

22 Bishopsgate

in the City of London

planning application no.15/00764/FULEIA

Strategic planning application stage 1 referral

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

The proposal

High-rise office building arranged as three basement floors, ground and 61 upper floors (plus mezzanines and plant) up to 295 metres A.O.D., comprising 185,424 sq.m of B1 office floorspace; 4,977 sq.m. restaurant/bar; 481 sq.m. retail; 3,482 sq.m. publicly accessible viewing gallery and facilities; and, hard and soft landscaping works.

The applicant

The applicant is **22 Bishopsgate General Partner Ltd.** and the architect is **PLP Architecture.**

Strategic issues

The proposal is supported in strategic planning terms. This is an appropriate location for a **tall building** of such **high design quality**, and the proposed **office** development would support the function of the **Central Activities Zone** and London's position as a **World City**.

Various outstanding matters with respect to **mix of uses, sustainable development** and **transport** should, nevertheless, be addressed prior to the Mayor's decision making stage.

Recommendation

That the City of London Corporation be advised that whilst the application is broadly supported in strategic planning terms, the application does not fully comply with the London Plan for the reasons set out in paragraph 63 of this report. The resolution of those issues could, nevertheless, lead to the application becoming compliant with the London Plan.

Context

1 On 5 August 2015 the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 15 September 2015 to provide the City Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

2 The application is referable under the following categories of the Schedule to the Order 2008:

- 1B 1.(a) *“Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - in the City of London and with a total floorspace of more than 100,000 square metres”*; and,
- 1C 1.(b) *“Development which comprises or includes the erection of a building of... more than 150 metres high and is in the City of London”*.

3 Once the City Corporation has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; take it over for his own determination; or, allow the City Corporation to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (as amended) has been taken into account in the consideration of this case.

5 The Mayor of London’s statement on this case will be made available on the GLA website www.london.gov.uk.

Site description

6 The 22 Bishopsgate site is a plot of 0.5 hectares located within the Central Activities Zone (CAZ), and situated centrally within the City of London’s eastern cluster of tall buildings. The primary frontage of the site is onto Bishopsgate and its junction with Threadneedle Street to the west. The northern boundary of the site extends across Great St. Helen’s to the southern elevation of 42-44 Bishopsgate. The eastern boundary runs south, around the existing building at 1 Great St. Helen’s and along Undershaft. The southern boundary extends up to the existing building at 6-8 Bishopsgate as well as land adjacent to The Leadenhall Building.

7 The site formerly comprised three buildings known as 22-24 Bishopsgate, 38 Bishopsgate (Crosby Court) and 4 Crosby Square. However, since 2011 the site has been occupied by three basement levels and a 9-storey core, along with construction apparatus, following the cessation of works on an extent planning permission for a scheme known as ‘The Pinnacle’ (refer to paragraph 11 below).

8 With respect to the historic environment, there are no Listed Buildings at the site, however, a small part of the highway at the north of the site is located within the St. Helen’s Place Conservation Area. Furthermore, Bank Conservation Area is located immediately to the west of the site, and there are various other Conservation Areas and Listed Buildings in the wider area (including St. Helen’s Bishopsgate Church (Grade I), Westminster Bank (Grade I) and Leadenhall Market (Grade II*)). Whilst the site is not over-sailed by any designated viewing corridors, given the scale of the proposal it would be visible in panoramic strategic views as well as in the context of various other heritage assets (including Bank of England (Grade I), St. Paul’s Cathedral (Grade I) and the Tower of London World Heritage Site (Grade I)).

9 In transport terms Bishopsgate forms part of the Transport for London Road Network, and Camomile Street and Leadenhall Street (a short distance away) form part of the Strategic Road Network. Various London Underground services are available at Bank, Monument and Liverpool Street stations, all of which are within a five minute walk of the site. National Rail services are also available at Liverpool Street, as well as Moorgate, Fenchurch Street and Cannon Street stations – which are all within a twelve minute walk (960 metres). Furthermore, Crossrail

services are due to serve Liverpool Street station from 2018. There are 28 bus services available within a 640 metre radius of the site (an eight minute walk) and the closest cycle hire docking station is located at St. Mary Axe, approximately 150 metres away. Overall the site registers a public transport accessibility level of 6b, on a scale of 0 to 6b, where 6b denotes the most accessible locations in the capital.

