



1 UNDERSHAFT EC3

PLANNING STATEMENT JANUARY 2016

DP9



1 UNDERSHAFT, CITY OF LONDON

PLANNING STATEMENT

JANUARY 2016

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Appendix 1 – Planning History

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared to accompany the application for full planning permission submitted on behalf of Aroland Holdings Ltd ('the Applicant') for the site at 1 Undershaft. The application proposes the demolition of the existing building and construction of a 73 storey tower (ground plus 72 storeys) providing office floorspace, a viewing gallery and restaurant and retail floorspace at lower ground floor within a retail gallery.

1.2 Full planning permission is sought for:

"Demolition of the existing building and construction of a 72 plus ground storey building for office use (Class B1) with retail floorspace (Class A1-A3) at lower ground floor, a publicly accessible viewing gallery (sui generis) and restaurant, public realm improvement works and ancillary basement cycle parking, servicing and plant."

1.3 This Planning Statement assesses the 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:

- Planning Application Drawings, prepared by Eric Parry Architects;
- Design and Access Statement, prepared by Eric Parry Architects;
- Statement of Community Involvement, prepared by Field Consulting;
- Sustainability Statement, prepared by WSP|Parsons Brinckerhoff;
- Energy Statement, prepared by WSP|Parsons Brinckerhoff;
- Archaeology Assessment, prepared by MOLA;
- Aviation Report, prepared by WSP|Parsons Brinckerhoff;
- Ecology Assessment, prepared by Aecom;
- Flood Risk Assessment, prepared by Aecom;
- Servicing and Waste Strategy, prepared by WSP|Parsons Brinckerhoff

1.4 An Environmental Impact Assessment ('EIA') has also been undertaken in support of the planning application. The Environmental Statement ('ES') comprises the following documents:

- Volume I: Main Text and Figures;
- Volume II: Townscape, Heritage and Visual Impact Assessment (prepared by Tavernor Consultancy and Cityscape);
- Volume III: Technical Appendices; and
- Volume IV: Non-Technical Summary.

1.5 The scope of the Environmental Statement that accompanies this planning application has been prepared and submitted having taken into account the Scoping Opinion issued by the City of London in December 2015.

1.6 This Planning Statement is structured as follows:

- **Section 2** provides a brief review of the site location and its surrounding context;
- **Section 3** details the proposed development;
- **Section 4** summarises the pre-application consultation process;

- **Section 5** assesses the proposed development against relevant planning policy; and
- **Section 6** provides a summary and conclusion.

2.0 THE SITE AND SURROUNDING AREA

Site description

- 2.1 The site is approximately 0.66 hectares (ha) in size and is located within the City of London. The site is centred at National Grid Reference TQ 330812 and is bounded by St Helen's Church to the north; St Mary Axe to the east; the Leadenhall Building to the southwest and Leadenhall Street to the south.
- 2.2 The site currently comprises a 28 storey office building with an area of publically accessible open space to the south which is called St Helen's Square. The existing tower is 118m tall and has five levels of basement beneath the main tower with an extensive two storey basement extending under the whole area of St Helen's Square and a smaller four storey basement under the building footprint. This two storey basement contains ancillary office space, loading bay, car park, storage and plant areas. A small public house (now closed) is located in the basement on the eastern side of the site. To the north of the existing building lies Undershaft with a service ramp accessed from this street.
- 2.3 The existing building is not listed, and a Certificate of Immunity (ref 1408449) in respect of the building was issued in April 2012. This certificate expires in April 2017.
- 2.4 The site is not within a conservation area, however the northern edge of the site is bounded by the St Helen's Place Conservation Area and the Grade I listed St Helen's Church. The Bank Conservation Area is located to the west and the Leadenhall Market Conservation Area is to the south.
- 2.5 With regard to access, the application site has excellent transport links with a Public Transport Accessibility Level (PTAL) rating of 6b. It is located within walking distance of Liverpool Street Station, Fenchurch Street Station, Aldgate Underground Station, Monument Underground Station and Bank Underground Station. The Site is also located in close proximity to several cycle routes, including Cycle Superhighway 2 (Stratford to Aldgate), 3 (Barking to Tower Gateway) and 7 (Merton to the City).
- 2.6 The site is located within Flood Zone 1 (land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)) and hence it has a low probability of flooding.
- 2.7 The entire CoL has been designated an Air Quality Management Area (AQMA) due to exceedances of the national Air Quality Strategy objectives for nitrogen dioxide (NO₂) (hourly and annual mean) and for particulate matter (PM₁₀) (24-hour objective value).
- 2.8 The application Site is defined on the red line Site Location Plan which accompanies this planning application.

Surrounding area

- 2.9 The site is located at the heart of the Eastern Cluster in the City of London, the centre of London's financial and insurance industries. The area is employment focussed in terms of land use, with some secondary retail, leisure and residential elements.
- 2.10 The Eastern Cluster is identified as an area appropriate for tall buildings within the City of London, and there are several tall buildings in the vicinity of the site, including 30 St Mary Axe (41 storeys), 122 Bishopsgate (48 storeys) and 110 Bishopsgate (46 storeys). A number

of nearby sites within the Eastern Cluster have recently been granted planning permission, including 22 Bishopsgate, 52-54 Lime Street, 100 Bishopsgate and 6-8 Bishopsgate.

- 2.11 To the south west of the site is the Leadenhall Market Conservation Area, and the ancient lanes of Lime Street and Cullum Street. This area consists of narrow passageways which contrast dramatically with the larger-scale existing and emerging tall buildings.

Historic environment

- 2.12 Although the site is not within a conservation area, St Helen's Place Conservation Area is located to the north, the Bank Conservation Area is located immediately to the west of the site and there are a number of other conservation areas within the wider area, including the Leadenhall Market Conservation Area discussed above.
- 2.13 There are no listed buildings on the Site, but there are a number of listed buildings in the immediate vicinity. St. Helen's Bishopsgate Church (Grade 1) is located on Great St Helen's, immediately north of the Site and St Andrew Undershaft (Grade 1) is located to the east. On the southern side of Leadenhall Street is the Grade I listed Lloyd's Building. Leadenhall Market (Grade II*) is located south of the Site beyond Leadenhall Street.
- 2.14 The wider context comprises St Paul's Cathedral (Grade I listed) and the Tower of London (a World Heritage Site).

Planning history

- 2.15 The available planning history primarily relates to works to the plaza to the south of the existing building (St Helen's Square), including hard and soft landscaping works and the temporary installation of sculptures within the plaza.
- 2.16 With regard to the existing building, the available planning history is limited. The building was constructed in the late 1960s, as permitted under Planning Permission 4359A dated 7 March 1963. The tower was badly damaged by bombing in 1992 and the external glazing system was completely replaced with a modern system.
- 2.17 The building has little recent planning history of relevance. In 2013 permission was granted for the temporary change of use of part of the basement level from office use to welfare facilities for a limited period of three years in association with the construction of 122 Leadenhall Street. This permission has now expired.
- 2.18 A full schedule of the available planning history is provided at Appendix 1.

3.0 THE PROPOSED DEVELOPMENT

3.1 This section provides a description of the proposed development. Full details are provided in the accompanying Design and Access Statement and submitted drawings.

3.2 Full planning permission is sought for the redevelopment of the Site for:

“Demolition of the existing building and construction of a 72 plus ground storey building for office use (Class B1) with retail floorspace (Class A1-A3) at lower ground floor, a publicly accessible viewing gallery (sui generis) and restaurant, public realm improvement works and ancillary basement cycle parking, servicing and plant.”

