG for the development.

The proposals for the transformation of 70 Gracechurch Street would see the retention of majority of the existing building to construct a new tall building for office use with a significant cultural offering, retail, and a public viewing gallery and terraces at ground, basement and level 32. The development would transform the ground plane providing a new north south route from the corner of Gracechurch Street and Fenchurch Street through to Ships Tavern Passage into Leadenhall Market, alongside a new area of dual use public realm for overnight servicing and a pop-up market during the day.

The proposals for 70 Gracechurch Street will deliver substantial and demonstrable public benefits including:-

- A transformational refurbishment and extension of the existing building to deliver a world class tall building on the edge of the defined City Cluster, providing exemplary architecture with low carbon design, retaining approximately 60% of the existing building;
- New public realm and routes through the site to enhance permeability and pedestrian comfort through the site and the wider City Cluster to cater for existing and future footfall, including a new north-south link from Fenchurch Street to Ships Tavern Passage, and a dual use public realm area for overnight servicing and a pop-up street market during the day;
- A significant new gateway to the Grade II* listed Leadenhall Market to further enhance its presence, footfall and connections to its surroundings with a new route through the site, a standalone retail unit and ground floor active frontages and wayfinding at a substantial urban junction within the Square Mile;
- A significant amount of world class office space with complimentary amenities and terraces to support the City of London's ambitious growth targets for commercial office space;
- Introduction of a public viewing gallery, terrace and cultural space at level 32, ground and basement levels to contribute towards the aspirations of Destination City, promoting inclusivity and activity seven days a week and providing new views to the City and wider London including St Paul's Cathedral;



- Exemplar sustainability credentials, low carbon design choices to reduce the environmental impact of the proposals in the context of the climate emergency whilst delivering growth and best use of land;
- Deliver a betterment over the previously approved planning consent granted in 2021 through the partial retention of the building, delivering lower embodied carbon and retaining all of the benefits previously secured;
- Introduction of generous landscaping to achieve biodiversity enhancements, biophilia urban greening; and
- Demonstrable positive socio-economic impacts in occupation as demonstrated in the Cultural Plan and Social Value Strategy which explain the measures taken to maximise the socio-economic impact of the development.

It is considered that the proposals are exemplar and representative of exactly the type of the development that the City of London aspire to be delivered in the Square Mile. The proposals would deliver an exemplary tall building with publicly accessible viewing gallery and terraces at level 32, alongside a mix of cultural and retail uses including a pop up market with a transformative public realm to compliment Leadenhall Market.

Furthermore, the proposals will also make a significant contribution of just under 75,000 sqm GIA to the City's office growth targets, equal to around 6% of projected demand.

The proposals would be highly sustainable, deliver significant urban greening and lead to the best use of land in this dense urban location by optimising the site through the design led approach.

The development is pre-assessed to achieve BREEAM "Excellent" with aspirations for "Outstanding", Nabers UK 5*, a 13% reduction in carbon dioxide over Part L 2021, targeting 851 kgCO₂ per square metre (GIA) in terms of embodied carbon (modules A1-A5), with an aspiration to strive towards 700 kgCO₂ per square metre, well within the GLA Whole Life Carbon Benchmarks.

It is considered that the proposals are in full accordance with the development plan, and in line with Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended), there are no material considerations that indicate that planning permission for the proposed development should not be granted.



1. Introduction

1.1 This Planning Statement has been prepared by DP9 Limited in support of an application for full planning permission submitted on behalf of SCF Gracechurch 2 GP Ltd & SCF Gracechurch Nominee Ltd for & on behalf of SCF Gracechurch 2 LP (the “Applicant”) for the development site of 70 Gracechurch Street, London, EC3A 8EE (the “Site”).

1.2 Full planning permission is sought for the Proposed Development:-

“Refurbishment and extension of the building to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development comprising ground plus 32 storeys (149.67m AOD, 132.47m AGL) with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm with associated highway works and other works associated with the development.”

1.3 The Proposed Development would see the transformation of 70 Gracechurch with the retention of majority of the existing building to construct a new tall building above, rising to a total height of 149.67m Above Ordnance Datum (AOD) (132.47m Above Ground Level (AGL)) for office use with significant culture, retail, and public viewing gallery and terraces at ground, basement and level 32. The development would transform the ground plane providing a new north south route from the corner of Gracechurch Street and Fenchurch Street through to Ships Tavern Passage into Leadenhall Market, alongside a new area of dual use public realm for overnight servicing and a pop up market during the day.

1.4 The Applicant comprises a joint venture between the Ontario Teachers Pension Plan (“OTPP”) and Stanhope PLC to bring forward the development. Stanhope PLC has an extensive track record of delivery both within the Square Mile and across London. Stanhope have successfully delivered towers in the City including the recently completed 8 Bishopsgate; secured planning permission for 55 Bishopsgate in July 2024 and revised proposals for 1 Undershaft are pending consideration.

1.5 The Applicant has appointed Kohn Pedersen Fox (“KPF”) to lead the design of the Proposed Development. KPF are supported by a full professional design team including Latz und Partner Landscape Architects, Trium Environmental Consultants (“Trium”) as Environmental Impact Assessment Co-ordinators, Arup for MEP design and Robert Bird Group for Structural Engineering.

1.6 KPF have lead design teams on highly regarded City projects including 81 Newgate Street, the Unilever Building, 52 Lime Street (the Scalpel), the Salesforce Tower and Peterborough Court. They were also the architect on the previous scheme consented in 2021. They have an impressive portfolio across London and the world.

1.7 This Statement provides an assessment of the Proposed Development against Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) which requires that planning



applications must be determined in accordance with the development plan unless any material considerations indicate otherwise. The development plan for the site comprises:-

- The London Plan – published in March 2021 (the “London Plan”); and
 - The City of London Local Plan – adopted in January 2015 (the “Local Plan”).
- 1.8 The National Planning Policy Framework (“NPPF”), published in December 2023 along with emerging policy, having regard to paragraph 48 of the NPPF, and supplementary planning guidance are material considerations. This includes the draft City of London City Plan 2040, which concluded regulation 19 Consultation in June 2024. Stanhope PLC have made detailed representations in relation to the Site and their other assets within the Square Mile.
- 1.9 Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) place a statutory duty on Local Planning Authorities to have special regard to the desirability of preserving listed buildings and their settings.
- 1.10 This Planning Statement assesses the relevant planning considerations associated with the scheme and considers the development in the context of national, regional and local planning policy and guidance. It should be read in conjunction with the plans and drawings submitted as part of the application. In addition to this Planning Statement, the planning application is accompanied by the following documents:-
- Completed Application Form, submitted via the planning portal;
 - Covering letter, prepared by DP9;
 - Additional CIL Information Form;
 - Architectural Drawings and Drawing Schedule, prepared by KPF;
 - Design and Access Statement, prepared by KPF, including:-
 - i. Accessibility Statement, prepared by Arup;
 - ii. Lighting Statement, prepared by EQ2 Lighting Consultants;
 - iii. Security and Hostile Vehicle Mitigation Strategy, prepared by Arup;
 - Aviation Safeguarding Report, prepared by KL Grant Consulting;
 - Biodiversity Net Gain Report (and BNG Plan), prepared by TMA;
 - Circular Economy Statement, prepared by Arup;
 - Cultural Plan, prepared by Hatch
 - Social Value Strategy, prepared by Hatch;



- Draft Construction Environmental Management Plan, prepared by Mace;
 - Outline Drainage Strategy, prepared by Robert Bird Group;
 - Ecological Appraisal, prepared by TMA;
 - Energy Statement, prepared by Arup;
 - Equalities Impact Assessment, prepared by Trium;
 - Flood Risk Assessment and Drainage Strategy, prepared by Robert Bird Group;
 - Fire Statement (and Fire Engineering Statement), prepared by Arup;
 - Framework Travel Plan, prepared by Momentum Transport Consultants;
 - Landscape Statement and Public Realm Management Plan, prepared by Latz und Partner;
 - Preliminary Ecology Appraisal, prepared by TMA;
 - Statement of Community Involvement, prepared by London Communications Agency;
 - Sustainability Statement, (including BREEAM Pre-Assessment), prepared by Arup;
 - Thermal Comfort Study, prepared by Gordon Ingram Associates;
 - Transport Assessment, prepared by Momentum Transport Consultants;
 - Utilities Statement, prepared by Arup;
 - Whole Life Carbon Assessment, prepared by Arup.
- 1.11 An Environmental Impact Assessment (“EIA”) has also been undertaken in support of the application. A scoping request was submitted to the City of London Corporation on 24 April 2024, at the time of submission of this application a Scoping Opinion (ref. 24/00534/SCOP) has not been provided. The consultation responses which have been received have been taken into account in the prepared of the Environmental Statement.
- 1.12 The Environmental Statement (“ES”), has been prepared by Trium and comprises the following:
- Volume I: Main Report, prepared by Trium, comprising:-
 - i. Chapter 1: Introduction, prepared by Trium;
 - ii. Chapter 2: EIA Methodology, prepared by Trium;



- iii. Chapter 3: Alternatives & Design Evolution, prepared by Trium;
 - iv. Chapter 4: The Proposed Development, prepared by Trium;
 - v. Chapter 5: Retention, Deconstruction and Construction, prepared by Mace;
 - vi. Chapter 6: Socio-Economics, prepared by Trium;
 - vii. Chapter 7. Noise and Vibration, prepared by Trium;
 - viii. Chapter 8. Daylight/Sunlight, Overshadowing and Light Pollution, prepared by Gordon Ingram Associates;
 - ix. Chapter 9. Wind and Microclimate, prepared by Gordon Ingram Associates and RWDI;
 - x. Chapter 10. Archaeology, prepared by MOLA;
 - xi. Chapter 11. Climate Change, prepared by Trium;
 - xii. Chapter 12. Solar Glare, prepared by Arup;
 - xiii. Chapter 13. Effect Interactions, prepared by Trium;
 - xiv. Chapter 14. Likely Significant Effects, prepared by Trium;
 - xv. Chapter 15. Environmental Management, Mitigation and Monitoring, prepared by Trium.
- Volume II: Townscape, Built Heritage and Visual Impact Assessment, prepared by Tavernor Consultancy (including Accurate Visual Representations by Millerhare);
 - Volume III: Technical Appendices
 - i. Appendix: Introduction;
 - Annex 1: Location of Information within the ES;
 - Annex 2: Glossary of Terms and Abbreviations;
 - Annex 3: EIA Statement of Competent Experts.
 - ii. Appendix: EIA Methodology;
 - Annex 1: EIA Scoping Opinion Request Report;
 - Annex 2: Cumulative Schemes List and Map; and



- Annex 3: Proposed Development and Consented Scheme Effects Comparison.
- iii. Appendix: Socio-Economics;
- Annex 1: Planning Policy Context.
- iv. Appendix: Noise and Vibration;
- Annex 1: Legislation, Planning Policy and other Relevant Standards and Guidance;
 - Annex 2: Glossary of Terms;
 - Annex 4: Environmental Noise Report;
 - Annex 4: Construction Plant Assumptions;
- v. Appendix: Daylight, Sunlight, Overshadowing and Light Pollution
- Annex 1: Baseline and Methodology;
 - Annex 2: Legislative and Planning Policy Context;
 - Annex 3: Drawings;
 - Annex 4: Daylight and Sunlight Assessment;
 - Annex 5: Window Maps;
 - Annex 6: Overshadowing Assessment;
 - Annex 7: Light Pollution Assessment.
- vi. Appendix: Wind Microclimate;
- Annex 1: Legislative and Planning Policy Context; and
 - Annex 2: Wind Microclimate Technical Appendix.
 - Annex 3: GIA Computational Fluid Dynamics (CFD) Report
- vii. Appendix: Archaeology;
- Annex 1: Archaeological Desk-Based Assessment.
- viii. Appendix: Climate Change;
- Annex 1: Climate Change Technical Note;



- Annex 2: Legislation, Policy and Guidance;
- Annex 3: Extract from Whole Life-Cycle Carbon Assessment;
- Annex 4: Extract from Energy Strategy;
- Annex 5: London Travel Demand Survey 2022/23.

ix. Appendix: Solar Glare;

- Annex 1: Solar Glare Technical Appendix.
- Non-Technical Summary, prepared by Trium.

1.13 This Statement is structured as follows:-

- **Section 2** describes the context of the Site and its surroundings;
- **Section 3** identifies the planning history of the site and relevant forthcoming planning activities in the surrounding area;
- **Section 4** details how the proposals have been formed with input of a range of stakeholders including pre-application engagement with the Local Planning Authority and other key stakeholders;
- **Section 5** describes the proposals in detail;
- **Section 6** identifies the Development Plan and wider material considerations of relevance to the proposals;
- **Section 7** assesses the acceptability of the proposals in the context of the Development Plan and material considerations;
- **Section 8** discusses potential Planning Conditions and Section 106 Obligations in connection with the proposals; and
- **Section 9** draws conclusions from the preceding sections.



2. Site Context

The Site

- 2.1 The Site occupies the corner plot between Fenchurch Street to the south and Gracechurch Street to the West. It is bounded by Ship Tavern Passage to the north and Lime Street to the east.

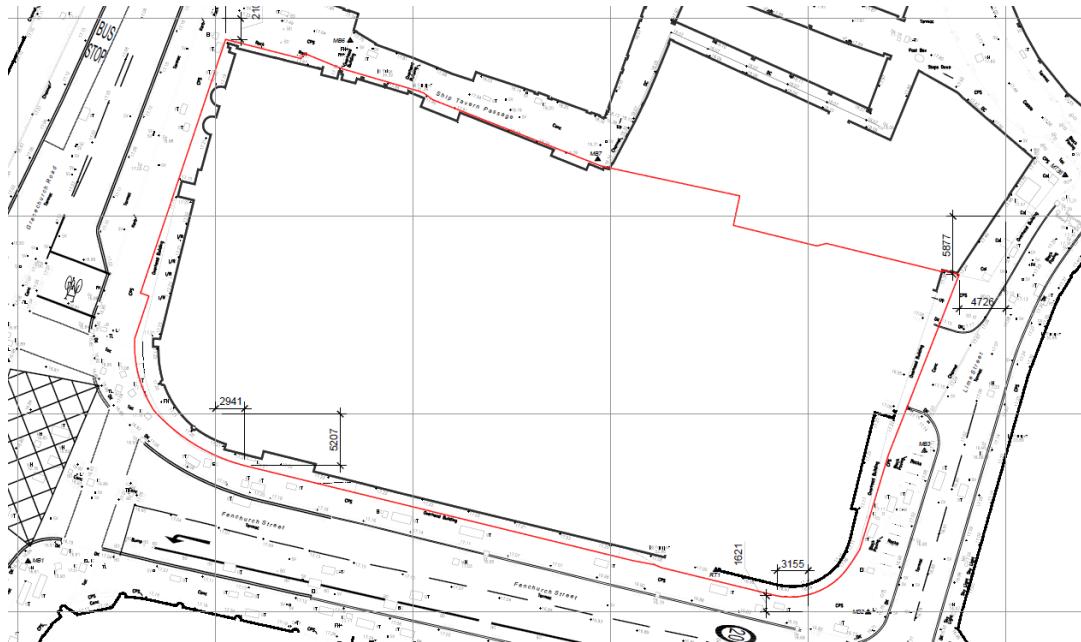


Figure 1 - Site Location Plan

- 2.2 The Site sits at approximately 0.29ha in area and is currently occupied by a ground plus seven storey building including a basement comprised of four storeys. The existing building, completed in 2001, was designed for Marks and Spencer to be their flagship UK store department store. Boasting a gross internal area of 28,071sqm, the Commercial, Business and Service (Class E) building, includes retail use from lower ground to first floors and office use above.
- 2.3 The existing building encompasses the majority of the Site with the remaining area comprising public highway and permissive path. Party walls lie to the north of the Site, at the Swan Tavern Public House and 21 Lime Street.
- 2.4 The existing façade is comprised of Jura Limestone curtain walling and glazed panel cladding. The building corners are articulated with horizontal limestone fins following a curved profile.
- 2.5 The Site benefits from the highest Public Transport Accessibility Level (PTAL) of 6b, largely attributed to its close proximity to a number of key London Underground and National Rail Stations including Bank, Monument, Cannon Street, Fenchurch Street, London Bridge and Liverpool Street. Several bus routes also serve the Site which can be accessed along



Gracechurch Street, Fenchurch Street and Eastcheap. At present, the building does not offer a public through route connecting the Site to Leadenhall Market.

Heritage Designations

- 2.6 The existing building is not Listed and does not fall within a Conservation Area as designated by the City of London.
- 2.7 The vast majority of the site is not located within a conservation area despite the Bank and Eastcheap Conservation Areas bordering the Site. However, the site is directly adjacent to the Leadenhall Market Conservation Area and there is a very slight overlap with the application boundary on Ships Tavern Passage. No built development is proposed within the conservation area and the works to Ships Tavern Passage are limited to remedial highway works.
- 2.8 The wider area contains a number of heritage assets, notably the nearby Leadenhall Market (Grade II*) and 81-82 Gracechurch Street (Grade II). Heritage assets further afield include The Monument (Scheduled Monument and Grade I Listed), Lloyd's Building (Grade I Listed), Church of St Mary Woolnoth (Grade I Listed), the Tower of London (World Heritage Site, Scheduled Monument including Listed Buildings) and St Paul's Cathedral (Grade I Listed).
- 2.9 The Site appears in a number of Central London Assessment Points and River Prospect Views in the London View Management Framework (2012), albeit it is located outside of landmark viewing corridors and wider consultation setting areas. These are covered in detail within Volume II of the Environmental Statement – Townscape, Built Heritage and Visual Impact Assessment, prepared by Tavernor Consultancy and Millerhare.

Surrounding Area

- 2.10 The Site is located in a prominent location within the western edge of the City Cluster, surrounded by numerous tall buildings in its immediate context. Completed buildings include 20 Fenchurch Street ('the Walkie Talkie' - 38 storeys), 22 Bishopsgate (62 storeys), 122 Leadenhall Street ('the Cheesegrater' – 52 storeys), 52 Lime Street ('the Scalpel', 39 storeys), 40 Leadenhall (35 storeys), One Leadenhall (36 storeys).
- 2.11 There are a number of nearby tall buildings benefitting from planning permission, the most prominent being the ground plus 72-storey 1 Undershaft. Other nearby permitted tall building schemes include 50 Fenchurch Street (36 storeys), 85 Gracechurch Street (32 storeys), 100 Leadenhall (57 storeys) and 55 Bishopsgate (63 storeys).
- 2.12 The Environment Agency flood maps show that the Site is located in Flood Zone 1, which is afforded the lowest probability of flooding. The Site is designated in the City of London Air Quality Management Area (AQMA.). Other relevant designations are covered in Section 6.



