

Leadenhall Court

in the City of London

planning application no.16/00859/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

Demolition of the existing building and redevelopment to provide a 36 storey building with 28 floors for office use (Class B1) with retail floorspace (Class A1-A4), office lobby and loading bay at ground floor, 2 levels of retail floorspace (Class A1-A4) at first and second floors, a publicly accessible terrace at second floor, 5 floors of plant and ancillary basement cycle parking, cycle facilities and plant (63,273sq.m GIA) (182.7m AOD).

The applicant

The applicant is **Brookfield**, the architect is **Make**, and the agent is **DP9**.

Strategic issues summary

Land-use: An office-led scheme within the Central Activities Zone is strongly supported. However, the applicant should address the requirements of London Plan policy 4.3 and an affordable housing contribution should be made as per the tariff established within the City of London Corporation Planning Obligations SPD (paras 15-20).

Urban design: The broad design principles and height are supported. The concerns raised by Transport for London in terms of the building line and the impact on the pedestrian footpath at the junction of Gracechurch Street and Leadenhall Street should be addressed (paras 21-29).

Strategic views: As part of an emerging and established cluster of tall buildings, no concerns are raised and the application complies with London plan policy 7.12 (paras 30-31)

Historic Environment: the proposal would not compromise the ability to appreciate the Outstanding Universal Value of the World Heritage Site at the Tower of London. Whilst the proposal would affect the setting of the Grade I Listed Chapel Royal of St Peter ad Vincula, the harm is considered to be less than substantial (paras 32-38)

Recommendation

That the City of London Corporation be advised that whilst the application is strongly supported in strategic planning terms, the application does not fully comply with the London Plan for the reasons set out in paragraph 64 of this report. The resolution of those issues could lead to the application becoming compliant with the London Plan.

Context

1 On 29 September 2016 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 9 November 2016 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 Category 1C of the Schedule to the Order 2008:

- 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 proposals relate to a site located in the heart of the City of London within the 'Eastern Cluster' an area determined as suitable for tall buildings. The site currently contains an existing seven- storey office building, Leadenhall Court, which provides approximately 15,000sq.m of office accommodation, including c.729sq.m of ground floor retail space. Built in the late 1980's the building has a low colonnade and a limited active frontage at ground floor level.

7 The surrounding area is characterised by a juxtaposition of modern tall buildings and low rise historic buildings. Adjoining the site to the south is the Grade 2* Listed Leadenhall Market, to the west of the site across Gracechurch Street is St Peter upon Cornhill Church (Grade 1 Listed) and the Grade 1 Listed Lloyds of London building is further to the east. Notable tall buildings include the recently completed Leadenhall Building (D&P Ref/0551), containing 46 levels of office accommodation to the north east of the site. Recently consented developments to the north at 22 Bishopsgate (D&P Ref/3704) and 6-8 Bishopsgate (D&P/3469), 62 storeys and 40 storeys respectively, will also inform the context. Although the site is not within a Conservation Area, it is adjacent to both the Leadenhall Market Conservation Area and the Bank Conservation Area.

8 The site has multiple frontages to Gracechurch Street, Leadenhall Street, and Whittington Avenue. Gracechurch Street forms part of the Transport for London Road Network (TLRN) and Leadenhall Street forms part of the Strategic Road Network. Measured on a scale of 1a – 6b where 6b is the highest, the site has a PTAL ranging of 6b, which is considered excellent.

9 In strategic policy terms, the site falls within the Central Activities Zone (CAZ) and Leadenhall Market is defined as a CAZ retail frontage.

Details of the proposal

10 Demolition of the existing building and redevelopment to provide a 36 storey building with 28 floors for office use (Class B1) with retail floorspace (Class A1-A4), office lobby and loading bay at ground floor, 2 levels of retail floorspace (Class A1-A4) at first and second floors, a publicly accessible terrace at second floor, 5 floors of plant and ancillary basement cycle parking, cycle facilities and plant (total: 63,273sq.m GIA) (165m AOD).

Case history

11 A pre-planning application meeting was held on 28 June 2016, with a written advice report issued on 12 July 2016. In summary, GLA officers advised that the scheme was broadly supported in strategic planning terms, subject to addressing the mixed-use policies of the London Plan and comments raised in relation to the ground floor layout and pedestrian movement.

Strategic planning issues and relevant policies and guidance

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

- Central Activities Zone *London Plan; CAZ SPG;*
- 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;*
- 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 City of London Local Plan 2015 and the London Plan 2016 (The Spatial Development Strategy for London 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;
- Central Activities Zone SPG (March 2016);
- City of London Planning Obligations SPD (April 2014).

