

1 Undershaft, EC3

in the City of London

planning application no.16/00075/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 buildings and construction of a ground plus 72 storey building (309.6m AOD) for office use (Class B1) [131,970sq.m GEA], retail (Class A1-A3) [2,145sq.m GEA] at lower ground floor, a publicly accessible viewing gallery (Sui Generis) [2,930sq.m GEA] at level 71-72 and a restaurant (Class A3) [1,220sq.m] at level 70. Public Realm improvement works, ancillary basement cycle parking, servicing and plant. [Total 154,100sq.m GEA]

The applicant

The applicant is **Aroland Holdings Ltd** and the architect is **Eric Parry Architects**.

Strategic issues

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

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

Recommendation

That the City of London Corporation be advised that whilst the application is broadly supported in strategic planning terms, the application does not fully comply with the London Plan for the reasons set out in paragraph 70 of this report. The resolution of those issues could, nevertheless, lead to the application becoming compliant with the London Plan.

Context

1 On 15 February 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 25 March 2015 to provide the City Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.

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

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

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

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

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

Site description

6 The 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 a 28 storey (118m) office building, St Helen's Tower, which provides approximately 59,000sq.m of office accommodation. Built in the late 1960's the building was badly damaged by a bombing in 1992 and the external glazing system was completely replaced with a modern system. On 16 April 2012 a Certificate of Immunity was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, as the Secretary of State does not intend to list the building for the duration of the certificate, which expires on 15 April 2017.

7 The site includes St Helens Square, a hard landscaped public square which suffers poor accessibility due to level changes and steps. It also includes the road, Undershaft, and a service ramp to the basement level of the existing building. The site boundary extends to the area indicated by the red line shown on Fig 1 below, encompassing all the paved areas and roads within the boundary.

