



**45 Beech Street**

# Planning Statement

**February 2024**

**DP9 Ltd**

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London  
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## **1. Introduction**

- 1.1 This Planning Statement has been prepared by DP9 on behalf of Beech Street (London) LLP ('the Applicant') in support of a planning application for development at 45 Beech Street, London, EC2Y 8AD ('the Site').

### **The Proposed Development**

- 1.2 The application seeks full planning permission for the following ('Proposed Development'):

*"Extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works"*

### **The Applicant**

- 1.3 Whilst the Applicant is Beech Street (London) LLP, the Proposed Development will be developed by HubCap.
- 1.4 HUB was originally founded in 2012 as a residential developer in London. More recently HUB has expanded to create HubCap which is a wholly owned subsidiary of the HUB business. HubCap has been set up to deliver low carbon city centre living opportunities across the UK.
- 1.5 HubCap prioritises the reuse of existing buildings, as well as optimising operational carbon savings through retrofitting offices or other commercial uses that are coming to the end of their life or are no longer fit for purpose.
- 1.6 HubCap brings vibrancy and residential accommodation back into parts of UK city centres where communities and neighbourhoods have often been lost.
- 1.7 HubCap believes in sustainable placemaking that is focussed strongly on well-connected locations within city centres.

### **Co-living**

- 1.8 Co-living describes a form of high quality shared housing where residents have their own private space but share communal spaces for dining, leisure, socialising and exercise.
- 1.9 The principle of co-living is founded on the concept of creating a residential community, with shared communal amenity spaces designed to enhance interaction and engagement between residents.
- 1.10 The Site is considered an ideal location for co-living accommodation given it is in an established residential area and has excellent links to the primary business core of the City. The proposal can therefore provide new homes for people who choose to live and work in the City.



## Supporting Information

1.11 This Planning Statement should be read in conjunction with the drawings submitted as part of this Application, together with the following supporting documents:

- Planning Application Form and Ownership Certificate, prepared by DP9 Ltd;
- CIL Additional Information Form, prepared by DP9 Ltd;
- Proposed Drawings, prepared by AHMM;
- Existing Drawings, prepared by AHMM;
- Design and Access Statement, prepared by AHMM and East;
- Energy Strategy, prepared by Introba;
- Sustainable Design and Construction Statement, prepared by Intoba;
- Circular Economy Statement, prepared by Circle;
- Shared Living Management Plan, prepared by HUB;
- Affordable Housing Viability Assessment, prepared by DS2;
- Loss of Office Viability Assessment, prepared by DS2;
- Whole Life Carbon Assessment, prepared by Circle;
- Daylight Sunlight & Assessment, and Internal Daylight Assessment, prepared by Anstey Horne;
- Heritage, Townscape and Visual Impact Assessment, prepared by The Townscape Consultancy;
- Transport Assessment, prepared by Markides;
- Travel Plan, prepared by Markides;
- Delivery, Servicing and Site Waste Management Plan, prepared by Markides;
- Outline Construction Management Plan, prepared by Markides;
- Air Quality Assessment, prepared by AQC;
- Noise and Vibration Assessment, prepared by Formant;
- Statement of Community Involvement, prepared by LCA;
- Flood Risk Assessment, prepared by Whitby Wood;
- Drainage Strategy and SuDs, prepared by Whitby Wood;
- Fire Statement, prepared by Arctec Fire;
- Equality Statement, prepared by Volterra;
- Health Impact Assessment, prepared by Volterra; and
- Ecology and Biodiversity Net Gain Assessment, prepared by ITP Energise.

1.12 This Planning Statement provides an overview of the Site, the Proposed Development and an evaluation of the Proposed Development against Development Plan policy and guidance. It is structured as follows:

- Section 2: describes the Site and surrounding area.
- Section 3: summarises the pre-application and consultation process.
- Section 4: describes the Proposed Development.



- Section 5: identifies the main national, regional and local planning policy relevant to the determination of the application.
- Section 6: provides an assessment of the Proposed Development against the relevant planning policy considerations.
- Section 7: identifies Draft Heads of Terms (“HoTs”).
- Section 8: provides a conclusion.



## **2. Site Context**

### **Existing Site and Surrounding Area**

- 2.1 The Site comprises an existing office building ranging in height from 6 to 8 storeys located within the Barbican Estate which is a predominantly residential area comprising c2,000 homes.
- 2.2 The building is joined to Bridgewater House to the north which is a residential property. To the west is Bryer Court which is also residential. The three buildings enclose a courtyard area and ramped access which leads from Bridgewater Street into the basement of the Site.
- 2.3 To the west of the Site is Ben Jonson House which sits on the opposite side of Bridgewater Street.
- 2.4 To the south is the Beech Street tunnel which runs underneath the Barbican podium. The ground and first floor of the Site therefore face into the tunnel whereas the upper floors overlook the Barbican Podium.
- 2.5 The primary pedestrian access is from Beech Street. Vehicle access is from Bridgewater Street, to the courtyard area, where four vehicle parking spaces are available on the ramp and several additional spaces are provided within the basement area.
- 2.6 The existing building was constructed in the 1950s and therefore has several shortcomings that means it does not meet the requirements for modern business occupiers. These are explored further in this Planning Statement but include low floor to ceiling heights and constrained layouts.
- 2.7 The surrounding area is predominantly residential in nature with some commercial properties including 1 Golden Lane which is currently being refurbished and extended to increase the height from 9 storeys to 12 storeys following approval of a recent planning application (LPA Ref: 22/00202/FULMAJ).