3. Planning History

- 3.1 The City of London's online planning search tool has been examined and the relevant history is discussed in this section. The accompanying Heritage, Townscape and Visual Impact Assessment should be referred to for a more detailed overview of the historic development of the Site.
- 3.2 Up to the 1970s comprised numerous different buildings fronting both Gracechurch and Fenchurch Streets. Many different schemes have been proposed on Site since the early 1900s with a 26-storey, 93m skyscraper offering 29,000sqm of office space proposed in 1968. Limebank House occupied the Site up until 1998 when it was demolished to make way for the current building.
- 3.3 The current building on Site, XL House was approved through Planning Application ref: 5185A on 21st October 1998. In 2000 a Planning Application was submitted for the demolition of the under-construction XL House and its replacement with a 35 storey, 144m mixed-use retail and office building. This scheme was not pursued, and the application was withdrawn in 2003 (following completion of XL House).
- 3.4 In 2021, the most recent and pertinent planning permission (ref. 20/00816/FULEIA) (the "Consented Scheme") was granted on 29 September 2021 for the following:-

"Demolition of all existing buildings and the erection of a new building comprising basement levels and ground floor plus 33 upper storeys (155m AOD) including office use (Class E), flexible retail uses (Class E, drinking establishments (Sui Generis) and hot food takeaway (Sui Generis)), a public viewing gallery, cycle parking, servicing, refuse and plant areas, public realm improvements and other works associated with the development including access and highways works."

- 3.5 The Consented Scheme is a strong material consideration for the Proposed Development, particularly because the Consented Scheme sets an approved baseline for a building of significant height and massing on the Site. The consented scheme expires in September 2026.
- 3.6 The City of London Planning and Transportation Committee report for the approved permission concludes, *inter alia*:
- **Principle of development** – the proposal would contribute positively to office growth in the Square Mile in the form of a new tall building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan policy S4.
 - **Building Height, Heritage and Townscape** - the proposal would preserve the special architectural and historic interest/significance and setting of strategic, landmark



designated heritage assets. The proposal would not harm and would make some positive contributions to the characteristics and composition of strategic views and their landmark elements;

- The proposed development in terms of its height, massing, materials, architectural design and greening would enhance the visual appearance of this part of the City. The setting of nearby listed buildings would not be harmed, and the development would provide a visually positive contribution to the character of this part of the City;
- As the proposals will make a significant contribution to advancing the strategic business objectives of the City and comply with relevant design, heritage, tall buildings and public realm policies, they accord with the development plan when considered as a whole;
- Planning of the City Cluster has sought to safeguard the immediate setting of the Tower of London in accordance with guidance and to step the height of development away from the Tower so that it rises to a peak some way from the Tower. This scheme is located on the western side of the eastern cluster and it is considered that it sits comfortably within the Eastern Cluster policy area as well as the City Cluster policy area of the replacement Local Plan and its Renewal Opportunity Area.
- **Public Realm and Culture** - The scheme offers significant public benefits including a strong cultural offer and viewing gallery. The scheme delivers an increased and significant enhancement of public realm through the introduction of a new north-south public route through the building connecting Fenchurch Street to the network of passageways and lanes connecting Leadenhall Market and the introduction of a large permeable accessible space within the site, fronting Fenchurch Street and Lime Street, open to the public 24 hours a day.

- 3.7 Since 2021, there are no new relevant planning applications which have been submitted, an application relating to the Sculpture in the City programme was approved for a temporary period until May 2023.
- 3.8 As described in Section 1 of this Statement, an EIA Scoping Opinion (Ref: 24/00534/SCOP) has not yet been issued by the City of London Corporation. Relevant consultation comments received as part of the Scoping Request from the following have been addressed in the Environmental Statement and/or the documents submitted in support of this application:-
- The London Borough of Tower Hamlets (Townscape and Heritage);
 - Heathrow Airport, City Airport and the National Air Traffic Service (Aviation Safeguarding); and
 - Historic England's Greater London Archaeological Advisory Service (Archaeology).
- 3.9 All other responses received confirm that relevant consultees have no comment or observations on the Scoping Request.



4. Pre-Application Discussions and Consultation

- 4.1 Paragraphs 39-43 of the NPPF (December 2023) highlight the importance of early engagement with stakeholders to improve the efficiency and effectiveness of planning for all parties. The more engagement and the earlier it occurs, the better the outcomes. Good quality engagement between public and private resources enables better co-ordination and improves outcomes for the community.
- 4.2 The Applicant and Design Team have carried out extensive engagement on the Proposed Development since October 2023 with the City of London Corporation, Transport for London, Historic England, Historic Royal Palaces, the Dean and Chapter to the Fabric of St Paul's Cathedral, the City of London Police and the EC BID.
- 4.3 The proposals have been subject to consultation with the local community, full details are contained within the Statement of Community Involvement, prepared by London Communications Agency.
- 4.4 The design of the proposals has been iterative and subject to ongoing feedback from various stakeholders including statutory bodies and members of the local community. Details of the design changes during the pre-application stage are outlined in the Design and Access Statement, prepared by KPF.

Local Planning Authority

- 4.5 A comprehensive programme of meetings with the City of London Corporation's Planning, Design, Public Realm, Culture, Sustainability and Highways Officers has been carried out since October 2023 to inform the design and detailing of the Proposed Development as part of a Planning Performance Agreement.
- 4.6 Key feedback was primarily centred around the design detailing and how the massing was expressed as a tripartite form in views from the south and west to break up the breadth of the Site. Officers were clear that the public viewing gallery space should be located at high level and the route through the Site could be realigned to better respond to pedestrian movement through and around the Site. The approach to retain part of the existing building was strongly supported. Officers also considered that the angled façade and crown of the building when viewed from the south was positive in urban design terms.
- 4.7 As part of the pre-application engagement, the Whole Life Carbon Options were independently reviewed and verified by Heyne Tillett Steele on behalf of the City of London Corporation, in line with the Carbon Options Guidance Planning Advice Note.

Engagement with Statutory Consultees and other bodies

- 4.8 During the pre-application period, several meetings were held with statutory consultees and other relevant groups. These are summarised at Figure 2 below.



Stakeholder	Summary of Engagement and Feedback
Transport for London ('TfL')	A pre-application meeting was held with TfL in March 2024 and a written response was provided in April. Subsequent discussions with TfL have been held to address some of the feedback. A summary of the key issues and considerations raised are addressed in the Transport Statement, prepared by Momentum. The main focus was on Section 106 financial contributions for cycle parking and public realm improvements, in addition to details relating to construction logistics, trip generation and pedestrian comfort level analysis.
Historic England ('HE')	A meeting with Historic England was held in April 2024 and a written response was issued on 18 July 2024. The advice received from Historic England identified the need for a high quality design to minimise any harmful potential effects to the surrounding designated heritage assets. They recognised the opportunity to provide public benefits to Leadenhall Market, and improve its setting. They did raise some concerns about the overall composition of the City Cluster and the infilling of the gap between the main body of the built cluster and 20 Fenchurch Street. The responses provided guidance on assessing the impacts of the Proposed Development on the World Heritage Statement.
Historic Royal Palaces ('HRP')	A pack of information was emailed to HRP on 15 March 2024. HRP confirmed on 18 March 2024 that they did not wish to comment on the proposals as they would cause no more harm than the consented scheme.
Surveyor to the Fabric of St Paul's Cathedral	A meeting and follow up call were held with the Survey and team during April and May 2024 and a written response was received at the end of May. They confirmed that the reductions and alteration in height were welcome compared to the consented scheme, and highlighted that it was positive that the proposals are not visible in relation to the Fleet Street Processional Route.
City of London Policy and Counter Terrorism and Security Officer	A meeting was held with the City of London Police to discuss the security needs assessment of the proposals. The feedback concluded that the security needs assessment appropriately assessed the threats to terrorism and security, including hostile vehicle attack. Feedback was received in relation to detailed design measures relating to security which has been taken into account.

Figure 2 – Summary of engagement with Statutory Consultees and other bodies



- 4.9 Further comments have been received from stakeholders as part of the EIA Scoping process, including London City Airport, Heathrow Airport, the National Air Traffic Service, Natural England, the Greater London Archaeological Advisory Service and neighbouring planning authorities. These have all informed the Proposed Development and its design.

Community and Political Engagement

- 4.10 A programme of consultation and engagement has been curated by London Communications Agency. The Statement of Community Involvement outlines engagement to date which is ongoing and provides a summary of feedback.
- 4.11 Two public exhibition events were held between 23 and 25 April, and again on 25 and 27 July and feedback was largely positive and mainly focussed around the public realm and location of the accessible spaces in the building. This physical engagement was in addition to a social media campaign, consultation website and newsletters.
- 4.12 Members of the City Corporation have been consulted and kept informed of the proposals in full alignment with the City's Developer Engagement Guidance recently updated in May 2023. This includes Officer attendance at all political meetings with Members of the Planning and Transportation Committee and/or Planning Applications Sub-Committee.

EIA Scoping Opinion

- 4.13 An Environmental Impact Assessment ("EIA") Scoping Opinion has not yet been provided by the City of London Corporation (ref. 24/00534/SCOP) at the time of submission of this application. Where possible the comments which have been received have been addressed in preparation of the Environmental Statement.
- 4.14 If a Scoping Opinion is issued, a response will be provided by Trium if appropriate during the application determination.



5. Application Proposals

- 5.1 This section describes the proposals and should be read in conjunction with the full suite of documents submitted in support of the application, these are described in Section 1.

Description of Development

- 5.2 Full planning permission is sought for:-

"Refurbishment and extension of the building to provide a mixed use office (Class E(g)) and culture/public viewing gallery (Sui Generis), retail/food and beverage (Class E(a)-(b)) development comprising ground plus 32 storeys (149.67m AOD, 132.47m AGL) with soft and hard landscaping, pedestrian and vehicle access, cycle parking, flexible public realm with associated highway works and other works associated with the development."

- 5.3 The Design and Access Statement, prepared by KPF has been prepared in accordance with Article 9 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 (as amended). It describes the proposals in full.

Overview of the Proposals

- 5.4 The Proposed Development seeks to retain approximately 60% of the existing substructure and superstructure to erect a new building above and around the retained fabric to create a commercial led ground plus 32 storey building with a public viewing gallery and cultural space at the top of the building alongside complementary access and circulation space at ground floor and basement level, together with a standalone retail/food and beverage unit.
- 5.5 The Proposed Development seeks to radically transform the ground floor with a new route through the site, widened footways and flexible public realm to the east for use as a shared overnight loading bay which can be programmed for use as a street market.
- 5.6 The existing and proposed areas for the Proposed Development are shown at figures 3.

Land Use	Proposed (GIA)	Proposed (GEA)
Office (Class E(g))	74,753sqm	78,112sqm
Retail/Food and beverage (Class E(a)-(b))	185sqm	195sqm
Culture/Public gallery Sui Generis)	1,209sqm	1,281sqm
Plant	4,032sqm	4,539sqm
Total	80,179sqm	84,127sqm

Figure 3 – Proposed Floor Areas



Retention, Partial Demolition and Deconstruction

- 5.7 The existing building features an atrium void space which has allowed for the partial retention of the existing sub and superstructure. The existing atrium creates a natural place to locate a new core whilst strengthening the existing columns and carrying out partial demolition of existing floor slabs to integrate new development around the retained parts of the building. The Proposed Development seeks to retain approximately 60% of the existing frame and basement.
- 5.8 One level of existing basement (B3) would be infilled for foundation strengthening. The extent of demolition and retention is highlighted within the Design and Access Statement, prepared by KPF.
- 5.9 It is proposed to retain and re-use the existing jura limestone façade within the base of the building where feasible. Section 7 of this statement considers how the proposals respond to Whole Life Carbon and Circular Economy Principles, alongside the requisite statements that have been prepared by Arup and Robert Bird Group.

Building Form, Layout and External Appearance

- 5.10 The Proposed Development would rise to a height of 132m above ground level (149.67m AOD) and comprise 32 above ground storeys and three subterranean levels (all within retained elements of the existing basements). The building would sit at the western edge of the City Cluster and is expressed as three massing volumes which step upwards from west to east at the top of the building, and step down to the corresponding podium below by one storey to each volume. The two westerly volumes would feature a landscaped pergola to shelter the proposed terraces and add visual interest to the steps in local and longer distance views. The southern elevation of the building is shown at figure 4.



Figure 4 – Proposed Illustrative South Elevation

- 5.11 The base of the building is expressed as a podium building with a more solid façade which rises to eight storeys tall on the corner of Gracechurch and Fenchurch Street which steps down along Fenchurch Street and Ships Tavern Passage to five storeys moving eastwards.



- 5.12 The materiality of the base is proposed as a mix of reclaimed jura limestone from the existing building alongside a buff stone with pinstripe recesses at the nose of every expressed vertical element with a metal window surrounds with light grey stone spandrels. The ground floor and route through the Site is proposed to be treated with a mix of dark metal and stone material which would continue through the public route to a series of bays with glazing. The eastern side of part of the route through would feature a digital LCD screen, and a soffit design which is proposed to be subtly illuminated and vaulted in appearance to add visual interest.
- 5.13 Above the podium level which is proposed to be heavily landscaped, the tower element of the Proposed Development dramatically rises upwards with a series of 3m wide façade modules with faceted corners of 1.5m wide façade modules, which wrap around the corners of the massing.
- 5.14 The vertical components of the massing at the edges are subtly tapered with the widest points being located in the middle of the tower volume, before tapering back inwards to break down the massing and make it appear more slender. The upper three floors of each massing volume is angled more sharply inwards than the floors below to articulate the crown of the building.
- 5.15 The south east and north west corners of the building feature a double curved feature to give a recessive appearance. The southern volumes also feature an architectural seam running up the tower massing volumes to the very top of the building.

Public Viewing Gallery and Public Realm Spaces

- 5.16 It is proposed the the ground, lower ground and level 32 of the building will feature a public viewing galley/cultural space. The level 32 space would feature 709 sqm of internal space with seating and a small bar/café, the space would be programmable for events which would function as an ancillary use to the public viewing gallery. The external terrace would be 445 sqm large and feature a café/bar space beneath the pergola space, alongside extensive landscaping and seating.
- 5.17 The viewing gallery space at the top of the building would be accessed from the lower ground level via a generous stair or lift from the new publicly accessible route through the site and from Gracechurch Street. This would provide security and screening facilities with opportunities for exhibition and cultural programming. The eastern part of the ground floor includes a dual purpose overnight loading bay/pop up market. This arrangement is shown at figure 5.

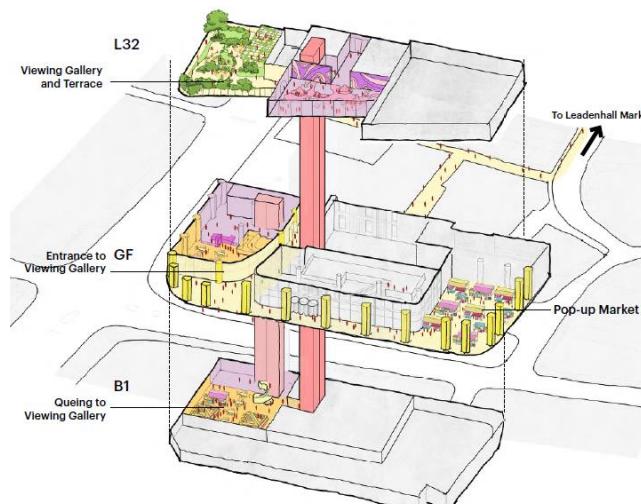


Figure 5 – Proposed public spaces in the building



- 5.18 Exit from the viewing gallery would be provided at ground floor onto Ships Tavern Passage on the north of the Site. It is considered that this would provide a significant operational benefit to manage queuing and security. At the south west corner of the building, a standalone retail unit is proposed at ground floor level.
- 5.19 In terms of off-site public realm works, it is anticipated that additional works to Lime Street, Fenchurch Street and Gracechurch Street would be secured by a section 278 highways agreement.
- 5.20 The material treatment to the public realm would be predominantly York stone with a mixture of granite cobbles fading to and from York stone within the route through the Site.

Workspace

- 5.21 The Proposed Development would deliver a significant amount of office workspace with a range of floorplate sizes, all of which are designed to be able to be divided into multiple tenancies (if required). The floorplates range from c.1,300 sqm to 2,000sqm NIA to cater to a wide range of different occupiers needs in terms of sizes.
- 5.22 A variety of amenity spaces are proposed within the building for use by tenants in the form of communal amenity spaces and external terraces. The Proposed Development would secure a significant amount of best in class workspace accommodation in a highly sustainable location.

Access, Transport, Deliveries and Servicing

- 5.23 Access to the building would be from the ground floor. The office lobby is accessed from the south, the culture/retail spaces from the western side of Gracechurch Street and the new route through the Site. Vehicular access is provided from Lime Street to an open area of dual use public realm which would provide for four vehicles of up to 10 metres to access the Site for deliveries and servicing. One blue badge space would also be provided on-site within the eastern area of hard standing which would also be accessible during the day and when overnight servicing is taking place. This space would function as a flexible piece of public realm for intended use as a street market during the day.
- 5.24 The suite of transport related documents, prepared by Momentum outline in full how measures to promote active travel, and reduce the number of vehicle trips to the site including through off-site consolidation.
- 5.25 The Proposed Development would provide 1,106 long stay cycle parking spaces at basement level 1 and 2, accessed by gullied stair and lifts from Lime Street in the form of:-
 - a. Adaptive spaces: 50 (5%)
 - b. Two tier spaces: 914 (83%)
 - c. Brompton lockers: 114 (10%)



d. Semi-vertical: 28 (3%)

- 5.26 The space requirement has been calculated with the London Plan and London Cycle Design Standards. Short stay cycle parking is proposed in the form of a 65 spaces, 46 at level B1 and 19 at ground floor level forming of:-
- a. Adaptive spaces: 7 (11%)
 - b. Sheffield Stands: 9 (15%)
 - c. Cargo bike spaces: 3 (5%)
 - d. Two Tier Spaces: 46 (70%)

Energy, Sustainability and Urban Greening

- 5.27 The Proposed Development would employ highly sustainable design measures to maximise energy efficiency through passive design, minimise embodied carbon through material choices and provide extensive landscaping to deliver urban greening.
- 5.28 The Proposed Development would be an all-electric building and has been designed with longevity, low maintenance and future adaptability in mind, including designing for disassembly. The facades have been designed with passive measures to reduce energy demand and maximise efficiency.
- 5.29 The plant would be located on each office floor and have a series of dedicated plant levels to serve the building, primarily through the use of Air Source Heat Pumps (ASHPs), air cooled chillers and water-to-water heat pumps to provide domestic hot water.
- 5.30 The Proposed Development is pre-assessed to achieve BREEAM “Excellent”, with aspirations for “Outstanding”, Nabers UK 5* and deliver a 13% reduction in CO2 emissions over Part L of the Building Regulations 2021, with a carbon offsetting contribution made to the City of London’s fund to offset the remainder to achieve net zero.
- 5.31 Vertical greening, green roofs, planting on terraces and ground floor trees will significantly improve biodiversity and result in an urban greening factor score of 0.33, and a Biodiversity Net Gain of 0.62 biodiversity units, equating to approximately 2.14 units per hectare in net biodiversity gains. The existing site has a baseline of zero which results in a “de-minimis” exemption from the 10% uplift which is not measurable as a percentage from a zero baseline.
- 5.32 The Proposed Development would be an exemplar tall building in terms of sustainability.



