

3 December 2013

Site bounded by 19-21, 49 Leadenhall Street/22 Billiter Street, 108 & 109-114 Fenchurch Street, 6-8 & 9-13 Fenchurch Buildings, London, EC3

in the City of London

planning application no. 13/01004/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

Partial demolition and works of refurbishment and reinstatement to 19-21 Billiter Street; demolition of all other buildings on the site; redevelopment to provide a new building comprising two basement levels and ground level plus part 10, 14 and 34 storeys plus plant (total height 170m AOD), containing offices (B1) and flexible retail/financial and professional services/café and restaurant uses (A1/A2/A3) at ground floor level; change of use at ground and first floor of 19-21 Billiter Street to retail/cafe and restaurant/bar use (A1/A3/A4); the provision of hard and soft landscaping; alterations to Fenchurch Buildings and other incidental works (125,977 sq.m GIA).

The applicant

The applicant is the **Vanquish Properties (UK) Ltd** and the architect is **Make**.

Strategic issues

The principle of a primarily office-led development is strongly supported in strategic terms; however, further information is required with regard to **climate change and transport** for the scheme to be considered fully compliant with the London Plan.

Recommendation

That the City of London Corporation be advised that the application broadly complies with the London Plan but that the issues set out in paragraph 63 of this report should be addressed before the scheme is referred back to the Mayor at Stage 2.

Context

1 On 28 October 2013 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 6 December 2013 to provide the Council 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 Categories 1B and 1C of the Schedule to the Order 2008:

Category 1B: "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 (a) in the City of London and with a total floorspace of more than 100,000 square metres"

Category 1C: "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 Council to determine it itself.

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

Site description

5 The site is bound by Leadenhall Street to the north, and Fenchurch Street to the south, and is located just to the west of the convergence of these streets with Aldgate. This street layout defines a parcel of land known as the 'Leadenhall Triangle'. The proposal site represents the base of the triangle, and is bound to the west by Billiter Street, and to the east by Fenchurch Buildings (a service route, and north-south pedestrian connection between Fenchurch Street and Leadenhall Street). The site lies within the Aldgate Ward of the City of London and is located to the eastern side of the City in an area characterised by high density and tall developments and dominated by commercial buildings.

6 The site is currently occupied by a collection of five buildings up to eight stories totalling just over 38,000 sq.m and comprising approximately; 35,000 sq.m. of B1 office floorspace, 1,300 sq.m. of A1-A5 retail floorspace and 2,000 sq.m of D2 leisure floorspace. Although the site doesn't fall within a conservation area, it is located adjacent to the Lloyd's Avenue conservation area to the south, which is centred on the buildings along Lloyd's Avenue and includes the northern side of Fenchurch Street. One of the buildings on site (19 to 21 Billiter Street) is Grade II Listed, and there are other listed buildings close to the site. The site also falls within the wider setting of the Tower of London World Heritage Site.

7 The surrounding is characterised by large and small office buildings, restaurants and retailers which create a vibrant commercial heart to the City. The buildings are a contrasting mix of typologies, with modern tall towers interspersed with traditional detailed low-rise blocks. The area also contains an interesting combination of primary thoroughfares, hidden alleyways and discreet public spaces. The contrast between busy streets and quieter spaces leading off them is a fundamental part of the urban experience of this part of the City. The urban character is animated by the pedestrian movements of businesses and workers, tourists and visitors, creating unique and atmospheric streets. There is an existing cluster of tall commercial buildings immediately to the west and north of the site, which includes 30 St Mary Axe, the Lloyd's Building, the Heron Tower, the Willis Building, Tower 42 and the Aviva Building. In addition to these existing buildings, a number of additional high rise developments are also currently under construction including 20 Fenchurch Street and 122 Leadenhall Street and there are a number of sites with planning permission for tall buildings including 120 Fenchurch Street, 52-54 Lime Street, the Pinnacle and 100 Bishopgate.