### **Heritage**

- 2.8 The Site is not in a Conservation Area. However, the Barbican and Golden Lane Conservation Area surrounds the Site. The Site was not considered to be significant enough to be included in the conservation area when it was designated.
- 2.9 There are several designated heritage assets within the Barbican and Golden Lane Conservation Area centring on its two estates:



- The Barbican Estate (Grade II Listed) and its Grade II\* Listed Registered Park and Garden of Special Historic Interest (RPGSHI).
- The Golden Lane Estate Grade II Listed RPGSHI and includes several Listed Buildings including the Grade II Cuthbert Harrowing House, Great Arthur House, Cullum Welch House, Community Centre, and Bowater House.

2.10 1 Golden Lane to the north east of the Site is Grade II listed.

### **Accessibility**

2.11 With respect to cycling, Beech Street is provided with a dedicated on-street cycle lane in both directions, with the A1 / B100 Beech Street / Long Lane junction provided with Advanced Stop Lines (ASL) for cyclists. Figure 3.4 below highlights the cycle network within the vicinity of the Site. Given the location of the Site, the cycle infrastructure present on Beech Street offers onwards connectivity throughout the Central London area.

2.12 The Site has excellent connectivity to public transport. This is reflected by the highest possible PTAL score of 6b.

2.13 Bus stops are situated on the A1, north of its junction with Beech Street. The bus stops are accessible within a distance of 200m, taking approximately 3-minutes on foot. There is a bus stop on either side of the carriageway, both of which are characterised by a dedicated shelter with seating, and a flag and a post which includes timetable information. Painted bus cages are provided within the carriageway for the waiting bus.

2.14 Additional bus stops are provided on Beech Street itself, within 100m of the site taking just over 1-minute on foot. These stops are, however, served by fewer routes, with the A1 bus stops offering access to a wider variety of services.

2.15 Barbican Underground Station is located approximately 150m from the site, taking less than 3-minutes on foot. Barbican is situated on the Circle, Hammersmith and City and Metropolitan lines. These lines offer connections with Hammersmith, Barking, Aldgate, Amersham, Chesham, Uxbridge and Watford.

2.16 The station benefits from frequent services in both an eastbound and westbound direction, with trains running every 2-4 minutes.

2.17 The site is near equidistant between Farringdon and Moorgate Railway Stations, taking in the region of 10 minutes on foot, with Farringdon located 800m from the site and Moorgate 650m. From Moorgate, additional Underground services area accessible via the Northern line, with services available to Edgware, Finchley Central, High Barnet, Golders Green, Mill Hill East and Morden.



- 2.18 Additionally, from Farringdon Railway Station, access to the Elizabeth Line is achievable. Access to the Elizabeth Line is taken from Lindsey Street / Long Lane, approximately 350m from the site taking just over 4 minutes on foot. This offers access to Abbey Wood, Shenfield, London Paddington, Maidenhead and Heathrow Terminals 4 and 5.

### Planning History

- 2.19 A review of the City of London's online planning records has been undertaken. A summary of the relevant applications and decisions are set out below:

Reference	Description	Decision
1698B	Erection of a 7 storey block of offices at 43, 43a & 44/46 Barbican & 2/8 (inc.) Bridgewater Street	Decided 22 May 1952
1698X	Alterations including the installation of replacement windows, changes to the main entrance and provision of a new entrance in Bridgewater Street, relocation of air-conditioning units and increased height of lift motor room. Creation of a self-contained residential flat at 6th floor level.	Approved 08 May 2003
05/00043/FULL	Change of use from a vacant residential unit at 6th floor level (Class C3) to office use (Class B1) (180sqm.).	Approved 22 March 2005
19/00062/FULL	External elevation alterations and refurbishment at ground floor level, replacement main entrance.	Approved 02 May 2019





### **3. Pre-Application Discussions and Consultation**

3.1 This section should be read in conjunction with the Statement of Community Involvement, prepared by LCA, which accompanies this planning application and explains the public consultation that has been carried out during the pre-application stage. This section provides an overview of the formal pre-application process with the City of London Corporation, and other key stakeholders.

#### **Public Consultation**

3.2 Full details of the public consultation can be found in the accompanying Statement of Community Involvement (SCI) prepared by London Communications Agency. The engagement was held between June and October 2023, across two phases, and included:

- Initial briefings held with representatives from local residents' groups such as the Barbican and Golden Lane Neighbourhood Forum, Barbican Association and local house resident associations on 2 June 2023 and with ward councillors on 24 July 2023 respectively, to introduce HubCap and the principles behind its refurbishment of the Site;
- A follow-up workshop for core local stakeholders to discuss early design proposals, on 15 September 2023;
- A newsletter delivered to 2,553 local residents and businesses via Royal Mail 1st Class, within the agreed consultation radius, inviting both to the public exhibition events;
- Two public exhibitions held on site at 45 Beech Street in September 2023 attended by 69 members of the public and key stakeholders, along with a preview event for City of London ward members;
- An article on the Barbican Association's 'Latest news' website page, encouraging residents to view the proposals and share their thoughts;
- A bespoke consultation website – [www.45beechstreet.co.uk](http://www.45beechstreet.co.uk) – which contained details of in-person events and provided a digital survey for feedback; and
- The creation of dedicated contact channels for people to get in touch with the team and share their questions and comments, including an email address ([45beechstreet@londoncommunications.co.uk](mailto:45beechstreet@londoncommunications.co.uk)) and freephone number 0800 307 7990



### **Pre-application Meetings with the City**

3.3 A series of pre-application meetings and workshops were held with officers at the City to discuss various topics associated with the Proposed Development in accordance with a Planning Performance Agreement. A summary is provided below.