3.3 A summary of the total proposed floorspace areas are set out in the table below:

Use Class	GIA (sqm)	GEA (sqm)
Retail (A1-A3)	2,005	2,145
Restaurant at Level 70 (A3)	1,200	1,220
Office (includes reception levels and transfer floors) (B1)	128,780	131,970
Viewing gallery (sui generis)	2,810	2,930
Ancillary (basement and plant)	14,305	15,835
TOTAL	149,100	154,100

3.4 The proposed building is ground plus 72 storeys and it will reach a maximum height of 309.6m above ordnance datum (AOD) / 294.6m above ground level (AGL). The building is formed of a single tower, and has a square footprint with a ‘backpack’ which contains the core and which terminates at the height of the second transfer floors (levels 48-49). The sides of the tower taper in slightly over the height of the building. The structural cross bracing of weathering steel is expressed externally on the façade, with horizontal brise-soleil running between the bracing.

3.5 At the top of the building a viewing gallery will be provided at levels 71 and 72. There is an aspiration for the viewing gallery to have an educational focus including two classrooms and audio-visual exhibition facilities. There will be a dedicated access to the viewing gallery from the lifts at lower ground floor. A restaurant will be provided at level 70.

3.6 An enhanced public realm is proposed at ground level, and the building will be elevated to allow this area to extend below the building. An elliptical opening within the public realm will maximise the additional public realm offer and provide a dedicated entry point for the viewing gallery visitors, including security and sheltered queuing space. Retail units will be provided at lower ground floor, accessed from the ground floor by stairs and dedicated lifts.

3.7 The service ramp to the north will be removed and access to the basement will be via the vehicle lifts, accessed from Undershaft, which will be relocated further north.

Office floorspace

3.8 The proposed scheme will provide a total of 128,780sqm (GIA) of office floorspace (Class B1). The main entry reception to the offices is elevated and will be a glazed, double height space, accessed via escalators from ground floor. The main method of vertical transportation from reception to the office floors will be via 8 double decker express shuttle lifts. There are two transfer levels, at floors 28 and 29 and 48 and 49.

- 3.9 The provision of the core to one side of the building means that the office floorplates will be large and open, which will allow maximum flexibility for future tenants. The floorspace will be high quality, with floor to ceiling heights of 2.85m, high levels of natural daylight and solar shading and comfort provided by the external brise-soleil.

Viewing gallery

- 3.10 A publicly accessible viewing gallery is accommodated at the top of the building, at levels 71 and 72. This space will be the highest publically accessible space in the City and will provide 360 degree views across London. The gallery will be free to access during opening hours on a ticketed basis. The gallery will be accessed via a dedicated lift at lower ground floor, which will have a designated queuing area.
- 3.11 The aspiration is for the gallery to have an education and culture focus and there is an opportunity to provide space for two classrooms within the viewing gallery.

Restaurant floorspace

- 3.12 A restaurant will be provided at level 70 with a capacity of approximately 200 people. The restaurant will be accessed via a dedicated entrance located at lower ground level, and the lifting strategy allows for visitors to exit at ground floor level, separating the flow of visitors entering and exiting the building.

Retail floorspace

- 3.13 A total of 2,005sqm (GIA) of retail floorspace is proposed at lower ground floor within an open retail gallery formed by an elliptical opening at ground floor. The retail units will be accessed via stairs and dedicated lifts from ground floor level.
- 3.14 The proposed units will provide a valuable retail offering for occupiers of the adjacent buildings, as well as future occupiers of the proposed building, as there is currently a lack of retail provision within this area of the City.

Ancillary servicing, plant and parking

- 3.15 It is proposed to utilise the existing basement floorspace within the site. As detailed above, retail floorspace and public realm will be provided at lower ground floor. Cycle parking and associated amenities will be provided at basement level 2. A total of 1664 cycle parking spaces will be provided with 167 showers. Access for cyclists from ground floor to the basement will be either down the ramp from ground to lower ground, then down the stairway with a cycle channel from lower ground floor level to basement, or by way of dedicated cycle lifts from ground level.
- 3.16 Servicing will be carried out in basement level 3, with the provision of a double height loading bay, accessed via two vehicle lifts from ground level. This basement level will also contain waste management facilities such as compactors, and 6 disabled parking spaces. Full details of the servicing arrangements are set out in the Environmental Statement.
- 3.17 Low level plant will be installed within basement level 4.

Public realm and highways works

- 3.18 The proposals will provide an enhanced area of public realm, which will extend under the elevated building. The proposed scheme will allow uninterrupted public access across the site, providing greater permeability and creating linkages between the southern and northern ends

of the site. The proposals have been developed in response to comprehensive analysis of the existing and predicted pedestrian flows, details of which are included within the Environmental Statement.

- 3.19 The service ramp within the northern part of the site will be removed, and Undershaft will be relocated to the north to increase the extent of the public realm and promote the east-west pedestrian flow.
- 3.20 As detailed above, an elliptical opening will be provided to a retail gallery at lower ground floor. To the north and south of this opening there will be seating areas incorporated into the hard landscaping. Additional seating will be provided around the four columns of the building.
- 3.21 The landscaping proposals for the scheme will provide additional planting and trees, and planter boxes are proposed at the edges of the elliptical opening which will be planted with seasonal flowering plants. High quality natural stone will be used for the paving, in accordance with the City street scene guidance. Translucent glass paving lights are proposed within the centre of the public realm to increase natural light to the retail gallery at lower ground floor.

Wellbeing

- 3.22 The building is designed to provide a high quality internal environment that will support the health, wellbeing and comfort of the occupants. The building has been reviewed against the criteria set out within Well Building Standard (published by the International Well Building Institute), and is capable of being developed during the detailed design and construction stage in accordance with the Standard for shell and core buildings.
- 3.23 Some examples of features incorporated into the design that meet the criteria described within the Standard are;
 - 2.85m floor to ceiling heights, taller than typical comparable developments, to promote greater levels of natural daylight and feeling of openness within all office floors
 - Increased levels of ventilation with greater volumes of fresh air than typical comparable developments
 - Brise soleil to all facades at all levels to control solar gain and in conjunction with internal blinds to reduce internal glare
 - Low VOC for all internal finishes
 - Transfer floors that provide opportunities for meeting, fitness and amenity areas for tenants to promote wellbeing of mind and body.
 - Extensive cycle facilities including cycle maintenance area
 - Extensive public realm that encourages and promotes pedestrian movement and exercise
 - High performance façade that controls the break in of external noise and maintains a comfortable internal acoustic environment
 - An attractive and stimulating external and internal environment that is conducive to occupants enjoying their surroundings