8 The site is well served by public transport, with various Underground and mainline stations all within 800 metres of the site, including: Fenchurch Street, Aldgate, Aldgate East, Liverpool Street, Bank, Monument, Tower Hill and Tower Gateway. These provide access to a range of Underground, overground and Docklands Light Railway services. Bus routes 25 and 40 operate along Leadenhall Street and Fenchurch Street respectively, and a wide range of other routes serve this area of the City. Overall the site registers an excellent public transport accessibility level of six, on a scale of one to six – where six denotes the most accessible locations in London.

Relevant history

9 There is no planning history directly affecting the site, although a number of new developments comprising contemporary towers setting the context to this site, are either recently complete, under construction or benefit from extant planning permission. A summary of these sites is provided in Appendix A4 of the Townscape, Heritage and Visual Impact Assessment (Volume 2 of the Environmental Statement).

10 A pre-application meeting was held on 20 June 2013 in relation to the current proposal, and an advice report was issued on 4 July. The report confirmed that officers supported the scheme in principle, although highlighted that the future planning application would need to respond to matters raised in relation to mix of uses, urban design including historic environment and strategic views, inclusive access, sustainable development and transport.

Details of the proposal

11 The proposal includes the demolition of all buildings on the site, with the exception of the listed building at 19-21 Billiter Street which will be retained and refurbished, and integrated into a comprehensive new building on the rest of the site. The proposal will provide an office-led development with flexible retail uses (A1-A4) at ground and first floors, with offices (B1) above. The scheme will provide a total floor area of 133,393sq m (GEA) as follows:

Building (A1/A2/A3)	Office (B1) Total	Flexible retail (A1/A3/A4)	Flexible retail
19-21 Billiter Street (existing listed building retained)	2,157 sq.m	969 sq.m	1,188 sq.m 0
New building	130,322 sq.m	0	914 sq.m 131,236 sq.m
Total	131,291 sq.m	1,188 sq.m	914 sq.m 133,393 sq.m

Table 1: Proposed floorspace (GEA)

12 The scheme comprises a single building with a north-south orientation in the form of 'slices' across the site. At the northern end fronting Leadenhall Street, the building would be ground level plus 34 storeys and plant above (total height 170.4m AOD). In the centre of the site adjacent to 19-21 Billiter Street it would be ground level plus 10 storeys; and at the southern end fronting Fenchurch Street it would be ground plus 15 storeys and plant. The scheme also comprises two full basement floors.

13 The double height ground floor would include office entrances on both the Leadenhall Street and Fenchurch Street frontages, linked by an internal business lounge with lift and an amenity area for office tenants and visitors. Retail units would be provided at the corner of Fenchurch Street and Fenchurch Buildings, and on Fenchurch Buildings, with further retail

concessions within the main office lobby space at the corners of Fenchurch Street and Billiter Street, and Leadenhall Street and Fenchurch Buildings.

Strategic planning issues and relevant policies and guidance

14 The relevant issues and corresponding policies are as follows:

- Central Activities Zone and World City Role *London Plan*
- Offices *London Plan*
- Mix of uses *London Plan*
- Urban design *London Plan Shaping Neighbourhoods: Character and Context Draft SPG*
- Historic environment *London Plan; World Heritage Site Supplementary Planning Guidance (SPG)*
- Strategic views *London Plan; Revised View Management Framework SPG*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG; Planning and Access for Disabled People; A good practice guide*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy; Mayor's Climate Change Adaptation Strategy*
- Transport and parking *London Plan; the Mayor's Transport Strategy*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; and Crossrail SPG*

15 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 2011 City of London Core Strategy, the 2002 City of London Unitary Development Plan (saved policies) and the 2011 London Plan with 2013 Alterations.

16 The following are also relevant material considerations:

- The National Planning Policy Framework and Technical Guide to the National Planning Policy Framework; and,
- The draft Revised Early Minor Alteration to the London Plan.