- 26 April 2023 – initial meeting to discuss the principle of the scheme, land uses, height and massing.
- 25 July 2023 – pre-application meeting to discuss land use, layouts, height, massing, architecture and façade design.
- 1 August 2023 – workshop to discuss energy, sustainability and carbon optioneering.
- 23 August 2023 – workshop to discuss transport and highways matters.
- 12 September 2023 – pre-application meeting to discuss layouts, design, facades and architecture.
- 20 September 2023 - Site visit to Sunday Mills co-living development in Earlsfield.
- 9 October 2023 – pre-application meeting to discuss Affordable Housing.
- 21 November – pre-application meeting to discuss Affordable Housing.
- 24 November 2023 – pre-application meeting to discuss façade design and materiality.
- 5 December 2023 – workshop to discuss façade design and materiality.



## 4. Application Proposals

### Description of Development

- 4.1 The application seeks full planning permission for the following development:

*“Extension and change of use of existing office building to co-living accommodation with associated internal and external amenity spaces (sui generis) including cycle storage, landscaping, servicing and all other associated works.”*

- 4.2 The Proposed Development is focused on refurbishing and making best use of an existing office building located within a residential area by delivering new homes in a sensitive proposal that will deliver on the City’s sustainability objectives and respect the surrounding context.
- 4.3 The Proposed Development will provide high quality co-living accommodation with 174 co-living rooms of which 10% will be accessible rooms. A series of shared spaces are proposed, which includes 200sqm of shared outdoor amenity space in the form of a roof terrace and courtyard and 690sqm shared internal amenity space including co-working space, kitchens, lounges, a café, gym and tv room.

### Building Form and Scale

- 4.4 The Proposed Development proposes to retain and refurbish the majority of the existing building. The top two floors are not suitable for retention given the low floor to ceiling heights and general incompatibility for the proposed use. They are proposed to be removed and replaced with four new floors of new built form. The existing building (which peaks at 8 storeys and 42.36m AOD) will have a net increase in height of two floors – with a final finished maximum height of 50m AOD (7.64m increase).
- 4.5 The form and scale of the additional massing has been heavily influenced by the vernacular of the adjacent Bryer Court and Ben Jonson House. This will ensure full compatibility of this modern development with the existing Barbican development.
- 4.6 In terms of floor area, the existing building comprises 5,284sqm (GIA) of office floorspace. It is proposed to demolish 957.1sqm (GIA) and add a total of 2,641.2sqm (GIA) of new floorspace. This would equate to a 1,684.2sqm increase in floorspace and result in a final building comprising 6,968.2sqm (GIA) of co-living floorspace (Sui Generis).



## **Co-Living**

- 4.7 The Proposed Development comprises 174 co-living rooms along with internal and external amenity spaces.
- 4.8 The private rooms measure between 19sqm and 37sqm and each room will comprise an ensuite bathroom, kitchenette facilities, a desk and living space and storage. 17 rooms (up to 37sqm in size) would be accessible for wheelchair users and those with mobility difficulties, which equates to a 10% provision.
- 4.9 Residents would have access to a range of communal amenity spaces including:
- Co-working
  - Café
  - Shared kitchen
  - Multi-function room
  - Gym
  - TV room
  - Roof terrace
  - Courtyard
- 4.10 The internal amenity spaces are located at basement and ground floor level. The external amenity spaces are within the courtyard and roof terrace. A total of 690sqm of internal amenity and 200sqm external amenity space is proposed. This equates to 5.1sqm of amenity space per unit. Additional to this, a city garden is also proposed at the Beech Street interface.

## **Landscaping**

- 4.11 Three key areas of landscaping are proposed across the development. For use by residents, the rooftop terrace and the ground level courtyard have both been sensitively designed to provide for specific amenity uses. The courtyard has been programmed with integrated seating, tall planters and sculptural screens to provide shelter, protection and seclusion.
- 4.12 The courtyard at ground floor level has been designed to provide a more animated amenity space; with material that delineates the existing roadway, extensive seating and benches; and playful materials, planting and colour palettes.
- 4.13 On the Beech Street interface, a city garden is proposed which seeks to provide a planted buffer zone between road and building. The use of planters (repurposed from the current development), and trees would provide amenity across the street scene and mark a distinctive entrance to the building.



