

St Alphage House, London Wall

in the City of London

planning application no.10/0832/FULEIA

Strategic planning application stage 1 referral (new powers)

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

The proposal

Erection of an 18-storey (west) and 14-storey (east) building to provide (67,815 sq.m.) of office (class B1) and 1,245 sq.m. of retail (classes A1/A2/A3 and A4) space; construction of basement to provide associated servicing, vehicle and cycle parking, plant and storage; alterations to existing vehicle and pedestrian access and highway layout within and around the site, including the creation of new pedestrian routes; the removal or alteration and reinstatement of various walkways within the vicinity of the site; and associated landscaping works.

The applicant

The applicant is **Hammerson (Centurion) Ltd**, and the architects are **MAKE**.

Strategic issues

Land use policy and **principle of development, design, tall buildings** and **views, inclusive access, climate change** issues (including the **energy** provisions for the site), and the **transport** implications of the development.

Recommendation

That the Corporation of London be advised that the application is generally acceptable in strategic planning terms, but does not fully comply with the London Plan, for the reasons set out in paragraph 65 of this report; but that the possible remedies set out in paragraph 67 of this report could address those deficiencies. The application does not need to be referred back to the Mayor if the Corporation resolves to refuse permission, but it must be referred back if it resolves to grant permission.

Context

1 On 9 March 2011, the Mayor of London received documents from the Corporation of London 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 19 April 2011 to provide the 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 3E of the Schedule to the Order 2008: *"Development —(a) which does not accord with one or more provisions of the development plan in force in the area in which the application site is situated; and (b) comprises or includes the provision of more than 2,500 square metres of floorspace for a use falling within any of the following classes in the Use Classes Order—(i) class A1 (retail); (vi) class B1 (business)."*

3 Once the Corporation of London 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; or allow the Council to determine it itself, unless otherwise advised. In this instance if Council resolves to refuse permission it need not refer the application back to the Mayor.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999 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 application relates to most of a triangular portion of land bounded by London Wall across its southern boundary, Wood Street along its western boundary and Fore Street, which tapers along its northern boundary to form the apex of the wedge at its eastern extreme.

7 The site boundary, however, runs along the south side of St Alphage Gardens, veering sharply north to join Fore Street; thereby excluding a rectangular portion of land in the north-west corner of the wedge. The resultant application site takes the form of two adjacent triangles, the smaller situated on the west, joined to the larger one on the east, midway along the southern boundary- in the location of the Grade II Listed remains of the 14th century St Alphage Church Tower, also referred to as the St Alphage Church Tower remains.

8 The application boundary encompasses approximately 0.725 hectares of land occupied by St Alphage House, a vacant office tower block that stands 19 storeys above a two-storey podium. The tower building also contains six residential units, comprising four studios and two maisonettes at roof level, all of which are understood to be vacant except one of the maisonettes, which is used intermittently for short periods by City employees. The flats are accessed solely by a staircase from the eighteenth floor of the building.

9 A number of vacant retail and public house units are located at podium level, which extends across the entirety of the site. Prior to the premises becoming vacant in March 2008, parts of the podium and basement of St Alphage House were used for leisure and recreational activities by private members' clubs; including the Stock Exchange Gun Club, the Rifle and Revolver Club and the Marylebone Rifle and Pistol Club.

10 St Alphage Highwalk bisects the site and is connected to Moorfields Highwalk (Moor House) to the east, Alban Highwalk to the west and Bassishaw Highwalk to the south. These pedestrian links are part of the designated City Walkway under the City of London (Various Powers) Act 1967; with the consequence that a temporary and/or permanent removal would require special procedures to rescind and/or redesignate those walkways.

11 With respect to its wider surroundings, the site is situated south of the Grade II Listed Barbican Estate, which is also the City of London's largest residential area. The Brewers' Hall, City Place House and City Tower are located to the south, on the opposite side of London Wall. To the east is Moor House, a substantial modern office and retail building and to the north-east on the opposite side of Fore Street lies the Telephone Exchange building.