Principle of development

Offices in the Central Activities Zone

17 London Plan Policy 4.2, and supporting text, establishes the strategic need for new office space within the Central Activities Zone (CAZ), and supports increases in current stock where there is demand, in order to meet the needs of a growing and changing economy.

18 Table 4.1 of the London Plan establishes a demand for 3,070,000 sq.m of B1 office floorspace within the CAZ and the north of the Isle of Dogs up to 2031. The most current strategic evidence, embodied within the 2012 London Office Policy Review report (LOPR), verifies this

demand, but also identifies a significant supply pipeline of office schemes at varying stages of delivery. The 2012 LOPR indicates that this pipeline is potentially capable of meeting the forecast demand, and, furthermore, identifies a potential oversupply of office floorspace within the pipeline for the City of London, and the CAZ as a whole. However, the 2012 LOPR acknowledges that the fruition of schemes within the pipeline is by no means guaranteed, and, ultimately, the mechanics of actual supply will be subject to market realities over time.

19 The application proposes a comprehensive rejuvenation of the business space at this site, replacing out-dated existing offices with high quality accommodation to meet modern office occupier requirements; this is supported by London Plan policy 4.2c. The scheme will result in an uplift of 96,265 sq.m in office floorspace and 792 sq.m in flexible retail floorspace, as set out in the table above. There would be a loss of 2,043 sq.m of leisure floorspace (D2), which does not raise any strategic concerns as the inherent nature of the area is business focussed within this part of the CAZ. The proposed uplift in both the B1 office and flexible retail floorspace is supported in strategic terms and would be in accordance with London Plan Policies 2.10c and 2.10e, subject to the architectural design being exemplary.

20 The proposed building has been designed in a way which will offer a range of floor plate sizes, with large floorplates on the low level floors, that are desirable and yet rarely found in the City, with the mid-level floors providing a variety of floorplate sizes to cater to the different office occupiers requirements for floor size and divisibility. From pre-application discussions, it is understood that the floorspace is intended to respond to the financial services market, and, in particular, the insurance sector - in recognition of the location of the site within the insurance district of the City. Also based on discussions at the pre-application meeting, it is understood that the applicant has entered into dialogue with a number of potential future occupiers, and that the proposed scheme has been met with positive initial interest from the market.

21 The proposed comprehensive renewal of this CAZ office site will deliver high quality, flexible, B1 office floorspace that will support London's function as one of the world's most attractive and competitive business locations. Having also had regard to the strategic evidence for office demand, the proposal (and associated 96,265 sq.m. uplift in office floorspace) is supported in accordance with London Plan Policy 4.2.

Mix of uses

22 London Plan Policy 4.3 promotes mixed use development, including housing, to support increases in office floorspace. Whilst a mix of flexible retail uses (A1-A4) are included at ground floor to provide activity onto surrounding streets, the scheme makes no provisions for housing on-site. Within the CAZ, the London Plan approach (detailed in paragraph 4.17) allows for a degree of flexibility with respect to the provision of mixed uses, in recognition of the fact that it may not always be suitable to provide housing on-site where it may compromise broader objectives such as "...sustaining important clusters of business activity, for example in much of the City...". Under such circumstances, contributions to off-site housing/affordable housing are sought as a planning obligation. The draft heads of terms submitted includes a contribution of just over £1.9m towards the provision of off-site affordable housing in accordance with the City Corporation's Planning Obligations SPG Tariff Calculation; this is strongly supported.

23 The provision of flexible retail floorspace is strongly supported in accordance with policy 4.3. The areas are located to maximise active frontages to all elevations of the building, particularly Fenchurch Avenue, which will complement the nearby primary shopping areas designated in the City's Core Strategy.

24 GLA officers support the principle of the development and the mix of uses proposed. The absence of on-site housing is accepted on the basis of the broader principle of sustaining the

important cluster of business activity in the City, subject to a suitable financial contribution being secured through the S106 as indicated in the draft heads of terms.