## **Access**

- 4.14 The existing access from Bridgewater Street will be retained as part of the proposals, for pedestrian and cycle access to the rear courtyard which will be converted to communal space for residents of the co-living space and to allow access to the basement level and associated cycle storage. The access will continue to be controlled and residents will have a fob or code to enable access to this area, ensuring security.
- 4.15 In addition, for servicing purposes associated with the sub-station within the courtyard area, the top of the internal ramp has been kept clear to allow for the parking of one van. This will allow the sub-station to be accessed and maintained accordingly, allowing for parking to take place off-street in association with its ongoing maintenance. This area can also be used by contractors who are likely to remain on site for prolonged periods and who need access to their van for equipment purposes. Further consideration of servicing is provided as part of the Servicing and Delivery Plan submitted with the planning application.
- 4.16 The primary pedestrian access will be taken from Beech Street. The location of the existing access will be maintained, with a 1:20 ramp installed in conjunction with the existing steps, to ensure access for all is maintained. Access to the café for the public, will be taken from this location also, with the café accessed from the entrance area.
- 4.17 An additional ramped (1:16) pedestrian entrance is proposed from Bridgewater Street offering further connectivity in this location. Within the building itself, two stair cores are proposed along with three lifts. Two of the lifts are provided with internal dimensions of 1.1m by 2.1m with the third lift being developed with internal dimensions of 1.1m by 1.4m, ensuring access for all users.

## **Parking**

- 4.18 The Proposed Development is car free to reflect the highly accessible nature of the Site. In terms of accessible parking, it is proposed to create an additional accessible parking space on Bridgewater Street. The location of the space is illustrated in the Transport Statement.
- 4.19 A total of 134 long stay cycle parking spaces are proposed to support the proposals, which equates to 77% of the London Plan residential cycle parking standards for studio units. These spaces are to be located in the basement area and will be accessed from the existing vehicle access from Bridgewater Street, which will be retained for pedestrian and cycle access to the communal courtyard area. A lift will also be provided to the basement area to allow for access to cycle parking.
- 4.20 The proposed cycle parking offers a variety of cycle parking arrangements. A total of 19% of the cycle parking spaces will be developed as Sheffield stands, of which several will be provided on the lower tier as part of a two-tier rack system. 6% of spaces will be provided as



oversized cycle parking spaces, to allow for different bicycle forms to be stored safely, enabling users who may otherwise travel via sustainable means to store their bicycle safely and securely. The remaining 75% will be provided as standard two-tier racks.

- 4.21 With respect to short-term cycle parking needs, a total of 6 Sheffield stands are proposed across the site frontage, accommodating 12 bicycles. As detailed above in the policy section, this level of short-term parking is seen to accord with the London Plan standards for the co-living space and café facility. The location of the spaces within the vicinity of the primary access on Beech Street, ensures the spaces are overlooked and easily accessible for visitors of the site.

### **Energy and Sustainability**

- 4.22 The brief for the project hinges around a central aim to ensure the building achieves the highest-level of sustainability and minimises carbon impact to exceed targets to meet evolving market standards for sustainable performance.
- 4.23 The energy and sustainability strategy are explained in the report prepared by Introba submitted with the application. In summary, the Proposed Development is to be an all-electric non-combustion development, which will be connected to the district heat network. A series of energy-based targets have been used to drive the design and include:
- A fabric performance improvement over Building Regulations.
  - Mechanical ventilation with heat recovery (MVHR) in the co-living rooms and shared spaces to provide background ventilation requirements.
  - Connection to the CitiGen district heat network to provide space heating, cooling and DHW.
  - Renewable energy generation from roof mounted photovoltaics.



## **5. Planning Policy Framework and Overview**

- 5.1 This section provides a brief summary of the key planning policies relevant to the Site and its redevelopment. Section 6 appraises the Proposed Development against the relevant planning policies.

### **National Planning Policy**

- 5.2 The National Planning Policy Framework (NPPF) was published on 27 March 2012 and revised in 2018, 2019, 2021, September 2023 and most recently 19<sup>th</sup> December 2023. It sets out the Government's planning policies for England and how these are expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development, for both plan making and for decision taking. The NPPF directs local planning authorities to approve development proposals that accord with the development plan without delay.

### **The Development Plan**

- 5.3 Section 38(6) of the Planning and Compulsory Purchase Act 2004 ('the 2004 Act') requires that planning applications are determined in accordance with the Development Plan unless material considerations indicate otherwise. This statutory duty is emphasised at paragraph 2 of the NPPF. The Development Plan for the Site comprises the London Plan (March 2021) ('the London Plan') and the City of London Local Plan (January 2015) ('the Local Plan').
- 5.4 The City has also prepared a number of supplementary documents to provide guidance on adopted planning policies. These documents form material considerations but do not form part of the Development Plan. Those relevant to the Proposed Development include:
- Carbon Options Guidance (2023)
  - Office Use SPD (adopted January 2015)
  - City of London Open Spaces Strategy (adopted January 2015)
  - Statement of Community Involvement (adopted July 2016)
  - Air Quality SPD (July 2017)
  - Cultural Strategy (2018-2022)
  - City of London Transport Strategy (May 2019)
  - Whole Life Carbon Optioneering Planning Advice Note (March 2023)
  - Thermal Comfort Guidelines (December 2020)
  - Planning Obligations SPD (October 2021)



## **National Planning Policy and Guidance**

### *National Planning Policy Framework (NPPF)*

- 5.5 National planning policy is set out in the National Planning Policy Framework (NPPF), which was updated on 19<sup>th</sup> December 2023. At the heart of the NPPF is a presumption in favour of sustainable development with three overarching objectives: economic, social and environmental. These are to be delivered through the preparation and implementation of plans and the application of policies within the Framework.
- 5.6 The NPPF states that, “To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (Paragraph 60).
- 5.7 The NPPF supports building “a strong, responsive and competitive economy” and encourages creating conditions ... “in which businesses can invest, expand and adapt”, making “as much use as possible of previously-developed or brownfield land” (Paragraph 8).