4.0 PRE-APPLICATION CONSULTATION

- 4.1 The Applicant has undertaken detailed pre-application consultation with the decision making authorities, key stakeholders and the local community prior to the submission of the application.
- 4.2 The project team has taken an proactive approach to engaging with the decision makers and key stakeholders throughout the design process. In terms of decision makers and statutory consultees, this included:
- The City of London
 - The Greater London Authority
 - Transport for London
 - Historic England
 - Historic Royal Palaces
 - Royal Parks
 - The Chapter of St Pauls Cathedral
 - Westminster City Council
 - Environment Agency
- 4.3 We have met with the City of London 12 times since February 2015, demonstrating the level of engagement with City officers to ensure that the 1 Undershaft scheme is aligned with the City's aspirations and planning policies for tall buildings in the Eastern Cluster. Public realm discussions have been key and we have evolved the design of this space over many months to ensure that the proposals allow for the cumulative impact of existing and future development not only on this site but throughout the Eastern Cluster. Similarly, we have worked hard to take on board the City's aspirations to ensure not only that wind impacts of cumulative schemes are accounted for but that all appropriate measures to improve wind conditions are taken. These meetings have also enabled the detailed design and materiality of the building to evolve within the context of the Eastern Cluster and the wider impact on views into the City.
- 4.4 A summary of feedback from the wider stakeholders is set out below:
- Welcome the simple design of the building
 - Interest in how the Corten material will weather, including long term maintenance plans
 - Interest in security measures proposed
 - The removal of the unsightly ramp outside St Helen's Church considered a significant benefit
 - Interested in the public realm and pedestrian/cycle flows and ensuring this takes into account future projections of City workers and visitors
 - Impact of 1 Undershaft on the amalgamation of the Eastern Cluster
 - Interest in the quality of the finished materials
 - Royal Parks noted an objection to any schemes above 150m
 - Consider the servicing/delivery consolidation plans a benefit
 - Requests for additional views from key locations including the Tower of London and Royal Parks

4.5 We have also contacted the immediate local neighbours and stakeholders, and have held separate meetings with the following:

- 122 Leadenhall
- Hiscox
- Leathersellers
- Church of St Helens

4.6 A summary of the feedback received from local stakeholders to date includes:

- How the viewing gallery works and ensuring that visitors are not queuing or discharging into areas that will cause conflict with neighbouring buildings
- Impacts on daylight/sunlight
- Does the scheme require additional basement excavation?
- Timescales for construction
- Likely impacts of additional traffic on Undershaft
- How access will be retained during works
- Impact of the building on local wind conditions
- Security and placement of bollards
- Public realm improvements welcomed
- Impact on setting of and the fabric of the listed church

4.7 All of the above queries have been addressed in detail in the analysis section of this planning statement and the accompanying Design and Access Statement.

Public consultation

4.8 A public consultation event was held at the Bishopsgate Institute over three days from 7-9 December 2015 between the hours of 9am-8pm on each day. The consultation event was attended by 452 people, which enabled the design team to receive and understand comments first hand. A detailed summary of the public consultation on the scheme is provided in the accompanying Statement of Community Involvement.

5.0 PLANNING POLICY FRAMEWORK

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that when making any determination under the Planning Acts, it should be done so in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 The development plan for the Site comprises the following:
- The London Plan: Spatial Development Strategy for Greater London – Consolidated with Alterations Since 2011 (March 2015)
 - The City of London Local Plan (January 2015)
- 5.3 Both the London Plan and the Local Plan are up-to-date development plan documents and can be given full weight in the determination of planning applications.

National planning policy and guidance

- 5.4 Regard has been given to the following national planning guidance:
- The National Planning Policy Framework (March 2012)
 - National Planning Practice Guidance (NPPG, March 2014, as amended)
 - Tall Buildings (Historic England Advice Note 4, December 2015).

Supplementary Planning Documents and Guidance

- 5.5 Regard has also been given to the following supplementary planning guidance:

Regional

- Accessible London: Achieving an Inclusive Environment (2014);
- The Control of Dust and Emissions During Construction and Demolition (2014);
- Shaping Neighbourhoods: Character and Context (2014);
- London Planning Statement (2014);
- Sustainable Design and Construction (2014);
- Use of Planning Obligations in the Funding of Crossrail, and the Mayoral Community Infrastructure Levy (2013);
- London View Management Framework (2011);
- The Mayor's Climate Change Adaptation Strategy (2011)
- The Mayor's Water Strategy (2011)
- The Mayor's Business and Municipal Waste Strategies (2011)
- The Mayor's Air Quality Strategy (2010);
- The Mayor's Energy Strategy (February 2010)
- The Mayor's Transport Strategy (May 2010)

Local

- Open Space Strategy (2015)
- Planning Obligations (2014)
- Protected Views (2012)
- Tree Strategy (2012)

- 5.6 Also of relevance is the Tower of London World Heritage Site Management Plan (Historic Royal Palaces, June 2007).

6.0 PLANNING ASSESSMENT

- 6.1 This section assesses the proposed development against the relevant planning policy tests, objectives and guidance set out at the national, regional and local level.

Principle of development

- 6.2 National Planning Policy is set out in the form of the National Planning Policy Framework (NPPF). The NPPF was adopted on 27 March 2012 and replaced all previous planning policy statements and guidance notes.
- 6.3 At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan making and decision taking. The NPPF clearly states that the development which is sustainable should be approved without delay and that all local plans should be based upon, and reflect the presumption in favour, of sustainable development. The core planning principles set out in the NPPF include, amongst others, to “*drive and support development*”.
- 6.4 With regard to economic growth, the NPPF states that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future. This is reiterated within the London Plan where Policy 4.2 states that the Mayor will support the redevelopment of office provision to improve London’s competitiveness, and to enhance its attractiveness for new businesses.
- 6.5 The City of London lies within the Central Activities Zone (CAZ), which contains London’s largest concentration of financial and business services. Local policy acknowledges the need to sustain the City’s cluster of economic activity and Strategic Objective 1 in the Local Plan 2015 is to maintain the City’s position as the world’s leading international financial and business centre. The Local Plan recognises the benefits from a concentration of economic activity and seeks to strengthen the cluster of office activity, and identifies the Eastern Cluster as an area for future office development and new tall buildings. Policy CS7 promotes the increase of office floorspace within the Eastern Cluster.
- 6.6 Redevelopment of the existing 1960s office building presents an opportunity to enhance the site’s contribution towards the economic growth of London in the context of the site location within the Eastern Cluster. The principle of development is therefore in accordance with current planning policy.

Land use

Employment

- 6.7 In summary, the development proposes 128,780sqm (GIA) employment floorspace (Class B1) distributed throughout the building, 1,200sqmm (GIA) of restaurant floorspace (Class A3), 2,005sqm (GIA) of retail floorspace (Class A1-A3) and a viewing gallery and associated facilities extending to 2,810sqm (GIA).
- 6.8 Policy 4.2 of the London Plan states that the Mayor will support mixed use development and redevelopment of office provision to improve London’s competitiveness, and to enhance its attractiveness for new businesses. The policy also focuses development towards viable locations with good public transport.
- 6.9 Local Plan Policy CS1 states that the City intend to ensure that additional office development of the highest quality is provided in order to meet long term demand and to enhance London’s

role as the world's leading financial and business centre. The policy encourages “*the assembly and development of large sites to meet accommodation needs of the city's biggest occupiers, protecting large office sites from piecemeal development and resisting development that would jeopardize the future assembly and delivery of large sites*”. Policy CS1 also encourages the development of a range of high quality office accommodation to meet the varied needs of city office occupiers. The proposed development has large floor plates, and the location of the core at the side of the building maximises the flexibility of the floorspace which will ensure that the floorspace is attractive to a range of potential occupiers.