Urban design

Tall buildings and strategic views

25 The site is not over sailed by any strategic views as set out in Policy 7.11 and the London View Management Framework SPG, although given the scale of the proposal, the building will be seen in various strategic view panoramas. It is located within the City Corporation's designated Eastern Cluster (Core Strategy Policy CS7); an appropriate location for tall buildings to serve the finance and insurance office market. This is subject to the highest standards of architecture and design as set out in London Plan Policy 7.7.

26 The development proposes a bold yet simple design approach. The buildings mass is articulated as a series of stepped 'slices' that are intended to relate to the positioning of the site within the City cluster, and responds to contextual sensitivities across the various scales at which the building will be seen. An extensive views analysis has been undertaken; and, as requested at pre-application the application clearly articulates the distinctive characteristics of the building in landmark terms, and has related the proposed architectural response to the existing and emerging built context.

27 The proposed building form responds well to the established characteristics of the City skyline, affiliating itself with the cluster of tall buildings in the City of London, with the orientation and mass distributed and stepped down to respond to the Tower of London World Heritage Site (WHS) in key London View Management Framework views 10A.1 and 25A.1, and the ceremonial route along Fleet Street to St. Pauls Cathedral.

28 In terms of the key views noted above, as demonstrated in Volume 2 of the Environmental Statement (ES), the proposal would not impact on the clear sky space around the White Tower of the Tower of London WHS, and would be viewed in the context of various other tall buildings in the City's eastern cluster. Guidance within the Mayor's 'London View Management Framework' SPG (2012) acknowledges that the juxtaposition of the World Heritage Site with the City cluster is a key characteristic of these views. Having reviewed the extensive views analysis undertaken as part of the ES, GLA officers are content that the proposal would be perceived as part of the City cluster, and therefore contribute to the aforementioned characteristic, whilst preserving the essential composition of these views, and remaining a suitable distance from the White Tower. With respect to LVMF view 25A.1, in particular, it is noted that the proposed building would appear in front of 30 St. Mary's Axe. The Mayor's LVMF SPG identifies 30 St. Mary's Axe (the 'Gherkin') as one of a rich variety of landmark elements in this view, and in this respect, the fact that the proposal would obscure this existing building in this view is somewhat of a loss to the view. However, the 30 St. Mary's Axe building is not afforded any specific protection or listing and the replacement building has the potential to be a striking and high quality addition to this view and the London skyline overall. Taking all matters into account, GLA officers are satisfied with the proposal in terms of tall buildings and views.

Layout

29 The layout of the ground floor of the building is supported, and provides prominent entrance areas at the two primary frontages of the scheme (Leadenhall Street and Fenchurch Street). The provision of flexible ground floor retail/cafe/restaurant spaces also ensures that the building will provide activity and overlooking at all four of the public facing edges of the scheme, which is particularly welcomed.

30 The proposed widening and improvement of the footway at Fenchurch Buildings (partly facilitated through the provision of a ground floor undercroft at the eastern flank of the proposed building) is strongly supported. Based on the plans and visualisations provided officers are satisfied that the proposed service access will be carefully integrated and adequately separated from pedestrian movements, and the active ground floor uses will help to ensure that the route is well used, and positively contributes to the wider public realm network.

31 At pre-application, GLA officers raised some concern with the inclusion of a colonnade as part of the eastern flank undercroft, and are pleased to see that this element have been removed and encompassed into the ground floor plan, which provides the most open and legible feel to the north-south route and fully exploits the dramatic potential of the undercroft.

Appearance

At stated earlier, the design and form of the building is simple and bold and expressed as a series of slices. The materiality of the building's façade would be predominantly floor-to-ceiling glazing and flush-back painted glass set within a metal frame, with brise-soleil solar shading on the south facing elevation. At the top of the building the plant areas include black vertical louvres, with a frieze of vertical metal panels with projecting triangular elements that visually solidify the top of the building when viewed at an oblique angle. The appearance and materiality of the building is high quality and fully supported in accordance with London Plan Policy 7.6.