### *National Planning Practice Guidance (NPPG)*

- 5.8 Alongside the NPPF, in March 2014 the Department for Communities and Local Government (DCLG) published the National Planning Practice Guidance (NPPG). The NPPG is a web-based resource which brings together planning guidance in an accessible, comprehensible and useable way.
- 5.9 Both the NPPF and NPPG are material considerations in the determination of a planning application, but do not form part of the City of London’s Local Plan.

## **Emerging Planning Policy**

- 5.10 The City is in the process of updating its Local Plan, but has only reached Regulation 19 stage (the Draft City Plan 2036, published in March 2021) and so having not yet gone through Examination, the Plan will carry limited weight. In terms of next steps, the new Local Plan known as the City Plan 2040 was due to be discussed at the City’s Planning and Transportation Committee on 21 November. However, it was withdrawn from the agenda to allow further consideration of the Levelling Up and Regeneration Act and the National Planning Policy Framework. It is expected to be taken through committee approval in March 2024.
- 5.11 This Planning Statement focuses on the City’s adopted Local Plan but also references emerging policy as an indication of the City’s direction of travel with regards to the new Local Plan.





### **Other Considerations – ‘Destination City’**

- 5.12 Though neither an adopted planning policy document, nor guidance document or other form of material consideration for planning, the Proposed Development is mindful of, and hoping to play a role in, the City’s ‘Destination City’ initiative - which sets out a renewed vision for the Square Mile to become the world’s most attractive destination for workers, residents and visitors. This ambitious vision will help to ensure that the City is the world’s most innovative, inclusive and sustainable business ecosystem as well as an attractive place to invest, work, live, learn and visit.



## 6. Planning Policy Assessment

- 6.1 This section outlines an assessment of the Proposed Development against the planning policy context identified in Section 5. Reference is made throughout the Design and Access Statement, plans, drawings and other consultants' documents submitted in support of the planning application where more detail can be found.

### Decision-Making Approach

- 6.2 The Development Plan, on the basis that it is up to date and can be afforded full weight, forms the primary consideration for the planning application. This should be assessed alongside the NPPF, to which significant weight should also be attached. The approach to assessing the Proposed Development should be based on the land uses proposed and whether it accords with the Development Plan; if it does, then it has the benefit of the statutory presumption in section 38(6) of the 2004 Act. If not, then it is necessary to consider whether there are any other material considerations, such as the NPPF, which indicate that the planning application should be determined otherwise than in accordance with the Development Plan.

- 6.3 As to the NPPF, it is informative to consider whether the Proposed Development constitutes sustainable development and will benefit from the NPPF paragraph 11 presumption in favour of granting planning permission. The Proposed Development represents sustainable development, as defined by the objective in paragraph 8 of the NPPF, for reasons which are summarised below and further supported in the comprehensive technical material that is being submitted in support of this application:

- **Economic Objective:** The Proposed Development is considered to contribute towards reinforcing a “strong, responsive and competitive economy” (within the City of London and on a wider regional and national level) through the delivery of co-living accommodation which can help support the primary business function of the City, representing the right type of use, in the right place, at the right time to “support growth”.
- **Social Objective:** The Proposed Development will help to maintain a strong, vibrant and healthy community. This is achieved through the design approach adopted (the Proposed Development will create a high-quality built environment, elevating the quality of the street scene for pedestrians and delivering an improved public realm). Furthermore, the design of the building reflects extensive work with a specialist, industry-leading team, to ensure that it is exemplary in terms of creating a healthy living environment and the promotion of inclusivity and accessibility to all.
- **Environmental Objective:** The Proposed Development comprises of a sustainable development with minimal environmental impact and large emphasis on climate change and circular economy principles, sustainable use of materials (and reuse of existing materials), with urban greening will all ensure a future proofed highly sustainable



development. The Proposed Development also represents the optimised use of the Site in a highly accessible and sustainable location. The historic and built environment will be preserved and, where possible, enhanced as a result of the high level of design quality applied to the proposed building. The impact that the Proposed Development will have on the local street scene and heritage assets (as relevant – see later analysis) is acceptable in planning terms.

### **Principle of Development**

- 6.4 At the heart of the NPPF is the presumption in favour of sustainable development, achieved through meeting the three ‘overarching aims’: building a strong, responsive and competitive economy; supporting strong, vibrant and healthy communities; and contributing to, protecting and enhancing the natural, built and historic environment.
- 6.5 The NPPF requires strategic planning policies to make “...as much use as possible of previously-developed or ‘brownfield’ land” (paragraph 119). Paragraph 126 also states that “good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
- 5.13 The NPPF also aims to significantly boost the supply of homes and explains that, “it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.” (Paragraph 60).
- 6.6 Furthermore, London Plan Policy GG2 states that those involved in planning and development must enable the development of brownfield land and prioritise sites which are well-connected by existing or planned public transport. Development on brownfield land should be optimised and optimisation should be a design led approach.
- 6.7 National, regional, and local policy seeks to optimise the potential of brownfield sites such as the Site to deliver high-quality, high density mixed-use development. The Proposed Development would support the principles of the optimal use of a brownfield site in a highly accessible, central location and provide new homes and jobs.
- 6.8 The principle of the Proposed Development therefore accords with the central theme of policy which seeks to deliver sustainable growth and is compliant with the Government’s overarching objectives for sustainable growth, specifically paragraphs 7, 11 and 60 of the NPPF and London Plan Policy GG2.
- 6.9 Considering the above, the principle of the Proposed Development is supported by current and emerging planning policy and guidance.