12 The site is located on London Wall and is bounded by St Alphage Gardens and Wood Street; both of which are borough roads. The nearest section of the Transport for London Road Network (TLRN) is the A10 Bishopsgate, which is located some 770 metres to the east. In addition, the section of London Wall 260m west of the site, from its junction with Moorgate, is part of the Strategic Road Network (SRN). The site is directly served by bus route 100 which stops on London Wall. There are a further 5 bus services operating along Moorgate which are within acceptable walking distance of the site. Moorgate station is located 300m north east of the site and offers services on the Circle, Hammersmith and City, Metropolitan and Northern lines along with national rail services on the Northern City Line. From 2018, Moorgate station will include a direct link to Liverpool Street Crossrail station, further enhancing accessibility to the site. The site is also within acceptable walking distance of Barbican, Liverpool Street, Mansion House, Monument, Cannon Street, Bank and St Paul's stations respectively. Accordingly, the site records an excellent public transport accessibility level (PTAL) of 6b, where 1 is the lowest and 6 the highest.

Details of the proposal

13 The application proposal is to deliver 69,060 sq.m. of business/commercial space, comprising 67,815 sq.m. of office (class B1) and 1,245 sq.m. of retail (classes A1/A2/A3 and A4).

14 The development, to be known as London Wall Place, entails the demolition of all non-listed structures on the site and the erection of two buildings to comprise 121 and 123 London Wall. No.123, the taller of two, would be sited on the western portion of the site and comprise a basement, ground floor plus 16 storeys and plant level above; constructed to a height of approximately 91.4 metres above ordnance datum (AOD). No 121 would be built on the larger, eastern, portion of the site and would vary from ground plus three storeys, to ground plus 16 storeys and plant level- reaching a maximum height of approximately 75 metres (AOD).

15 The former would provide restaurant/cafe and retail uses at basement and street level, with sixteen floors of office accommodation above that. The latter would provide retail and restaurant/cafe accommodation at street and high-walk levels respectively, with office accommodation on the remaining floors. In total, the development would result in a net uplift of some 55,338 sq.m. in office space and a net loss of 280 sq.m. of retail, leisure and recreational space compared to the existing development.

16 Provision is made for 18 car parking spaces, of which two would be retained for users with impaired mobility and four equipped with electric car-charging facilities. Space would also be provided for 87 motorcycles at basement level, 307 sheltered and secure cycle parking places at ground and basement levels, and a further 30 cycle spaces for short-stay visitors in landscaped areas around the buildings.

17 The proposals include alterations to the existing vehicular and pedestrian access routes and the road layout around the site. In particular, the northern carriageway of London Wall would be narrowed to two lanes, to facilitate the creation of a wider, continuous footpath. The existing car park exit ramp onto London Wall would, however, be retained.

Case history

18 On 6 May 2010 pre-application meeting was held between GLA officers and representatives of the applicant, Hammerson, to discuss design proposals for an office-led development of some 77,000 sq.m. on this site. The meeting focussed primarily on a 'St Alphage Concept Development' document, produced in March 2010. The subsequent GLA advice report, dated 19 May 2010, concluded that the submissions responded well to the opportunities and constraints presented by the site and its context; integrating heritage assets and new public spaces. The alignment of the proposed high-walk bridge across London Wall, some inclusive access issues and the design of ground floor facades, however, required further attention. The potential for greater architectural differentiation to the two buildings was to be explored. The architect was also requested to design out any breach of the threshold plane of the Landmark Viewing Corridor, and to provide a comprehensive townscape and visual impact assessment.

19 Two additional pre-application follow-up meetings were held between the GLA and the applicant's representatives on 8 July and 19 July 2010, to discuss the inclusive access arrangements and energy provisions of the development respectively. For each of those issues, the joint advice report, of 11 August 2010. concluded that:

- The proposed integration of inclusive design measures within the scheme was supported and would represent an improvement upon the existing situation. Further consideration should be given to the inclusion of way-finding measures for visually impaired people, the provision of parking for blue badge holders in appropriate locations on and around the site, and opportunities to improve access to Salters Hall and the basement car park close to the site.
- The applicant's commitment to minimising carbon dioxide emissions was welcomed, and that the principles discussed formed a sound basis for an energy strategy that meets London Plan policy requirements. A more detailed assessment would be undertaken on submission of a full energy strategy with the proposed planning application.