Principle of development

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. The proposal

would provide 48,511 sq.m of high quality B1 office floorspace (an uplift of 33,963 sq.m compared to existing) 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. 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

16 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 as per the tariff established within the City of London Corporation Planning Obligations SPD.

17 In order to address the requirements of London Plan policy 4.3, an affordable housing contribution should therefore be made as per the tariff established within the City of London Corporation Planning Obligations SPD. The associated financial contribution should be secured by way of the Section 106 agreement and full details should be provided before the Mayor considers the proposals at Stage 2.

18 The proposals would provide a publicly accessible viewing gallery on the second floor, adjoining Leadenhall Market. This is welcomed and access should be secured by legal agreement. Details of the proposed heads of terms should be provided before the Mayor considers the proposals at Stage 2.

19 The proposals would also include public realm improvements along Whittington Avenue which will lead down into Leadenhall Market, as well as new retail units on the ground floor. It is noted that the applicant is working with the City on a retail strategy which will complement and strengthen, rather than undermine, Leadenhall Market and this is welcomed. Retail activity will help activate the lower floors and improve retail within the CAZ frontage for workers and visitors and is supported in accordance with London Plan policies 2.11 and 4.3.

Urban design

Tall building and architectural quality

20 The principle of a tall building within an existing and emerging cluster of tall buildings within the City of London is supported. The recently consented towers at 6-8 Bishopsgate (185.1m AOD) and 22 Bishopsgate (295m AOD) are also a relevant consideration, particularly in terms of wider views where it will have the effect of screening the proposed development.

21 The proposed tower sits above a six storey podium, comparable to the height of the existing building. The simplicity of the design approach is supported, given its proximity to a number of visually interesting listed buildings including Lloyds of London and Leadenhall Market. Having considered the submitted townscape, built heritage and visual impact assessment, GLA officers are of the opinion that the height and form of the proposed building relates well to the emerging cluster and the rationale for its height is accepted and supported, demonstrating a high standard of architecture in accordance with London Plan policy 7.6.

Layout

22 The proposed layout of the ground level is considered key to the success of the building. The existing building fails at ground floor level floor with an oppressive colonnade, creating a claustrophobic ‘bunker-like’ environment for pedestrians and a poor retail frontage. The improvement to the public realm that the development will provide will be one of its major benefits. The proposed building retains a colonnade, but this is taller and lighter than existing, allowing for viability of the retail uses and interaction with the wider streetscape and will help ensure a successful retail frontage. TfL has flagged some concern with the proposed footway arrangements on pedestrian movement at the corner of Gracechurch Street and Leadenhall Street which could reduce capacity (see paragraphs 46 – 49 below). These concerns should be resolved, prior to Stage 2.

23 The rationale of creating a shared surface along Whittington Avenue to provide a gateway into Leadenhall Market is supported. The proposed servicing bay entrance on Whittington Avenue is flanked with active uses either side of the bay which will ensure a dead frontage is avoided and encourage drivers and cyclists to be wary of pedestrians.

24 The layout of the building allows for uninterrupted open floorplates to be provided, around a central core. The floors can be subdivided to provide split tenancy arrangements. GLA officers support the efficient and flexible office layouts enabled by the building design. Amenity spaces for office users are provided with landscaped upper floor terraces, and these are welcomed. GLA officers support the intention to deliver a high quality inclusive workplace environment with an emphasis on occupier well-being.

25 The public will be able access the public terrace (and retail uses) at second floor level directly from the street and via lifts. It is recognised that the full details will be finalised when it is clear what kind of retail tenants and uses will be occupying these part of the development, as part of a wider signage strategy, but these access points to the public terrace should be legible, inviting and clearly marked.

26 Overall the elevation of the building at ground level and the building podium creates a positive relationship with street level activity, mediates the scale of the building and makes a positive contribution to the character of the area in accordance with London Plan policy 7.4. The layout of the development integrates well with the surrounding streets and spaces in accordance with London Plan policy 7.6.

Strategic views

27 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; 2A.1; 3A.1; 4A.1; 5A.2; 6A.1; 10A.1; 11B.1 & 2; 15B.1 & 2; 16B.1 and 25A.1, 2 & 3.)