### **Loss of Office**



- 6.10 The existing lawful use of the site is office use (Use Class E (g) (i)). The building does however have a number of shortcomings to the extent that it no longer meets the expectations of modern office occupiers – all of whom are looking for office floorspace of increasingly exemplar quality, useability, flexibility and accessibility. The shortcomings are summarised as follows:
- Low slab heights and low floor to ceiling heights.
  - Poor occupational flexibility of office space due to existing structural wall in the centre of the building.
  - Different floor levels mitigated by use of ramps and raised access floors.
  - Layout flexibility constrained by column layout.
  - Washrooms do not meet expectations.
  - Staircases do not meet most recent fire escape regulation/guidance.
  - Poor accessibility at ground floor with steps in the entrance lobby.
  - Poor energy conservation standards and inefficient thermal envelope.
  - Geographically challenging for commercial use.
  - Low floor to ceiling heights and awkward entrance lobby from lifts.
  - Dated appearance of building.
  - Narrow and dark corridors.
- 6.11 Local Plan Policy CS1 seeks to protect office accommodation where there are strong economic reasons why the loss would be inappropriate and prejudice the primary business function of the City. Local Plan Policy DM1.1 goes further stating loss of existing offices will be refused where the building is considered suitable for long-term viable office-use.
- 6.12 Losses of office floorspace are considered inappropriate for the following reasons:
- *“prejudicing the primary business function of the City;*
  - *Jeopardising the future assembly and delivery of large office development sites;*
  - *Removing existing stock for which there is demand in the office market or long term viable need;*
  - *Introducing uses that adversely affect the existing beneficial mix of commercial uses”.*
- 6.13 As of the 31<sup>st</sup> March 2022, there had been an increase of 835,000 sqm (net) increase in office space delivered in the CoL since 2016 and a further 576,000 sqm (net) was under construction or was permitted. Within this context, the emerging Local Plan Policy S4 sets a target increase in office floorspace from 2021-2040 of a minimum of 1,200,000sqm.
- 6.14 The office floorspace already consented is ultimately in superior locations, located on key thoroughfares in proximity to other offices and within close proximity to transport hubs. The Site sits within the wider Barbican Estate, bounded on all sides by other residential uses so is not considered suitable for office use.



- 6.15 The extent of work required to bring the existing building up to an exemplar standard as required by the market would be substantial. This, alongside a continuous downward trend in lettings across the building demonstrates that the Site is not viable for long-term office use. More details in this regard are set out in the Loss of Office Viability Assessment prepared by DS2 submitted with this application; but in summary, it confirms that even if the building is retrofitted to modern standards, there would still be fundamental constraints inhibiting its success as a positive office location.
- 6.16 The loss of this existing office space is therefore considered to be negligible alongside the substantial quantum of existing stock and Grade A stock within the pipeline. Its loss is therefore considered to be appropriate and would not prejudice the aspirations of London Plan Policy SD5 (G), which seeks to increase office floorspace within the CAZ and Local Plan Policy CS1, which seeks to sustain and enhance the City of London as a financial and business service centre, with offices being the primary land use.
- 6.17 Whilst it has been demonstrated that the Site is not viable for long-term viable office use, the supporting text to Policy DM1.1 states that exceptionally, the loss of individual office developments to other commercial or infrastructure uses may be acceptable where the proposed alternative use meets the wider objectives of the Local Plan. The proposed development provides 174 high-quality co-living rooms which equates to approximately 97 standard C3 dwellings. This meets the wider objectives of the Local Plan, as demonstrated in further detail in the commentary above. It should be noted that the provision of 97 standard C3 dwellings in themselves would be difficult to achieve within the existing building without significant demolition.
- 6.18 Further, whilst the proposed development does not provide commercial floorspace for office use, the uses proposed is employment generating and the development as a whole will provide a number of economic benefits.

### **Co-living**

- 6.19 The Proposed Development seeks to deliver 6,968.2sqm (GIA) of co-living accommodation, comprising 174 private rooms and associated amenity space.

### *London Plan*

- 6.20 The London Plan recognises the pressing need for more homes in London. Table 4.1 of the London Plan sets a 10-year target of 1,460 net housing completions for the City of London.