- 6.10 Also of relevance is Local Plan Policy DM 1.2 which relates to the assembly and protection of large office development sites. The Policy states that the City Corporation will assist developers in identifying large sites where large floor plate buildings may be appropriate.
- 6.11 As the site is within the designated Eastern Cluster, it is therefore subject to Policy CS7, which identifies the Eastern Cluster as an area which can accommodate a significant growth in office floorspace. The key aspirations set forward in Policy CS7 include the increase in the provision of sustainable, energy-efficient, high quality office floorspace in a range of accommodation types, delivery of tall buildings on appropriate sites that enhance the overall appearance of the cluster, enhancement of the streets, spaces and public realm for pedestrians and increase connectivity and delivery of public transport improvements.
- 6.12 The proposed development will deliver 128,780sqm (GIA) office floorspace which will be a significant contribution to the City of London's aim to increase the City's office floorspace by 1,150,000sqm during the period 2011-2026. The floorspace will be high quality and flexible, and will strengthen the City of London's role and attractiveness as a world leading business centre. The provision of a substantial and tall office building in this location meets the aims of policy CS7 in delivering a significant growth in both office floorspace and employment.

Viewing gallery

- 6.13 The application proposes a publicly accessible viewing gallery with the potential for classrooms for education use and exhibition space (*sui generis*) which will be free to enter during public access hours and will have a dedicated lift capacity of 400 people. The viewing gallery is an integral part of the scheme design and has been discussed with CoL Officers during the pre-application stage. The viewing gallery will have a cultural and educational focus, and the intent is that it would be developed and implemented in conjunction with a suitable body, such as the Museum of London. The Applicant is committed to providing a facility which genuinely benefits the local community, local school children, visitors and tourists, to showcase the building itself, the City of London and London as a World City.
- 6.14 The viewing gallery will be the highest in London, situated at levels 71 and 72 and will provide 360 degree views of London. The viewing gallery which will ensure the inclusivity of the building to members of the public and is in accordance with London Plan policy 7.7 which requires tall buildings to incorporate publicly accessible areas on the upper floors, where appropriate.

Restaurant

- 6.15 The proposed development includes a public restaurant at level 70 which is expected to have a capacity of 200 guests at any one time. The proposed restaurant will enhance the evening economy of the area, will generate activity and footfall and create jobs for local people.
- 6.16 The restaurant floorspace accords with Local Plan policy DM 1.5 (mixed uses in commercial areas) which encourages a mix of commercial uses within office developments which

contribute towards the City's economy and character and provide support services for its business, workers and residents. This element of the proposed development also complies with Local Plan policy DM 3.5 (night-time economy) in respect of amenity.

Retail

- 6.17 The application proposes 2,005sqm (GIA) of retail floorspace (Class A1-A3) at lower ground floor level within a retail gallery. The proposed retail units will provide a valuable offering to occupiers of the proposed building, surrounding office buildings, local residents and tourists. Presently there are very few retail spaces in the immediate area. As stated above, Local Plan Policy DM1.5 encourages a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for businesses, workers and residents.
- 6.18 The restaurant and retail elements of the proposed development are defined as 'main town centre uses', as defined by the NPPF. Para 24 states that local planning authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing town centre and are not in accordance with an up-to-date Local Plan. Para 24 requires proposals which provide above of 2,500sqm retail to review the impact on existing and proposed town centres in terms of their vitality and viability, and the investment in these centres.
- 6.19 Although it is considered that the provision of retail and restaurant floorspace in the proposed development is in accordance with Local Plan Policy DM1.5 (which supports a mix of commercial uses in office developments) and London Plan Policy 2.10 and 2.11 (which promotes retail provision in the CAZ) a review of the impact of the proposals on existing Principle Shopping Centres has been undertaken and is set out below.
- 6.20 Local Plan Policy CS20 directs new retail development to the Principal Shopping Centres and then Retail Links, as well as maintaining a distribution of convenient local services elsewhere in the City. The nearest Principal Shopping Centres to the site are Leadenhall Market and Liverpool Street. The site is very well connected to these centres, and the proposed enhancement to the public realm means that this connectivity will increase. The site presents an opportunity to enhance the retail offer of these centres by integrating further main town centre uses in this area.
- 6.21 The proposed high level restaurant has a very specific market requirement which means that it can only be located within this location, i.e. within a tall building in the Eastern Cluster. The restaurant will attract visitors as a result of its location.
- 6.22 The retail gallery will provide 2,005sqm (GIA) of retail floorspace, which can be accommodated on the site due to the scale of the proposed public realm. There is no other location within the surrounding area which could provide this retail offer.
- 6.23 The proposed development will have a large number of occupiers, estimated to be 8,251 office workers, a net increase of 4,916 employees. There are also existing and consented buildings in the Eastern Cluster that will have high numbers of occupants. The provision of retail space in this location therefore meets an identified local need, as there will be high numbers of people working in and passing through this area in which there is currently a low level of retail provision. The scale of the proposed retail provision is therefore considered to be appropriate for this location.
- 6.24 Case law dictates that when applying the sequential test and reviewing potential sequentially preferable sites that 'the proposal' as a whole should be considered. Due to the specific nature

of the proposed development in terms of scale and height there is no alternative site in the vicinity that could deliver the proposed development in its current form. The proposal therefore meets the sequential test required by the NPPF.

- 6.25 With regard to the potential impact upon the nearby Principal Shopping Centres, the City of London 2010 Retail Need Assessment (NLP) found Liverpool Street and Leadenhall Market to both be healthy and have low levels of vacancy. The Assessment confirms that the City should seek to identify development opportunities for a further retail floorspace and this is set out in Local Plan Policy CS20 which states that gross retail floorspace should be increased by at least 136,000sqm by 2026. The supporting Retail Need Assessment states “*Longer term projections suggest the expansion of retail development to link the PSCs is desirable.*”
- 6.26 The Retail Need Assessment identifies evidence of additional retail requirement, and highlights that retail proposals which link Principal Shopping Centres are desirable. This evidence of need provides a good indication that the impact of the proposals on existing centres will not be material. It shows there is enough spending capacity available to support existing retailers as well as the proposed retail units, and this capacity will only increase with the proposed development within the Eastern Cluster.
- 6.27 In summary the proposal will deliver retail and restaurant uses that will meet a location specific need and an identified requirement for additional retail floorspace, whilst integrating with the existing network of Primary Shopping Centres and strengthening linkages between these centres with the increased connectivity of the enhanced public realm. The proposal therefore complies with the NPPF retail tests (sequential and impact), and relevant London Plan and Local Plan policies.

Design, height and massing

- 6.28 The design approach for the Site and the design evolution process are explained in detail in the accompanying design and access statement, which also includes further comprehensive commentary on the rationale for the proposed design approach, height, massing, structure, and materials.
- 6.29 The proposed development will reach a maximum height of 309.6m above ordnance datum (AOD), (294.6 above ground level). The proposal will be the tallest tower in the Eastern Cluster, at a location where the tallest buildings in the cluster are considered to be appropriate in terms of townscape and other considerations. The height of the proposed scheme is considered appropriate in relation to the development plan, specifically Local Plan policy CS7, CS14 and London Plan policy 7.7, as well as relevant tall building guidance.
- 6.30 The height of the building has been discussed with relevant authorities such as London City Airport and the Civil Aviation Authority. Full details are provided within the Aviation Report.
- 6.31 The building form has been carefully developed and responds to views at varying distances and in all directions. The massing of the development is square in plan form (with the exception of the backpack at lower floors) and the sides of the tower taper in slightly over the height of the tower. The bracing of weathering steel will give the building a rich colour and texture, while the horizontal brise soleil will provide solar shading for the occupants of the building. The full rationale for the building design is provided in detail in the Design and Access Statement, and fully accords with Policy 7.7 of the London Plan, which requires tall buildings to incorporate the highest standards of architecture and materials, and Local Plan policy CS10, which seeks to ensure that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