Details of the proposal

10 High-rise office building arranged as three basement floors, ground and 61 upper floors (plus mezzanines and plant) up to 295 metres A.O.D. comprising 185,424 sq.m of B1 office floorspace; 4,977 sq.m. restaurant/bar; 481 sq.m. retail; 3,482 sq.m. publicly accessible viewing gallery and facilities; and, hard and soft landscaping works.

Case history

11 This site is subject to partly implemented planning permission (05/00546/FULEIA) for a high-rise office scheme known as 'The Pinnacle' (refer to GLA report PDU/0201/02). The permission allows for a building of 304.9 metres A.O.D. and was approved in December 2006. Following the approval of a revised scheme (06/01123/FULEIA) in November 2007, works commenced on site before ceasing in late 2011. On 16 July 2015 GLA planning officers met with the new applicant team to discuss the current proposal for the site. GLA officers advised that the scheme was broadly supported in strategic planning terms, and stated that the future application would need to address London Plan policy with respect to: CAZ office development; mix of uses; urban design (including views and the historic environment); inclusive access; sustainable development; and, transport.

Strategic planning issues and relevant policies and guidance

12 The relevant strategic issues and corresponding policies are as follows:

- Central Activities Zone *London Plan;*
- Offices *London Plan;*
- Mix of uses *London Plan;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Tall buildings and views *London Plan, London View Management Framework SPG;*
- Historic environment *London Plan; World Heritage Sites SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Transport and parking *London Plan; the Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; and, Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG.*

13 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2015 City of London Local Plan and the 2015 London Plan (Consolidated with Alterations since 2011).

14 The following are also relevant material considerations:

- The National Planning Policy Framework, Technical Guide to the National Planning Policy Framework and National Planning Practice Guidance;
- Draft Minor Alterations to the 2015 London Plan; and,
- City of London Corporation Planning Obligations SPD (2014).

Principle of development (CAZ office)

15 London Plan policies 2.10 and 4.2 recognise the established long-term demand for office space in the CAZ, and strongly promote the renewal of office sites within the CAZ in order to meet this demand and support London's continuing function as a World City. Accordingly, the proposed office scheme is strongly supported in principle planning terms.

Offices

16 The proposal would provide 185,424 sq.m of high quality B1 office floorspace in what is envisaged to be a flexible and multi-tenanted building. Strategically situated at the heart of the eastern cluster, the scheme is particularly well positioned to support the insurance and financial services districts of the City, and could accommodate one or more large anchor tenants, as well as a variety of small to medium sized companies. In this way the scheme has significant potential to contribute to the diversity of workspace and businesses within the CAZ, and is supported in accordance with London Plan Policy 4.2.

Mix of uses

17 In order to support the vibrancy and vitality of the CAZ, London Plan policies 2.11 and 4.3 promote mixed use development, including housing, to support increases in office floorspace. The London Plan approach (refer to London Plan paragraph 4.17) nevertheless allows a degree of flexibility with respect to the provision of mixed uses in the CAZ - in recognition of the fact that it may not always be suitable to provide housing on-site. Having considered the characteristics of this scheme, which would help to sustain an important cluster of CAZ business activity, GLA officers accept an absence of on-site housing in this case. Under these circumstances, contributions to off-site housing/affordable housing are normally sought as a planning obligation.