Strategic planning issues and relevant policies and guidance

20 The relevant issues and corresponding policies are as follows:

- Land use policy *London Plan*
- World city role *London Plan*
- Economic development *London Plan; the Mayor's Economic Development Strategy*
- Employment *London Plan; PPS4; Industrial Capacity SPG*
- Retail uses *London Plan; PPG13, PPS4*
- Mix of uses *London Plan*
- Urban design *London Plan; PPS1*
- Tall buildings/views *London Plan; RPG3A, Revised View Management Framework SPG*
- Historic Environment *London Plan; PPS5*
- Access *London Plan; PPS1; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People: a good practice guide (ODPM)*
- Equal opportunities *London Plan; Planning for Equality and Diversity in Meeting the spatial needs of London's diverse communities SPG; Diversity and Equality in Planning: A good practice guide (ODPM)*
- Transport/parking *London Plan; the Mayor's Transport Strategy; PPG13;*
- Crossrail *London Plan Alteration; Crossrail SPG*

- Sustainable development *London Plan; PPS1, PPS1 supplement; PPS3; PPG13; PPS22; draft PPS Planning for a Low Carbon Future in a Changing Climate; the Mayor's Energy Strategy; Mayor's draft Climate Change Mitigation and Adaptation Strategies; Mayor's draft Water Strategy; Sustainable Design and Construction SPG*

21 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 Unitary Development Plan (2002) and the London Plan (Consolidated with Alterations since 2004).

22 The following are relevant material considerations.

- The draft replacement London Plan, published in October 2009 for consultation.
- The draft Core Strategy (EiP version), March 2011.
- The St Alphege House Planning Framework (2003).

Land use policy and the principle of development

23 The application site falls within the Central Activities Zone. London Plan policies 2A.2 and 5G.3 affirm the position of the CAZ as the nation's most important strategic office location and look to enhance its attraction as a globally attractive business location. Policy 3B.2 commits the Mayor to work with strategic partners to seek the renovation and renewal of existing stock, in order to increase and enhance the quality and flexibility of London's office market offer; and requires local authorities to promote the provision of additional space and the rejuvenation of existing office space in the CAZ. These objectives are reinforced by policies 2.10 and 2.11 of the draft replacement London Plan, which aim to enhance and promote the unique international, national and London-wide roles of the CAZ.

24 Similarly, the City of London UDP states that the vision for the City is to strengthen its role as a world leading international financial and business centre that contributes significantly to the UK and European economies, and requires the provision of a good supply of modern, high quality employment-generating accommodation. Specific policies of the plan include ECON 1, ECON 2 and ECON 3, which seek to encourage office development of the type that meets the requirements of new office technology and caters for variations in office layout and use; and to encourage the development of large floorplate buildings where their scale bulk and massing are appropriate to their surrounding.

25 The draft Core Strategy for the City reiterates in policy CS1 that the need to provide additional high quality office development to meet the demand from long term employment growth, to strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as a leading international financial and business centre. The measures by which this policy should be promoted include:

- A target to increase the stock of City office floorspace by 1.5million sq.m. between 2006 and 2026, to meet the needs of projected long term economic and employment growth.
- Encouraging the assembly and development of large sites, where appropriate, to meet the accommodation needs of the City's biggest occupiers; protecting potential large office sites from piecemeal development; and resisting development that would jeopardise the future assembly and delivery of large sites.

- Encouraging the supply of a range of high quality office accommodation to meet the varied needs of City office occupiers.

26 In 2003, the Corporation of London prepared a site-specific planning brief, which confirmed that a redevelopment of the site for office use was acceptable in principle and that the proposed office space should meet the requirements of new office technology and be flexible enough to cater for variations in office layout and use. This framework was approved by the Corporation's planning committee but not formally adopted as supplementary planning guidance.