- 6.21 The London Plan recognises that co-living schemes count towards meeting housing targets on the basis of a 1.8:1 ratio, with 1.8 co-living bedrooms/units being counted as a single conventional home. This approach to monitoring net housing provision from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up. The Proposed Development is therefore equivalent of 97 conventional homes, which makes a substantial contribution to the City of London's housing supply. This comprises 66% of the City's annual housing supply target.
- 6.22 London Plan Policy H16 relates to 'Large-Scale Purpose-Built Shared Living' which is defined as "*a housing option for single persons households who cannot or choose not to live in self-contained homes or HMOs*" (Sui Generis Use not traditional residential use Class C3). The policy applies to co-living developments of at least 50 units, therefore applicable for the assessment of the Proposed Development and sets out a detailed list of requirements, which we consider in turn.
- 1) *It is of good quality design*
- 6.23 The Proposed Development has evolved through a detailed understanding of the Site and its context – and has thus been the subject of extensive discussions with the City to ensure that the final proposal is high quality, well designed, and flexible for the needs of its future residents.
- 6.24 As set out in more detail the below, the accommodation proposed is high quality, well-equipped and flexible to meet the everyday needs of future residents. Comprising 174 individual co-living rooms alongside a substantial provision of communal amenities and functions, it will provide a high quality development.
- 2) *It contributes towards mixed and inclusive neighbourhoods*
- 6.25 The predominant land use in the surrounding area is conventional residential accommodation within the Barbican. The proposal provides a different type of housing that will bring diversity to the area and provide the opportunity for people to both live and work in the City. The proposed development will therefore contribute towards creating mixed and inclusive neighbourhoods.
- 6.26 More detail on the benefits of the co-living accommodation and its compatibility with its social context are detailed in the Health Impact Assessment and Equality Statement prepared by Volterra and submitted with the planning application.
- 3) *It is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency*



6.27 The Site is located in a highly sustainable location with excellent public transport links (PTAL 6b) and access to a an extensive range of local services and employment opportunities that can be reached by walking, cycling and public transport. The Proposed Development is car free so will not contribute to car dependency.

*4) It is under single management*

6.28 The Proposed Development will be under single management.

*5) Its units are all for rent with minimum tenancy lengths of no less than three months*

6.29 All of the co-living rooms are for rent and minimum tenancy lengths will be no less than three months.

*6) Communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents*

*6a) Convenient access to a communal kitchen*

6.30 A communal kitchen is proposed on the ground floor measuring 113.5sqm. Linked to the kitchen is a separate washing up area measuring 13.4sqm. The kitchen comprises the following:

- 12no hobs and ovens
- 12no sinks
- 8no fridge/freezers
- 9no dishwashers
- 12 bins under sink
- Up to 20no microwaves

6.31 This provision would ensure that sufficient capacity for residents to be able to cook whenever they need without having to queue and wait. The communal kitchen is conveniently located in close proximity to lifts and stair core to allow residents easy access with shopping.

*6b) Outside communal amenity space (roof terrace and/or garden)*

6.32 External amenity space is proposed in the form of a roof terrace and courtyard measuring providing a total of 200sqm of space. This equates to 1.1sqm of space per resident and sufficiently balances the wider operational requirements of the building with the need to minimise demolition within this built up context.



*6c) Internal communal amenity space (dining rooms, lounges)*

6.33 A diverse range of different internal communal amenity spaces are proposed at ground floor and lower ground floor level amounting to 690sqm – which equates to 4sqm per resident. The spaces will all be equipped with appropriate furniture, equipment and services and be available for all residents as part of an all-inclusive rent. The spaces are summarised as follows:

- Co-working.
- Café/lounge.
- Shared kitchen.
- Private dining room.
- Multi-function room.
- Gym.
- TV room.

*6d) Laundry and drying facilities*

6.34 A laundry room with drying area is proposed on the lower ground floor level. The laundry has access to the courtyard space providing natural ventilation to assist with the drying of laundry.

*6e) A concierge*

6.35 A concierge would assist in the management of the building. During day time hours, this service would operate from the reception desk in the lobby.

*6f) Bedding and linen changing and/or room cleaning services.*

6.36 The Operational Management Plan confirms that bedding and linen may be supplied to new residents on occupation. A cleaning service would be provided bi-weekly on a rotational basis to assist all members in the general upkeep of their private space. Ad hoc at-cost room cleaning services are to be available to residents.

*7) The private units provide adequate functional living space and layout, and are demonstrably not C3 Use Class accommodation*

6.37 The private rooms measure between 19 and 37sqm and are all fully furnished and contain an en-suite shower room. There are no adopted policies or guidance that define size requirements for the private rooms. However, it is worth noting that the proposed private rooms are larger than those in some of the other operational co-living schemes in London, including Palm House in Harrow, Sunday Mills in Earlsfield and Florence Dock in Battersea where the standard rooms are approximately 16sqm.





6.38 The Design & Access Statement describes the design and content of the private rooms in detail with floorplans and axonometric diagrams to show the different layouts and the furniture that is provided. In summary they contain the following furniture:

- Double Bed with in built storage.
- Compact kitchenette with hob and fridge.
- In built ventilation/extraction.
- Wardrobe.
- Seating area.
- Desk and chair.

6.39 There is some variety in the size of the rooms and the rooms on the top floor of the building benefit from their own private external terrace.

6.40 The private rooms would not comply with the legal definition of a dwelling because they do not individually contain all of the requirements for day-to-day domestic living and, as such, are incapable of being used as self-contained homes. They are clearly designed as part of a wider community with reliance of the shared amenity facilities, with a view to creating an integrated community. In this regard, the proposed co-living accommodation constitutes a Sui Generis use.

*8) A management plan is provided with the application*

6.41 The Operational Management Plan submitted in support of this application sets out how the development will be managed and the various spaces within the development will be maintained. In terms of the ways in which potential sources of neighbour disturbance, such as noise nuisance, would be minimised through management arrangements, the Plan details the following provisions:

- Staffing.
- Community liaison.
- Security.
- Tenancies.
- security and fire safety procedures.
- Move in and move out arrangements.
- Maintenance of internal and external areas.
- Cleaning arrangements and how linen changing services will operate.
- Deliveries and servicing.