6. Planning Policy Framework and Overview

- 6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 The Development Plan for the Site comprises:-
- The London Plan, published in March 2021; and
 - The City of London Local Plan, adopted in January 2015.
- 6.3 The NPPF, published in 2012 and updated most recently in December 2023; the National Planning Practice Guidance (“NPPG”) which is periodically updated; Supplementary Planning Guidance; parts of the draft City of London Local Plan 2040; and the previously approved planning permission (ref. 20/00816/FULEIA) are all material considerations in assessing the Proposed Development.
- 6.4 An assessment of the Proposed Development against the Development Plan is provided at section 7 of this statement.

Adopted Policy Designations

- 6.5 The Site is within the London Plan Central Activities Zone (“CAZ”) designation.
- 6.6 The London Plan is the spatial development strategy for Greater London which includes the 32 Boroughs and the City of London. The London Plan is centred around Good Growth with a focus on building strong and inclusive communities, making the best use of land, creating a healthy city, growing a good economy and increasing efficiency and resilience.
- 6.7 The London Plan recognises the key role of Central London as a driver for London and the wider UK economy with the City of London and the wider CAZ being critical in supporting growth.
- 6.8 The Site has the following policy designations in accordance with the City of London Local Plan Policy Proposals Maps A and B, adopted in January 2015 (with Map B being updated in September 2020):
- Leadenhall Market Principal Shopping Centre;
 - Leadenhall Market Conservation Area (partial);
 - Heathrow and London City Airport Aerodrome Safeguarding Area.
- 6.9 The vast majority of the site is not located within a conservation area. However, the site is directly adjacent to the Leadenhall Market Conservation Area and there is a very slight overlap



with the application boundary on Ships Tavern Passage. No built development is proposed within the conservation area and the works to Ships Tavern Passage are limited to remedial highway works.

6.10 The Local Plan sets out five strategic objectives to meet the vision of creating a World Class City:-

- To maintain the City's position as the world's leading international financial and business centre.
- To ensure that the challenges facing the five Key City Places are met, complementing the core business function of the City, contributing to its unique character and distinguishing it from other global financial districts.
- To promote a high quality of architecture and street scene appropriate to the City's position at the historic core of London, complementing and integrating the City's heritage assets and supporting the continued development of the City as a cultural destination for its own communities and visitors.
- To ensure that the City of London remains at the forefront of action in response to climate change and other sustainability challenges that face high density urban environments, aiming to achieve national and international recognition for its sustainability initiatives.
- To ensure the provision of inclusive facilities and services that meet the high expectations of the City's business, resident, student and visitor communities, aiming for continuous improvement in the City's rating in satisfaction and quality of life surveys.

6.11 The Spatial Strategy within the Local Plan divides the Square Mile into five "Key City Places". These are North of the City; Cheapside and St Paul's; Eastern Cluster; Aldgate; and Thames and the Riverside. These areas do not have defined boundaries and are allocated to address the particular challenges or opportunities that each of these areas face.

6.12 Of relevance is the Site being located within the Eastern Cluster Policy Area. The Eastern Cluster policy area is an adopted location identified for significant growth in office floorspace through the delivery of tall buildings on appropriate sites. Figure 6 shows the approximate location of the Site with the Proposed Development shown in the context of the Eastern Cluster.



Figure 6 - Approximate Location of the Site shown in blue in the Eastern Cluster (Figure G of the City of London Local Plan)



- 6.13 The Site is not located within an area deemed "*inappropriate for tall buildings*" in accordance with Figure N of the Local Plan which highlights the parts of the Square Mile which are not appropriate for the development of tall buildings as part of the supporting text to policy CS14.
- 6.14 Section 3.7 of the Local Plan sets out that the Eastern Cluster is anticipated to contain more tall and large buildings and a larger workforce, accounting for 50-60% of all projected City office space. Meeting this growth - while providing adequate space for pedestrians, managing security and transport impacts of new development - are key considerations in this part of the City.
- 6.15 These aims and objectives are translated into core strategic and development management policies to deliver the aspirations of the Local Plan.

Emerging Planning Policy

- 6.16 The City of London are in the process of reviewing their Local Plan to provide a new framework up to 2040. The City of London Consulted on the City Plan 2036 'Shaping the Future of the City' between 19 March 2021 and 10 May 2021 for formal consultation in line with regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).
- 6.17 On 14 December 2021, Members of the Planning and Transportation Committee agreed to "pause" work on the Local Plan and extend the timeframe of the Plan Period up to 2040. It was also renamed the "City Plan". This was in order to allow for an updated evidence base to be procured following the coronavirus pandemic, the adoption of the new London Plan in March 2021 and national legislative changes to the Town and Country (Use Classes) Order 1987 in 2020.
- 6.18 In respect of the need for offices, the City of London commissioned a policy paper as part of the revised evidence base for the draft City Plan 2040, 'Future of Office Use – Summary Report – June 2023', prepared by Arup and Knight Frank. The accompanying Committee Report and Office Topic Paper prepared for the Local Plans Sub (Planning and Transportation) Committee was tabled, and Officers confirmed they were testing a range of different scenarios and the summary was that long-term growth prospects were good with the City requiring between 6 and 20 million additional square feet of office space by 2042.
- 6.19 In addition to the Office topic paper, over the spring and summer of 2023, a series of other topic papers were considered by Members of the Local Plans (Planning and Transportation) Sub Committee:-
 - Retrofit First (April 2023)
 - Culture Public Uses and Spaces (April 2023)
 - Housing (May 2023)

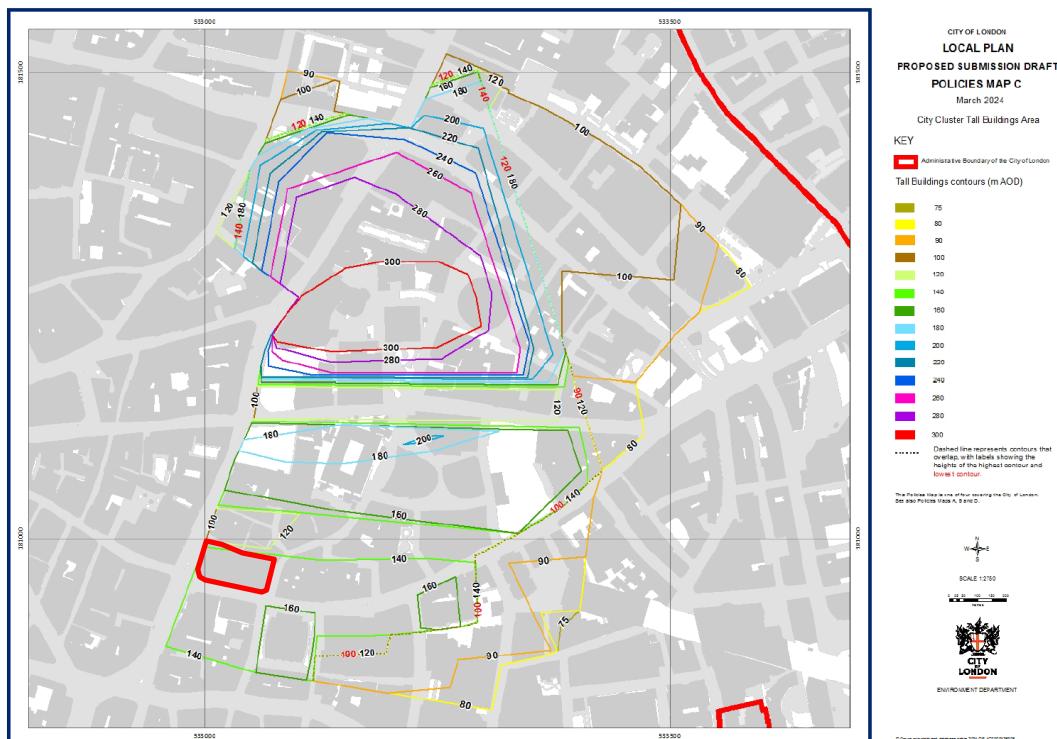


- Hotels (May 2023)
 - Offices (June 2023)
 - Tall Buildings and Heritage (June 2023)
- 6.20 Following this additional evidence gathering, the City of London published an updated City Plan 2040 for Regulation 19 Consultation from 14 April 2024 to 14 June 2024. This included the full suite of evidence to support the Plan. Officers are reviewing consultation responses, including site specific representations made by the Applicant to the Draft City Plan, and are expecting to submit the Plan for independent examination to the Planning Inspectorate before the end of 2024.
- 6.21 In advance of Examination in Public, it is considered that very limited weight can be attached to the Draft City Plan in line with paragraph 48 of the NPPF. Those policies in the Plan which are subject to unresolved objections, notably strategic policy S12 of the Draft City Plan (Tall Buildings), policy S5 (Retail and active frontages) and RE1 (Principal Shopping Centres) should be given limited, if any weight in line with paragraph 48(b) of the NPPF.
- 6.22 The draft policies in the Regulation 19 City Plan 2040 (the “Draft City Plan”) which have been considered to be relevant to the Proposed Development are:-
- Draft Strategic Policy S4 – Offices
 - Draft Policy OF1 – Office Development
 - Draft Strategic Policy S2 – Safe and Secure City
 - Draft Strategic Policy S5 – Retail and active frontages
 - Draft Policy RE1 – Principal Shopping Centres'
 - Draft Policy RE5 – Active Frontages
 - Draft Strategic Policy S6 – Culture and visitors
 - Draft Policy CV2 – Provision of Arts, Culture and Leisure Facilities
 - Draft Policy CV3 – Provision of Visitor Facilities
 - Draft Strategic Policy S8 – Design
 - Draft Policy DE1 – Sustainable Design
 - Draft Policy DE2 – Design Quality
 - Draft Policy DE3 – Public Realm



- Draft Policy DE5 – Terraces and Elevated Public Spaces
- Draft Policy DE9 – Lighting
- Draft Strategic Policy S10 – Active Travel and Healthy Streets
- Draft Strategic Policy S11 – Historic Environment
- Draft Policy HE1 – Managing Change to the Historic Environment
- Draft Policy HE3 – Setting of the Tower of London World Heritage Site
- Draft Strategic Policy S12 – Tall Buildings
- Draft Strategic Policy S13 – Protected Views
- Draft Strategic Policy S21 – City Cluster Key Area of Change

6.23 An additional policy consideration is the City Cluster Tall buildings area and the proposed building contours contained within policy proposals map C. The Site's relationship to these contours is shown below at figure 7. The Site would mostly fall within the 140m AOD contour, and as outlined in the Applicants site specific representations, the current approach to draft strategic policy S12 and policies map C is not sound and warrants objection. This is discussed in more detail at section 7 of this statement.





Supplementary Planning Guidance

6.24 We have considered the following London Planning Guidance (“LPG”) and Supplementary Planning Guidance (“SPG”) documents in the assessment of the Proposed Development:-

- Draft Fire Safety LPG (February 2022)
- Characterisation and Growth Strategy LPG (June 2023)
- Optimising Capacity – A design-led approach LPG (June 2023)
- Planning for Equality and Diversity in London SPG (October 2007)
- Accessible London SPG (October 2014)
- London View Management Framework SPG (March 2012)
- Social Infrastructure (May 2015)
- London World Heritage Sites SPG (March 2012)
- Urban greening factor LPG (February 2023)
- Air quality positive LPG (February 2023)
- Air quality neutral LPG (February 2023)
- Be Seen energy monitoring LPG (March 2022)
- Circular economy statements LPG (March 2022)
- Energy Planning Guidance (March 2022)
- The control of dust and emissions in construction SPG (July 2014)
- Whole life carbon LPG (March 2022)
- Sustainable Transport, Walking and Cycling LPG (March 2023)

6.25 We have also considered the following City of London supplementary planning documents (“SPD”), strategies and planning advice notes:-

- City of London Air Quality SPD (July 2017)
- Office Use SPD (2015)



- Planning Obligations SPD May (2021)
- Protected Views SPD (January 2012)
- Lighting SPD (October 2023)
- Freight and Servicing SPD (February 2018)
- City of London Wind-microclimate guidelines (2019)
- City of London Thermal Comfort guidelines (2020)
- City of London Solar Glare Planning Advice Note (2017)
- Carbon Options Guidance Planning Advice Note (2023)
- Preventing Suicides in High Rise Buildings and Structures Planning Advice Note (2022)
- The City Cluster Vision public realm document (2019)
- Developer Engagement Guidelines (May 2023)
- London Recharged: Our Vision for London in 2025



7. Planning Policy Assessment

- 7.1 This section sets out an assessment of the Proposed Development against the Development Plan alongside the other material considerations listed in Section 6.
- 7.2 The key planning considerations addressed in this section are as follows:-
- **The principle of development**, including:-
 - Re-use and partial deconstruction of the existing building;
 - Intensification of office floorspace;
 - Principle of a tall building;
 - Introduction of a viewing gallery and cultural space at level 32;
 - Introduction of cultural and retail spaces at ground and basement level;
 - Introduction of new public realm;
 - **The design and massing**, including:-
 - Whether the proposed design is acceptable;
 - A detailed analysis of the building against tall buildings policies;
 - An assessment of the architectural treatment of the building;
 - The quality of the design and proposed workspace;
 - The approach to public realm, landscaping and urban greening;
 - The approach to accessibility and inclusive design;
 - The approach to cycle parking, lighting, fire safety and security, suicide prevention, design for disassembly and re-use;
 - **The heritage and townscape**, including:-
 - An assessment of the impacts of the Proposed Development on protected views;
 - A summary of any harm and/or benefits to heritage assets;
 - The townscape impact of the Proposed Development;
 - **The environment and sustainability**, including:-



- The approach to deliveries, transport, servicing and impacts on the local transport network;
 - The proposed energy and sustainability strategy, impact on Whole Life Carbon and the Circular Economy;
 - The impacts on wind, microclimate and thermal comfort on the proposed public realm and surrounding area;
 - The impact on daylight, sunlight, overshadowing, solar glare and light pollution
 - The impact on air quality;
 - The impact on archaeology;
 - Deconstruction and construction impacts;
 - Aviation and television impacts;
 - Flood risk and drainage impacts; and
 - Biodiversity impacts.
- 7.3 This section provides a summary of the relevant policies, grouped into sections and topics, followed by an assessment of the Proposed Development in turn against the Development Plan and any relevant material considerations. This section draws on the findings and conclusions of the submitted reports, described at section 1.

Principle of Development

- 7.4 At the heart of the NPPF is the presumption in favour of sustainable development. Paragraph 11 of the NPPF confirms that the planning decisions must be taken in accordance with the Development Plan, without delay.
- 7.5 The Good Growth Principles of the London Plan set out how the City is expected to deliver strong and inclusive communities, make the best use of land, grow a good economy and increase efficiency and resilience.
- 7.6 Policies SD4 and SD5 of the London Plan set out how these growth principles are to be applied spatially, with office development of national and international importance to be given great weight and importance within the Central Activities Zone.
- 7.7 The Local Plan provides a series of core strategies to deliver sustainable long term growth to preserve the Square Mile's role as the heart of the world's leading international financial and business centre and a driver of the national economy. The Local Plan envisages that this will be delivered by the continued growth of office and business floorspace to meet demand for new development.



- 7.8 The draft City Plan sets out a series of economic, social and environmental objectives which include the delivery of a minimum of 1.2 million square metres of net additional office floorspace while delivering new, inclusive open spaces and enhancing the City's public realm for everyone, transforming the seven key areas of change, creating a more inclusive city, ensuring that development is environmentally sustainable and transitions to net zero carbon by 2040, delivering urban greening and greater biodiversity, celebrating and protects the City's unique heritage assets, enhancing the City's skyline while preserving strategic views, ensuring exemplary design and transforming the City's streets.
- 7.9 It is considered that the Proposed Development fully aligns with the aspirations of the NPPF to deliver sustainable development, alongside regional and local strategic objectives in the London Plan, Local Plan and draft City Plan.

Deconstruction of the Existing Building

- 7.10 Paragraph 152 of the NPPF states that the planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- 7.11 Policy SI7 of the London Plan promotes a circular economy approach to development to reduce waste, conserve resources, increase material re-use and recycling.
- 7.12 Policy CS15(3) of the Local Plan sets out that demolition should be avoided through the reuse of existing buildings or their main structures. Strategic policy S8 and policy DE1 of the draft City Plan states that proposals should follow a retrofit first approach, thoroughly exploring the potential for retaining and retrofitting existing buildings as the starting point for appraising site options. It requires major developments to undertake an options assessment for the site in line with the Carbon Options Guidance Planning Advice Note.

Assessment

- 7.13 A Carbon Optioneering Assessment has been carried out by Arup which considered four options, three of which involved the retention and refurbishment of the existing building to varying degrees. These options were assessed across several quantitative and qualitative parameters, which included a high-level estimation of the embodied and operational carbon. The assessment concluded that *Option 3: Refurbishment with Major Strengthening* was the proposed strategy; maximising retention of the existing superstructure and substructure elements, lean design and carbon optimised materials procurement. This strategy minimises both the embodied and operational carbon impact of the scheme meeting the Applicant's ambitions to deliver a highly sustainable building.



- 7.14 In contrast to the previous consent which involved the comprehensive demolition of the existing building, the Proposed Development seeks to retain approximately 60% of the existing substructure and superstructure. Further, as detailed in the Whole Life Carbon Assessment, prepared by Arup (WLCA), the proposal will look for opportunities to use low carbon and recycled materials where feasible. Pre-construction demolition is required to clear the Site and modify elements of an existing buildings. Since this is an early-stage assessment, detailed demolition estimates are yet can be quantified, however they are still considered in compliance with RICS PS Ed. 2 2023.
- 7.15 The Whole Life Carbon Assessment, prepared by Arup, concludes that the proposed Scenario shows a 8% improvement compared to the Baseline Business-as-Usual Scenario at A1-A5 with an upfront embodied carbon target of 872kgCO₂ per square metre, with aspirations to achieve 700kgCO₂ per square metre at design stages.
- 7.16 With this in mind, it is considered that the deconstruction of the existing building is in conformity with the Development Plan. Please refer to the accompanying WLCA, prepared by Arup for further details.