Townscape, heritage and views and archaeology

- 6.32 A full assessment of effects on local, regional and wider views, as well as on the historic environment, is included within the accompanying Environmental Statement Volume II: Townscape, Built Heritage and Visual Impact Assessment.
- 6.33 The assessment tests the visual effect of the proposed development using a series of verified photomontage images which are designed to show the visibility and appearance of the development from a range of publicly accessible locations. In total, 66 views have been selected for the assessment. The assessment has also tested the following views in addition to the LVMF requirements, following consultation with stakeholders:
- Royal Parks requested:
 - St James' Park Blue Bridge,
 - Victoria Memorial,
 - Memorial Gates at the Duke of Wellington Gate,
 - West End of Victoria Monument
 - Historic Royal Palaces: Kinetic view of Inner Wards of Tower of London, demonstrating the view as the public walk through the site.
- 6.34 An assessment of these views is provided in the Townscape, Built Heritage and Visual Impact Assessment.
- 6.35 Chapter 15 of the Environmental Statement details the findings of an archaeological assessment. The assessment recommends that archaeological monitoring is undertaken throughout the proposed geotechnical investigations, and concludes that if this is undertaken there are unlikely to be any significant environmental effects as a result of the proposals.

Public realm and open space

- 6.36 The application proposes a comprehensive approach to public realm, which will be substantially increased in area and will extend under the elevated building. The proposed scheme will allow uninterrupted public access across the site, providing greater permeability. The existing service ramp will be removed and Undershaft relocated to the north, extending the area of the public realm, and an elliptical opening will be included at ground floor level, allowing natural daylight to the retail gallery below. Hard and soft landscaping is proposed to enhance the area and provide an improved experience for pedestrians and cyclists at street level.
- 6.37 Following consultation with City of London officers, Members and local stakeholders we recognise the importance of the public realm and ensuring that the scheme takes into account the growing City. The design of the public realm has developed extensively throughout the pre-application process with the benefit of pedestrian and cycle movement analysis undertaken by Space syntax. The proposed layout ensures maximum accessibility and minimum pedestrian/cycle conflict.
- 6.38 The public realm itself has substantially increased when compared to the existing and this increase enables the pressure on the pavement surrounding the site to be reduced significantly. The Applicant has taken on board the City's aspirations and is keen to ensure that this area is a desirable space to dwell as well as an efficient through route, increasing accessibility through the cluster.

- 6.39 The public realm, amenity and open space elements of the proposed scheme are considered to comply with relevant development policies and guidance, including Local Plan policies DM19.1 and DM19.2, as well as London Plan policies 5.10, 5.11, 7.5, 7.19 and 7.21.

Wind microclimate

- 6.40 A full assessment of the proposed development's effect on wind conditions at the site and in the surrounding area has been undertaken and this assessment accompanies the planning application within Chapter 10 of the Environmental Statement.
- 6.41 Extensive wind tunnel tests were undertaken to assess the effect of the proposal on the wind microclimate. The assessment delivers a detailed account of the average and gust wind conditions around the existing building and the proposed development and also assesses the cumulative impact with other proposed developments.
- 6.42 The mitigation measures have been formulated on the basis that wind impacts will not be higher than 'leisure walking' on the Lawson Criteria and the main objective has been to maximise 'sitting' and 'standing' scenarios. Wind tests have been undertaken to assess a number of different scenarios to reflect the transient nature of wind and the potential cumulative effects in conjunction with neighbouring proposed schemes.
- 6.43 This testing has informed the mitigation proposals and the resultant wind microclimate complies with relevant planning policies, including CoL Local Plan DM10.1, London Plan 7.6 and 7.7, and Local Policy DM10.1 which states that the design and materials of new development should avoid unacceptable wind impacts at street level on the surrounding townscape and public realm. Following consultation with the City of London Officers the Applicant has agreed to an independent assessment of the wind test findings.

Daylight, sunlight, overshadowing and solar glare

- 6.44 Policy 7.6 of the London Plan states that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings in relation to privacy and overshadowing. Policy 7.7 reinforces this by stating that buildings should not affect their surrounding adversely in terms of overshadowing and other factors. Local Policy DM10.7 seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 6.45 Chapter 11 of the accompanying Environmental Statement presents an assessment (undertaken by GIA) of the proposed development's effect on daylight and sunlight availability to surrounding neighbouring properties, as well as the internal daylight conditions, overshadowing, light pollution and solar glare.
- 6.46 While the assessment has been carried out for all the surrounding buildings including commercial offices, only those considered as sensitive in terms of daylight and sunlight are evaluated in the assessment. With regard to neighbouring properties, these comprise:
- 50 Cornhill ;
 - 33 Great St Helens;
 - 52-58 Bishopsgate;
 - 22-24 Wormwood Street;
 - 20-21 Wormwood Street;
 - 6 Creechurch Lane;

- 18-20 Creechurch Lane;
- 16 Creechurch Lane;
- 14 Creechurch Lane;
- 12 Creechurch Lane;
- 10 Creechurch Lane; and
- 2 Creechurch Lane

6.47 In addition to these residential properties other uses may be considered sensitive in terms of daylight and sunlight such as livery halls or churches. Therefore the following buildings have been assessed:

- Drapers Hall;
- 19 Old Broad street (City of London club);
- Parish Church of St Helen Bishopsgate;
- St Andrew Undershaft Church;
- Spanish and Portuguese Synagogue;
- Merchant Taylors Hall;
- Gibson Hall; and
- 15 Bishopsgate

6.48 The impact on surrounding amenity areas to the north of the site have also been considered

- Area around 30 St Mary Axe;
- Area in front of Parish Church of St Helen Bishopsgate;
- Area next to the Leadenhall Building;
- Playground of the St John Cass Primary School;
- Courtyard serving the City of London Club;
- Amenity space between the Royal Exchange buildings; and
- St Boltolph without Bishopsgate gardens

6.49 The technical assessments have been undertaken using a three-dimensional model of the site and surrounding context and by reference to guidelines published by the Building Establishment (BRE). An assessment has been undertaken against the existing baseline conditions to understand the effects of the proposed development.

6.50 Full details are provided within the Environmental Statement, however in summary the assessment concludes that there will be no likely significant effects resulting from the proposed development in regards to daylight, sunlight or overshadowing. Although there may be instances of moderate adverse effects in regards to solar glare, the assessment provides a worst case scenario assuming all glazing is fully reflective (regardless of exact specification) and that the sun will be shining throughout the whole day and entire year. In reality this will not be the case, and mitigation has been incorporated into the design of the façade to reduce solar glare. The proposed development therefore complies with Policies 7.6 and 7.7 of the London Plan and Policy DM 10.7 of the Local Plan

Transport and highways

6.51 A Transport Assessment (TA) and Travel Plan (TP) have been prepared by WSP to accompany the planning application. The TA summarises relevant policy guidance, including the NPPF, London Plan, Local Plan and Mayor's Transport Strategy and establishes the

baseline conditions in terms of access and connectivity, public transport and the road network before assessing the effects of the proposed development.