28 Having considered these visualisations, GLA officers conclude that whilst the scheme would in many cases be a prominent feature, it would be perceived as part of an established grouping of tall buildings at the heart of the City of London’s eastern cluster, would preserve the ability to appreciate the various strategic landmarks identified by the LVMF SPG and 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

Impact on World Heritage Sites

29 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 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.

30 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. Important views looking towards and across the Tower of London from the south side of the River (LVMF 25A.1, 25A.2 and 25A.3) and Tower Bridge (LVMF 10A.1) and views from within the World Heritage site were assessed. 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. However, it is noted that the development would be visible beyond the bell tower of the Chapel Royal of St Peter ad Vincula (Grade I Listed) and this is discussed in further below in paragraphs 35-38.

31 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. Accordingly the application complies with London Plan Policy 7.10.

Impact upon designated heritage assets

32 Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 respectively require the decision maker to have “special regard” to the desirability of preserving a listed building or its setting, and pay “special attention” to the desirability of preserving or enhancing the character or appearance of a conservation area. The NPPF also states that substantial harm to listed buildings should only be allowed in exceptional circumstances. Where less than substantial harm will be caused, the harm should be weighed against the public benefits of the proposal. Having found harm to a heritage asset, the decision maker must give that harm considerable importance and weight, even when the harm in NPPF terms is less than substantial.

33 As mentioned in paragraph 7 (and audited within the submitted built heritage and visual impact assessment), there are numerous heritage assets in the immediate vicinity of the site including Leadenhall Market and Bank Conservation Areas, and the Lloyds Building (Grade I), Church of St Peter (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, notably

the Chapel Royal of St Peter ad Vincula (Grade I Listed) within the Tower of London complex . 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 harm the setting of the Chapel Royal of St Peter ad Vincula (Grade I Listed), but that this harm would be less than substantial. GLA officers do not consider the proposal would harm the other listed buildings identified, nor do GLA officers consider the proposal would harm the character/setting of the above-mentioned Conservation Areas, which are characterised by a juxtaposition of the old and the new.

34 In assessing the proposals, GLA officers conclude the harm identified, namely the impact of the development on the setting of the Grade I Listed Chapel Royal of St Peter ad Vincula, would be less than substantial and would be outweighed by the public and townscape benefits of the scheme, including the proposed public terrace which would help better reveal the significance of the roofscape of Grade II Listed Leadenhall Market to the wider public.

35 Accordingly, GLA officers are satisfied that the application accords with London Plan Policy 7.8.

Inclusive access

36 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. As a significant new building on the City's skyline the development will have a wide range of publicly accessible facilities, including new retail and offices, plus the public terrace, and should achieve the highest standards of accessible and inclusive design in accordance with London Plan Policy 7.2. The applicant has set out its response to access and inclusion within the design and access statement, with an access statement prepared by National Register of Access Consultants (NRAC) accredited consultants.

37 All of the street-level entrances will be step-free and logically located in relation to the surrounding streets. Step-free circulation will be provided throughout including 15 lifts for the offices and 2 public passenger lifts serving the retail on the lower floors, as well as the proposed public terrace. There will be a dedicated accessible Blue Badge car parking space, along with cycle parking for adapted cycles, as well as parking spaces for mobility scooters and charging facilities, all accessed via dedicated cycle lifts. The proposals for the semi-pedestrian public realm along Whittington Avenue into Leadenhall Market will ensure smooth surfaces for wheelchair users utilising main entrances. Based on the submitted information the proposals provide the key features for compliant and convenient access and are therefore capable of achieving the high standards for inclusive access to meet the needs of the public and commercial office tenants in accordance with London Plan policies 4.12 and 7.2.

Climate Change

Energy

38 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Both air permeability and heat loss parameters will be improved beyond the minimum backstop values required by building regulations. Other features include central heating plant linked to BMS/EMS with central time control, weather compensation and metering, and high efficiency gas boilers to supplement the communal heating network. The applicant has sought to minimise the demand for cooling by following the cooling hierarchy, specifically through: solar coatings in the glass fabric of the building and mechanical ventilation with an efficient heat recovery system.

39 The applicant has provided a commitment to ensuring that the development is designed to allow future connection to existing district heating networks should it prove to be viable. This should be secured by condition.

40 The applicant is proposing to install a site heat network served by CHP, and has confirmed that all uses will be connected to it.

41 The applicant should provide the annual profiles to show what proportion of the domestic hot water and space heating demand is being supplied by the CHP and what contribution this is making to the overall load. Further information on the CHP should also be provided including the total space heating and domestic hot water (DHW) demand of the development (MWh annually).