18 In this case the applicant proposes to make an affordable housing contribution as per the tariff established within the City of London Corporation Planning Obligations SPD. The associated financial contribution (sum to be confirmed at the Mayor's decision making stage) will be secured by way of the Section 106 agreement. Noting also the proposed on-site provision of mixed uses (comprising 4,977 sq.m. of restaurant/bar space; 481 sq.m. of retail space; and, a 3,482 sq.m. publicly accessible viewing gallery on the 59/60th floor), the application is supported in accordance with London Plan policies 2.11 and 4.3.

Urban design

Tall building

19 The 22 Bishopsgate site is located at the heart of the eastern cluster of tall buildings within the City of London, and (as discussed in paragraph 11) there is extant permission at this site for an office building of 304.9 metres A.O.D. Accordingly, this is a location where a tall

building is acceptable in principle, subject to the highest standards of architecture and urban design - as prescribed by London Plan Policy 7.7.

20 The proposed building is 62-storeys / 295 metres A.O.D. The applicant is proposing a bold and simple design approach, with the building massing articulated as a series of stepped 'facets' that are designed to emphasise the situation of the site at the centre of the eastern cluster, and to respond to a range of contextual considerations across the various townscape scales at which the building will be seen. To complement this approach, the base, middle and top of the building are also proposed to be carefully distinguished to enhance the contextual response, and to support the articulation of their particular functions (i.e. front of house/public realm, office workspace and public viewing gallery, respectively). Having considered the submitted townscape, built heritage and visual impact assessment (refer also below), GLA officers are of the opinion that the proposed building scale, design and massing strategy ensures that the base of the scheme would relate well to the height of existing (smaller-scale) buildings along Bishopsgate (including Westminster Bank (Grade I)), whilst, in longer views, the proposal would reinforce and enhance the established characteristics of the City cluster, as well as its relationship with other strategic London landmarks.

21 The proposed provision of a publicly accessible viewing gallery at the upper levels of the building is strongly supported, and noting also the considerations associated with architectural quality, strategic views and the historic environment (refer below), GLA officers are satisfied that the application accords with London Plan Policy 7.7.

Layout

22 The layout of the ground floor and base of the building has been generally well considered. Entrances are well situated and distributed in order to respond to key pedestrian desire lines as well as the need to manage the dispersal of peak pedestrian flows in and out of the building. Furthermore, a new east-west pedestrian route from Bishopsgate through to Undershaft would be created to the south of the main building – helping to enhance the permeability of the area. A high proportion of active frontage, in conjunction with the accompanying landscaping strategy, would also ensure that the quality of public realm around the building would be substantially enhanced. This is particularly evident to the north and east of the building, at the interfaces with Great St. Helen's and Undershaft respectively).

23 It is noted that the proposed 'saw tooth' building line at the Bishopsgate frontage would result in a degree of encroachment onto the existing footway in certain areas (albeit the approach also results in compensatory gains in other areas). Further to discussions at pre-application stage, it is recognised that this feature is proposed as part of a necessary wind mitigation strategy. Nevertheless, as discussed in the transport section below, TfL has raised a concern with respect to the proposed extent of encroachment on to highway. Following joint discussions GLA officers understand that the applicant team is currently preparing revised plans with a view to addressing TfL's concern in this regard. This is supported, and whilst it is accepted that there may need to be a degree of compromise in order to achieve an optimised balance between pedestrian space and pedestrian wind comfort, GLA officers expect the quality of the public realm to be prioritised as far as reasonably possible.

Architectural quality

24 The submitted townscape assessment demonstrates that the proposed massing and faceted elevations would help to create a simple yet subtly distinctive building. The proposed use of low-iron glazing as the principal facade treatment is supported, and would help to ensure a light appearance to the building, as well as presenting an opportunity to reveal internal spaces

and structures – adding to the interest and animation of the building. Overall the proposed architectural response is supported in strategic planning terms in accordance with London Plan Policy 7.6.