27 It is evident from the foregoing that the principle of an office-led development with complementary retail space is acceptable from a strategic and local planning policy perspective. There is, however, a requirement in policies 3B.3 and 5G.3 of the London Plan (and policy 2.11 of the draft replacement London Plan), that wherever increases in office floorspace are proposed, they should include a mix of uses, including housing, unless such a mix would demonstrably conflict with other policies of the plan.

28 To fulfil this obligation, the applicant is understood to have agreed in principle to make a financial contribution towards an off-site provision of affordable housing. Details of the exact amount and the site at which the housing would be delivered, are still under negotiation with the Corporation of London's planning obligations officer and is likely be reported back to the Mayor if the Corporation's planning committee resolve to grant permission for the development.

Urban design and architectural quality

29 Good design is central to all objectives of the London Plan and is specifically promoted by the policies contained in Chapter 4B. London Plan policy 4B.1 sets out a series of overarching design principles for development in London. Other policies in Chapter 4B and elsewhere in the London Plan set out design requirements relating to specific issues, notably heritage. London Plan policies 4B.9 and 4B.10, which set out specific design requirements for tall and large-scale buildings, are applicable to the proposal. Chapter 7 of the draft replacement London Plan sets out design-related policies.

30 The proposed design has benefited from review and revision through pre-application discussions. The arrangement of buildings on the site would successfully respond to the constraints and opportunities presented by the context. The integration of the various heritage assets into the new public spaces is welcome and would enhance their setting and allow greater opportunity for public access and appreciation. The privacy and aspect of residents of the Barbican has also been carefully considered and respected.

31 The proposal would significantly enhance the landscape and public realm across the site integrating and augmenting existing spaces, such as Salter's Hall Garden, with new spaces around the historic remains and public realm, including a generous pavement along London Wall. The landscape would also be used to soften those areas of the scheme, such as the elevation to Fore Street, with a prevalence of blank frontage and service entrances. This is positive in mitigating these, though it is lamentable that the design of the street level elevation to Fore Street does not do more to incorporate glazing to stairwells, servicing and back-of-house areas, such as cycle storage, as far as practicable, in order to enliven Fore Street, rather than treating it as a service yard.

32 The proposal would integrate and extend the existing network of high walks in the area north-south and east-west through the site. This is a response to local planning advice and the existing condition on the site, which includes the high walks in the listed Barbican complex which abut the site at first floor level. The high walks, though potentially difficult in urban design terms,

are generally well regarded by local users and the proposed design would create a clear and legible route structure with clear, frequent and inclusively designed opportunities to move between ground level and the high walks using stairs and lifts. It would also ensure that the walks would be overlooked by the new buildings, well-lit and visually open, to ensure users would feel safe and secure at all times of day.

33 The applicant has illustrated two options for the alignment of the proposed bridge over London Wall from the high-walk network. One option would introduce a bridge at an angle to the north-south high-walk that would land in the vicinity of the existing Bassishaw Bridge, which would be removed. The other option would introduce a bridge directly across London Wall that would reflect the north-south alignment of the new high walk. This would connect into the existing high walk on the southern side of London Wall and in some ways offers a more legible solution. If a bridge continues to be considered preferable to an at-grade crossing on London Wall, then the latter of the two options is considered preferable. In any event, the applicant should continue to discuss the approach with the City Corporation and other stakeholders and ensure that the chosen solution is both legible and inclusive in its design.

34 The scale, massing and overall architectural treatment of the two buildings is well resolved in terms of the immediate site context and would create an engaging frontage to London Wall. The proposal would appear in a number of views protected by the London View Management Framework. In those from Gabriel's Wharf (16B) and Blackfriars Bridge (14B) the proposal would be either invisible or barely visible amongst existing buildings in the background. In that from Westminster Pier (8A), the proposal would be invisible and sit outside the protected vista. The proposal would, therefore, maintain the ability of the viewer to recognise and appreciate the strategic landmark of St. Paul's Cathedral and be consistent with London Plan policy 4B.18 and draft replacement London Plan policy 7.12.