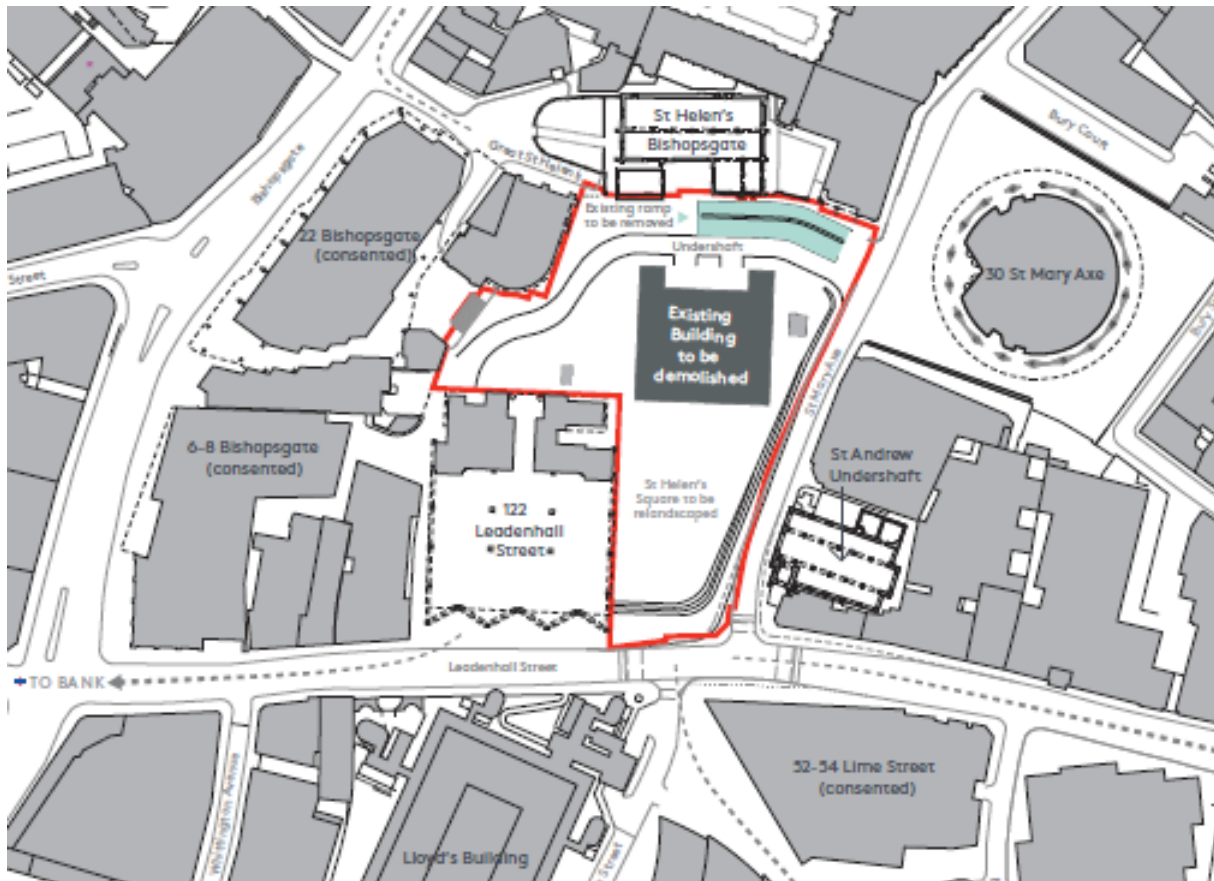


Fig 1: Site location plan

8 The surrounding area is characterised by a juxtaposition of modern tall buildings and low rise historic buildings. Notable tall buildings include the recently completed Leadenhall Building, containing 46 levels of office accommodation and which bounds the site to the south and east. The 40 storey 30 St Mary Axe is located to the east and the Grade I Listed Lloyds building is located to the south. Recently consented developments at 22 Bishopsgate and 6-8 Bishopsgate, 62 storeys and 40 storeys respectively, will also inform the context.

9 With respect to the historic environment immediately adjacent to the site the Grade I Listed Church of St Helen's is located to the north. The Grade I Listed Church of St Andrew Undershaft is to the east with Grade II iron gates and railings at its entrance. The area surrounding the site contains a number of other listed buildings. The site is adjacent to the St Helen's Place Conservation Area to the north and the Bank Conservation Area lies to the west. The wider surrounding area contains a further five conservation areas.

10 The site has a public transport accessibility level of 6b, on a scale of 0 to 6b, where 6b denotes the most accessible locations in the capital. A cycle hire docking station is located adjacent to 30 St Mary Axe with capacity for 19 bikes. Leadenhall Street is a strategic cycle route.

Details of the proposal

11 Demolition of the existing buildings and construction of a ground plus 72 storey building (309.6m AOD) for office use (Class B1) [131,970sq.m GEA], retail (Class A1-A3) [2,145sq.m GEA] at lower ground floor, a publicly accessible viewing gallery (Sui Generis) [2,930sq.m GEA] at level 71-72 and a restaurant (Class A3) [1,220sq.m] at level 70. Public Realm improvement works, ancillary basement cycle parking, servicing and plant. [Total 154,100sq.m GEA]

Case history

12 On 26 January 2016 GLA planning officers met with the applicant team and planning officers from the City of London to discuss the proposals for the site. GLA officers advised that the scheme was broadly supported in strategic planning terms, and stated that the future application would need to address London Plan policy with respect to: CAZ office development; mix of uses; urban design (including views and the historic environment); inclusive access; sustainable development; and, transport.

Strategic planning issues and relevant policies and guidance

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

- Principle of Development *London Plan; Central Activities Zone SPG;*
- Offices *London Plan; Central Activities Zone SPG;*
- Mix of uses *London Plan; Central Activities Zone SPG;*
- Urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG;*
- Strategic views *London Plan, London View Management Framework SPG;*
- Historic environment *London Plan; World Heritage Sites SPG;*
- Inclusive access *London Plan; Accessible London: achieving an inclusive environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's Water Strategy;*
- Transport *London Plan; the Mayor's Transport Strategy;*

14 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 (Consolidated with Alterations since 2011).

15 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;
- City of London Corporation Planning Obligations SPD (2014).

Principle of development

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

Offices

17 The proposal would provide approximately 130,000 sq.m of high quality B1 office floorspace in what is envisaged to be a flexible and multi-tenanted building. Strategically situated at the heart of the eastern cluster, the scheme is particularly well positioned to support the insurance and financial services districts of the City, and could accommodate one or more large anchor tenants, as well as a variety of small to medium sized companies. In this way the scheme has

significant potential to contribute to the diversity of workspace and businesses within the CAZ, and is supported in accordance with London Plan Policy 4.2.