Strategic views

25 The site is not over-sailed by any strategic viewing corridors, however, given the scale of the proposal, the building would be visible in various strategic view panoramas and river prospects as defined by the Mayor’s London View Management Framework (LVMF) SPG. As part of the environmental assessment which accompanies the scheme, the applicant has presented a wide range of verified view studies (including visualisations of the proposal from LVMF views 1A.1 & 2; 2A.1; 3A.1; 4A.1; 5A.2; 6A.1; 10A.1; 11B.1 & 2; 15B.1 & 2; 16B.1 & 2; 17B.1 & 2; 19A.1; 25A.1, 2 & 3; and, 26A.1).

26 Having considered these visualisations, GLA officers conclude that whilst the scheme would in many cases be a prominent feature on the capital’s skyline, it would be perceived as part of an established grouping of tall buildings at the heart of the City of London’s eastern cluster, and would preserve the ability to appreciate the various strategic landmarks identified by the LVMF SPG. Indeed, GLA officers are of the opinion that the proposal would reinforce and enhance the characteristics of strategic views through an improved consolidation of the eastern cluster. Accordingly, the application complies with London Plan Policy 7.12.

Historic environment

27 London Plan Policy 7.10 states that development should not cause adverse impacts on World Heritage Sites or their settings, and, in particular, should not compromise the ability to appreciate Outstanding Universal Value, integrity, authenticity or significance. The submitted townscape, built heritage and visual impact assessment (which includes the abovementioned views study) considers the impact of the proposal on World Heritage Sites and Outstanding Universal Value. Whilst the verified views study demonstrates that the proposal may be seen in the wider setting of a number of World Heritage Sites (including Maritime Greenwich), its impact is most significant at the Tower of London – which is the World Heritage Site in closest proximity to the site.

28 Accordingly, the submitted assessment finds that the principal effect on the Tower of London would be a visual change to its setting. The submitted views study (which includes verified visualisations of the proposal from within the Inner Ward of the Tower of London) therefore provides the basis for considering the impact proposed. In this regard views 25A and 10A demonstrate that the proposal would not impact on the clear sky space around the White Tower of the Tower of London, with the proposed building featuring amongst various other tall buildings within the eastern cluster. Similarly, views from within the Inner Ward of the Tower of London demonstrate that the proposal would be seen in the context of existing tall buildings in the City. Guidance within the Mayor’s LVMF SPG and the Tower of London World Heritage Site management plan acknowledges that the juxtaposition between the Tower and the City cluster is a key characteristic of these views, and a relationship that may be seen as positive. Accordingly, GLA officers conclude that the proposal would reinforce the positive characteristics of the existing setting to the Tower of London, and would not compromise the ability to appreciate the Outstanding Universal Value of this World Heritage Site, or indeed the other World Heritage Sites in the capital.

29 This exciting juxtaposition between old and new (a defining and positive characteristic of the City of London) is representative of the response of the scheme to designated heritage assets more generally. As mentioned in paragraph 8 (and audited within the submitted built

heritage and visual impact assessment), there are numerous heritage assets in the immediate vicinity of the site (including St. Helen's Place and Bank Conservation Areas, and St. Helen's Bishopsgate Church (Grade I), Westminster Bank (Grade I) and Leadenhall Market (Grade II*)) as well as various others which the proposal would be seen in conjunction with in longer townscape and strategic views (including Bank of England (Grade I with associated Conservation Area), St. Paul's Cathedral (Grade I with associated Conservation Area) and Tower of London (Grade I with associated Conservation Area)).

30 Having carefully considered the townscape, built heritage and visual impact assessment, and having had special regard to the desirability of preserving the setting of Listed Buildings, GLA officers are of the view that the proposal would not harm the setting of Listed Buildings, and would not harm the character/setting of the above-mentioned Conservation Areas. Accordingly, GLA officers are satisfied that the application accords with London Plan Policy 7.8.

Inclusive access

31 This scheme represents an important opportunity to promote equal and convenient access to employment opportunities in accordance with the principles of London Plan Policy 4.12. The applicant has set out its response to access and inclusion within the design and access statement, and, in particular, GLA officers support the intention to deliver a high quality workplace environment with an emphasis on occupier well-being.