35 In summary the proposal would be consistent with the design policies of the London Plan including policies 4B.1, 4B.9, 4B.10, 4B.12 and 4B.15, and those of the draft replacement London Plan.

Inclusive design and access

36 The aim of London Plan Policy 4B.5 is to ensure that proposals achieve the highest standards of accessibility and inclusion (not just the minimum), and this and all developments should seek to better minimum access standards from the outset. The design process should demonstrate has considered how all visitors, including disabled and deaf people, older people and young people, would be able to use the places and spaces proposed. This, together with the Supplementary Planning Guidance '*Accessible London: achieving an inclusive environment*', underpins the principles of inclusive design and aims to achieve an accessible and inclusive environment across London. These policies are respectively supported by policies 7.2 and 3.8 of the consultation draft replacement London Plan.

37 The applicant has submitted a design and access statement that covers the external and internal provisions for visitors with impaired mobility. With regard to the public realm, the existing stair link from St Alphage House podium to Salters' Garden and Roman Wall garden would be removed and replaced by separate step-free and new stair accesses. The two sets of steps from the podium to street level would also be removed and replaced by two new lifts and a set of stairs to the centre of the site.

38 Additional works proposed as part of the scheme includes the removal and replacement, in the same position, of the high-walk bridge over Fore Street; and the removal and replacement, in a revised position, of the high-walk bridges over Wood Street, London Wall and Fore Street Avenue.

The applicant also proposes to make good any structures affected by these alterations to the high-walk arrangements.

39 Full details for the new amenity areas and internal arrangements for the building are provided in the design and access statement.

Transport for London's comments

Vehicle and Cycle Parking

40 TfL notes that the development provides 18 parking spaces. Whilst within the London Plan maximum standards, the applicant is advised that a further reduction would be supported in view of the high PTAL. To accord with the draft replacement London Plan policy 6.13 '*Parking*', the scheme should ensure that 20% of all spaces (both active and passive) should include an electric charging point. This would equate to 4 spaces at occupation of the development, with a further 4 spaces capable of future conversion. The commitment to provide 307 cycle parking spaces with shower and changing facilities for the office development is welcomed, together with 30 visitor spaces in accordance with TfL's cycle parking standards and London Plan Policy, 3C.22. '*Improving Conditions for Cycling*' and draft replacement London Plan policy 6.9, '*Cycling*'.

Trip generation

41 For TfL to verify the trip generation assessment, in accordance London Plan policy 3C.2 '*Matching development to transport capacity*' and revised draft London Plan policy 6.3 '*Assessing effects of development on transport capacity*', the applicant should clarify the proposed office floorspace and ensure that it is expressed as gross external area. Currently the assessment provides various figures. Accordingly, the information should be resubmitted in order to demonstrate the scale and the number of trips produced from the extant and proposed developments, using the methodology presently set out in the original assessment.

Buses

42 The development would be in close proximity to a number of bus routes that run along Moorgate. The applicant's assessment predicts that the scheme would generate a net increase of 168 bus trips at morning peak times.

43 Whilst the inclusion of a directional split of trips on each bus route is commended, trips should also be distributed for each direction; some of the routes only have trips generated in one direction. To enable TfL to properly assess which routes are most affected, this element of the bus trip assessment should be revised. TfL notes that currently, the busiest point on the bus network for many of these routes is Old Street and, therefore, any significant increase in demand on these routes could require mitigation. Subject to these revisions, TfL welcomes further discussion on this matter.