Historic environment

32 The design and access statement and volume two of the ES – the Townscape, Heritage and Visual Impact Assessment (THVIA), considers in detail the impact on heritage assets, assessing their significance and contribution to the area. The scheme also details in full the works proposed to 19-21 Billiter Street to be retained as part of the scheme.

33 The applicants approach to the retention, refurbishment and integration of this building into the wider development retains and enhances as much of the internal fabric of the building as possible, and this is fully supported, in accordance with the aims of London Plan policies 7.8 and 7.9. It would be seamlessly linked into the new building which would be stepped back at the junction with the listed building to form clean shadow gaps between the two architectural styles.

34 The proposal falls within the wider setting of the Tower of London World Heritage site. 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.

35 19-21 Billiter Street is a listed Victorian office building with a fine Portland stone façade and some high quality internal features including a staircase. The listed building will be retained and has been imaginatively integrated into the redevelopment, with all the remaining internal features being retained and refurbished. The setting of the listed building will be significantly enhanced by the development and the listed building will provide one the principle entrances into the development.

36 The THVIA submitted as part of the ES includes a comprehensive assessment of the impact of the development on the outstanding universal values of the Tower of London WHS, based on guidance within the Mayor's 'London World Heritage Sites - Guidance on Settings' SPG (2012). It includes an assessment of views 10A.1 (from the north bastion of Tower Bridge) and 25A.1 (from Queen's Walk at City Hall) in the London View Management Framework (LVMF) SPG, as well as the visibility of the proposal from the Inner Ward of the Tower of London. The development would be

seen behind and above the Tower of London in views from a number of positions within and outside the Tower. However, this would only be to the extent that it adds another new building to the cluster of recent tall buildings that are visible from these positions and would not cause harm to the setting of the Tower or compromise its outstanding universal value.

Inclusive access

37 The plans and access statement submitted with the application illustrate floor plate layouts, building cross-sections and access routes, and overall the scheme responds well to the principles of inclusive design. The access statement identifies wheelchair routes into and through the building, the location of wheelchair accessible WCs, fire lifts, refuge spaces and blue badge parking bays. The landscaping of the public realm including the widened pavement, improved pedestrian routes and the provision of a raised table to provide level pedestrian access across Fenchurch Buildings, is all fully supported.

38 As with any listed building, it is noted that there are a number of access challenges associated with refurbishment of 19-21 Billiter Street. In particular, wheelchair access into the ground floor restaurant/cafe space will not be possible from its principal Billiter Street frontage. Instead, wheelchair users will enter this space via the central lobby of the main building (from Leadenhall Street or Fenchurch Street). Whilst it is disappointing that step-free access is not proposed for the primary street frontage of this building, it is acknowledged that the need to conserve the listed building provides a constraint to doing so. The applicant has demonstrated that all reasonable steps have been taken to ensure that the refurbished space within 19-21 Billiter Street, including the upper office levels is as accessible as possible within the constraints posed by the fabric of the Listed Building. Accessible WC's and lifts would be provided throughout the building and access routes are indicated which are acceptable.

Climate change adaptation

39 The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO₂) emissions. A range of passive design features and demand reduction measures are proposed to reduce the CO₂ emissions of the development, including air permeability and heat loss parameters, heat recovery on air handling units, and others, which are all supported by officers. The development is estimated to achieve a reduction of 705 tonnes per annum (26%) in regulated CO₂ emissions compared to a 2010 Building Regulations compliant development. In order to support the high levels of savings claimed, GLA officers will need to see further evidence in the form of BRUKL sheets including efficiency features only (i.e. without CHP) before the application is referred back at Stage 2.