Mix of uses

18 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.

19 In this case it is envisaged that an affordable housing contribution will be made as per the tariff established within the City of London Corporation Planning Obligations SPD. The associated financial contribution (sum to be confirmed) should be secured by way of the Section 106 agreement.

20 The proposals would provide a publicly accessible viewing gallery and education space on the upper floors. This is strongly supported and access, free of charge, for individual, schools, charities and local groups should be secured by legal agreement together with the specification of the spaces, as set out in the application material. Details of the proposed heads of terms should be provided before the Mayor considers the proposals at Stage 2.

21 The proposals also include a remodelled St Helen's Square which will lead down to a new retail gallery at lower ground floor, providing approximately 1,800 sq.m of floorspace for shops, restaurants and cafes. Retail activity will help activate the public space and provide much needed facilities for workers and visitors and is therefore supported in accordance with London Plan policies 2.11 and 4.3.

Urban design

Tall building

22 The site is located at the heart of the eastern cluster of tall buildings within the City of London. Accordingly, this is a location where a tall building is acceptable in principle, subject to the highest standards of architecture and urban design - as prescribed by London Plan Policy 7.7. As previously discussed the site already contains a tall building and a taller building would form a better relationship with the recently completed Leadenhall Building. The recently consented tower at 22 Bishopsgate is also a relevant consideration, particularly in terms of wider views where it will have the effect of screening the proposed development.

23 The proposed building is 73 storeys (309.6m AOD), which would make it the tallest building in the eastern cluster of tall buildings. For comparison the Shard is 308.5m AOD and 22 Bishopsgate is 295m AOD. It is understood that the height of the proposed building is limited by aircraft safety requirements stipulated by the Civil Aviation Authority. The applicant is proposing a bold and elegant design approach which derives its form and appearance from a structural solution to providing an open, permeable interface with the public realm and flexible, efficient use of space. Having considered the submitted townscape, built heritage and visual impact assessment (see also below), 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 it being the tallest building in the cluster is accepted and supported.

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

Layout

25 At ground level the building is raised to enable the public realm to extend across the site and under the building. The reception lobby is elevated to the first floor to create a generous space beneath the building and allow uninterrupted public access across the site. This fundamental aspect of the building design provides a significant improvement to visual and physical permeability across the site, better revealing the surrounding historic environment and is strongly supported.

26 To the north of the existing building lies the road, Undershaft, and an unsightly and intrusive service ramp that acts a physical barrier to permeability. The proposed development allows the removal of the service ramp and the relocation of Undershaft further north, creating a pedestrian friendly route from Bishopsgate to St Mary Axe and greatly enhancing the permeability and visual amenity of the area. GLA officers welcome this intervention.

27 To the south of the existing building St Helen's Square is currently unattractive and inaccessible, bounded by steps on two sides and the facade of the existing building to the north. The proposed development includes the reconfiguration of St Helen's Square with an elliptical lower court open to the sky, which provides a retail gallery and access to the proposed viewing gallery and cycle facilities. Around this opening the landscaping includes new tree planting and seating areas. GLA officers support the provision of the lower court, which will provide opportunities for active retail uses, sheltered seating space and a means of managing access to the public areas of the building. GLA officers also support the provision of a retail kiosk in the public realm.

28 The main entrance and reception are elevated and accessed via two banks of escalators. An offset core to the west of the proposed building houses the lifts. Up to level 48 and 49 the lift shafts are contained in a 'backpack' to the tower. At level 48 and 49 a transfer floor connects the backpack to a central core. The layout of the building allows for uninterrupted open floorplates to be provided. 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 within the building including at prime levels such as the transfer floors and the top of the building, which is welcomed. GLA officers support the intention to deliver a high quality inclusive workplace environment with an emphasis on occupier well-being.

29 At the top of the proposed building space is provided for a viewing gallery and education space at levels 71 and 72 and the floor below will house a restaurant. The entry to these spaces will be provided alongside the retail gallery in the lower ground court described above. Access to the public spaces at the top of the building will be free and available to all visitors including school parties. This is welcomed and should be secured by section 106 legal agreement alongside a management plan to facilitate access for school parties.