Walking

44 The developer's commitment to enhance the pedestrian environment is welcomed. These include measures, such as introducing an active street frontage across both buildings and improved pedestrian access to the existing high-walk network. TfL also supports the proposed widening of the footway on the north side of London Wall. As the main pedestrian entrances to the development will be on London Wall, the applicant should undertake a pedestrian comfort guidance assessment on this footway to ensure that it can cope with additional trips. Furthermore, TfL understands that the Corporation is considering the provision of a crossing on London Wall in

the vicinity of the site. The applicant should investigate whether any implementation can be expedited to mitigate the demand for crossings from the development. During the construction period it would be necessary to identify direct and convenient walk routes to the highwalk network. Where required, the use of temporary 'Legible London' maps and signs is recommended. In the longer term, TfL recommends the introduction of the Legible London way-finding system to this area.

Travel planning

45 In order to manage travel demand, and to accord with London Plan policy 3C.23C.2 '*Matching development to transport capacity*' and revised draft London Plan policy 6.3 '*Assessing effects of development on transport capacity*', TfL welcomes the submission of site wide travel plan. Detailed comments about the travel plan, including the results of any ATTrBuTE assessment will follow separately. The travel plan should be secured and monitored by the local planning authority through the section 106 agreement. In order to comply with London Plan policy 3C.25 '*freight*' and draft revised London Plan policy 6.14 '*Freight*' TfL also welcomes the submission of delivery and service plan and a construction logistics plan.

Crossrail

46 In view of the strategic regional importance of Crossrail to London's economic regeneration and development, and in order to bring the project to fruition in a suitably timely and economic manner, contributions will be sought from development likely to add to or create congestion on the public transport network that Crossrail is intended to mitigate. This will be through planning obligations, arrangements for the use of which are established at strategic level in accordance with Policy 3C.12A of the London Plan and policy guidance. An approach has been developed for collecting contributions towards Crossrail and is set out in the Mayor's draft Supplementary Planning Guidance (SPG) '*Use of planning obligations in the funding of Crossrail*' (July 2010). The SPG states that contributions should be sought in respect of office, hotel and retail developments in the Central London Charging Area, which involve an uplift in floorspace of more than 500 sq.m. The indicative level of charge is £137 per square metre (gross external area) of office floorspace and £88 per square metre (gross external area) of retail floorspace will be applied to this development.

47 As stated above, a schedule of the existing and proposed floorspace should be provided to enable TfL to confirm the level of contribution that will be sought. A 20% discount will be applied to development that is commenced, where a full contribution has been agreed and is paid before March 2013.

Summary

48 Although TfL is generally supportive of the proposals, a number of matters will need to be resolved before the application is determined. These are:

- Consideration as to whether car parking can be further reduced in view of the high PTAL level.
- Ensuring that electronic vehicle provision is in line with the draft replacement London Plan.
- A need to provide a direction split for bus trips in both directions.

- A need to undertake a pedestrian comfort assessment for the relevant section of London Wall.
- Confirmation of the existing and proposed floorspace, so that the appropriate level of Crossrail contribution can be established.

Climate change mitigation

49 The London Plan climate change policies as set out in chapter 4A collectively require developments to make the fullest contribution to tackling climate change by minimising carbon dioxide emissions, adopting sustainable design and construction measures, prioritising decentralised energy supply, and incorporating renewable energy technologies with a target of 20% carbon reductions from on-site renewable energy. The policies set out ways in which developers must address mitigation of and adaptation to the effects of climate change. Chapter 5 of the draft replacement plan sets out the approach to climate change and requires developments to make the fullest contribution to minimizing carbon dioxide emissions.

Energy

50 Policies 4A.1 to 4A.8 of the London Plan focus on how to mitigate climate change, and the carbon dioxide reduction targets that are necessary across London to achieve it.

Be Lean

Energy efficiency standards

51 A range of passive design features and demand reduction measures are proposed to reduce the carbon emissions of the proposed development. Features include optimum access to day light, low energy lighting and controls, solar shading and efficient cooling provision.

52 Based on the information provided, the proposed development does not appear to achieve any carbon savings from energy efficiency alone compared to a 2010 Building Regulations compliant development.

53 Using 2010 Building Regulations compliance software, the applicant should model, and commit to, additional measures that can be adopted to enable the development to exceed 2010 Building Regulations compliance through energy efficiency alone.