Intensification of Office Floorspace

- 7.17 Paragraph 86 of the National Planning Policy Framework states that Main Town Centre Uses, including offices, should be primarily located in Town Centres. The site is located within the CAZ and the Site falls within a ‘town centre’ location.
- 7.18 Policy SD4 and E1 of the London Plan support the intensification of office floorspace within the CAZ.
- 7.19 Policy D3 of the London Plan sets out how sites should be optimised in order to increase density through a design led approach. It requires all development to make the best use of land, with higher densities being promoted in locations that are well connected to jobs, services, infrastructure and public transport.
- 7.20 Local Plan Policy CS1 and CS7 support the significant growth of office floorspace within the City and specifically within the City Cluster. The City Cluster is forecast to deliver a substantial proportion of the Square Mile’s office floorspace growth. This position is supported by policies S4 and S21 of the draft City Plan, with a target growth in office floorspace of 1.2 million square metres of net additional floorspace by 2040, the majority of which is expected to be delivered in the City Cluster Key Area of Change.

Assessment

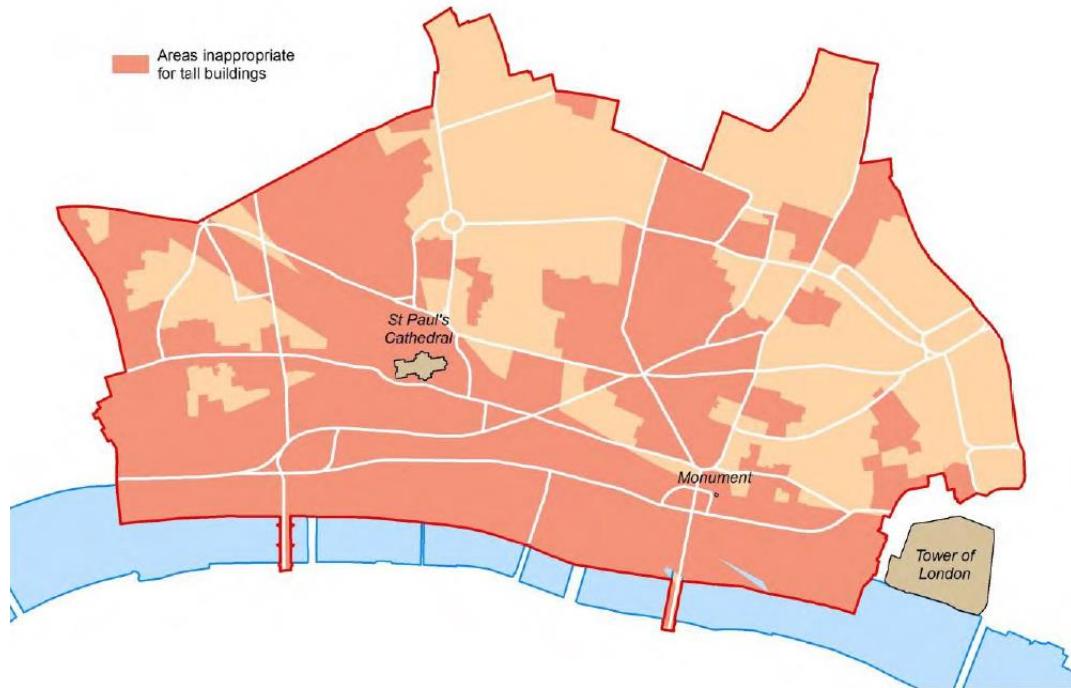
- 7.21 The Proposed Development seeks to provide approximately 80,179 sqm of additional office floorspace at the heart of the City Cluster, representing a significant amount of the City of London’s projected 1.2 million square metres of additional net office floorspace over the period of the Draft City Plan. The contribution of the Proposed Development to economic growth is substantial.



- 7.22 A denser concentration of officer floorspace through a design led approach in this regionally and locally allocated area for the clustering of significant additional office floorspace is strongly supported by the Development Plan and the proposals are policy compliant. The Proposed Development provides an increase in floorspace on Site when compared to previous consent.

Principle of a Tall Building

- 7.23 Policy D9 of the London Plan states that Boroughs should locally define what constitutes a tall building (part A) and identify appropriate locations for them (part B). Part C provides a framework for how the impacts of tall building development should be assessed in terms of their visual, functional and environmental impacts. Part D of the policy supports free to enter publicly accessible locations within tall buildings.
- 7.24 Policy CS14 of the Local Plan states that the City will permit tall buildings on suitable sites within the City's Eastern Cluster, refusing planning permission for tall buildings within inappropriate areas including conservation areas, the St Paul's Heights Area, St Paul's protected vista viewing corridors and Monument views and setting. Tall buildings must ensure they do not adversely affect the operation of London's Airports.
- 7.25 Policy CS7 of the Local Plan states that the Eastern Cluster will delivery tall buildings on appropriate sites that enhance the overall appearance of the cluster on the skyline and the relationship with the space around them at ground level, while adhering to the principles of sustainable design, conservation of heritage assets and their settings, taking account of their effect on the wider London skyline and protected views.
- 7.26 The Local Plan defines a tall building (at paragraph 3.1.4.1) as "*those which significantly exceed the height of their surroundings*". Figure N of the Local Plan provides a map identifying areas which are inappropriate for tall buildings in the City which is shown below. The Site is not located in such an area.



- 7.27 Strategic policy S12 of the draft City Plan states at part 1, that tall buildings are defined as buildings over 75 metres AOD. Part 2 states that tall building areas are identified on the policies map of the draft City Plan and are considered appropriate in principle for tall building development, subject to the requirements in this and other relevant policies. Part 3 states that maximum permissible heights within identified areas are depicted on policies map C (with an extract below).
- 7.28 It goes on to state that tall buildings should not exceed the height of the relevant contour rings and be designed to successfully mediate between the and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and townscape character, creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity. It also states that the height and form of tall buildings must take account of strategic and local views.
- 7.29 Policy S21 of the draft City Plan states that the City Cluster key area of change will deliver its growth objectives through the construction of new tall buildings. The supporting text (paragraph 17.7.4) sets out that tall buildings are very much an established defining feature of the City Cluster. This area is designated as an area appropriate in principle for tall building development. Detailed sensitivity analysis and three dimensional modelling shows that there is potential for further tall building development.



Assessment

- 7.30 The Development Plan, and the Consented Scheme, which is a strong material consideration supporting the principle of a tall building at this Site. The Consented Scheme, which remains extant and able to be implemented until September 2026 for a building of a similar form and height, it was assessed in the Officer’s committee report for the Consented Scheme to be suitable in principle for a Tall Building and in terms of visual, functional and environmental impacts.
- 7.31 The Proposed Development would be considered a “tall building” for policy purposes and it lies within an area that the City of London deem to be appropriate for tall buildings in the adopted Local Plan.
- 7.32 The Design and Access Statement, prepared by KPF and Volume II of the Environmental Statement, prepared by Tavernor and Millerhare, provide a full assessment of the Proposed Development’s visual, environmental and functional impacts in line with policy D9(C) of the London Plan and it is considered that these have been fully addressed to justify the impacts of the Proposed Development. These are addressed in detail under separate assessments within this Statement.
- 7.33 As outlined in section 6 of this Statement, the Applicant has made site specific representations to the draft City Plan and have an objection to strategic policy S12 of the draft City Plan. The principal concern is that the evidence base has been translated into an unsound policy which seeks to oversimplify a very complex 3D shape, combined with an overly restrictive policy wording which will not allow for the necessary flexibility for the City of London to achieve its growth targets.
- 7.34 The evidence base and 3D jelly mould was prepared on the basis of a “no harm” scenario and recognises that there are opportunities for the contours to be exceeded as part of a detailed townscape and heritage analysis. The Applicants representations have put forward a range of potential remedies to make the policy sound.
- 7.35 The Proposed Development would exceed the proposed height contours at map C by approximately 10 metres. It lies largely within the 140m AOD proposed contour, with a smaller element that sits within the lower 120m AOD contour. On the basis of the current draft policy, the Proposed Development would not comply with part 3, as it would exceed what the policy seeks to define as “maximum permissible” heights. A thorough assessment of the functional, visual and environmental impacts of the Proposed Development have been undertaken which is addressed in the heritage and townscape section of this Statement. It is considered that the Proposed Development complies with all other parts of policy S12 of the draft City Plan.
- 7.36 Taking the status of the draft City Plan, which at present carries very limited weight, together with the Consented Scheme, we do not consider that any potential non-compliance with part 3 of policy S12 of the draft City Plan is a material consideration in the assessment of the



Proposed Development for the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended).

- 7.37 The Proposed Development would provide free to enter public access to level 32 which is the second highest accessible floor within the building. It is therefore considered that the Proposed Development is appropriate for a tall building in line with the Development Plan and that strategic policy S12(3) of the draft City Plan at this stage is not a material consideration.

Introduction of a Viewing Gallery and Cultural Space

- 7.38 Policy D9(D) of the London Plan states that free-to-enter publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.
- 7.39 Policy DE5(3) of the draft City Plan sets out that roof terraces will be required on all tall buildings to provide free to enter, publicly accessible elevated spaces which may include roof gardens, terraces, public viewing galleries or other retail or leisure facilities to create attractive designations for people to enjoy the City's spectacular skyline. Where these spaces are proposed, safety and security risks must be addressed at the design stage and space for security checks and any hostile vehicle mitigation incorporated into the development, where required.

Assessment

- 7.40 The Proposed Development will make a meaningful contribution to the aspirations of Destination City through the provision of a public viewing gallery, terrace and cultural spaces at ground and lower ground levels.
- 7.41 The Applicant has drawn on their experience in providing successful cultural spaces within the Square Mile at 8 Bishopsgate to establish a cultural offer that delivers the following:
- A lower ground art exhibition space and community function room;
 - Public access at ground floor via a pedestrian passage, enlivened with digital art, hospitality offerings and flexible market space;
 - A level 32 viewing terrace with an indoor gallery and outdoor garden terrace, offering flexible space for hosting art, hospitality and community events;
 - A through-route within the Site invigorating the southern gateway to the City Cluster drawing visitors into Leadenhall Market; and
- 7.42 The accompanying Cultural Plan, prepared by Hatch, demonstrates how the provisions above address the ambitions as set out in the Emerging City Plan 2040 and Cultural Planning Framework, 2024.



- 7.43 There are numerous high level roof terraces surrounding the Site that have proven successful; the Proposed Development seeks to provide something which is unique and different from those which existing and which are approved/under construction. The proposed roof terrace will provide one of London's highest roof terraces, uniquely positioned to look over the western 'cliff edge' from the City Cluster and feature ancillary cultural functions to increase dwell time and encourage visitors to return.
- 7.44 A new pedestrian passage and through-route at ground floor level will feature a digital media wall and associated lighting. This will transform public access to the Market by giving it a new southern gateway and help spread footfall across the whole district. The lower ground floor art exhibition space and community function room supports the enrichment of the arts culture industry within the Square Mile.
- 7.45 It is considered that the Proposed Development fully aligns with the Development Plan in respect of culture and visitors.

Introduction of Cultural and Retail Facilities

- 7.46 Policy HC5 of the London Plan supports the continued growth and evolution of London's diverse cultural facilities and creative industries in sustainable locations. Policy HC6 of the London Plan supports the growth and diversification of night time economy.
- 7.47 Core strategic policy CS20 and policy DM20.1 of the Local Plan seek to improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres. Part 1 of policy DM20.1 of the Local Plan states that within Principal Shopping Centres (PSCs) the loss of retail frontage and floorspace will be resisted and additional retail provision will be encouraged. Proposals for changes between retail uses within the PSC will be assessed against the following considerations:
- maintaining a clear predominance of A1 shopping frontage within PSCs, refusing changes of use where it would result in more than 2 in 5 consecutive premises not in A1 or A2 deposit taker use;
 - the contribution the unit makes to the function and character of the PSC;
 - the effect of the proposal on the area involved in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.
- 7.48 Core strategic policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences.
- 7.49 Strategic Policy S6 of the draft City Plan states that the City Corporation will maintain and enhance the City of London's cultural offer, visitor experiences and infrastructure, and the



City's evening and weekend economies to position the Square Mile as a key cultural and leisure destination.

- 7.50 Policy CV2 of the draft City Plan also sets out that the City will seek new opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors to the City by requiring large scale development proposals over 10,000sqm in size to make provision on site.
- 7.51 Strategic Policy S5 and policy RE1 of the draft City Plan set out how the City will manage retail and active frontages in new development. The policies seek to make the City's retail areas more vibrant with a greater mix of retail, leisure, entertainment, experience, culture and other appropriate uses across the City in collaboration with Business Improvement Districts, landowners, operators and other partners to enrich the ground floor economy. The City seek to improve the quantity and quality of the retail environment by focussing new large scale retail development to the Principal Shopping Centres (PSCs).
- 7.52 Policy RE1 of the draft City Plan specifically seeks to retain the concentrations of comparison and convenience shopping, the loss of ground floor retail frontages and floorspace being resisted and additional retail provision of varied unit sizes and frontage lengths will be encouraged, supported by complementary uses that increase footfall and provide active frontages. Where planning permission is required, proposals for changes between retail uses within the PSCs will be assessed against:
- the contribution the unit makes to the function and character of the PSC;
 - maintaining an active frontage; and
 - the effect of the proposal on the area in terms of the size of the unit, the length of its frontage, the composition and distribution of retail uses within the frontage and the location of the unit within the frontage.
- 7.53 The Applicant has made site specific representations in relation to policy RE1 of the Draft City Plan, particularly in relation to the need for flexibility around protecting designated frontages where large and transformational proposals would change the ground floor plan and footprint in a positive way. The representations have suggested specific changes to the wording of this policy to encourage a less restrictive approach to development within the PSCs.
- 7.54 It should be noted that conclusions reached by the City of London in the officers committee report at paragraphs 86-87 in respect of the Previous Consent establish that:-

"In weighing the planning balance, it is necessary to take into account the fact that the current Local Plan and the emerging City Plan places emphasis on the primary business function of the City and on strengthening the cluster of activities that contribute to London's role as the world's leading international financial and professional services centre.



Although there is a loss of retail floor space, the amount of active retail frontage at ground floor level increases slightly.

The proposed retail would be fit for purpose in the context of a changing retail market, being flexible and adaptable in layout, in support of long-term vitality and viability of the Principal Shopping Centre. It is considered that the proposed use would complement retail uses at the neighbouring Leadenhall Market, particularly with the introduction of the proposed passageway providing increased access.

During the day, there is potential for a pop-up retail space within the new permeable, accessible open space. This offer would provide a flexible and adaptable space which has the potential to address rapidly changing retail patterns and demand from the largely office-based employment in the Cluster.

On balance it is considered that the loss of retail floorspace is acceptable, the mix of uses would provide a complementary use to the offices on the upper floors.”

Assessment

- 7.55 The Proposed Development would provide 185 sqm of dedicated retail (Class E(a)-(b)) floorspace in a standalone unit on the corner of Gracechurch Street and Fenchurch Street, alongside culture/public viewing gallery access and experiences at ground and basement 1 level. A daytime pop up outdoor market area would also occupy majority of the ground floor on the eastern side of the building on the corner of Lime Street and Fenchurch Street.
- 7.56 The existing building is considered to be within a lawful Commercial, Business and Service (Class E) use and could be used within any lawful use within Class E without requiring planning permission. There is one existing retail unit on the corner of Lime Street and Fenchurch Street and the remainder of the ground floor is occupied (although the store is now closed) by Marks & Spencer and was last used as a department store and food hall. Marks & Spencer took the decision in 2023 to close the store albeit they are still in occupation under the terms of their lease.
- 7.57 The ground floor cultural and public viewing gallery space would feature a generous stair to take visitors down into the security screening area providing access up to level 32. It is proposed for these spaces to be programmed for various cultural uses as outlined in the Cultural Plan, prepared by Hatch.
- 7.58 There would be a reduction in overall retail floorspace, however the loss of existing floorspace is not controlled under its lawful Class E use. The contribution the existing building makes to the PSC frontage, even when it was open was limited and is not considered to maximise the amount of active frontage around the building. Alongside the dedicated cultural/viewing gallery and retail spaces, the new public route through the Site will be highly activated with LCD screens on the eastern side of the new route, and the daytime pop-up outdoor market space.



- 7.59 The Proposed Development would provide significantly more active frontages than the existing building does, and contribute to the vitality and accessibility of Leadenhall Market with the new route through the Site, whilst there would be less dedicated retail space than the existing building, it is considered that on balance the Proposed Development is in accordance with the Development Plan and would make a significant contribution to culture and the vibrancy of the Square Mile.

Introduction of New Public Realm

- 7.60 Policy D8 of the London Plan states that development proposals should encourage and explore opportunities to create new public realm where appropriate, include good quality landscaping and maximise opportunities for active travel.
- 7.61 Policy CS10 of the Local Plan expects development to have an appropriate street level presence and a positive relationship to neighbouring buildings and spaces.
- 7.62 Policy DM10.1 of the Local Plan expects development to have attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets. It further expects servicing entrances to be designed to minimise their effects on the appearance of the building and street scene.
- 7.63 Policy DM10.4 of the Local Plan states that the City will support highways, public realm and other space enhancement that provides pedestrian priority and enhances permeability.
- 7.64 Strategic policy S21 of the draft City Plan requires the provision of new and improved open spaces, enhancing streets, spaces and public realm to improve connectivity into and through the City Cluster, prioritising pedestrian movement during the daytime and creating new routes through sites.
- 7.65 Policy DE3 of the draft City Plan states the creation of new public realm will be delivered in partnership with developers, Transport for London, Business Improvement Districts and other stakeholders to design and implement schemes for the enhancement of streets, spaces and the creation of new spaces including public squares, parks, open spaces, viewing galleries, rooftops, forecourts, streets, courts, alleyways, routes and spaces between buildings.

Assessment

- 7.66 The Proposed Development would transform the existing building to create a significant amount of new public space through and around the Site. The Landscape Design Statement and Public Realm Management Plan, prepared by Latz und Partner sets out in full the intentions for the design, materiality and maintenance of the proposed hard and soft landscaping. The dual use overnight servicing and daytime pop up market would be carefully managed to be functional for both of its intended purposes.
- 7.67 The existing site features no public realm at all, in total, the overall area of public realm will increase by 795 sqm and provide a new route through to Ships Tavern Passage and beyond to



Leadenhall Market which will create a more permeable space which improves pedestrian comfort. The Proposed Development has considered the Public London Charter and addressed the principles in the Public Realm Management Plan and will promote an inclusive and accessible space. The Accessibility Statement, prepared by Arup has addressed in detail the accessibility requirements for the public realm.