32 Based on the submitted material it is evident that the layout of the ground floor has been informed by prevailing pedestrian desire lines, and that the relationship of the proposal with the public realm would ensure that access to the building would be achieved in comfort. The main building entrances are legible and uncluttered, and whilst energy efficient revolving doors are proposed for the office reception, adjacent power-assisted pass doors would ensure an accessible solution for wheelchair users and other disabled people. The internal floorplans are spacious and well laid out, and it is clear that the proposed office renewal would enhance the accessibility of employment space at this site in line with London Plan Policy 4.12.

33 The opportunity to enhance the public realm adjacent to the site is also a key benefit of the scheme in accessibility terms, and the stated commitment to contribute towards upgrades to Bishopsgate, Great St. Helen's and Crosby Square / Undershaft is strongly supported.

Sustainable development

Energy strategy

34 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L 2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has submitted an energy strategy for the development, setting out how the scheme proposes to reduce carbon dioxide emissions in accordance with the London Plan energy hierarchy. In summary, the submitted energy strategy confirms: the proposal to exceed Part L of Building Regulations 2013 by 26% through efficiency measures (including passive design measures, heat loss measures, automatic blinds and low energy lighting); potential connection to the Citigen district heating network is being appropriately prioritised; and, a single energy centre (proposed to include a combined heat and power system engine, and futureproofed for district network connection) would achieve a further 9% carbon dioxide saving. Overall therefore, the energy strategy would meet the 35% carbon reduction target within London Plan Policy 5.2.

35 Having investigated the feasibility of a range of renewable energy technologies in line with London Plan Policy 5.7, none are proposed to be included by the applicant. On the basis that the proposal would meet the 35% carbon reduction target within Policy 5.2 GLA officers accept this.

36 Whilst the proposed energy strategy is broadly supported in strategic planning terms, GLA officers seek further information with respect to the proposed cooling measures in line with London Plan Policy 5.9 (comprising details of the expected 'actual' cooling demand relative to 'notional' demand, and the envisaged long-term management arrangements for the integrated blinds). GLA officers would also welcome an update with respect to the progression of discussions with Citigen.

Climate change adaptation

37 London Plan Policy 5.10 seeks a 5% increase in green infrastructure within the CAZ by 2030 in order to support urban greening and the capital's response to climate change. In this case the applicant has set out the proposed climate change adaptation measures within the design and access statement and flood risk assessment. Whilst the nature of the proposed development presents a number of challenges with respect to the incorporation of urban greening and biodiversity measures, GLA officers support the proposed provision of street trees, a green roof at level three, and various planted terrace areas (at levels 49 and 51). The flood risk assessment also sets out the key principles of the sustainable drainage strategy - demonstrating that attenuation tanks and rain water harvesting measures (in conjunction the green roof) would notably enhance the run-off characteristics of the site. GLA officers are of the view that the proposed response is acceptable given the characteristics of the scheme and the site, and the City Corporation is encouraged to secure detailed approval of the climate change adaptation measures by way of planning condition in line with London Plan policies 5.10, 5.11 and 5.13.

Transport

Access and public realm

38 The pedestrian access strategy for the scheme seeks to maximise the number of entry/exit points for the building on Bishopsgate, Great St. Helens and Undershaft. A new east-west pedestrian connection between Bishopsgate and Undershaft would also be created. These measures will help to disperse pedestrian flows across the local street network, and are strongly supported. Vehicle access (including for cyclists) is to be taken from Undershaft (on the eastern boundary of the site) and any taxi or private hire pick up/drop off should also take place here. This is supported, and more generally TfL understands that the City Corporation has aspirations to enhance the public realm along Undershaft, and to better control vehicle access to it for reasons of security. In conjunction with the public realm measures proposed as part of this scheme, such an approach would help to improve the environment for pedestrians and cyclists in the area, and would be supported by TfL.