- 6.52 The Site is well connected and has a PTAL rating of 6b. Bank, Aldgate, Liverpool Street, Monument and Fenchurch Street stations are within a 10 minute walk of the site. Pedestrian access to the site is provided from St Mary Axe and Undershaft and there is an established network of footways and pedestrian connections surrounding the site in addition to several Cycle Superhighways. It is understood that an additional Cycle Superhighways is proposed between the City of London and Tottenham.
- 6.53 A number of pedestrian surveys have been undertaken along footways and crossings surrounding the site which have identified various pinch points on the footways (including bus stops and benches) which result in isolated narrowing and pedestrians briefly experiencing uncomfortable conditions. In particular Undershaft and St Mary Axe have significant footway narrowing adjacent to St Helen's Church and St Andrew Undershaft Church respectively. The proposed amendments to the public realm will create additional pedestrian desire lines which are currently unavailable, thereby reducing pressure on the surrounding footways and allowing easier pedestrian movement around and through the site.
- 6.54 It is anticipated that the Proposed Development would accommodate 8,251 office workers, a net increase of 4,916 employees, and for the purpose of the Transport Assessment it is assumed that 85% of staff will occupy the building on any given day. It is anticipated that a total of 3,296 office employees would travel to the development during the AM peak hour and 3,016 would travel from the development in the PM peak hour, a net increase of 1,964 and 1,797 trips respectively. As well as staff trips there will be a number of visitor trips. As typical peak hour trip generation for visitors to offices is 0.3 persons per 100sqm, this would equate to 267 visitors during the peak hours, a net increase of 159 trips.
- 6.55 It is expected that the restaurant and viewing gallery would generate an additional 1,000 trips between them in the PM peak hour.
- 6.56 With regard to the retail uses, shops within commercial areas are generally considered to be ancillary such that they generate pedestrian pass-by trips that are already on the surrounding transport network. Therefore no new trips are expected to be generated by the proposed retail gallery.
- 6.57 In total, 83% of trips to the Proposed Development are expected to be undertaken by public transport. In terms of the national railway network, the net trips forecast by rail are 1,022 trips in the AM peak hour and 1,170 trips in the PM peak hour. This is an increase in the number of passengers by 0.2% in the AM peak hour and 0.4% in the PM peak hour, an additional 1.6 and 1.8 passengers per service.
- 6.58 The forecast number of Underground net development trips (final mode) is 917 in the AM peak and 1,051 in the PM peak. In the vicinity of the site the Northern line is the busiest route followed by the Waterloo & City and District lines. The Circle, Hammersmith & City and Metropolitan lines have lower service frequencies and passenger volumes. The Transport Assessment provides details of the expected increase in trips per line. The Assessment notes that a number of improvements are programmed for the Waterloo & City, Northern and Central lines that will improve capacity and will accommodate future growth in trips on these lines.
- 6.59 Changes to journey choice are also anticipated with the full opening of Crossrail which is expected in 2019 prior to occupation of the Proposed Development. Crossrail will result in changes to journey choice for various trips to and from the west and east of London. It is

anticipated that Crossrail would result in a total mode share of 10.3% and reductions in trips using the rail and Underground networks.

- 6.60 With regard to bus travel, total of 302 AM peak hour trips (289 inbound) and 319 PM peak hour trips (287 outbound) are forecast. The net increase is 181 and 207 trips in the AM and PM peak hours respectively which is on average 0.7 and 0.4 additional passengers per bus service.
- 6.61 Overall, the Transport Assessment demonstrates that the Proposed Development can be accommodated within the local transport network without any adverse residual impacts.
- 6.62 A Framework Travel Plan has been produced in accordance with TfL guidance. The Travel Plan sets out the site-wide management structure for the Site, and outlines the sustainable travel principles and measures to be incorporated within the proposals.

Parking

- 6.63 In terms of car parking, the London Plan sets out a maximum standard for offices (Class B1) of 1 per 1,500sqm (GIA) within the CAZ. Development should also provide at least one accessible parking bay even if no general parking is provided. Local Plan policy DM16.5 states that developments in the City should be car-free, except for disabled parking. The proposed development is 'car free' with only six car parking spaces for disabled users which will have no discernible impact on the highway network. This provision is in accordance with the London Plan and Local Plan standards.
- 6.64 With regard to cycle parking, the London Plan sets out minimum standards of 1 space per 90sqm for Class B1 use in Inner London (long stay), with further additional spaces for short stay. Separate minimum standards are identified for other uses such as retail, cafes and restaurants. The Local Plan details minimum cycle parking standards for offices of 1 space per 125sqm floorspace. A total of 1664 cycle parking spaces will be provided with 167 showers. This provision is fully in accordance with policy requirements. Access for cyclists from ground floor to the basement will be either down the ramp from ground to lower ground, then down the stairway with a cycle channel from lower ground floor level to basement, or via dedicated cycle lifts from ground level.
- 6.65 The top of the cycle ramp is located approximately 10m from the western kerb of St Mary Axe. Cyclists would not be required to dismount when travelling across the public realm between St Mary Axe and the ramp. The location of the cycle access ramp and its approach has been discussed with the City of London during pre-application meetings and studies have been undertaken to assess pedestrian / cyclist interaction which demonstrate that this arrangement will not result in conflict.

Waste and servicing

- 6.66 The servicing and waste collection strategy has been developed in consultation with City of London highways and waste officers. The proposed development will be serviced on site with all deliveries and refuse collection activities being carried out at basement level 3. Two lorry lifts (to accommodate 8m long vehicles) are proposed that are accessed via Undershaft.
- 6.67 Courier deliveries (cycle/motorcycle) would be managed at a ground floor security point adjacent to the lorry lifts.
- 6.68 A servicing consolidation strategy is proposed, whereby vehicle deliveries are made to an off-site location where freight is consolidated and then transferred to the site. An appointed in-house delivery team will move consolidated deliveries directly from the vehicles in the

unloading bay in the basement to the appropriate floor without any planned intermediate storage.

- 6.69 This delivery consolidation is proposed to reduce servicing trips in the vicinity of the site, manage peak demand and reduce potential conflicts between servicing traffic and pedestrians/cyclists. It will ensure that only those goods that are necessary for the operation of the building are moved into the City and that the vehicles making the trip are fully loaded.
- 6.70 A Waste Management Strategy has been prepared by WSP, which sets out the requirement to lessen the impact of waste generation through prevention, minimisation, reuse and recycling of materials from the operational phase of the proposed development.
- 6.71 In summary the commercial waste from the operational phase is estimated to be 80,712 litres of refuse and 40,355 litres of recycling per day. The main waste storage area will be at basement level 3 which will provide sufficient space for the required number of compactors and bins. A total of four compactors will be provided, which will be collected twice daily. Glass will be collected three times a week and food waste will be collected on a daily basis. In summary the proposed waste strategy will ensure that the development operates in accordance with the requirements of waste policy and relevant guidance.