30 Overall the elevation of the building at ground level and creation of a lower ground court 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 provides for high quality indoor and outdoor spaces that integrate well with the surrounding streets and spaces in accordance with London Plan Policy 7.6.

Architectural quality

31 The sides of the tower taper in slightly over its height to mirror the reduction of structural requirements as the building rises. If the lines were to be extended beyond the height of the tower they would eventually converge at a point ten times the height of the building. The building is characterised by its external bracing, made of weathering steel, which provide additional strength and reduce the amount of internal structure. Horizontal shades or brise solei made in white vitreous enamel metal protect the glazed facades and will give the building a distinctive white tone in contrast to the earthy colour of the weathering steel bracing. At the top of the building the enamel metal brise solei gives way to dichroic horizontal glass shades to provide a distinctive top. The result of the above is an elegant, distinctive building that demonstrates a high standard of architecture in accordance with London Plan Policy 7.6.

Landscape and public realm

32 As discussed above the proposed development provides a significant enhancement to the public realm. The proposed public realm has a unified surface across the site, utilising high quality natural stone and a palette of materials favoured by City of London to achieve continuity with the wider context of the City, which is welcomed. Trees have been incorporated into the landscape proposal, which is strongly supported. To the north and south of the elliptical opening there are seating areas incorporated into the hard landscaping, integrated with the steps and paving. Further seating is provided under the elevated building under the north stair and around the four columns. At the lower court there is also opportunity for cafe seating. The integration of seating within the public realm is welcomed as it will enliven the space and provide amenity for City workers. In accordance with London Plan policy 7.3 security and prevention measures have been implemented either through design of street furniture and planters or by the placement of security bollards.

33 The environmental assessment that accompanies the scheme includes an assessment of the effect upon wind microclimate, which has been informed by extensive wind tunnel tests. Consideration was given to the effect upon pedestrian thoroughfares in and around the site, locations representing entrances and amenity spaces. These receptors were generally expected to record an acceptable wind environment for their intended use when tested with the proposed development in place. In a cumulative scenario tested with consented schemes in the surrounding area, wind conditions were generally consistent with or calmer than those recorded in the previous configuration. With mitigation measures in place an acceptable wind environment is expected for all receptors in both the proposed and cumulative scenarios.

34 Different mitigation measures were tested for the proposed development and in the cumulative scenario, including a building canopy, porous screens and a canopy over the lift shaft located in the amenity space. The applicant should confirm the required / proposed mitigation measures and these should be secured by condition. In addition to the mitigation measures tested the wind assessment recommends that further shelter can be provided within the amenity space by the proposed tree planting. Landscaping conditions should secure semi-mature tree planting, which will also ensure planting has an immediate impact and help make the public realm comprehensible at a human scale.

35 Overall the emerging landscape proposal demonstrates a commitment to the creation of a public realm of the highest quality and the detailed landscape design including, materials, planting and street furniture should be secured by condition to ensure compliance with London Plan Policy 7.5.

Strategic views

36 The site is not over-sailed by any strategic viewing corridors, however, given the scale of the proposal, the building would be visible in various strategic view panoramas and river prospects as defined by the Mayor's London View Management Framework (LVMF) SPG. As part of the environmental assessment which accompanies the scheme, the applicant has presented a wide range of verified view studies (including visualisations of the proposal from LVMF views 1A.1 & 2; 2A.1; 3A.1; 4A.1; 5A.2; 6A.1; 10A.1; 11B.1 & 2; 15B.1 & 2; 16B.1 & 2; 17B.1 & 2; 19A.1; 25A.1, 2 & 3; and, 26A.1; and massing renders from 9A.1; 23A.1; and 8A.1).

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

Historic environment

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

39 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. The very top of the development would be visible over the parapet of the Chapel Royal of St Peter ad Vincula but as a distant and secondary component of the view without diminishing the viewer's ability to appreciate the Outstanding Universal Value.

40 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.