42 The applicant has investigated the feasibility of a range of renewable energy technologies but is not proposing to install any renewable energy technology for the development. The applicant should provide a more detailed roof layout specifying the dimensions, as well as further explanation of the constraints involved in installing PV on the roof. The applicant should state whether alternative roof configurations are possible to enable PV to be installed. The installation of solar PV is strongly supported to maximise carbon savings on site and comply with Policy 5.7.

43 Based on the energy assessment submitted, a reduction of 268 tonnes of CO₂ per year in regulated emissions is expected, compared to a 2013 Building Regulations compliant development, equivalent to an overall saving of 20%. The carbon dioxide savings fall short of the target set within Policy 5.2 of the London Plan. The applicant should consider scope for additional measures aimed at achieving further carbon reductions.

Climate change adaptation

44 The site is within Flood Zone 1 and is at low risk of surface water flooding. In terms of sustainable drainage, whilst the site itself is not at risk of surface water flooding, other locations in the local vicinity are at risk and therefore the application of London Plan policy 5.13 (Sustainable Drainage) is an important consideration for this application. The sustainability statement states that the development will reduce surface water run-off from the site by at least 50%, through the use of rainwater harvesting and attenuation tanks. Given the nature and location of the proposals this approach is considered to be an acceptable approach to London Plan policy 5.13.

Air Quality

Air quality assessment (AQA)

45 The applicant has submitted an AQA assessment which complies with London Plan policies 7.14 and 5.3. The Council should secure the provision of the measures within the assessment through conditions to ensure compliance with London Plan policies 7.14 and 5.3.

Transport

Walking and public realm

46 As part of the consented 6-8 Bishopsgate development immediately to the north of the site, changes to the Gracechurch Street / Leadenhall Street junction were agreed. Although not an integral part of the proposals, a scheme for further works to the junction has been put forward by this applicant looking to alter the kerblines on the eastern side of Gracechurch Street, bringing it further into the carriageway. Although much of the information previously requested by TfL at pre-application stage to support these proposals has been provided, a safety audit should be carried out. TfL are also aware that the crossings at this junction, and in particular across Gracechurch Street, are operating at capacity. As such, proposals to look at widening this crossing should be considered as part of these proposals.

47 Assessment of the impacts of the proposals on footway capacity shows an improvement on Leadenhall Street due to the revisions to the building line, and although on Gracechurch Street there is a slight reduction in pedestrian comfort, it is still within acceptable levels. If the proposals to alter the kerblines can be taken forward, this would also be beneficial.

48 However, it is of concern that the changes to the building line on the corner of Gracechurch Street and Leadenhall Street result in a much more significant reduction in capacity. At present the footway is rated as 'comfortable' but with the development this changes to 'at risk'. Further detail on the pedestrian modelling inputs should be provided but TfL have concerns over the impact of the development on pedestrian comfort in this location.

49 A qualitative assessment of the pedestrian environment has also been carried out and identifies issues to the south of the site. In particular, improvements could be made at the western entrance to Leadenhall Market immediately to the south of the site and TfL would request that works to improve this access are incorporated into any Section 278 works associated with the site on Gracechurch Street.

Access and parking

50 Cycle access into the site would be via two dedicated cycle lifts, located on Whittington Avenue and separated from the site's service access. This is supported, although it is noted that the proposals for public realm include cobbles on Whittington Avenue. Cobbles often provide a difficult surface for cyclists to ride on and consideration will need to be given to this in agreeing a detailed design for this area.

51 It is proposed to provide 736 long stay cycle parking spaces at basement level, in excess of London Plan minimum standards. This level of provision, along with a good mixture of different types of parking and supporting facilities is welcomed by TfL. However, it is understood that provision above London Plan standards is in part due to the lack of any short stay cycle parking within the site. Whilst the constraints on footway capacity and public realm around the site are accepted, providing no short stay cycle parking is likely to lead to informal parking taking place, which is a concern.

52 Whilst cycle hire should not be considered as an alternative to short stay cycle parking the area will continue to experience high levels of demand for cycle hire which will be added to by these proposals. As such, a financial contribution of £71,000 towards installation of additional cycle hire capacity should be secured through this application. This contribution is proportionate to that secured on other applications in the local area.

53 Car parking is limited to one blue badge bay located within the service yard accessed from Whittington Avenue. This space is to be provided with an electric vehicle charging point. This low level of provision is considered appropriate by TfL given the site's location and access to public transport.