Air quality

- 6.72 An Air Quality Assessment (AQA) has been undertaken by AECOM to inform the accompanying Environmental Statement. This considers the effects of the development on air quality during demolition, construction and operational phases.
- 6.73 Construction activities have the potential to generate temporary dust emissions as a result of demolition, construction, earthworks or track-out of material. The emission of airborne matter generated by these activities during construction will be controlled using on-site management practices. Overall, the effect of emissions from the proposed works following mitigation, is considered to be non-significant with respect to potential effects on human health and amenity.
- 6.74 In relation to the operational phase of the building, the assessment confirms that the provision of only six parking spaces designated for disabled car users means that any potential impact on road traffic will be attributed to movements of taxis and vehicles servicing the building. The number of vehicle movements associated with building services estimated to be up to 75 additional HDV movements per day. The Air Quality Assessment confirms that as the total Benchmarked Transport Emissions (1674.0 NO_x / annum and 296.0 kg PM₁₀ / annum) are greater than the Total Transport Emissions (461.0 kg NO_x / annum and 83.0 kg PM₁₀ / annum), the proposed development transport emissions are within the benchmarks, so no further mitigation needs to be considered.
- 6.75 The proposed development includes the installation of an energy centre containing two CHPs and seven boilers. The Assessment confirms that the emission limits for the proposed CHPs and boilers meet those requested in the GLA's Sustainable Design and Construction SPG.
- 6.76 Overall the assessment confirms that the Total Benchmarked Building Emissions (2,865kg NO_x/annum) are higher than the Total Building Emissions (1,686kg NO_x/annum) giving a negative score. It is therefore concluded that the proposed development is air quality neutral and is therefore in accordance with Local Plan policy DM15.6 and London Plan policy 7.14.

Energy and sustainability

- 6.77 An Energy Statement has been prepared by WSP to accompany the planning application. The Statement assesses the baseline energy demands and outlines an energy strategy for the proposed development.
- 6.78 The development targets compliance with Building Regulations Part L 2013, a 35% reduction in carbon emissions and a minimum BREEAM rating of 'Excellent'.
- 6.79 The proposed energy strategy shows that the Proposed Development significantly exceeds the minimum façade fabric requirements of Building Regulations Part L2A (2013) and utilises energy efficient building services plant. The building will be served by a centralised heating and cooling system, led by a combined heat and power (CHP) system engine which will be designed to meet at least 60% of the building's annual heating demand. The system will be designed to allow future connection to an expanded Citigen network for import/export of heat.
- 6.80 Overall, the development achieves total cumulative carbon emission savings of 837.5 MT CO₂ per annum whilst equates to 35.7% regulated carbon dioxide emission savings.
- 6.81 A Sustainability Statement has been prepared by WSP to accompany the planning application. The Statement considers the proposed development against a range of sustainability headings, including BREEAM, climate change adaptation and mitigation, energy and carbon, effective use of land, materials, water management, pollution and local impacts, waste, health and wellbeing, biodiversity and transportation and accessibility. The proposed development targets a minimum of BREEAM Excellent for both the office and retail spaces.
- 6.82 The Proposed Development is in accordance with relevant national, regional and local policy, in particular with relevance to Local Plan policies CS15, DM15.1 to DM15.5 and London Plan policies 5.1, 5.2, 5.3, 5.6, 5.7 and 5.9.

Flood risk and drainage

- 6.83 The planning application is accompanied by a Flood Risk, Surface and Foul Water Drainage Assessment prepared by WSP.
 - 6.84 The Site is located in Flood Zone 1. This is the area where the probability of fluvial and tidal flooding is lowest, less than 0.1% every year, therefore the risk linked to tidal flooding is considered to be low to negligible.
 - 6.85 Given the Site's location within Flood Zone 1 and the uses proposed, the development is fully compliant with the policy requirements and guidance on the sequential test and the principles of the NPPF.
 - 6.86 With regard to drainage, existing drainage assets within the area are Thames Water combined sewers. The Drainage Report prepared by WSP confirms that surface water runoff rates from the proposed development are proposed to reduce by 50% (168.81l/s) compared to existing. A variety of drainage systems have been designed to cater for the 1in100 year storm event + 30% climate change allowance, in accordance with best practice and National Planning Policy Framework (NPPF). Beyond this minimum requirement, the design has also reduced the surface water runoff for lower storm events (1 in 1, 1 in 30, 1 in 100 and 1 in 100+30% climate chance allowance).
 - 6.87 The proposed development complies with the NPPF, London Plan policy 5.13 and CoL Local Plan policies CS18, DM 18.2 and DM 18.3 in terms of flood risk and drainage.
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Demolition and construction

- 6.88 Details of the demolition and construction works are included in Chapter 5 of the Environmental Statement. This Chapter sets out the mitigation measures to ensure that the surrounding amenity of the site is protected. These include:
- The contractor will agree with the City all vehicle routes to and from Site during the demolition and construction works. It is anticipated that all demolition vehicles will enter and exit the Site via gates located on St Mary Axe to avoid the use of Undershaft.
 - A site specific logistics plans will be provided before the commencement of the substructure works and all immediate neighbours, subcontractors and stakeholders will be notified.
 - A vehicle management and route management plan will also be developed and implemented
 - A full logistics team will be employed to fully service the construction process which will include road marshalling, banksmen, security, waste disposal, site housekeeping, and the material delivery management system.
 - Employment of a web based material booking system will ensure precise control of vehicles around the local road network and access to Site; this will ensure that vehicles will not have to wait on local highways.
 - The project would secure and utilise an off-site holding area (preferably within the M25 motorway) which will manage the timely delivery of materials to Site. This provides certainty of delivery with minimal disruption and impact to the neighbours and reduces the total number of journeys into London.
 - All demolition material generated will be re-used during construction, wherever practicable. None will be taken off-site to a waste transfer facility, but will be recycled for re-use either within this development or as construction materials for other projects. Suitable demolition material will be crushed on site and used as back-fill and piling mat material
 - Careful consideration will be given to the types of plant that are likely to be used during the demolition and construction works and the site would be registered with the ‘Considerate Constructors Scheme’.
 - It is anticipated that the core working hours for both the demolition and construction phases would be as follows with no working normally undertaken on Sundays or Bank Holidays:
 - 08:00 – 18:00 weekdays; and
 - 08:00 – 13:00 Saturday.
- 6.89 The commitments made within the ES would be incorporated into a Construction Environmental Management Plan (CEMP), to include roles and responsibilities, detail on control measures and activities to be undertaken to minimise environmental impact, and monitoring and record-keeping requirements. A commitment would be made to periodically review the CEMP and undertake regular environmental audits of its implementation during the construction phase of the proposed development

Aviation

- 6.90 An Aviation Safeguarding Assessment has been carried out by Avia Solutions. The Assessment comprises a Physical Safeguarding Assessment, which relates to physical obstacles within the surrounding airspace, and a Technical Safeguarding Assessment, which analysis the impact upon communications, navigation and surveillance equipment.
- 6.91 The assessment demonstrates that the Proposed Development will not affect the safe and regular operation of aircraft at London City Airport or London Heathrow Airport, as the maximum development height of 306.9m (AOD) maintains a 300m vertical separation between the top of the building and aircraft. In addition, a lighting scheme has been proposed which will ensure that the building is visible to all aircraft, while minimising the visual impact in long distance views. The Assessment concludes that it is not anticipated that there will be any negative impact upon the communication and navigation equipment operating at London City Airport and London Heathrow Airport; however discussions around additional mitigation measures are ongoing. The Applicant is committed to working with these stakeholders to mitigate any potential impact on air traffic operations.

Other relevant considerations

- 6.92 A number of other relevant considerations have been assessed as part of the accompanying Environmental Statement. These considerations include socio-economics, noise, vibration and electronic interference. The ES comprises individual chapters on each of these topics, and assesses the proposed development's effects in the context of relevant planning policy and legislation. The findings of these various assessments are not repeated here, but their respective conclusions should be considered against relevant development plan policy as part of the overarching planning balance.