Be Clean

District heating

54 The applicant states that a connection to the Citigen district heating scheme will be provided subject to technical, operational and commercial viability. This approach is welcomed and the GLA would like to work towards achieving a more definite commitment to this option.

55 It is worth pointing out that the Citigen scheme includes both district heating and cooling networks. As in the current proposals only heat would be taken from the Citigen energy system. There seems to be insufficient cooling capacity from the Citigen cooling distribution system.

56 The applicant should include details of correspondence with Citigen to support their energy strategy, including indicative drawings of the extension of the Citigen district heating and cooling networks, as well as a description of its (spare) heating and cooling capacity.

Combined heat and power

57 The use of on-site combined heat and power has been disregarded. Given the type of development, that is acceptable in this instance.

Cooling

58 A combined strategy consisting of passive ventilation and a mixed-mode ventilation system would reduce the cooling demand for the proposed development.

59 When necessary, a combination of (heat driven) absorption chillers and high efficient electrical chillers would be used to provide comfort cooling to the site. As in the current proposals, heat from the Citigen heat network would be used to run the absorption chillers. Further explanation is required to understand the constraints that prevent the uptake of cold water from the Citigen cooling network.

Be Green

60 The applicant proposes to install photovoltaic panels (PV) on the roof of the buildings. In total, 311sq.m. would provide a renewable energy contribution for the proposed development. The use of on-site electricity generation with PV is welcome. The need to avoid shading of the panels due to existing and future planned structures in the area should be emphasised.

Overview

61 The applicant should provide an estimate of the regulated carbon emissions of the development, in tonnes of carbon dioxide per year, after the cumulative effect of energy efficiency measures, district heating and renewable energy are taken into account. Carbon emissions should be reported and calculated on the basis of 2010 Part L of the building regulations.

Local planning authority's position

62 Officers at the Corporation of London support the principle of development as proposed, but are working to resolve a spate of objections, mainly from the adjoining Barbican Estate, to some details of the scheme. It is, however, proposed to report the application to the Corporation's planning committee on 31 May 2011, with a recommendation for approval, subject to satisfactory details and the completion of a legal agreement.

Legal considerations

63 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. 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

64 There are no financial considerations at this stage.

Conclusion

65 London Plan policies on land uses within the Central Activities Zone, the principle of development, housing contributions in respect of net increases in office space within the CAZ, urban design and architectural quality, tall buildings, strategic views, inclusive access, transport, Crossrail contributions and energy are relevant to this application. The application complies with some of these policies but not with others, for the following reasons:

- **Mixed use (Central Activities Zone):** Inadequate information is available to confirm full compliance with London Plan policies 3B.3 and 5G.3, which seek to provide a mix of uses, including housing, wherever increases in office floorspace are proposed within the Central Activities Zone, as described in paragraph 27 of this report.
- **Transport:** Additional information, revisions and financial contributions are required to ensure full compliance with the transport policies of the London Plan, as detailed in paragraphs 40 to 48 above.
- **Energy:** Additional details are required to ensure that the submitted energy strategy is sufficiently robust and compliant with the energy hierarchy of the London Plan, as detailed in paragraphs 50 to 61 above.

66 Whilst the application is broadly acceptable in strategic planning terms, on balance, it does not fully comply with the London Plan.

67 The following changes might, however, remedy the above-mentioned deficiencies, and could possibly lead to the application becoming compliant with the London Plan:

- **Mixed use (CAZ):** Submission of full details within the Heads of Terms or a draft legal agreement to secure a housing contribution commensurate with the uplift in office space resulting from this development and the basis of its calculation.
- **Transport:** A full resolution of all the matters summarised by Transport for London in paragraph 48 of this report.
- **Energy:** The applicant should provide an estimate of the regulated carbon emissions of the development (in tonnes of carbon dioxide per year), after the cumulative effect of energy efficiency measures, district heating and renewable energy have been taken into account. Carbon emissions should be reported and calculated on the basis of Part L of the 2010 Building Regulations, as summarise in paragraph 61 above.

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