Trip generation and impact assessment

54 Although some issues have been identified with trip generation, it is accepted that the impact of this development in isolation on public transport is likely to be acceptable given the number of bus, rail and underground services close to the site.

Travel Plan

55 A draft framework travel plan has been submitted as part of the Transport Assessment and should be secured through the Section 106 agreement. TfL have identified some detailed issues with the submitted plan, which have been flagged directly to the City of London. An update will be provided at Stage 2.

Servicing and delivery

56 There is currently no vehicle access into the site, with all deliveries taking place on street from Whittington Avenue. The proposals introduce a new off street servicing yard and it is intended that servicing will be consolidated off site. There is potential for this to be opened up to neighbouring uses and particularly those within Leadenhall Market, and it is intended to reduce the number of delivery vehicles using Whittington Avenue to make it a more attractive pedestrian and cycle route. This is welcomed, and its operation is outlined through a comprehensive Delivery and Servicing Plan (DSP) which should be secured as part of any consent.

57 It is also understood that deliveries will be timed to take place outside peak hours. This is welcomed but any conditions regulating servicing hours will need to reflect the fact that servicing would take place overnight.

Construction

58 A framework Construction Logistics Plan (CLP) has been submitted as part of the application, which is welcomed. As with delivery and servicing, TfL would support arrangements which reduced or preferably removed peak time construction vehicle movement. TfL would also request that the viability of using construction consolidation centres is considered in the final CLP, which should be secured by condition

Section 106 and Community Infrastructure Levy

59 The City of London adopted its Community Infrastructure Levy (CIL) charging schedule in July 2014. A full charging schedule is available from the council, but both office and retail uses are charged at £75 per square metre. The Regulation 123 list identifies that this levy can be spent on 'transport improvements'.

60 In accordance with London Plan policy 8.3 the Mayor commenced CIL charging for developments on 1st April 2012. Within the City of London, the charge is £50 per square metre. The site is also in the area where section 106 contributions for Crossrail will be sought in accordance with London Plan Policy 6.5 and the associated Supplementary Planning Guidance (SPG) 'Use of planning obligations in the funding of Crossrail' (April 2013). In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liabilities and this should be reflected in the wording of the section 106 agreement.

Local planning authority's position

61 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. A date has not been set for the City Corporation to formally consider the application at a planning committee meeting.

Legal considerations

62 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

63 There are no financial considerations at this stage.

Conclusion

64 London Plan policies on Central Activities Zone; offices; mix of uses; urban design, strategic views, the historic environment, inclusive access; climate change; air quality 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.
- **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 and the CAZ retail frontage. However, an affordable housing contribution should be made as per the tariff established within the City of London Corporation Planning Obligations SPD to ensure the requirements of London Plan policy 4.3 are met.
- **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 development provides for high quality office as well as enhancement to the existing public realm along Whittington Avenue. Accordingly the application accords with London Plan policies 7.1, 7.4, 7.3, 7.5, 7.6 and 7.7.
- **Strategic views:** The development would reinforce and enhance the characteristics of strategic views through an improved consolidation of the City's eastern cluster and complies with London Plan policy 7.12.

- **Historic environment:** The development would not compromise the ability to appreciate the Outstanding Universal Value of World Heritage Sites. Accordingly the application complies with London Plan policy 7.10. The development would have an adverse impact upon the setting of the Grade I Listed Chapel Royal of St Peter ad Vincula, however the harm is considered to be less than substantial and this harm is considered to be outweighed by the public and townscape benefits of the proposal.
- **Inclusive access:** The approach to access and inclusion is supported in accordance with London Plan polices 4.12 and 7.2.
- **Sustainable development:** The proposed energy strategy falls short of the 35% target within London Plan policy 5.2. The applicant should consider scope for additional measures aimed at achieving further carbon reductions.
- **Transport:** TfL's main concern relates to the proposed changes to the building line on the corner of Gracechurch Street and Leadenhall Street and the resultant impacts on pedestrians and further clarifications are sought. Otherwise, the proposal is broadly acceptable in strategic transport terms; however, the applicant should address the matters discussed in this report and the detailed TfL response in respect to the kerblines on Gracechurch Street, the travel plan, trip generation and short term cycle parking in order to ensure accordance with London Plan polices 6.3, 6.5, 6.9, 6.10, 6.13 and 6.14.

65 The resolution of outstanding issues with respect to sustainable development and transport could lead to the application becoming compliant with the London Plan.

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