- 7.68 High quality materials to tie in with the existing York stone pavements surrounding the Site will be complemented by granite paving within the internal route and dual use servicing and pop up market area. Soft landscaping in the form of planters on the western elevation will soften the look and feel of Gracechurch Street while retaining its role as a significant area of pedestrian movement. Overall, it is considered the public realm of the Proposed Development is in full accordance and exceeds the expectations of the Development Plan.

Principle of Development: Conclusions

- 7.69 It is clear that the principle of the development is strongly supported by the NPPF, the London Plan, the Local Plan and majority of the policies within the draft City Plan, which carries very limited weight in advance of Examination by the Planning Inspectorate. It is considered that the Proposed Development would fully align with the aspirations of policy at all levels and provide significant benefits in terms of national, regional and local social, economic and environmental objectives.
- 7.70 The Proposed Development will increase office floorspace, the City's priority land use, with supporting retail and cultural/public viewing gallery uses with a transformative public realm which is considered to be in full accordance with the Development Plan.

Design and Massing

- 7.71 The detailed design of the Proposed Development is explained in full in the submitted plans, the Design and Access Statement, the Landscape Statement, the Energy Statement and the Sustainability Statement. They provide a full overview, rational and justification in design terms and have been prepared by specialist consultants, led by KPF.

Scale, Bulk and Height

- 7.72 The building is considered to be a "tall building" for policy purposes and is considered to be an appropriate site for tall building development in principle.
- 7.73 Policy D3 of the London Plan expects development to follow a design-led approach that optimises the capacity of sites to make the best use of land. Development should be the most optimum form and land use for the site. High density development should be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport and walking and cycling. Development proposals should consider form and layout, experience, quality and character.



- 7.74 Policy D9 of the London Plan states that Local Authorities should define what constitutes a tall building, define areas where they may be appropriate and it provides a range of considerations which tall buildings should be assessed against in terms of its visual, functional and environmental impacts. The policy sets out a range of criteria for assessing the visual impacts of tall buildings, including the view of the buildings from different distances (long range, mid-range and immediate views), whether part of a group or standalone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding. Architectural quality and materials should be of an exemplary standard to ensure that the appearance and integrity of the building is maintained through its lifespan. Proposals should avoid harm to the significance of heritage assets and their settings and preserve the Outstanding Universal Value of World Heritage Sites.
- 7.75 Policy CS10 of the Local Plan states that the bulk, height, scale and massing of buildings should be appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Policy DM10.1 of the Local Plan states that proposals should have due regard to the general scale, height, building lines of the locality and relate well to the character of streets, squares, lanes, alleys and passageways.
- 7.76 Strategic policy S8 of the draft City Plan states that development should optimise site capacity, informed by the character of the area and its potential for growth, delivering buildings and spaces that have the right scale, massing, built form and layout, with due regard to the existing and emerging urban structure, building types, form and proportions identified in the character areas study.
- 7.77 Strategic policy S12 of the draft City Plan at parts 4, 6, 7, 8 and 10 provides a series of detailed criteria as they relate to the design of tall buildings. They state that the height and form of tall buildings must take account of strategic and local views, and take into consideration local heritage assets as they relate to the design, height, scale and massing of tall buildings. It states that tall buildings must achieve exemplar standards of architectural quality and sustainable and accessible building design, enhance the City skyline and views, and make a positive contribution to townscape character.

Assessment

- 7.78 This Statement has established that the principle of a tall building is supported by the Development Plan, this assessment section addresses the design, bulk and massing of the building.
- 7.79 The Proposed Development comprises a tripartite massing to the south stepped to create three vertical elements reinforced by recesses in plan. The massing steps upwards from west to east with the “crown” of the building comprising a different massing approach for the top three storeys, each of which increases in height by one storey in each massing module. The crown seeks to give the building more definition on the skyline and sets it apart from its immediate neighbours.



- 7.80 The crown elements grow out of the main tripartite body of the tower so that the southwest leading edges are continuous to the top of each volume and the separation between crown and body is achieved by angling the upper elements away from the southern facade, giving a very deliberate emphasis to the corners.
- 7.81 The two westerly massing modules include a planted pergola to provide shelter to the terraces at level 32 and 33.
- 7.82 The massing of the tower is tapered outwards to a midpoint of the tower massing to visually minimise the bulk of the building in key local and strategic views. The massing on the south east and north east corners is expressed as a double curve, with the remaining edges being curved in the form of faceted corners.
- 7.83 The Proposed Development is considered to have appropriate scale, bulk and height which responds well to its context and is of exceptional design quality. This is considered to be in accordance with the Development Plan.

Design for Disassembly and Re-Use

- 7.84 Policy SI7 of the London Plan promotes circular design principles, including through designing for disassembly to reduce waste and maximise the opportunity for re-use of existing materials.
- 7.85 Policy DM17.2 of the Local Plan states that new development should be designed to minimise the impact of deconstruction and construction waste on the environment through re-use of existing structures, building design which minimises wastage and makes use of recycled materials.
- 7.86 Policy DE1(6) of the draft City Plan states that development should be designed to incorporate circular economy principles throughout the life cycle of buildings through flexible building design to accommodate evolving working and living patterns, reducing the need for redevelopment, floorspace adaptability to maximise the lifespan of building, re-use, refurbishment and retention of existing buildings, structures and materials to reduce reliance on virgin resources, designing for disassembly, reuse and recycling of the construction materials, maximum use of recycled materials and development and off-site construction methods to reduce wastage and designs which enable durability modularity sharing of goods and services and reuse of supplies and equipment minimising waste during the buildings operational phase.

Assessment

- 7.87 The Proposed Development has circular economy, low carbon design embedded, with approximately 60% of the existing superstructure and substructure proposed to be retained. A continual review of the Proposed Development against embodied carbon benchmarks and design principles of “building in layers” has been adopted. The Design and Access Statement, prepared by KPF and the Circular Economy Statement, prepared by Arup further quantify the measures that have been taken to promote good, sustainable design practices.



- 7.88 It is anticipated that any planning determination would include monitoring conditions relating to circular economy principles that would enable performance against the targets to be reviewed following the different stages of the development.
- 7.89 A Carbon Options Study was carried out at pre-application stage by Arup and the design team to compare different options for retaining the existing structure. Four options were considered ranging from refurbishment with no strengthening, refurbishment with minor strengthening, refurbishment with major strengthening and full demolition and redevelopment of the Site.
- 7.90 Following a holistic assessment of these four options, which were independently verified by Heyne Tillet Steele on behalf of the City of London, the Applicant and design team confirmed that refurbishment with major strengthening was feasible and would deliver the lowest embodied carbon impact and that it would be possible to construct a new tall building whilst retaining approximately 60% of the existing superstructure and sub-structure.
- 7.91 Opportunities for re-use of the existing stone on the podium façade have been explored as potentially feasible. Other measures for designing for disassembly and deconstruction in the future are outlined in the Circular Economy Statement, prepared by Arup.
- 7.92 It is considered that the Proposed Development complies and accords with the Development Plan in this regard.

Architectural Treatment

- 7.93 Paragraph 126 of the NPPF sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- 7.94 Policy D9C of the London Plan states that architectural quality and materials of tall buildings must be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan.
- 7.95 Policy CS10 of the Local Plan expects the quality of materials and detailed design of buildings to be appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Policy DM10.1 of the Local Plan goes on to state that schemes should have a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling.
- 7.96 Strategic Policy S8 of the draft City Plan promotes innovative, sustainable and inclusive high quality buildings, streets and spaces. In terms of quality and character, development will be supported that delivers high quality design which is visually interesting, well-proportioned and well-detailed and conserves and enhances the townscape character and appearance of the City, and its historic environment and takes into account cross boundary impacts of the neighbouring boroughs.



Assessment

- 7.97 The Proposed Development would bring forward a world class design of exceptional quality. It seeks to be low carbon and highly sustainable responding to in depth environmental testing to minimise its impact to the local context and reduce energy demand.
- 7.98 The podium of the building is proposed to be clad in reclaimed jura limestone where possible with metal window panels and curved glazing along the corners. The massing of the podium steps down from west to east from seven storeys to five storeys. The area between the podium and the tower is recessed and intends to be a celebration of the structural gymnastics that illustrate a transfer from the retained structure below to the new tower above.
- 7.99 The materiality of the tower element is comprised of glazed 3 metre modules with 1.5m modules on the corners. An articulated horizontal spandrel is proposed for the tower element with a “seam” between the three massing volumes of the tripartite form to give the appearance of the massing appearing as more slender in key townscape views, whilst adding visual interest to the external envelope of the building when experienced from street level.
- 7.100 It is considered that the Proposed Development will optimise the site, making best use of land through the design lead approach. The external appearance and architectural treatment of the building is considered to be in accordance with the Development Plan.

Workspace

- 7.101 Policy CS1 of the Local Plan states that the City will encourage a supply of a range of high-quality office accommodation to meet the varied needs of City office occupiers. Policy DM1.3 states that the City will promote 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 sub-division to create small and medium sized business units.
- 7.102 Strategic Policy S4 of the draft City Plan seeks to ensure that new floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SMEs, start-up companies and those requiring move-on accommodation.

Assessment

- 7.103 The Proposed Development will make a significant contribution to the City’s growth targets and provide a variety of different types of workspace for a range of different sized businesses and occupiers. The floorplates are all different sizes by virtue of the tapering massing, and have been designed to be able to be multi-tenanted, with examples of how the floors can be divided set out in the Design and Access Statement, prepared by KPF.
- 7.104 It has been designed to cater to a range of different occupiers and provide exceptional amenity with communal areas and terraces alongside world class private amenity spaces.



Design for wellbeing and sustainability is at the heart of the proposals and is focussed on occupiers. The Proposed Development fully aligns with the Development Plan in this regard.

Public Realm, Landscape and Urban Greening

- 7.105 Policy D8(B) of the London Plan states that development proposals should ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution.
- 7.106 Policy G5 of the London Plan states that major developments should contribute to the greening of London by including urban greening as a fundamental element of site and building design by incorporating measures such as high quality landscaping, green roofs, green walls and nature based sustainable drainage. Part B of the policy recommends a target Urban Greening Factor (“UGF”) score of 0.3 for predominantly commercial development.
- 7.107 Policy DM10.1 of the Local Plan expects development to have attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets. It further expects servicing entrances to be designed to minimise their effects on the appearance of the building and street scene.
- 7.108 Policy DM10.4 of the Local Plan states that the City will support highways, public realm and other space enhancement that provides pedestrian priority and enhances permeability.
- 7.109 Strategic Policy S21 of the draft City Plan specifically requires the provision of new and improved open spaces at ground level, activating streets, spaces and public realm at the ground floor and improving wayfinding through the streets and alleys and improving walking and cycling into and through the Cluster. Pedestrian movement should be given priority through re-allocation of road space on key routes during daytime.
- 7.110 Policy S8 of the draft City Plan seeks development that delivers publicly accessible space within the development by maximising the amount of accessible, inclusive spaces. It further supports street level building frontages which are active, public-facing, usable, permeable, interesting, well-detailed and appropriately lit, delivering suitable levels of passive surveillance.
- 7.111 Policy OS2 of the draft City Plan states that the provision of urban greening should be integral to the design and layout of buildings and the public realm.
- 7.112 The City of London Open Space SPD seeks to increase quality and supply of open space and provides a series of criteria and recommendations to achieve these aims.



Assessment

- 7.113 The Proposed Development incorporates exemplary landscape design and is on target to achieve an urban greening factor score of 0.33 which is in excess of policy targets. The proposed landscaping is set out in detail within the Landscape Design Statement, prepared by Latz und Partner and includes an overview of the appropriate species to be selected at the operational stage to ensure for minimum maintenance and longevity of the various planting types proposed at ground floor, level five to seven and level 28 to 32.
- 7.114 The design of the hard and soft landscaping has been carefully curated to ensure that the landscaping is fit for its intended purpose, including through any mitigation measures for the on site external areas to achieve good wind and microclimatic conditions.
- 7.115 A Public Realm Management Plan has been prepared by Latz und Partner to illustrate how the publicly accessible areas of landscaping are properly managed in line with the Public London Charter.
- 7.116 The Proposed Development would make a significant contribution to the groundscape of the City Cluster and provide new publicly accessible outdoor space at high level in full accordance with the Development Plan.

Accessibility, Safety, Health and Security

- 7.117 Policy D5 of the London Plan states that development proposals should achieve the highest standards of accessible and inclusive design. They should: be designed taking into account London's diverse population; provide high quality people focused spaces that are designed to facilitate social interaction and inclusion; be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; be able to be entered, used and exited safely, easily and with dignity for all; be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- 7.118 Policy D11 of the London Plan states that development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.
- 7.119 Policy GG3 of the London Plan sets out a range of strategic measures to seek to reduce health inequalities, part D suggests that the development proposals should assess the potential impacts on the mental and physical health and wellbeing of communities through the use of Health Impact Assessments.



- 7.120 Policy DM10.8 of the Local Plan requires development to meet the highest standards of accessibility and inclusive design and this requirement is repeated in policy HL1 of the draft City Plan.
- 7.121 Local Plan policy CS3, DM3.2, DM3.3 and DM3.5 seeks to ensure that the City is secure from crime, disorder and terrorism and ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. It requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to night-time uses.
- 7.122 Strategic Policy S2 of the draft City Plan sets out how the City will work with stakeholders to ensure that it is safe and secure from crime, the fear of crime, anti-social behaviour and terrorism by ensuring that development proposals design out crime, encourage a mix of uses and natural surveillance of streets and spaces. It requires that the design of buildings to meet the highest standards of fire safety. Major development proposals must submit a Fire Statement setting out how the development will address fire safety in the design, construction and operation of the building for all building users, including safe and dignified emergency evacuation.
- 7.123 Policy T5 of the London Plan and policy AT3 of the draft City Plan confirm that cycle parking should be designed in accordance with the London Cycle Design Guide Standards, including the provision for accessible cycles.
- 7.124 Policy DM15.7 of the Local Plan states that 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.
- 7.125 Policy DE9 of the draft City Plan expects developers to consider the lighting impacts of their development. It also seeks lighting that reduces energy consumption, avoids spillage of light beyond where it is needed and protects the amenity of light-sensitive uses.
- 7.126 Strategic Policy S21 of the draft City plan at part 14 states that the City will ensure an area wide approach has been taken to security in the state management to ensure that safety and comfort of workers and visitors with a high quality public realm an environment that reflects the status of the area.
- 7.127 Policy HL9 of the draft City Plan outlines requirements for Health Impact Assessments (HIA), for EIA development the policy requires a full HIA to be prepared to assess the impacts of development on health outcomes.
- 7.128 The City of London's Lighting Supplementary Planning Guidance was adopted in October 2023 and a planning advice note on Preventing Suicides in High Rise Buildings and Structures was published in April 2022.

Assessment



- 7.129 The Proposed Development is designed to meet the highest standards of safety and accessibility. The Design and Access Statement, prepared by KPF with an inclusive design statement prepared by Arup that fully appraises the design of the proposals in terms of accessibility. A Fire Statement and Security and HVM Statement (within the DAS) have also been prepared which set out the fire safety and security measures for the building.
- 7.130 A Lighting Design Statement, prepared by EQ2 provides and overview of how lighting will be carefully designed for safety, access and security purposes.
- 7.131 A Health Impact Assessment has also been prepared by Trium which concludes that in health terms, the impacts of the Proposed Development would have a beneficial impact on active lifestyles, healthy environment and design, safe and vibrant neighbourhoods and access to work and training.
- 7.132 The safety measures that have been designed into the proposals in terms of suicide prevention are outlined in the Desing and Access Statement, which relate to balustrade heights and the location of planters to avoid the ability to climb, all in accordance with the Development Plan and City's Planning Advice Note.

Cycle Parking

- 7.133 The City of London Transport Strategy sets out an aspiration for a significant increase in the number of people cycling to, from and within the City. Proposal 25 seeks to increase the amount of cycle parking in the City and Proposal 26 states that Cycle Parking should be provided in line with London Plan standards.
- 7.134 Policy T5 of the London Plan sets out standards for cycle parking spaces at Table 10.2. The London Cycle Design Standards also provide detailed guidance on how cycle parking should be laid out and designed.
- 7.135 Policy DM16.3 of the Local Plan states that on-site cycle parking must be provided in accordance with the standards in the London Plan.
- 7.136 Policy AT2 of the draft City Plan states that all major development must promote and encourage active travel through making appropriate provision for people who walk, wheel and cycle, by ensuring suitable access between the development site and pedestrian cycle routes, and by incorporating sufficient shower and changing facilities, with lockers/storage to support walking and cycling in line with the London Cycling Desing Standards.
- 7.137 Policy AT3 of the draft City Plan re-iterates the adopted policy position, with a focus on ensuring that cycling facilities are conveniently located, easily accessible, safe and secure, with opportunities to provide space for dockless cycle parking spaces in the public realm.

Assessment



- 7.138 The Transport Assessment, prepared by Momentum Transport Consultancy and the Design and Access Statement, prepared by KPF provide an overview of the design, location and quantum of cycle parking proposed, including associated end of trip facilities.
- 7.139 The Proposed Development would provide 19 short stay cycle spaces at grade with 46 at basement level accessed from Lime Street at the ground floor via a dedicated lift and entrance.
- 7.140 Long stay cycle parking comprising of 1,106 spaces is provided at basement levels 1 and 2 along with end of trip facilities in line with the British Council for Office standards. These are proposed to be of the highest quality to encourage active travel in full accordance with the Development Plan.

Heritage and Townscape

- 7.141 The City of London as Local Planning Authority have statutory duties to carry out in accordance with Section 66 and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended).
- 7.142 Section 66 imposes a general duty as respects listed buildings in exercise of planning functions. Sub-section (1) states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall 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*".
- 7.143 In terms of what defines the "setting" of a listed building, the need to apply this test was reiterated by the Court of Appeal in the case of Catesby Estates Ltd v Steer and Secretary of State for Communities and Local Government (2018) sets out three general principles to be applied when considering the setting of a Listed Building. The Judgment states (paragraph 28 to 30) that:-

"...[28] First, the section 66(1) duty, where it relates to the effect of a proposed development on the setting of a listed building, makes it necessary for the decision-maker to understand what that setting is – even if its extent is difficult or impossible to delineate exactly – and whether the site of the proposed development will be within it or in some way related to it.