39 Site cycle access from Undershaft would be taken via cycle channels set into steps. There would also be a dedicated cycle lift. Whilst a predominant reliance on stepped access is not TfL's preferred approach, given the constraints associated with the proposed reuse of the existing basement, this approach is accepted.

40 The proposal to improve the quality of public realm along the Bishopsgate frontage is strongly supported in principle. The detailed design of this will, nevertheless, need to be agreed by the applicant, the City Corporation and TfL. This will be formalised through a Section 278 agreement (with TfL as the highway authority), and will also need to include a commuted sum to cover additional maintenance costs.

41 As discussed in the urban design section above, it noted that the design of the proposed building line at the Bishopsgate frontage would require parts of the footway on Bishopsgate to be stopped up. TfL has a concern with respect to this aspect of the proposal given that, when taken in conjunction with proposed street tree planting, a number of pinch points/pedestrian capacity constraints may arise. Nevertheless, following various discussions on this point it is acknowledged that the applicant is reviewing the scheme design in this location with a view to minimising impact on the pedestrian environment. This is supported, and a formal response from the applicant is awaited in due course.

42 It is also noted that the proposed building overhangs the public highway on Bishopsgate to some extent. As discussed with the applicant team, in order to secure the necessary Section 177 licence from TfL, some minor design changes may be required. Based on related discussions to date the applicant has indicated that it would be willing in principle to make any such changes as reasonably required. This is welcomed, and TfL seeks continuing discussion in this regard in order to resolve the matter. TfL also requests that a detailed facade maintenance plan is secured by way of planning condition.

Car and cycle parking

43 It is noted that car parking is proposed to be limited to four basement level Blue Badge spaces, of which one will be provided with an electric vehicle charging point. This is supported.

44 However, the proposed provision of cycle parking is below London Plan standards. Whilst it is acknowledged that there are a number of constraints in this case (including reuse of the existing basement) TfL is not satisfied that the under provision of cycle parking proposed has been justified by the transport assessment. Following discussions on this matter a further explanatory note from the applicant (providing further details on the nature on the proposed provision and the considerations which have influenced this) is being reviewed by TfL. In any event, TfL seeks a minimum 5% provision of long-stay cycle parking spaces that are suitable for non-standard bicycles.

45 In terms of the publically accessible short stay cycle parking, it is accepted that a provision in excess of 30 spaces may impact on pedestrian flow in and around buildings. However, should the City Corporation's public realm aspirations for Undershaft be brought forward, TfL would encourage a greater provision of public cycle parking to be provided in the vicinity.

Trip generation

46 The trip generation approach is largely accepted, however, GLA officers understand that as part of joint discussions with the applicant team, TfL is seeking clarifications in a number of areas.

Public transport impact

47 TfL is not in a position to fully establish the impact on the public transport network until the above-mentioned trip generation clarifications have been provided. Nevertheless, the development is anticipated to result in significant demand on London Underground services (in particular on the Central, Northern and Waterloo and City lines) which already experience very high levels of crowding during peak times. On the basis of the trips generated by the consented scheme at this site, a £2.3m contribution was secured towards mitigation for London Underground (it is understood that a large proportion of this contribution has already been paid to the City Corporation). Noting that the current proposal would result in a significant uplift in

trips over the consented scheme, TfL is of the view that additional mitigation is required. Accordingly, TfL seeks further discussion with the applicant and the City Corporation in order to determine the nature and scale of any additional mitigation required.

Walking

48 As part of the application a detailed pedestrian capacity assessment has been carried out. This demonstrates that in the existing situation the majority of footways can accommodate pedestrians comfortably throughout the day (although during the morning peak there are some locations on Bishopsgate where the level of walking comfort drops from comfortable to acceptable).