Planning obligations and Community Infrastructure Levy (CIL)

- 6.93 Section 106 of the Town and Country Planning Act 1990 allows the entering into of an obligation, by agreement or otherwise, between the local planning authority and any person interested in the land for the purposes of:
- (a) restricting the development or use of the land in any specified way;
 - (b) requiring specified operations or activities to be carried out in, on, under or over the land;
 - (c) requiring the land to be used in any specified way; or
 - (d) requiring a sum or sums to be paid to the local planning authority (or, in a case where section 2E of the 1990 Act applies, to the Greater London Authority) on a specified date or dates or periodically.
- 6.94 Regulation 122 of the Community Infrastructure Levy Regulations (2010) states that planning obligations may only constitute a reason for granting planning permission for the development if the obligation is:
- (a) necessary to make the development acceptable in planning terms;
 - (b) directly related to the development; and
 - (c) fairly and reasonably related in scale and kind to the development.
- 6.95 Paragraph 203 of the NPPF states that '*Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations*'. Paragraph 204 reinforces the requirement that planning obligations meet the tests set out in regulation 122 of the CIL Regulations.

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- 6.96 Planning obligations to secure contributions towards Crossrail are required by two mechanisms – the Mayor’s Crossrail SPG and the Mayoral Community Infrastructure Levy (CIL), for which a Charging Schedule was adopted in April 2012. The Mayoral CIL introduced a standard charge of £50 per sqm of additional GIA floorspace on developments within the charging zone – this is applicable to the proposed development.
- 6.97 Paragraph 3.12 of the Crossrail SPG states that *‘Contributions should be sought in respect of retail and hotel and office development, in Central London ..., which involves a net increase in office floorspace of more than 500 square metres’*. The methodology outlined within the Crossrail SPG requires a payment of £140 per sqm GIA on the uplift of office floorspace and a payment of £90 per sqm GIA of the uplift to retail floorspace for all sites which meet these criteria. The SPG includes provisions whereby any Mayoral CIL charge also required for a development scheme can be counted as a credit towards a Crossrail SPG payment, where both are due.
- 6.98 The City adopted a CIL Charging Schedule along with an updated Planning Obligations SPD which took effect on 1 July 2014. The Charging Schedule applies a CIL charge of £75 per sqm of net additional office and retail floorspace (GIA), whilst the Planning Obligations SPD applies a (combined) tariff of £23 per sqm of net additional offices to deal with employment and training and affordable housing.
- 6.99 Draft proposed heads of terms for a Section 106 agreement, which deal with the financial contributions referred to above, are included in this planning application.

7.0 CONCLUSIONS

7.1 1 Undershaft represents a high quality, sustainable development which is in accordance with the development plan. It has been designed in consultation with the relevant decision makers and other key stakeholders. In particular:

- The development provides economic, social and environmental benefits and so represents sustainable development;
- The redevelopment of the site to provide a significant amount of new, high quality, flexible office accommodation within the City of London is supported by development plan policy;
- The provision of high level public access within a bespoke public viewing gallery with an educational and cultural focus provides a significant public benefit;
- The provision of a significant amount of retail floorspace at lower ground floor level and a restaurant at level 70, is consistent with development plan policy and will provide a valuable resource for local occupiers, residents and visitors;
- The enhancement and extension of the existing public realm will improve the pedestrian and cyclist experience at street level and increase the permeability of the site in accordance with the City of London aspirations and policies relating to the built environment;
- The development of a tall building in this location within the City's Eastern Cluster is supported, and the proposal accords with relevant policies relating to tall and large scale buildings;
- The design is of the highest standard and as such the proposal accords with policies regarding design and the built environment;
- The proposal has been designed and assessed so as not to have any adverse effects on important views, including those of St. Paul's Cathedral and the Tower of London in particular;
- The proposed building has been designed and assessed so as not to cause any harm to heritage assets, including World Heritage Sites, listed buildings and conservation areas, and so meets the policy tests relating to the historic environment;
- The proposal accords with policies relating to transportation, including through the provision of cycle parking and other sustainable transport measures, and its impact on the transport network would be acceptable;
- The proposal achieves the Mayor's target for carbon savings through energy savings and efficiency measures; and
- The Applicant will comply with the relevant requirements relating to planning obligations and CIL.

7.2 Overall, the proposals are sustainable and are in accordance with the provisions of the development plan, and as such there should be a presumption in favour of the development being approved.

APPENDIX 1 – PLANNING HISTORY

1 Undershaft

Planning History

Decision Date	App Ref	Details	Status
16/6/15	15/00388/FULLR3	Temporary installation of a sculpture, 'Greener Grass' by Ceal Floyer, for a temporary period of up to one year, to be taken down on or before 5th June 2016	Approved
3/2/15	14/01159/ADVT	Installation and display of: 6 non illuminated hoarding advertisements measuring 2.2 metres high, 12 metres wide displayed at a height of 0.1 metres above ground level.	Approved
7/11/13	13/00769/FULL	The landscaping of the existing open space at 1 Undershaft comprising hard and soft landscaping and associated ancillary works.	Approved
7/6/13	13/00452/FULLR3	Temporary installation of a sculpture - 'String Quintet' by Shirazeh Houshiary - for a temporary period of up to 1 year, to be taken down on or before 10 June 2014.	Approved
31/5/12	12/00335/FULLR3	Temporary installation of a sculpture - Untitled piece by Dan Graham, for a temporary period of up to a year, to be taken down on or before 8th June 2013.	Approved
15/3/12	11/01005/FULL	Temporary change of use of part of basement level two from office (B1) use to welfare facilities (sui generis) for a limited period of three years in association with the construction of the 122 Leadenhall Street development	Approved
5/1/12	11/00856/FULL	Installation of a freestanding flagpole.	Approved
9/6/11	11/00269/FULLR3	Temporary installation of a sculpture, Sky Mirror by Anish Kapoor, to be taken down on or before 2nd July 2012	Approved
12/7/07	07/00436/FULL	Construction of temporary garden for the duration of the construction works at 122 Leadenhall Street	Approved
18/1/07	06/00991/FULL	Removal of two rising arm security barriers and installation of six rising security bollards at office entrance. Installation of two rising arm security barriers and two rising security bollards on car park ramps.	Approved
22/6/06	06/00303/FULL	Installation of external bollards to north elevation.	Approved
09/3/06	05/01097/FULL	Installation of a flag pole.	Approved
16/6/05	05/00288/FULL	Installation of benches and planters on piazza.	Approved
11/9/03	4359CY	Deletion of Condition 8 of Planning Permission 4359A dated 7.3.63	Approved
3/8/01	4359CX	Change of use of part basement 2 and 3 from ancillary restaurant and office use (B1) to restaurant and fitness centre (A3/D2).	Approved
3/8/01	4359CW	Installation of new entrance for basement restaurant and fitness centre. New vents and	Approved

		planters.	
20/4/00	4359CS	Application of solar film on part of ground floor glazing on south elevation	Approved
27/8/99	4359CR	Installation of exhaust for standby generator	Approved
16/11/84	4359BL	Change of use of restaurant for use of staff within the building to restaurant for use of staff within the building and certain approved firms outside the building for a limited period at basement level, 1 Undershaft.	Approved
26/1/82	4359BD	Enclosure of open podium floor & change of use to office space at St. Helen's 1/3 Undershaft	Approved
29/10/70	4359AL	4 Illuminated signs at Commercial Union Headquarters Building 1 Undershaft.	Refused