[29] Secondly, though this is never a purely subjective exercise, none of the relevant policy, guidance and advice prescribes for all cases a single approach to identifying the extent of a listed building's setting. Nor could it. In every case where that has to be done, the decision-maker must apply planning judgment to the particular facts and circumstances, having regard to relevant policy, guidance and advice. The facts and circumstances will differ from one case to the next. It may be that the site of the proposed development, though physically close to a listed building, has no real relationship with it and falls outside its setting, while another site, much further away, nevertheless has an important relationship with the listed building and is within its setting. (...) Under current national planning policy and guidance in England, in the



NPPF and the PPG, the decision-maker has to concentrate on the “surroundings in which [the heritage] asset is experienced”, keeping in mind that those “surroundings” may change over time, and also that the way in which a heritage asset can be “experienced” is not limited only to the sense of sight. The “surroundings” of the heritage asset are its physical surroundings, and the relevant “experience”, whatever it is, will be of the heritage asset itself in that physical place.

[30] Thirdly, the effect of a particular development on the setting of a listed building – where, when and how that effect is likely to be perceived, whether or not it will preserve the setting of the listed building, whether, under government policy in the NPPF, it will harm the “significance” of the listed building as a heritage asset, and how it bears on the planning balance – are all matters for the planning decision-maker, subject, of course, to the principle emphasized by this court in East Northamptonshire District Council v Secretary of State for Communities and Local Government [2015] 1 W.L.R. 45 (at paragraphs 26 to 29), Jones v Mordue [2016] 1 W.L.R. 2682 (at paragraphs 21 to 23), and Palmer (at paragraph 5), that “considerable importance and weight” must be given to the desirability of preserving the setting of a heritage asset”.

- 7.144 The Judgment is clear that the setting of a Listed Building is not limited to how one visually experiences a heritage asset through sense of sight; in judging the impact development may have on the significance of a Listed Building and its setting, regard should be given to its physical surroundings and how that informs the relevant “experience” of that heritage asset.
- 7.145 Section 72(1) states that in planning applications relating to any building or other land in a conservation area, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. The Site is not within a conservation area, so this statutory duty is not engaged.
- 7.146 Chapter 16 of the NPPF sets out how national policy is to be applied to conserving and enhancing the historic environment. Paragraph 189 states that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 7.147 Paragraph 194 of the NPPF states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset’s importance and no more than sufficient to understand the potential impact of the proposal on their significance.
- 7.148 Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should



be). This is irrespective of whether any potential harm amounts to substantial harm, total loss, or less than substantial harm.

- 7.149 Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset (Listed Buildings, Conservation Areas and World Heritage Sites), this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 7.150 Paragraph 203 of the NPPF states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 7.151 Paragraph 206 of the NPPF states that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.
- 7.152 Policy D3(D)(11) of the London Plan states that development proposals should respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character. Policy D9(C)(1) provides a framework for assessing the visual impacts of tall buildings.
- 7.153 Policy HC1 of the London Plan states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate. It further states that development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.
- 7.154 Policy HC2(B) of the London Plan states that development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes.
- 7.155 Policy HC3 of the London Plan sets out how strategic and local views should be designated and how development proposals should be assessed. The Mayor will designate views of



strategic importance that make a very significant contribution to the image of London or provide a significant cultural orientation point. The Mayor will seek to protect vistas toward strategically important landmarks, with these protected vistas requiring management appropriate to its potential impact on the viewer's ability to recognise the ability to recognise a strategically important landmark or World Heritage Site.

- 7.156 The London View Management Framework SPD (March 2012) identifies a number of important views and vistas across London. It states that new development should not harm, and where possible should make a positive contribution to, the characteristics and composition of the strategic views and their landmark elements. It should also preserve or enhance viewers' ability to recognise and to appreciate strategically important landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places.
- 7.157 Policy CS12 of the Local Plan seeks proposals that safeguard the City's Listed Buildings and their settings, preserve and enhance the distinctive character and appearance of the City's conservation areas including through appropriate development and, specifically, the preservation of the Tower of London World Heritage Site and its setting. Policies DM12.1 DM12.2 and DM12.3 add detail to Policy CS12.
- 7.158 Strategic policy S11 and S12, policy HE1 and HE2 of the draft City Plan largely mirror the adopted policy, with some greater emphasis on placing heritage at the heart of place making and delivering high quality buildings which enrich and enhance the settings of heritage assets. It also seeks enhanced public access and interpretation of the City's cultural and heritage assets ensuring that opportunities to experience and enjoy the City's heritage and culture is available to a wide and diverse audience in a way that socially and economically inclusive.
- 7.159 The City of London Protected Views SPD provides further guidance on view protection policies and notes that St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features are protected within the Square Mile.

Assessment

- 7.160 Volume II of the Environmental Statement provides a Townscape, Heritage and Visual Impact Assessment ("THVIA") which has been prepared by Tavernor Consultancy with Accurate Visual Representations ("AVR"), prepared by Millerhare. It is split into two parts (1) Townscape and Visual Impact Assessment and (2) Built Heritage Assessment.
- 7.161 The THVIA contains 53 AVRs of the Proposed Development as agreed during pre-application meetings with the City of London. They include one night view, alongside 21 supplementary non-verified model views in Appendix A of the THVIA. The THVIA assesses 68 Listed Buildings and three Conservation Areas within the City of London and one within the London Borough of Tower Hamlets within 250m of the Site, in addition to additional heritage assets outside of the 250m radius that have been scoped into the assessments, these are:-



- Tower of London World Heritage Site and listed buildings within the Boundary of the World Heritage Site;
 - Tower Bridge (Grade I Listed);
 - Fishmongers' Hall (Grade II* Listed);
 - Adelaide House (Grade II Listed);
 - St Magnus the Martyr (Grade I Listed);
 - Former Billingsgate Market (Grade II Listed);
 - Pair of towers at Cannon Street Station (Grade II Listed);
 - Church of All Hallows by the Tower (Grade I Listed);
 - Custom House (Grade I Listed); and
 - St Paul's Cathedral (Grade I Listed).
- 7.162 Part 2 of the THVIA provides a full description and assessment of the identified heritage receptors. No Non Designated Heritage Assets ("NDHA") have been identified by the City of London during pre-application dialogue and they have not published a formal local list, no NDHA's have accordingly been assessed within the THVIA.
- 7.163 The Site is not listed and it is partially located within a Conservation Area, for the avoidance of doubt, none of the existing building is within the Conservation Area. The vast majority of the site is not located within a conservation area. However, the site is directly adjacent to the Leadenhall Market Conservation Area and there is a very slight overlap with the application boundary on Ships Tavern Passage. No built development is proposed within the conservation area and the works to Ships Tavern Passage are limited to remedial highway works.
- 7.164 As a tall building it is recognised that the Proposed Development has the potential to have a substantial impact on London's built heritage assets and townscape character. The key townscape views that have informed the development of the massing at the Site are:-
- The Fleet Street Processional Route kinetic sequence and views towards St Paul's Cathedral;
 - LVMF River Prospect Views; and
 - The Tower of London World Heritage Site.
- 7.165 In terms of townscape and visual impact, Tavernor Consultancy in conjunction with Millerhare have carried out extensive modelling and technical analysis, particularly in relation to the Fleet Street kinetic sequence to assess potential impacts. This has been tested on the basis of a



person moving down Fleet Street's northern pavement at a 30cm offset from the building line in order to create a somewhat representative experience, however in reality there are many items of street furniture, combined with an undulating building line that would make it very difficult to experience Fleet Street and St Paul's Cathedral kinetically and realistically in this way. A more natural experience would be walking down the centre of the pavement. It should be recognised that the Zone of Theoretical Visibility which has been run on the basis of total invisibility from the building line (both of existing and proposed, cumulative schemes) which is achieved by the Proposed Development. Further detail on this technical analysis and views from the Fleet Street Processional Route is included in the THVIA.

- 7.166 The assessment concludes that the Proposed Development would not result in any significant adverse townscape effects in isolation or cumulatively, and therefore no additional mitigation is required during construction or operation.
- 7.167 Tavernor Consultancy consider the Proposed Development would relate positively in height, scale and massing to the wider London skyline in all Panoramas, and would further consolidate the form of the City Cluster. The scale of the effect would range from minor to major and the nature of the effect ranges from neutral to beneficial. An assessment has been carried out on the impact of the Proposed Development on three key Townscape Character Areas (TCA), which concludes that the impacts are beneficial to the City Cluster and Riverside TCA, and neutral to the Bank TCA. It can therefore be concluded on balance that the Proposed Development has a beneficial impact on townscape.
- 7.168 In terms of built heritage, Tavernor Consultancy conclude that during the retention, demolition and construction stages, there would be effects on the ability to appreciate the heritage significance of designated heritage assets in the study area close to the Site. These adverse effects would be temporary, low magnitude impact in respect of Leadenhall Market (Grade II*), The Ship Tavern PH (Grade II), 81 and 82 Gracechurch Street (Grade II), and the Leadenhall Market Conservation Area due to the proximity of these heritage assets to the Site. This would result in a Minor Adverse effect on a temporary basis, which would equate to heritage harm at the lower end of "Less than Substantial Harm".
- 7.169 These adverse effects would arise in respect of a reduced ability to appreciate the heritage significance of the heritage assets, which would occur as a result of the detrimental appearance and experience of the partial demolition and construction activities within the settings of the heritage assets, on a temporary basis. This would only last for the duration of the demolition and construction works.
- 7.170 In terms of the operational phase of the Proposed Development, Tavernor Consultancy conclude overall that there are no significant adverse effects requiring mitigation, with some beneficial effects to setting identified, resulting in no harm to heritage significance.
- 7.171 In terms of the Tower of London World Heritage Site ("WHS"), the Proposed Development would be located well to the northwest of the WHS and conclude that there would be no effect on any attribute of the Outstanding Universal Value of the Tower of London, nor any of



the attributes linked to setting and appreciation of the Tower of London as an internationally famous monument, its landmark siting, the physical dominance of the White Tower and its concentric defences – would remain unaffected. Tavernor Consultancy consider there is **no harm** to the Outstanding Universal Value of the World Heritage Site or the appreciation of it.

- 7.172 In terms of other designated heritage assets, in this case being the identified listed buildings and Conservation Areas within 250m of the Site, and those which are scoped in and identified for additional assessment beyond the 250m radius, including St Paul's Cathedral and Tower Bridge, Tavernor Consultancy conclude that there is **no harm** to any of the identified heritage assets or their settings.
- 7.173 Paragraph 202 of the NPPF states that any less than substantial harm to designated heritage assets, should be outweighed by public benefits. Tavernor Consultancy do not conclude any harm arising from the Proposed Development and on this basis, paragraph 202 of the NPPF is not engaged.
- 7.174 In any case, there are public benefits arising from the Proposed Development, which are substantial and are set out below in terms of the economic, environmental and social benefits flowing from the proposal.

Economic Benefits

- Creation of approximately 74,000 sqm of new office floorspace, equating to approximately 6% of the City's projected office floorspace targets up to 2040 within a single development site;
- Substantial employment densification, making best use of land in line with the design led approach, generating significant socio-economic benefits, estimated to be equivalent to a net uplift of 3,345 FTE jobs and between £3.2m-£5.4m in employee expenditure in the local economy;
- Introducing complementary use employment generating retail, culture and viewing gallery uses alongside a pop-up outdoor market space, enhancing the local economy;

Environmental Benefits

- New elevated public views of St Paul's Cathedral and other heritage assets within the Square Mile and further afield;
- Consolidation of the form and composition of the City Cluster, forming a distinctive and dynamic architectural design in key long distance and local views;
- Urban greening to deliver a significant increase in biodiversity, totally 0.62 biodiversity units above the baseline of zero alongside various ecological enhancements;



- Delivery of a BREEAM “Excellent” building at pre-assessment stage, with aspirations for “Outstanding” and Nabers UK 5*;
- Reductions in operational carbon of 13.8% of Part L 2021;
- Delivery of servicing consolidation to reduce vehicle trips to the Site;

Social Benefits

- Provision of free to access culture/viewing gallery spaces at the penultimate accessible level of the building, driving social value and giving everyone the opportunity to experience views within and out of the City of London, alongside a cultural programme of events;
- Significant public realm benefits at grade to provide high quality landscaped public space at ground floor level to make the City Cluster a more permeable, accessible place; and
- An occupier focus on wellbeing with high quality amenities for the office workers, with external private and communal terraces for a significant amount of the office floors to enable access to outside space.

7.175 On this basis, it is considered that the Proposed Development is in line with relevant statute and policies within the Development Plan.

Environment and Sustainability

7.176 A suite of reports have been prepared and submitted in support of the application:-

- Energy Statement, prepared by Arup;
- Sustainability Statement, prepared by Arup;
- Whole Life Carbon Assessment, prepared by Arup;
- Circular Economy Statement, prepared by Arup;
- Volume I, Chapter 12 (Climate Change) of the Environmental Statement, prepared by Trium;

7.177 This section summarises environmental and sustainability topics and draws on conclusions and assessments from the suite of reports.

Energy and Sustainability

7.178 Policy SI2 of the London Plan expects major development proposals to be net zero-carbon. In practice, this means following the ‘be lean, be clean, be green, be seen’ energy hierarchy to deliver a minimum on-site energy consumption reduction of 35% when compared to Building



Regulations Part L 2021, with the remaining reduction up to 100% (zero carbon) achieved through maximising on-site opportunities and, where necessary, carbon offset fund payments.

- 7.179 The Whole Life-Cycle Carbon Assessments LPG explains how to prepare a Whole Life-Cycle Carbon (WLC) assessment in line with Policy SI2 F of the London Plan using the WLC assessment template.
- 7.180 Policy SI 2 F applies to planning applications which are referable to the Mayor. This guidance explains how to calculate WLC emissions and the information that needs to be submitted to comply with the policy. It also includes information on design principles and WLC benchmarks to aid planning applicants in designing buildings that have low operational carbon and low embodied carbon.
- 7.181 Policy CS15 of the Local Plan seeks to enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate, by *inter alia*:
- 1) Requiring all redevelopment proposals to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and “end of life” phases of development. Proposals for major development should aim to achieve a BREEAM rating of “excellent” or “outstanding”.
 - 2) Requiring development to minimise carbon emissions and contribute to a City wide reduction in emissions:
 - i. adopting energy-efficiency measures;
 - ii. enabling the use of decentralised energy, including the safeguarded Citigen CHP network, CHP-ready designs in areas where CCHP networks are not yet available, and localised renewable energy technologies;
 - iii. adopting offsetting measures to achieve the Government’s zero carbon targets for buildings.
 - 3) Avoiding demolition through the reuse of existing buildings or their main structures, and minimising the disruption to businesses and residents, using sustainably sourced materials and conserving water resources.
- 7.182 Policy DM 15.1 of the Local Plan states that Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development and for major development the Sustainability Statement should include as a minimum:
- BREEAM or Code for Sustainable Homes pre-assessment;



- an energy statement in line with London Plan requirements;
- demonstration of climate change resilience measures.

- 7.183 Local Plan Policy DM 15.2 states that development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption. The Policy states that energy assessments must be submitted for all major development proposals.
- 7.184 Policy DM 15.4 of the Local Plan states that 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”.
- 7.185 Policy DE1(7) of the draft City Plan sets out that major development must achieve a minimum of BREEAM “Excellent”, commit to achieving a minimum NABERS UK rating of 5 stars.
- 7.186 The City of London Planning Advice Note – Whole Lifecycle Carbon Optioneering sets out the requirements of the draft PAN are addressed in the pre-redevelopment audit, appended to the Circular Economy Statement.

Assessment

- 7.187 The Proposed Development is pre-assessed to achieve BREEAM “Excellent”, with aspirations for “Outstanding”, and achieve an 18% reduction in CO₂ for operational carbon over part L 2021 and a Nabers UK 5* rating. A carbon offsetting contribution of £600,344 would be secured via Section 106 Legal Agreement to achieve net zero carbon in line with policy SI2 of the London Plan.
- 7.188 It would be an exemplar for sustainable design and construction. In terms of whole life carbon, a full Whole Life Carbon Assessment has been provided, and the Proposed Development has been subject to a third party review of the Whole Life Carbon Options (undertaken by Heyne Tillet Steele on behalf of the City of London), in line with the City’s Planning Advice note. This optioneering process has demonstrated that retention of approximately 60% of the existing superstructure and substructure of the Site, is feasible and would result in the lowest overall whole life carbon impact whilst fully optimising the Site through the design led approach.
- 7.189 It is considered that the Proposed Development accords with the Development Plan in this regard.

Wind and Microclimate

- 7.190 Policy D3 of the London Plan supporting paragraph 3.3.8 states that buildings should be of high quality and enhance, activate and appropriately frame the public realm. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area. Particular attention should be paid to the design



of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and location of entrances. Creating a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation is important.

- 7.191 Policy D8(J) of the London Plan states that development plans and development proposals should ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.
- 7.192 Policy D9(3)(A) of the London Plan states that wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building, part b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions.
- 7.193 Policy DM10.1 of the Local Plan states that seeks to ensure that development does not cause unacceptable wind impacts.
- 7.194 Strategic policy S8 of the draft City Plan requires development to optimise microclimate conditions including in relation to wind and thermal comfort and air quality. Policy DE2 of the Draft City Plan reiterates that design and materials must avoid unacceptable wind impacts.
- 7.195 The City of London's Wind and Microclimate Guidelines published in August 2019 provides further detailed criteria for assessing wind and microclimate impacts of development.

Assessment

- 7.196 Several documents have been produced relating to wind and microclimate, which have been submitted as part of the application:-
 - Volume I, Chapter 11 (Wind Microclimate) of the Environmental Statement, prepared by Gordon Ingram Associates and RWDI;
 - Volume III, annex 2 of the Environmental Statement: Pedestrian Level Wind Microclimate Assessment, prepared by RWDI;
 - Volume III, annex 3 of the Environmental Statement: Computational Fluid Dynamics (CFD) Wind Microclimate Assessment Report, prepared by Gordon Ingram Associates; and
 - Thermal Comfort Study, prepared Gordon Ingram Associates.
- 7.197 For the purposes of the wind assessments, wind measurements have been taken for 36 wind directions in 10° increments within an 400m radius of the Site (represented in configuration 1), which is considered a large enough scale to ensure all wind effects are captured and is the



stated radius to be used in the City of London's Wind Microclimate Guidelines. The results have been combined with long-term meteorological climate data for the London area from data captured at Heathrow and London City Airports.