49 Under the development scenario, whilst there would be some diversion of pedestrians along the proposed new east-west route, the number of pedestrians using Bishopsgate would increase. Furthermore, and with reference to paragraph 41 above, it is noted that the proposed building line and tree planting would result in a reduction in footway width to just over 2 metres (whereas TfL would typically expect an effective width of 2.5 metres). Considering the expected increase in footfall, and the relative narrowing in pavement width in conjunction, TfL has a concern that the level of pedestrian comfort during peak times may fall below what would typically be acceptable. Accordingly, as discussed in paragraph 41, a further review and analysis of the scheme design in this location is currently being undertaken.

50 As part of the approach to public realm more generally, it is noted that the applicant has investigated ways in which the existing pedestrian crossing over Bishopsgate (close to Great St. Helens) could be improved to better serve the existing pedestrian desire line. Having reviewed the submitted material, TfL is of the view that only 'Option 2' (as presented within the transport assessment) is a workable solution. TfL expects a Stage 1 Road Safety Audit of this design to be submitted prior to the application being determined, with the associated works to be subsequently secured via a Section 278 agreement.

Cycling

51 Notwithstanding the above-mentioned position with respect to cycle parking provision, it is acknowledged that the applicant has put significant effort into incorporating high quality facilities for cyclists as part of the scheme. This is welcomed. The corresponding facilities and measures proposed should be secured by way of planning condition and as part of the Travel Plan accordingly.

52 Following discussions at pre-application stage, it is noted that the applicant has considered opportunities to introduce further cycle hire docking stations around the site. Additional provision in this location would be supported given the current levels of peak hour demand, and TfL is currently in joint discussions with the City Corporation with respect to a cycle hire strategy for the area (expected to be agreed later this year). Whilst specific locations are still to be finalised, given the number of new employees expected at this site, TfL seeks to secure a Section 106 contribution towards future provision of cycle hire facilities in the immediate vicinity.

Servicing and construction

53 As the scheme would largely retain the previously constructed basement, the proposals for service vehicle access remains largely unchanged from the 2006 consent - with two vehicle lifts to be provided on Undershaft. It is, nevertheless, welcomed that the specification of these

lifts has been revised in order that they could accommodate 10 metre service vehicles. It is noted that there would also be a concierge facility on Undershaft for courier deliveries.

54 The applicant accepts that with the increase in floorspace proposed, the provision of two lifts is unlikely to provide sufficient service vehicle capacity for the development under normal circumstances. Accordingly, an off-site consolidation approach is proposed. This is strongly supported by TfL, and should deliver significant benefits including a reduction in the number of freight trips, control over vehicle types and delivery timings, security benefits (including driver and load screening) and backfilling of vehicles leaving the site. It is nevertheless acknowledged that not all goods can be consolidated (particularly food), so a vehicle booking system will still be required for deliveries that fall outside of the consolidation strategy. More generally it is also understood that the applicant proposes to offer the use of the consolidation centre to other nearby buildings, this is strongly supported.

55 Given the physical constraints on-site, it will be necessary to ensure that the consolidation arrangements are secured in perpetuity, monitored and enforced. The applicant has proposed that the simplest way of doing this would be to impose a condition or planning obligation on the maximum number of service vehicles that would be permitted to visit the site. TfL is of the view that this would be a pragmatic approach, but seeks further discussion on how this cap would be set. It is expected that, in conjunction with the cap, a Delivery and Servicing Plan would also be secured that would specify requirements for matters such as vehicle types and routings to and from the site etc.

56 Consolidation is also proposed for construction logistics. This is strongly supported and should be secured by way of planning condition. TfL encourages the City Corporation to consider extending the hours during which construction work/logistics can take place - in order to minimise the number of construction vehicle trips during peak times. Similarly, the applicant is encouraged to commit to ensuring that all vehicles travelling between the consolidation centre and the site (both during construction and normal operation of the development) are at least 'FORS Silver' accredited.