41 This juxtaposition between old and new (a defining and positive characteristic of the City of London) is representative of the response of the scheme to designated heritage assets more generally. As mentioned in paragraphs 8 and 9 (and audited within the submitted built heritage and visual impact assessment), there are numerous heritage assets in the immediate vicinity of the site (including St. Helen's Place and Bank Conservation Areas, and St. Helen's Bishopsgate Church (Grade I), the Lloyds Building (Grade I) and Church of St Andrew Undershaft (Grade I) as well as various others which the proposal would be seen in conjunction with in longer townscape and strategic views. Having carefully considered the townscape, built heritage and visual impact assessment, and having had special regard to the desirability of preserving the setting of Listed Buildings, GLA officers are of the view that the proposal would not harm the setting of Listed Buildings, and would not harm the character/setting of the above-mentioned Conservation Areas. Further St Helen's Church will become visible from Leadenhall under the raised entrance of the development, enhancing the visibility and setting of the Church. Accordingly, GLA officers are satisfied that the application accords with London Plan Policy 7.8.

Inclusive access

42 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 with substantial areas of new public realm, the development will have a wide range of publicly accessible facilities, including the viewing gallery, 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.

43 The proposed development and public realm will create and cater for important pedestrian desire lines, that are currently unavailable or indirect, providing clearly visible accessible pedestrian routes. The reconfigured St Helen's square will be step-free (currently stepped) and enable easier pedestrian movement around and through the site. Two DDA compliant lifts are provided underneath the building adjacent to the main entrance escalators that provide access to the first floor office lobby. These lifts also connect to the lower court retail level and viewing gallery entrance lobby. A further pair of DDA/cycle lifts located to the south of the building provide access to the lower court and basement levels. 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.

Sustainable development

Energy strategy

44 For the purposes of assessing applications against the carbon dioxide savings target within London Plan Policy 5.2, the Mayor now applies a 35% reduction target beyond Part L 2013 of Building Regulations. In accordance with the principles of Policy 5.2 the applicant has submitted an energy strategy for the development, setting out how the scheme proposes to reduce carbon dioxide emissions in accordance with the London Plan energy hierarchy.

45 For first part of the energy hierarchy the development is estimated to achieve a reduction of 879 tonnes per annum (28%) in regulated CO₂ emissions compared to a 2013 Building Regulations compliant development. This is achieved through a range of passive design features and demand reduction measures 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 heat recovery plant and low energy lighting with automated controls.

46 Mechanical cooling is proposed throughout the development. The demand for cooling will be minimised through solar control glazing. The applicant should outline all measures taken to minimise cooling demand in line with Policy 5.9. The applicant should provide evidence to demonstrate that the passive design measures have minimised the cooling demand, for example quantifying the cooling demand in kWh against a baseline. The applicant should also provide the results of the Part L solar gain check demonstrating that all areas will be within the criterion limit.

47 The applicant has carried out an investigation and there are no existing or planned district heating networks within the vicinity of the proposed development. The applicant has identified that the Citigen network is the nearest existing network. However connection is not proposed due to the distances involved, estimated to be over 1km. The development site is situated within a district heating opportunity area and the GLA is aware that there are plans by the Citigen network operator for an additional heating and cooling network to be developed in the City. The applicant should therefore contact the network operator to discuss connection opportunities. Evidence of correspondence should be provided.

48 The site heat network will be supplied from a single energy centre. This will be 740sq.m in size and located on the top floor. The applicant has provided a commitment to ensuring that the development is designed to allow future connection to a district heating network should one become available, which is welcomed.

49 The applicant is proposing to install a 480 kW_e / 730 kW_{th} gas fired CHP unit as the lead heat source for the site heat network. The CHP is sized to provide the domestic hot water load, as well as a proportion of the space heating (60% of the total heat load). A reduction in regulated CO₂ emissions of 237 tonnes per annum (7%) will be achieved through this second part of the energy hierarchy.

50 The applicant has investigated the feasibility of a range of renewable energy technologies and is proposing to install 350 m² of roof mounted Photovoltaic (PV) panels. A roof plan has been provided. A reduction in regulated CO₂ emissions of 24 tonnes per annum (1%) will be achieved through this third element of the energy hierarchy.

51 Based on the energy assessment submitted at Stage 1 a reduction of 1141 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, equivalent to an overall saving of 36%. The carbon dioxide savings exceed the target set within Policy 5.2 of the London Plan, which is welcomed. However, the comments above should be addressed before compliance with London Plan energy policy can be verified. The details of the Energy Strategy should be secured by condition.