- 7.198 A series of cumulative configurations have been run, which separates out all consented developments, and those which have been submitted but not yet granted planning permission (referred to as "non consented cumulative schemes").
- 7.199 The eight configuration scenarios which were assessed in the wind tunnel tests are listed below:-
- Configuration 1: Existing site with Existing Surrounding Buildings;
 - Configuration 2: Existing site with consented and Non Consented Cumulative Schemes;
 - Configuration 3: Proposed Development with Existing Surrounding Buildings;
 - Configuration 4: Proposed Development with consented Cumulative Schemes;
 - Configuration 5: Proposed Development with Consented and Non Consented Cumulative Schemes;
 - Configuration 6: Proposed Development with Existing Surrounding Buildings, Proposed Landscaping and Wind Mitigation Measures;
 - Configuration 7: Proposed Development with Consented Cumulative Schemes, Proposed Landscaping and Wind Mitigation Measures;
 - Configuration 8: Proposed Development with Consented and Non Consented Cumulative Schemes, Proposed Landscaping and Wind Mitigation Measures.
- 7.200 A ninth configuration was also tested to assess wind additional tests were conducted with temporary wind mitigation measures at off-Site locations which would not be required once cumulative buildings are completed to illustrate how certain off-site comfort exceedances could be mitigated. This is also addressed in part as it relates to on-site wind mitigation within the Design and Access Statement, prepared by KPF.
- 7.201 Within this assessment, configuration 1 is taken as the baseline and results are compared against this to address impacts. In configuration 1, wind conditions range from suitable for frequent sitting use to uncomfortable for all uses. During the summer season, wind conditions are the same or one category calmer at ground level, suitable for frequent sitting use to walking use. The reference to "locations" in this section refers to the number of the probes that were established in the wind tunnel testing.
- 7.202 In configuration 3, there are some on-site comfort exceedances which require mitigation measures:-



- The entrance to the viewing gallery use within the new public route (location 345) which was deemed to be a Moderate Adverse impact which is significant;
 - Two areas of the terrace at level 7 (locations 408 and 412) which was deemed to be a Moderate Adverse impact which is significant;
 - Areas on all upper terraces (both the office and public terraces) were deemed to have some Moderate Adverse effects which are significant (locations 415 ,418, 419 and 423);
- 7.203 Configuration 3 illustrates that with appropriate mitigation measures which have been successfully designed into the scheme, in the form of recessed entrances, landscaping measures, baffles in the public route through and. All other on-site areas will achieve the target wind comfort levels without requiring mitigation.
- 7.204 In configuration 6, some off-site comfort exceedances were identified:-
- A temporary bus stop located on the western side of Gracechurch Street, which is deemed to be a Major Adverse and significant effect (location 218);
 - Entrances to buildings at 159 Fenchurch Street and Alpha House/24A Lime Street (locations 103 and 124) which is considered to be a Major Adverse effect, which is significant;
 - A bench outside 20 Fenchurch Street (in itself intended to be a wind mitigation tool for that development – location 101) would experience a Major Adverse and significant effect;
- 7.205 Some Moderate Adverse effects to multiple off site entrances were identified in this configuration when compared to the baseline, however the wind conditions will remain suitable for the intended purposes and mitigation would not be required. There are no safety exceedances which have been identified in this configuration.
- 7.206 Configuration 6 and 9 have identified that there are temporary mitigation measures which could be implemented for all of these wind comfort exceedances.
- 7.207 In the cumulative scenarios, represented by configuration 7 and 8, there are no off-site comfort exceedances. On the basis that the anticipated construction programme for the Proposed Development is longer than other cumulative developments, it is proposed to secure these off-site mitigation measures where feasible by Section 106 Legal Agreement in the event that any of them are necessary. The temporary measures identified in configuration 9 involve:-
- Reinstatement of a dead tree outside 20 Fenchurch Street;
 - A 3 metre temporary baffle within the new route through the site;



- A solid temporary screen at the bus stop on Gracechurch Street; and
- Use of movable screens/windbreaks to the outdoor dining area on Lime Street Passage and on Bulls Head Passage.

- 7.208 Majority of these measures can be implemented by the Applicant at their cost, and secured through the Section 106 Legal Agreement. The tree which has died outside 20 Fenchurch Street is not within the control of the Applicant so this mitigation measure can not be reinstated by the Applicant, and should be addressed under the terms of the Section 106 Legal Agreement attached to that development.
- 7.209 In addition to these off-site comfort exceedances, there are a host of beneficial wind impacts which are present around the Site. Overall, it is considered that the Proposed Development performs well in terms of pedestrian comfort wind criteria and is acceptable in planning terms. In comparison to the consented scheme, the Proposed Development performs much better and does not require any off site wind mitigation in the form of trees which were proposed on Rood Lane and Philpot Lane as part of the Consented Scheme. The iterative design process through continual Computational Fluid Dynamics testing and wind tunnel review have led to the design seeking to minimise any potential impacts in terms of wind and microclimate.
- 7.210 In terms of thermal comfort performance, Gordon Ingram Associates conclude that the conditions remain largely unchanged as a result of the Proposed Development, with minor changes occurring in terms of some improvement to conditions and some slight deterioration to conditions. In the existing scenario and the scenario with the Proposed Development in place, the assessment concludes that all areas remain suitable for their intended use, with certain parts of the ground floor remaining unsuitable for outdoor seating in all seasons at the south and east of the Site.
- 7.211 The design has evolved over time as a result of stringent environmental testing in line with the EIA process and is considered to fully accord with the Development Plan.

Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution

- 7.212 Policy DM10.7 of the Local Plan seeks to ensure that development does not cause unacceptable daylight and sunlight impacts to nearby dwellings. Policy DE8 of the draft City Plan requires that daylight and sunlight impacts (including those of historic interiors of surrounding buildings) should be assessed taking into account the Building Research Establishment's guidelines. It also sets out the need to consider solar glare effects on surrounding buildings and the public realm. The City of London's Planning Advice Note on Solar Glare also provides additional detailed criteria for assessing impacts and addressing mitigation.

Assessment

- 7.213 Volume I Chapter 11 (Daylight, Sunlight, Overshadowing and Light Pollution) of the submitted Environmental Statement, prepared by Gordon Ingram Associates sets out a full assessment



of the impacts to the relevant sensitive receptors. The assessment methodologies have been used for the purposes of analysis:-

- Daylight: Vertical Sky Component ("VSC") and No Sky Line ("NSL");
- Sunlight: Annual Probably Sunlight Hours ("APSH");
- Overshadowing: Transient Overshadowing ("TOS");
- Light Pollution: sky glow (the upward light ratio), light intrusion (vertical illuminance in lux), luminaire intensity and building luminance.

7.214 A total of 17 potentially sensitive receptors have been tested for daylight and sunlight. These are outlined at figure 8. These are; 4 Brabant Court, The Ship Tavern - 11 Talbot Court, 4 Bulls Head Passage, 2-3 Bulls Head Passage, The Bunch Of Grapes-14 Lime Street, Jamaica Buildings, St Michael Cornhill Church, St Edmund The King Church, 1-4 Botolph Alley, St Clements Church, St Margaret Pattens Church, The Swan Tavern, 5 Philpot Lane, 2 Philpot Lane, 11 Eastcheap, 9 Eastcheap and St Peter Upon Cornhill Church.

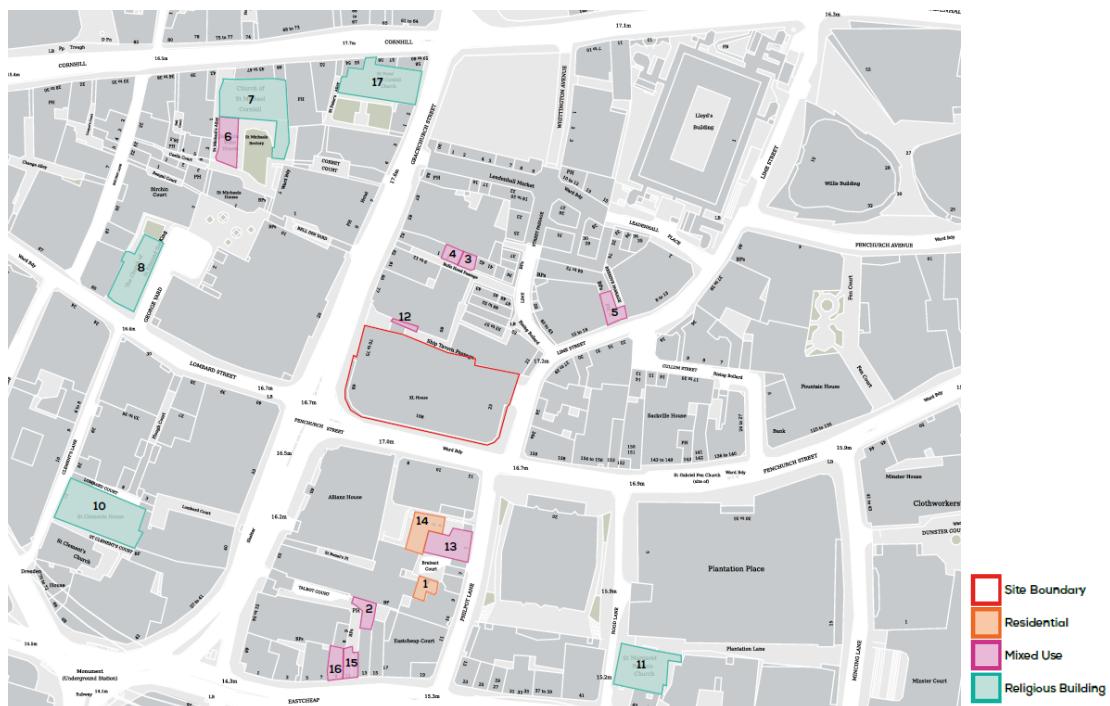


Figure 8 – Daylight, Sunlight and Light Pollution Receptors

7.215 For daylight, 17 properties have been assessed, of the 354 windows assessed for VSC, 307 (86.7%) meet the criteria outlined in the BRE Guidelines (2022). Of the 146 rooms assessed for NSL, 127 (87%) meet the criteria. Nine buildings experience little to no impact (less than 20% alteration) or retain values in line with the BRE Guidelines (2022). This is assessed to be a negligible effect and not significant.



7.216 The eight properties which experience greater reductions beyond the BRE guidelines are:-

- 4 Brabant Court;
- 4 Bulls Head Passage
- 2-3 Bulls Head Passage;
- St Edmund The King Church;
- The Swan Tavern;
- 11 Eastcheap (previously referenced as 9b Eastcheap);
- St Peter Upon Cornhill Church;

7.217 The effects range from negligible to minor adverse which are not deemed to be significant. The reductions in VSC to the Swan Tavern and St Edmund the King Church would exceed 40% which are explained further below. In relation to St Edmund the King Church, one window experiences a 100% reduction in VSC, however this window has an existing VSC level of 0.1% which is an incredibly low level of existing light. In NSL terms, this represents a 63% loss which is still overall a small absolute reduction which results in a disproportionately high percentage reduction. This reduction is considered to be a major adverse effect albeit it is not significant given the existing low levels of light overall.

7.218 For the Swan Tavern, five windows would experience alterations to VSC in excess of 40%. All of these windows in the existing situation received very little light with existing VSC levels between 2.4-9.2%, result in minor absolute reductions that create proportionally higher reductions in percentage terms. This impact is considered to be a minor adverse effect which is not significant.

7.219 The remaining properties which exceed the BRE Guidelines all experience reductions up to 39% VSC which are all considered to be at most to be minor adverse impacts which are not significant.

7.220 In terms of sunlight, Of the 192 windows assessed for APSH and WPSH within 14 properties, 175 (91.5%) within 10 properties would meet the BRE Guidelines (2022) criteria which is considered to be a negligible effect which is not significant.

7.221 Four properties would experience reductions in ASPH and Winter PSH beyond the guidance:-

- 4 Bulls Head Passage
- 2-3 Bulls Head Passage;
- The Bunch of Grapes – 14 Lime Street; and



- St Michael Cornhill Church.

- 7.222 The effects range from negligible and not significant to minor adverse and not significant.
- 7.223 In terms of overshadowing, transient overshadowing studies have been carried out for Spring, Summer and Winter to assess the impact on Leadenhall Market. The Proposed Development would cast a shadow over the roof of the market in the afternoon, with a maximum period of three hours in Spring, two hours in the summer and in winter, none of the amenity areas are affected by shadow cast from the Proposed Development. The impact on Leadenhall Market is assessed from a heritage perspective within Volume 2 of the Environmental Statement, prepared by Tavernor Consultancy.
- 7.224 In terms of sun hours on ground, a total of 10 of the 14 amenity areas assessed received less than 20% alteration from the percentage of total area which sees at least two hours of direct sunlight on the 21st of March, when comparing the baseline scenario with the Proposed Development scenario. The four remaining areas that see alterations greater than 40% are:-
- 85-87 Gracechurch Street – roof terrace 1
 - 2-4 Bulls Head Passage – rooftop amenity
 - 12 15-18 Lime Street - roof terrace 03
 - 12 15-18 Lime Street - roof terrace 04.
- 7.225 These are assessed as being a major adverse and significant effect, however the former two areas receive only very marginally above the two hour criteria, and therefore the reduction in sunlight hours would only need to be approximately 1 hour or less to fall below the recommendation.
- 7.226 It should be noted that the use of the latter two roof terraces at 15-18 Lime Street are unclear. It appears as though it could potentially be utilised as an outdoor terraced amenity and therefore has been assessed as a worst-case scenario. Should this area serve an inaccessible roof area which is not used for amenity purposes there would be no effect.
- 7.227 The light pollution assessment concludes that the impact on sensitive receptors is negligible and not significant.
- 7.228 In terms of the cumulative impacts, for all tier one and two cumulative schemes, the daylight and sunlight would remain largely the same, with one property, 2 Philpot Lane experiencing an increase in impacts.
- 7.229 In comparison to the previous consent, the reductions in daylight, sunlight and overshadowing are very similar. The assessment has considered this position and provided a specific comparison. it can be concluded that the Proposed Development would not result in any noticeable changes to daylight or sunlight beyond those already approved. In most instances



there is no change at all and the maximum difference being less than an absolute 2% VSC alteration, which is considered imperceptible.

- 7.230 The officers report for the consented scheme concluded in respect of daylight, sunlight and overshadowing that at paragraph 408 that; “*It is not considered that the proposal would result in unacceptable harm to the amenity of surrounding land and buildings and will not reduce noticeably the daylight and sunlight available to nearby dwellings to unacceptable levels. The daylight and sunlight available will be sufficient and appropriate to context and provide acceptable living conditions. As such, the overall impact (including the degree and extent of harm) is not considered to be such that it would conflict with...[policy]*”.
- 7.231 The assessment for the Proposed Development therefore concludes as a whole that the impacts to daylight, sunlight, overshadowing and light pollution are acceptable and in accordance with the Development Plan.
- 7.232 In terms of solar glare, chapter 9 of the Environmental Statement and annex 1 of the solar glare appendices, prepared by Arup provide an assessment of the Proposed Development and its impacts. The assessment concludes that there is a potential impact which requires mitigation. Levels 6-10 on the eastern portion of the southern elevation create a reflected disability glare along Fenchurch Street which would be a major adverse impact. The effect would be present during May, June, July and August in the late afternoon.
- 7.233 A series of mitigation measures were tested, a combination of low reflectivity glazing and fritting (details of which are outlined in the Environmental Statement and Design and Access Statement) for these areas of the façade, the reflected solar glare occurrence is reduced to less than 10 days per annum, factoring into account the days which are likely to actually experience sun, the effect is likely to be present for around 3 days or less per year. With mitigation in place, the effect on Fenchurch Street is Moderate Adverse overall, but not significant.
- 7.234 It is considered that the Proposed Development is acceptable in terms of solar glare in line with the Development Plan.

Air Quality

- 7.235 Policy SI1 of the London Plan states that development proposals should not lead to a further deterioration of existing poor air quality and be at least Air Quality Neutral. It expects development proposals to use design solutions to prevent or minimise increased exposure to existing air pollution. It also requires consideration of air quality impact during construction.
- 7.236 The Air Quality Positive and Air Quality Neutral LPG was published in February 2023 and advocates an approach to maximise the benefits to local air quality in and around a development site and minimises exposure to existing sources of poor air quality. It also seeks to ensure that air quality impacts have been considered in the design of development and ensuring that it can be appropriately monitored.



- 7.237 Policy CS15 of the Local Plan requires developments to positively address local air quality, particularly nitrogen dioxide and PM₁₀ particulates. Policy DM15.6 addresses air quality and requires maximisation of BREEAM pollution credits.
- 7.238 Policy S1(6) of the Draft City Plan reiterates the need for development to improve air quality, particularly related to nitrogen dioxide and PM₁₀ and PM_{2.5} particulates. Policy S8(9) of the draft City Plan requires development to optimise microclimate conditions including in relation to air quality. Policy HL2 of the draft City Plan sets out further detailed requirements in relation to air quality, including that all development must be Air Quality Neutral. For EIA Development, development should adopt an air quality positive approach. Major development must maximise credits for the pollution section of the BREEAM assessment relating to on-site emissions of NOx.

Assessment

- 7.239 The Consented Scheme had Air Quality scoped in to the previous Environmental Statement. As outlined in the EIA Scoping Report, prepared by Trium, it is proposed to scope out Air Quality given the conclusions from the previous Environmental Statement did not identify any significant effects in construction or operation of the completed development.
- 7.240 An Air Quality Assessment, as required by policy, has been prepared by Air Quality Consultants which considers the impacts of the Proposed Development on local air quality in terms of emissions from road traffic generated by the completed and occupied development and also during construction. It has also identified the air quality conditions that future users will experience, and whether or not the Proposed Development is air quality neutral (as required by the London Plan). An Air Quality Positive statement has been provided.
- 7.241 The assessment has been based on measurements made during 2023. Based on the CoL Code of Construction Practice for Deconstruction and Construction Sites (City of London, 2019), the Site is considered to be a 'high risk' site for construction dust and therefore appropriate mitigation measures to control dust have been outlined.
- 7.242 In terms of impacts, Air quality conditions for future users of the Proposed Development have been shown to be acceptable, with concentrations below the air quality objectives at sensitive receptors.
- 7.243 The assessment has demonstrated that pollutant concentrations will be below the objectives at all existing sensitive receptors in 2032, and that the emissions from the additional traffic generated by the Proposed Development during both construction and operational phases, will have a negligible impact on air quality conditions at all existing receptors along the local road network.
- 7.244 The overall operational air quality effects of the Proposed Development are judged to be 'not significant'. This conclusion is based on the concentrations at existing receptors being below



the objectives and impacts all being negligible, while concentrations for future users of the development will be below the objectives.