Travel plan and demand management

57 A framework Travel Plan has been submitted with the application, and this is of a good quality. In particular, the variety of soft measures that the applicant proposes to commit to in order to encourage cycling (and achieve a 15% mode share five years after opening) are strongly supported. The applicant should, nevertheless, respond to the issue of cycle parking under provision (discussed above) in order that on-site facilities could comfortably support a shift of this scale. A detailed Travel Plan should be secured through a Section 106 agreement.

Strategic transport contributions

58 The City of London Corporation adopted its Community Infrastructure Levy (CIL) charging schedule in July 2014. A full charging schedule is available from the City Corporation, but both office and retail uses are charged at £75 per square metre. The Regulation 123 list identifies that this levy may be spent on 'transport improvements'. TfL is keen to explore the possibility of using a proportion of the CIL money collected to relieve pressure on the cycle hire network, and for the introduction of step free access at the Liverpool Street Metropolitan line platforms.

59 In accordance with London Plan Policy 8.3 the Mayor commenced CIL charging for developments on 1 April 2012. Within the City of London, the charge is £50 per square metre. This site is also in the area where Section 106 contributions for Crossrail are sought in

accordance with London Plan Policy 6.5 and the associated Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG. In these situations, the Mayoral CIL is to be treated as a credit towards the section 106 Crossrail liability, and this should be reflected in the wording of the Section 106 agreement. In this case TfL has calculated the charge generated under the SPG as £26,450,580.

Local planning authority's position

60 The City of London Corporation has been involved in extensive pre-application discussions on this scheme and is understood to support the proposal in principle. The City Corporation is expected to formally consider the application at a planning committee meeting in October/November 2015.

Legal considerations

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

Financial considerations

62 There are no financial considerations at this stage.

Conclusion

63 London Plan policies on Central Activities Zone; offices; mix of uses; urban design (including views and the historic environment); inclusive access; sustainable development; and, transport are relevant to this application. Whilst the application is broadly supported in strategic planning terms, the application does not fully comply with the London Plan as set out below.

- **Central Activities Zone:** The proposed development would respond to established demand for office space within the CAZ, and would support London's continuing function as a World City in accordance with London Plan policies 2.10 and 4.2.
- **Offices:** The proposal would provide high quality, flexible office accommodation that would contribute to the diversity of workspace and businesses within the CAZ in accordance with London Plan Policy 4.2
- **Mix of uses:** The proposed mix of on-site uses is appropriate given the characteristics of this scheme in terms of supporting an important cluster of CAZ business activity. An affordable housing contribution should, nevertheless, be secured by way of planning obligation in line with London Plan policies 2.11 and 4.3, and the City Corporation's Planning Obligations SPD.

- **Urban design:** This is an appropriate location for a tall building, and the high architectural quality proposed is fitting for a development of this scale and prominence. The scheme would reinforce and enhance the characteristics of strategic views through an improved consolidation of the City's eastern cluster, and would not cause harm to the historic environment. Accordingly the application accords with London Plan policies 7.1, 7.6, 7.7, 7.8, 7.10 and 7.12.
- **Inclusive access:** The approach to access and inclusion is supported in accordance with London Plan policies 4.12 and 7.2.
- **Sustainable development:** The proposed energy strategy and climate change adaptation measures are broadly supported in accordance with London Plan policies 5.2, 5.10, 5.11 and 5.13. Notwithstanding this GLA officers seek further information with respect to cooling measures, as well as an update with respect to discussions with Citigen. The City Corporation is encouraged to secure the details of the energy strategy and climate change adaptation measures by way of planning condition.
- **Transport:** Whilst the proposal is broadly acceptable in strategic transport terms, the applicant should address the matters discussed in this report with respect to access and public realm; cycle parking; trip generation; public transport impact; walking; cycling; servicing and construction; travel plan and demand management; and, strategic transport contributions in order to ensure accordance with London Plan policies 6.3, 6.5, 6.9, 6.10, 6.13 and 6.14.

64 The resolution of outstanding issues with respect to mix of uses; sustainable development; and, transport could lead to the application becoming compliant with the London Plan.

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