Climate change adaptation

52 London Plan Policy 5.10 seeks a 5% increase in green infrastructure within the CAZ by 2030 in order to support urban greening and the capital's response to climate change. GLA officers support the proposed planting of trees within the public realm and accept that due to its height and single volume the building does not provide opportunities for green roofs or other biodiversity enhancement measures. The proposals are therefore considered satisfactory with regards to London Plan Policies 5.10 and 5.11.

53 The site is within Flood Zone 1, with no significant surface flood water risk at the site. Therefore the proposals are acceptable in terms of London Plan Policy 5.12. The Sustainability Statement states that the development will reduce surface water drainage by at least 50% by the use of include geo-cellular attenuation and rainwater harvesting. Given the nature and location of the proposed development, this approach is considered to be acceptable in terms of London Plan policy 5:13. The measures outlined in the Sustainability Statement should be secured by condition.

Transport

Access and public realm

54 A Pedestrian Environment Review System (PERS) audit incorporating a Pedestrian Comfort Level assessment, based upon TfL's Pedestrian Comfort guidance, has been undertaken. The Pedestrian Comfort Level (PCL) demonstrates the impact of the additional pedestrian movements arising from the development, and TfL would support the securing of improvements to walking routes on borough roads in the vicinity of the site to mitigate this impact. TfL officers confirm that no s106 mitigation would be sought in regard to the impact of the development upon the TfL Road Network.

55 The proposed scheme is very successful in opening up routes into and through the site, including an adequate range of entrance points into the development for pedestrians and cyclists. Cyclist access through a combination of an external ramp and lifts is satisfactory, subject to the securing of details regarding management and maintenance of these elements. Cyclists would be able to cycle across the public realm adjacent to the ramp entrance point on St Mary Axe, and it is assumed that a dropped kerb will be provided in this location. The City should satisfy itself that this approach would not lead to excessive conflict between cyclists and pedestrians at this point.

56 Service vehicle and wheelchair parking space users would utilise dual 8m vehicle capable vehicle lifts accessed from Undershaft at the rear (west) edge of the site. The servicing implications are discussed in greater detail below.

57 It is proposed to relocate the carriageway of Undershaft northwards, to accommodate a larger building footprint, of which the greater part would be open and permeable at ground level. A shared pedestrian and vehicle surface is proposed, which is supported by TfL in principle, with different surface materials intended to demarcate the pedestrian and vehicle elements. It will be necessary to clearly set out the proposed areas for adoption by the City of London, and to set out both the level of traffic in total that will need to use this route, and how informal vehicle parking is to be avoided.

Car and cycle parking & cycle hire capacity

58 Car parking will be limited to six blue badge spaces, which is supported. TfL officers request that at least two of these spaces are provided with active electric vehicle charging points. Proposals for the drop off and pick up of disabled people should also be identified before the application is referred back to the Mayor.

59 Cycle parking is provided in accordance with London Plan standards based on GEA floorspace as set out in the table below. Long stay spaces are located in the basement and accessed via a combination of an external ramp and lifts. Cyclists would also be able to cycle across the public realm adjacent to the ramp entrance point on St Mary Axe, and it is assumed that a dropped kerb will be provided in this location. The City should satisfy itself that this approach would not lead to excessive conflict between cyclists and pedestrians. The majority of short stay spaces would be located at ground level with 61 Sheffield stands provided in various locations throughout the public realm. The remaining 20 stands would be provided at basement level and this approach is accepted given the high overall requirement.

Land Use	Type	London Plan Standard	Floor Area (GEA)	Requirement
Office (B1)	Long Stay	1 space per 90sq.m	147,445	1,638
	Short Stay	First 5000sq.m: 1 space per 500sq.m. thereafter: 1 space per 5000sq.m		38
Viewing Gallery (Sui Generis)	Long Stay	1 space per 8 staff	2,930	4
	Short Stay	1 space per 100sq.m		
Retail (A1 – A3)	Long Stay	1 space per 175sq.m	3,725	29
	Short Stay	1 space per 40sq.m		
Total Long Stay				1664
Total Short Stay				161

60 Of the 1,644 long stay spaces, 15% are of the foldable bicycle locker type, which is potentially excessive in relation to the proportion of cycling trips likely to be undertaken to and from the site on that type of cycle, but which is acknowledged to have been agreed at several other sites in the City. The required 5% of larger Sheffield stand type spaces will be provided. 1 shower per 10 cycle parking spaces (167 showers) and 1:1 locker provision is welcomed, and no objection is raised to the locating of some shower facilities on upper floors of the building.