- 7.245 The building and transport related emissions associated with the Proposed Development are both below the relevant benchmarks. The Proposed Development therefore complies with the requirement that all new developments in London should be at least air quality neutral.
- 7.246 On this basis, the Proposed Development is in accordance with the Development Plan.

Noise and Vibration

- 7.247 Policy D13 of the London Plan establishes the Agent of Change principle, which places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- 7.248 Policy DM15.7 of the Local Plan sets out that: developers will be required to consider the impact of their developments on the noise environment and ensure that the layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses; 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; and must demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
- 7.249 Policy HL3 of the draft City Plan sets out that a noise assessment will be required where there may be an impact on noise-sensitive uses. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect nearby land uses, particularly noise-sensitive land uses such as housing, hospitals, schools, nurseries and quiet open spaces. New noise-generating development should include suitable mitigation measures such as noise attenuation or restrictions on operating hours. It goes on to state that any potential noise pollution conflict between existing activities and new development should be minimised, in line with the ‘agent of change’ principle.

Assessment

- 7.250 Volume I Chapter 7 (Noise and Vibration) of the Environmental Statement, prepared by Trium provides an assessment of the impacts of the Proposed Development in terms of noise and vibration. Long-term environmental noise surveys were conducted between 12 March and 19 March 2024 at two locations on site to establish background noise levels around the site. Attended measurements were completed on 19 March 2024 at ground floor positions around the building and at receptors.
- 7.251 The assessment also establishes future baseline noise levels for the anticipated opening year of 2032. This is based on a scenario where there is no uplift in road traffic volumes and building services noise is maintained at current noise levels recorded through the baseline surveys.



- 7.252 15 sensitive receptors in proximity to the Site have been assessed as the potentially worst affected, it is assumed therefore that other potential receptors further away would experience effects no more significant than the 15 which have been assessed.
- 7.253 Demolition and construction noise and vibration effects have been assessed, together with operational noise effects; the assessment has considered the market at ground floor, the overnight delivery and servicing of the building, ground floor retail use, external office terraces and the public viewing gallery.
- 7.254 The assessment has identified some potential effects for noise and vibration during the demolition and construction stage which have potential major adverse significant (demolition of central core) or moderate adverse significant (tactile vibration during piling). These impacts would be limited to the Swan Tavern Public House and correspond with specific worst-case periods of the construction programme, so are localised, temporary and direct. There are some additional potential cumulative significant effects which have been identified at 4 Brabant Court and 2-4 Bulls Passage, which are predominately related to the influence of the cumulative schemes (i.e. 55 Gracechurch Street and 85 Gracechurch Street) rather than the Proposed Development. Nevertheless, with predicted cumulative impacts ranging from major adverse to moderate adverse.
- 7.255 Mitigation measures would be required for the Proposed Development and secured as part of a demolition and construction logistics plan - alongside other mitigation controls which are secured by the Control of Pollution Act 1974, these would include an assessment of any relevant cumulative impacts. Similar impacts were identified in the Consented Scheme and were deemed to be acceptable by the City of London.
- 7.256 In terms of operational effects of the Proposed Development, these are considered to be negligible and not significant. For plant noise, the baseline surveys have been carried out to establish the levels at which all plant noise will need to comply, being 10dB below the baseline. A review of the expected building services plant indicates that these limits are achievable at all high sensitivity receptors (residential) with industry standard measures adopted.
- 7.257 It is considered that the Proposed Development is in accordance with the Development Plan in this regard.

Transport, Deliveries and Servicing

- 7.258 Policy T6 of the London Plan states that all development proposals that are well connected by public transport should be car free. Policy T7 of the London Plan states that development proposals should facilitate safe, clean, and efficient deliveries and servicing, with a preference for off-street servicing. It further states that deliveries and servicing should take place outside of peak hours and in the evening and nighttime.
- 7.259 Policy DM16.5 of the Local Plan 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. It states that delivery vehicles should be able to enter and exit sites in forward gear. The policy also states that developments in the City should be car-free except for designated Blue Badge spaces. Policy VT3 of the draft City Plan reiterates the adopted policy.

- 7.260 Strategic policy S9 of the draft City Plan states that development proposals should minimise the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle for shorter distances.
- 7.261 Strategic policy S21 of the draft City Plan specifically supports new approaches to freight, construction logistics and servicing in the City Cluster as a means to accommodate increasing pressure. Policy VT2 of the draft City Plan expands on these requirements in stating that major developments must provide for freight consolidation utilising new technologies where possible and should be serviced outside of peak hours.

Assessment

- 7.262 A suite of transport documents has been prepared and submitted as part of the application:-
 - Healthy Streets Transport Assessment, prepared by Momentum Transport Consultants;
 - Delivery and Servicing Plan, prepared by Momentum Transport Consultants;
 - Cycle Promotion Plan, prepared by Momentum Transport Consultants;
- 7.263 In terms of deliveries and servicing, this would be provided at grade in the form of four loading bays. It is proposed to consolidate 50% of the deliveries and restrict timings of all deliveries overnight within the dual use public realm/servicing area, accessed from Lime Street.
- 7.264 The Proposed Development will consolidate deliveries with an estimated 54 delivery and servicing vehicles per day by implementing at least 50% consolidation between the hours of 22:00 and 06:00 outside of the pedestrian peak movements. Deliveries and servicing will be carried out via a booking system, with a dedicated waste store at basement level 1, which will be managed by staff on-site to ensure that this is managed to minimise wait times for vehicles. One on-site blue badge parking space is also proposed within this area.
- 7.265 A Cycle Promotion Plan has been prepared that sets out measures to support a mode shift towards active travel.
- 7.266 On this basis, it is considered that the Proposed Development is in accordance with the Development Plan.



Archaeology

- 7.267 Paragraph 194 of the NPPF states that local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.
- 7.268 Policy DM12.4 of the Local Plan and Policy HE2 of the draft City Plan require applications involving excavation or ground works to provide an archaeological assessment of the site. Each set out that development should preserve, protect, safeguard, and enhance archaeological monuments, remains and their settings in development. Part 3 of policy HE2 of the draft City Plan states that significant, substantive archaeological features on major development sites must be preserved in-situ and, where feasible, exposed to public view. Significant archaeological artefacts on major development sites must be retained and exhibited on site. Where it can be demonstrated that found archaeological features or artefacts are of lesser significance or substance, proper investigation and recording of archaeological remains will be required as an integral part of a development programme, including timely publication and archiving of results to advance understanding.

Assessment

- 7.269 Volume I, Chapter 10 of the Environmental Statement, prepared by MOLA and the Desk Based Archaeological Assessment address the impacts of the Proposed Development on below ground, buried heritage assets.
- 7.270 The baseline characterisation of the Site is determined by an assessment relating to the potential for archaeological remains with consideration of how the baseline may evolve based on future cumulative development. The assessment demonstrates that will be no change to the archaeological baseline of the site and the surrounding area in the absence of the Proposed Development. The archaeological baseline would remain as currently understood and as presented within Chapter 10 of the Environmental Statement and Desk Based Archaeological Assessment.
- 7.271 No changes are proposed to the existing basements. The impact on archaeological survival from the proposals is anticipated to be limited to two new piles in the south-east corner of the site.
- 7.272 As per Policy DM12.4 of the Local Plan and Policy HE2 of the draft City Plan the Archaeological Desk Based Assessment includes further information relating to preservation, protection and mitigation relevant to the asset significance on Site.
- 7.273 It is considered that the Proposed Development is in accordance with the Development Plan with regard to Archaeology.



Aviation and Airport Safeguarding

- 7.274 Policy CS14 of the Local Plan states that tall building proposals should not adversely affect the operation of London's airports. Strategic policy S12 of the draft City Plan reiterates this position and states that proposals must not exceed the Civil Aviation Authority's maximum height limitation for tall buildings in central London.

Assessment

- 7.275 The Aviation Safeguarding Assessment, prepared by KL Grant Consulting Limited has been submitted as part of the application, it concludes that the Proposed Development would not effect the safe operation of London City or Heathrow Airport as per Policy CS14 of the Local Plan. The National Air Traffic Service (NATS) have provided a response to the pending EIA Scoping Opinion which seeks to confirms the Proposed Development would need to consider potential mitigation measures to the H10 Radar at Heathrow at detailed design stage. It is anticipated that this can be controlled by planning conditions.
- 7.276 The Assessment also provides a set of safety measures to be developed at construction stage in relation to the erection of cranes and potential warning lighting to be developed in consultation with London City Airport.
- 7.277 It is considered that the Proposed Development is in accordance with the Development Plan with regard to aviation safeguarding.

Flood Risk and SUDS

- 7.278 Paragraphs 159 of the NPPF seeks to direct development away from areas of higher fluvial Flood Risk and towards low-risk locations (whether existing or future).
- 7.279 Policy CS18 of the London Plan requires major development proposals to submit Flood Risk Assessments setting out the anticipated flood risk in relation to the proposals. It requires reductions in rainwater runoff through the use of Sustainable Urban Drainage Systems ("SUDS"). Policy CR2 of the draft City Plan reiterates this position.
- 7.280 Policy DM18.2 of the Local Plan and policy CR3 of the draft City Plan provides more detail on how SUDS should be factored into development.

Assessment

- 7.281 The Proposed Development will feature a series of SUDS measures in order to reduce runoff through the introduction of blue roofs, green roofs, rainwater harvesting and an attenuation tank before discharging into the existing waste water sewer network. The Flood Risk Assessment and Drainage Strategy, prepared by Robert Bird concludes that the Proposed Development will not be unduly at risk from flooding post development and integrate a series of SUDS measures to reduce water runoff rates in line with policy. The assessment also sets out indicative maintenance criteria for the SUDS measures proposed.



- 7.282 It is considered that the Proposed Development is in accordance with the Development Plan with regard to flood risk and drainage.

Biodiversity

- 7.283 Section 98 of the Environment Act 2021 makes the provision for biodiversity net gain to be a condition of planning permission in England. Schedule 14 confirms the Biodiversity Net Gain should be 10%. The requirement is subject to further Commencement Regulations being introduced.

- 7.284 Policy DM19.2 of the Local Plan states that developments should promote biodiversity including through green roofs, green walls, soft landscaping and trees, considerate planting mixes and features such as nesting boxes and beehives.

- 7.285 Policy OS3 of the draft City Plan encourages development to achieve net gains for biodiversity where possible by incorporating measures including green roofs and walls, gardens and terraces, soft landscaping and trees, with planting mixes that encourage biodiversity. The policy seeks to introduce a target of 3 biodiversity units per hectare.

Assessment

- 7.286 Tim Moya Associates have prepared a Biodiversity Net Gain Assessment, accompanying this application, demonstrating a significant increase in biodiversity compared to that existing on Site.

- 7.287 In order to achieve a biodiversity net gain, the biodiversity unit score must have a post-development score that is higher than the baseline score. The baseline biodiversity value is zero and the Proposed Development score is estimated to result in a Biodiversity Net Gain of +0.62 biodiversity units. Schedule 14 of the Environment Act (2021) requires a biodiversity net gain of 10% however the percentage gain cannot be calculated due to the baseline of zero. Nevertheless the biodiversity units are considered to far exceed the 10% BNG requirement and therefore is in accordance with the ‘de minimis exemption’ from the 10% biodiversity net gain requirement.

- 7.288 Although the Proposed Development would not achieve the target set by policy OS3 of the draft City Plan, it is considered that the policy has very limited weight at this stage and that the Proposed Development will nonetheless represent a major uplift over the baseline and contribute to biodiversity enhancements within the Square Mile.

- 7.289 It is considered that the Proposed Development is in accordance with the Development Plan with regard to Biodiversity.



8. Planning Obligations and Section 106

- 8.1 Section 106 of the Town and Country Planning Act 1990 (as amended), allows Local Planning Authorities the power to enter into planning obligations with any person interested in the land in their area for the purpose of restricting or regulating the development or use of the land.
- 8.2 Section 278 of the Highways Act 1980 (as amended) allows Highway Authorities to enter into an agreement if they are satisfied that it will be of benefit to the public for the execution of any works to the highway including maintenance.
- 8.3 The Community Infrastructure Levy Regulations 2010 (as amended) provide a framework for how the Community Infrastructure Levy (“CIL”) can be charged. The City of London adopted a CIL charging schedule in July 2014.
- 8.4 Paragraphs 55-57 of the NPPF states that Local Planning Authorities should consider whether otherwise unacceptable development could be made acceptable through the use of planning conditions or obligations. Planning obligations should only be used where it is not possible to address unacceptable impacts through planning conditions.
- 8.5 Planning obligations must only be sought where they meet all of the following tests:-
- Necessary to make the development acceptable in planning terms;
 - Directly related to the development; and
 - Fairly and reasonably related in scale and kind to the development.
- 8.6 Policy CS4 of the Local Plan states that the impact of development will be managed by seeking appropriate developer contributions through CIL and section 106 obligations, having regard to their impact of the obligation on the viability of development.
- 8.7 The City of London adopted their Planning Obligations SPD in October 2021.
- 8.8 With this in mind, we and the Applicant’s solicitor, Herbert Smith Freehills LLP, expect that the following heads of terms would be secured by a Section 106 Legal Agreement:-
- Local Training, Skills and Job Brokerage Strategy (for the demolition and construction phase);
 - Local Training, Skills and Job Brokerage Contribution;
 - Local Procurement;
 - Area specific security contribution;
 - Affordable Housing Contribution;



- Highway Works Obligations (to be scoped and agreed);
- Carbon Offsetting Contribution;
- Cultural Implementation Strategy;
- Cycle Improvements Contribution and Legible London Contribution;
- Solar Glare;
- Wind Mitigation;
- Monitoring Costs Contribution;
- “Be Seen” Energy Monitoring;
- Utility Connections; and
- Public Space Management Plan; and
- Public Terrace and Viewing Gallery Management Plan.

8.9 In relation to the public space plan, we can confirm the following:-

- The public route through the site would be open to members of the public except between midnight and 6am; and
- The eastern side of the ground floor would be publicly accessible, except for the hours of 23:00-07:00 when it is closed for use as overnight servicing;

8.10 In relation to the Public Terrace and Viewing Gallery Management Plan, we can confirm the following:-

- The level 32 terrace will be open between 10:00-19:00 (or nautical dusk, whichever is later), 7 days a week, with the possibility to close from time to time for a range of events on a certain number of days per year;
- The provision of ancillary café/bar spaces at level 32 internally and externally, alongside cultural uses and programming; and
- Ringfenced area at ground and basement where access is provided where there is no commercial/cultural function.

8.11 It is proposed that the final Public Terrace and Viewing Gallery Management Plan be submitted prior to completion/occupation of the development to ensure that the exact measures can be agreed and confirmed at a later date. The Applicant will seek to begin discussions on the draft Section 106 Legal Agreement upon submission of the application for full planning permission.



9. Conclusions

- 9.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, requires proposals to be determined in accordance with the development plan unless material considerations indicate otherwise. This Planning Statement has assessed the Proposed Development against the development plan and other relevant planning policy and guidance at national, regional and local policy level. Where relevant, emerging policy has been considered and assessed, subject to paragraph 48 of the NPPF. The Consented Scheme is a strong material consideration.
- 9.2 The Proposed Development has been developed following thorough and wide ranging consultation with stakeholders at pre-application stage.
- 9.3 The Proposed Development is located in an area of high public transport accessibility and should be optimised in line with national, regional and local policy. It presents an opportunity to create an exemplar tallest building with new publicly accessible spaces at the top, middle and base to allow all to enjoy the views. It will deliver extensive new public realm and provide an exemplar, world class design befitting of the City Cluster.
- 9.4 The proposals for the transformation of 70 Gracechurch Street would see the retention of majority of the existing building to construct a new tall building above for office use with significant culture, retail, and public viewing gallery and terraces at ground, basement and level 32. The development would transform the ground plane providing a new north south route from the corner of Gracechurch Street and Fenchurch Street through to Ships Tavern Passage into Leadenhall Market, alongside a new area of dual use public realm for overnight servicing and a pop up market during the day.
- 9.5 The Proposed Development has been curated by KPF alongside a full design team, culminating in a development that would deliver substantial, significant public benefits for the City of London and London as a whole, including:-
- A transformational refurbishment and extension of the existing building to deliver a world class tall building on the edge of the defined City Cluster, providing exemplary architecture with low carbon design, retaining approximately 60% of the existing building;
 - New public realm and routes through the site to enhance permeability and pedestrian comfort through the site and the wider City Cluster to cater for existing and future footfall, including a new north-south link from Fenchurch Street to Ships Tavern Passage, and a dual use public realm area for overnight servicing and a pop-up street market during the day;
 - A significant new gateway to the Grade II* listed Leadenhall Market to further enhance its presence, footfall and connections to its surroundings with a new route through the site, a standalone retail unit and ground floor active frontages and wayfinding at a substantial urban junction within the Square Mile;



- A significant amount of world class office space with complimentary amenities and terraces to support the City of London's ambitious growth targets for commercial office space;
- Introduction of a public viewing gallery, terrace and cultural space at level 32, ground and basement levels to contribute towards the aspirations of Destination City, promoting inclusivity and activity seven days a week and providing new views to the City and wider London including St Paul's Cathedral;
- Exemplar sustainability credentials, low carbon design choices to reduce the environmental impact of the proposals in the context of the climate emergency whilst delivering growth and best use of land;
- Deliver a betterment over the previously approved planning consent granted in 2021 through the partial retention of the building, lower embodied carbon and
- Introduction of generous landscaping to achieve biodiversity enhancements, biophilia urban greening; and
- Demonstrable positive socio-economic impacts in occupation as demonstrated in the Cultural Plan and Social Value Strategy which explain the measures taken to maximise the impact of the development.

- 9.6 It is considered that the proposals are exemplar and representative of exactly the type of the development that the City of London aspire to be delivered in the Square Mile. The proposals would deliver a exemplary tall building with publicly accessible viewing gallery and terraces at level 32, alongside a mix of cultural and retail uses including a pop up market with a transformative public realm to compliment Leadenhall Market.
- 9.7 Furthermore, the proposals will also make a significant contribution of just under 75,000 sqm GIA to the City's office growth targets, equal to around 6% of projected demand.
- 9.8 This Planning Statement and the supporting documents as a whole demonstrates the Proposed Development is in accordance with the Development Plan and the NPPF.
- 9.9 When talking into account all relevant material considerations, including the relevant policies in draft City Plan, other relevant guidance and the Consented Scheme in relation to the principle of a tall building, mix of land uses, provision of public realm and environmental impacts, the application should be determined in accordance with the Development Plan. The scheme as a whole represents an exemplary form of sustainable development, and it is considered on this basis that the Proposed Development should be granted planning permission.