40 The applicant has identified that the proposed City 2 district heating network is within the vicinity of the site but states that it is currently too early to allow connection. Connection to the network should be prioritised and evidence of the correspondence with the network developer should be provided at Stage 2 including details of timescales. The applicant has, however, provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available. Whilst this is supported, GLA officers require further detail on how this will be achieved, as the images in the design and access statement show that the plant will be located at roof level at various locations on the building.

41 The applicant is proposing to install a site heat network, and GLA officers require confirmation that all non-domestic building uses will be connected to this network. A plan will be required before the application is referred back at Stage 2 showing the route of the heat network linking all buildings and demonstrating future proofing for connection to a district heating network. The applicant must also confirm that the site heat network will be supplied

from a single energy centre, and information on the floor area and location of the energy centre is required.

42 The applicant is proposing to install 2-3 gas CHP engines as the lead heat source for the site heat network. The CHP is sized to provide domestic hot water load as well as a proportion of the space heating. A reduction in regulated CO₂ emissions of 375.5 tonnes per annum (19%) will be achieved through this second part of the energy hierarchy. Before the application is referred back at Stage 2, GLA officers require further information on the sizing of the CHP system as the capacity appears high compared to the carbon savings claimed.

43 The applicant has investigated renewable energy technologies but is not proposing to install any for this development.

44 An overall reduction of 1080 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. This complies with Policy 5.2 of the London Plan, although further information is required before the savings can be verified.

Transport for London

45 The nearest section of the Transport for London Road Network (TLRN) is Gracechurch, 350m to the west of the site, with Leadenhall Street forming part of the Strategic Road Network (SRN). The area is well served by buses with a total of 20 bus routes available within 400m of the site; the nearest bus stops are located on Fenchurch Street adjacent to the site.

46 There are eight London Underground lines accessible within walking distance of the site; the nearest station is Aldgate on the Circle and Metropolitan line located 260m away to the east. The Docklands Light Railway (DLR) is available from both Tower Gateway and Bank, both close to the site. In addition, there are three Network Rail stations near the site, the nearest being Fenchurch Street. From 2019, Crossrail services will also be available from Liverpool Street station. The area is served by the Mayor's Cycle Hire Scheme, with a total of five docking stations located within 300m of the site with the closest located on Jewry Street.

47 The site has an excellent Public Transport Accessibility Level (PTAL) of 6b, on a scale of 1-6 where 6 is most accessible.

Car and cycle parking

48 The development is proposed to be car free, except for two blue badge bays located within the underground servicing area. Whilst car free developments are generally welcomed, in accordance with London Plan Policy 6.13, it should be demonstrated that this Blue Badge provision is sufficient to meet demand. Furthermore each bay should also have access to Electrical Vehicle Charging Points.

49 920 cycle spaces are proposed for the office uses and would be located in the basement. To cater for staff and visitors of the retail uses, a total of 13 cycle spaces will be provided within the public realm; shower and changing facilities will also be available for staff. The car and cycle parking provision complies with London Plan Policy 6.9.

Impact assessment

50 No retail trips have been included in the transport assessment and so TfL officers have assumed that no new retail trips would be generated by the development; however, the

applicant will need to confirm this with TfL officers and explain the rationale behind it if that is the case. DLR trips are also omitted from the TA and TfL require a comparison to be made between the presented mode share and the local Census ward data before confirming acceptability of this methodology.

Sustainable transport

51 The development would exacerbate the existing stress on the cycle hire network at this central location; and TfL therefore require additional capacity to be provided in accordance with London Plan Policy 6.9.

52 To allow TfL to consider the impact on the local bus network, the applicant is required to provide a directional split of bus trips onto specific corridors during peak periods. Furthermore, in accordance with London Plan Policy 6.7 and TfL's accessibility guidelines, an assessment is required on the pair of bus stops located on Leadenhall Street.

53 With consideration to the significant uplift of walking and cycling trips expected from the proposed development, a contribution is required towards the delivery of improved pedestrian and cyclist facilities on the A10 Bishopsgate junction with Leadenhall Street and Cornhill in accordance with London Plan policy 6.9 and 6.10.