61 A Cycle Hire station is proposed on the site's St Mary Axe frontage. Whilst this is welcomed in accordance with London Plan Policy 6.9, the space shown appears to be too small to meet operational requirements and the need generated by the proposals. This can be remedied by forming a second row of stands, creating a dual banked station capable of accommodating 25 cycles. A Section 106 contribution of £200,000 to pay for installation and maintenance of the station is required, and the applicant is urged to provide revised plans to address the above point as well as safeguard the land within the site and begin discussions over lease conditions.

Trip Generation

62 Some further work on trip generation is required before the transport impacts of the proposals can be fully assessed. However, at this stage it is likely that no site-specific transport mitigation other than the cycle hire docking station will be sought by TfL. However, it should be acknowledged that this and other large developments in the area will place further pressure on already congested rail, underground and DLR networks as well as the pedestrian and cycle network.

63 As a result, TfL would expect a proportion of the borough CIL receipts from this development to contribute to funding public transport accessibility or capacity improvements that can be delivered at stations affected by the proposals, such as step free access improvements at Liverpool Street London Underground Station. TfL would also welcome further discussions as to how pedestrian and cycle capacity in the area can be secured.

Servicing and delivery

64 To minimise the development's impact on the surrounding road network, consolidated servicing is proposed to occur, managed through an off-site consolidation centre. This is strongly supported by TfL and should deliver significant benefits. This should be secured by the Section 106 agreement. Servicing would then take place from basement level, although it is noted that the vehicle access lifts could not accommodate larger HGVs and further consideration must be given to how access to the site by these types of vehicle is catered for.

Travel Plan

65 A framework Travel Plan has been submitted with the application and is of a good quality. In particular, the variety of soft measures that the applicant is willing to commit to in order to encourage are strongly welcomed. The detailed Travel Plan should be secured by Section 106 agreement, in accordance with London Plan Policy 6.3.

Strategic transport contributions

66 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). As a guide the section 106 Crossrail liability has been estimated to be in the region of £13 million based on floorspace figures provided in the application forms. However, the City should confirm the floorspace figures and calculate the exact amount liable. In these situations, the Mayoral CIL will be treated as a credit towards the section 106 Crossrail liability and this should be reflected in the wording of the section 106 agreement.

Local planning authority's position

67 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

68 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

69 There are no financial considerations at this stage.

Conclusion

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

- **Central Activities Zone:** The proposed development would respond to established demand for office space within the CAZ, and would support London's continuing function as a World City in accordance with London Plan policies 2.10 and 4.2.
- **Offices:** The proposal would provide high quality, flexible office accommodation that would contribute to the diversity of workspace and businesses within the CAZ in accordance with London Plan Policy 4.2
- **Mix of uses:** The proposed mix of on-site uses is appropriate given the characteristics of this scheme in terms of supporting an important cluster of CAZ business activity. An affordable housing contribution will be made as per the tariff established within the City of London Corporation Planning Obligations SPD.
- **Urban design:** This is an appropriate location for a tall building, and the high architectural quality proposed is fitting for a development of this scale and prominence. The development provides for high quality indoor and outdoor spaces including a significant enhancement to the existing public realm. 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 and would not cause harm to the historic environment. Accordingly the application complies with London Plan policies 7.8 and 7.10.
- **Inclusive access:** The approach to access and inclusion is supported in accordance with London Plan policies 4.12, 7.2 and 7.6.
- **Sustainable development:** The proposed energy strategy and climate change adaptation measures are broadly supported in accordance with London Plan policies 5.2, 5.10, 5.11 and 5.13. Notwithstanding this GLA officers seek further information with respect to cooling measures, as well as an update with respect to discussions with Citigen.
- **Transport:** The proposal is broadly acceptable in strategic transport terms; however, the applicant should address the matters discussed in this report with respect to cycle hire in order to ensure accordance with London Plan policies 6.3, 6.5, 6.9, 6.10, 6.13 and 6.14.

71 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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