Bank Station

54 Bank station suffers from significant congestion. Works to mitigate overcrowding and improve station accessibility are being progressed, although these works are not yet fully funded. Taking into account the significant uplift in London Underground trips from this development, a contribution is required in accordance with London Plan Policy 6.1 and 6.4.

Freight, servicing and construction

55 Servicing for all land uses is proposed to be undertaken from a dedicated service yard located in the basement. TfL considers these arrangements to be satisfactory subject to a delivery and servicing plan (DSP) being provided. In line with London Plan Policy 6.14 a construction logistics plan (CLP) will also be required, and both documents should be secured by condition and submitted to the City Corporation for approval in consultation with TfL.

Travel Planning

56 The travel plan submitted failed the ATTrBuTE test, and so in accordance with London Plan Policies 6.3 and 6.11 a baseline modal split needs to be included. The travel plan and all agreed measures therein should be secured, enforced, monitored and reviewed as part of the section 106 agreement.

CIL and Crossrail

57 The Mayor has introduced a London-wide Community Infrastructure Levy (CIL) to help implement Policies 6.5 and 8.3 of the London Plan toward the funding of Crossrail. The rate for the City of London is £50 per square meter. The required CIL should be confirmed by the applicant and council once the components of the development or phase have been finalised.

58 The site is within the area where section 106 contributions for Crossrail is also required 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).

59 In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and should be reflected in the wording of the Section 106 agreement.

Local planning authority's position

60 The applicant has had extensive pre-application discussions with the City of London Corporation, who broadly support the scheme subject to consultation responses and further detailed assessment of the scheme. They expect to present the scheme to their planning committee in February 2014.

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 the **principle of development (offices, mix of uses), urban design, heritage, tall building and views, inclusive access, sustainable development and transport** are relevant to this application. The application complies with the majority of these policies and is strongly supported but further information is needed in order to fully comply with the London Plan. The potential remedies to issues of non-compliance are set out below:

- **Principle of development:** The principle of an uplift in office and retail floorspace on the site, and the mix of uses is strongly supported in this location within the City and the Central Activities Zone.
- **Urban design, heritage, tall buildings, views:** Officers support the design, massing and height of the building, including the ground floor interactions, public realm improvements and the manner in which the listed building has been retained and incorporated into the development. Officers are satisfied that a tall building is acceptable in this location of the City adding to the existing eastern cluster, and are satisfied that the development will have an acceptable impact on views.
- **Inclusive access:** Overall the scheme responds well to the principles of inclusive design. Whilst there are a number of access challenges associated with refurbishment of 19-21 Billiter Street, it is acknowledged that the need to conserve the listed building provides a constraint to doing so. The applicant has demonstrated that all reasonable steps have been taken to ensure inclusive access across the development.

- **Sustainable development:** The applicant has broadly followed the energy hierarchy to reduce carbon dioxide (CO₂) emissions. An overall reduction of 1080 tonnes of CO₂ per year in regulated emissions compared to a 2010 Building Regulations compliant development is expected, equivalent to an overall saving of 40%. This complies with Policy 5.2 of the London Plan. However, further evidence/information is required in order to verify this including; BRUKL sheets showing efficiency features only; the sizing of the CHP system; further detail on the operation of the site heat network, energy centre and connection routes; and future proofing evidence for connection to a district heating system.
- **Transport:** TfL require further clarification and confirmation from the applicant as follows; demonstration that the blue badge provision is sufficient to meet demand and that each bay will have access to EVCP's; clarification on whether the TA includes new retail trips; comparison required between the presented mode share of DLR trips and local Census ward data; mitigate the likely additional stress on the cycle hire network; assessment of local buses and bus stops on Leadenhall Street; revisions to travel plan; DSP and CLP to be secured by condition. Financial contributions are sought towards; improved pedestrian and cycling facilities; works to mitigate overcrowding and improve accessibility at Bank;

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