9) *it delivers a cash in lieu contribution towards conventional C3 affordable housing.*

- 6.42 The Viability Letter dated 24<sup>th</sup> November 2023 has been formally submitted to the CoL confirming that the Proposed Development is capable of accommodating a payment in lieu contribution in line with the CoL's guidance, on a without prejudice basis.

*City of London Local Plan*

- 6.43 The City of London Local Plan directs new residential accommodation to the residential areas of the City. The Site sits within the Barbican Estate which is one of the residential areas identified in the Local Plan and therefore the principle of residential use on the Site is acceptable in principle.
- 6.44 The Local Plan does not contain any policies on co-living due to the fact that co-living is a relatively new housing product and therefore would not have been a consideration when the Local Plan was being drafted. The Local Plan was adopted in 2015 and is therefore now 8 years old. Specifically it was adopted pre-pandemic and therefore does not reflect the current aspirations and ambitions of the City – specifically in relation to its Destination City initiative, and the City's Recovery Taskforce whose mission is to ensure the Square Mile is the world's most innovative, inclusive and sustainable business ecosystem as well as an attractive place to work, live, learn and visit.
- 6.45 The draft Local Plan provides support for co-living uses as follows, *'The City Corporation considers that there is potential within or near the identified residential areas for Co-living accommodation and will encourage such provision on appropriate sites. Co-living will typically provide private en suite bedrooms, shared social spaces and co-working spaces with the latest smart technology. They are often suitable for people at early stages of their career when their ability to afford self-contained accommodation may be limited.'*
- 6.46 The draft City Plan 2040 (Proposed Submission Version) includes Strategic Policy S3 (Housing) which supports the delivery of co-living within the identified residential areas. It also makes reference to the fact that co-Living accommodation is likely to have an increasing role in meeting future housing needs, particularly for City workers at an early stage of their careers.
- 6.47 In summary, the principle of delivering co-living accommodation on the Site meets both current and emerging planning policy objectives and therefor is considered acceptable in principle.

**Design approach, height and massing**

- 6.48 An important planning consideration is whether the Proposed Development is considered to be acceptable in terms of design, paying particular regard to the immediate surroundings, the local context and notably the setting which in this case relates most pertinently to key designated heritage assets.



- 6.49 The design and layout approach of the Proposed Development is outlined in full in the submitted plans, drawings and Design and Access Statement. Detailed elevational drawings and CGI's have been prepared and show the proposed detailing and materiality of the Proposed Development.
- 6.50 Recognising national, regional and local policy requirements and guidance, the Proposed Development has been carefully designed to: respond to the specific constraints and opportunities of the Site; deliver appropriately sized and high quality co-living accommodation; respect the local character and context of its surroundings, including heritage assets; and provide a viable and deliverable scheme.
- 6.51 The Proposed Development will act as a positive contributor to the existing and emerging development within this area of the CAZ. The height of the Proposed Development is appropriate as a result of the high architectural quality employed, and in particular the choice of materials used, having regard to the Development Plan, specifically London Plan Policy D3 (which requires all development to make the best use of land following a design-led approach and be of a high quality design) and Local Plan Policies CS10 (which promotes a high standard and sustainable design of building streets and spaces having regard to their surroundings and character of the City) and DM10.1 (which requires all developments to be of a high standard of design). This also complies with Draft City Plan Policies S8, DE2 and S14 which all require buildings to incorporate the highest standards of architecture and materials.
- 6.52 Whilst the Proposed Development does comprise a net height increase, the final form, scale and materiality has been devised with full consideration to the wider Barbican vernacular. Whilst it was not possible, with the low intervention approach proposed, for the middle floor level datums to be reconfigured to match those of the adjacent Bryer Court and Ben Jonson House; the upper floor forms, synergy of the maximum heights, and modern reinterpretation of the wider brutalist style ensure that the Proposed Development in its entirety is rooted in its context.
- 6.53 From building base up to the roof, the façade treatment has been thoughtfully considered and articulated to engage with the surrounding established context. Key to this is the use of more prominent vertical piers, glazing and ceramic inserts to embed a greater grid rhythm evocative of the Barbican style. The Proposed Development is finished with a series of metal arches which will be read as a continuation of those on mid-rise blocks across the Barbican Estate.
- 6.54 Further rationale for the building design, materiality and vernacular is provided in detail in the Design and Access Statement, and fully accords with Policy D3 of the London Plan, which requires a design-led approach and buildings to be of the highest standards of architecture and materials, and Local Plan Policies DM10.1; and Draft City Plan Policies S8 and DE2 which seek to carefully control new development and their impacts and ensure that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.



- 6.55 London Plan Policy GG1 (which requires new buildings and the spaces they create to help reinforce or enhance neighbourhood identity, legibility, permeability, and accessibility) is satisfied through the Proposed Development's contribution to the creation of a strong and inclusive community, achieved through the introduction of a well-designed new building which provides legibility and permeability to the area and generates the interaction of new uses with members of the 'neighbourhood'. In designing the Proposed Development the architects have undertaken a thorough approach to understanding and referencing local character (London Plan Policy D3), resulting in an architecture of the highest quality (London Plan Policy D4), that achieves a positive contribution to the area (London Plan Policy D3) and to ensure that the highest design standards are incorporated. The Proposed Development delivers the design objectives set out in Chapter 12 of the NPPF and in the National Design Guide (January 2021), where relevant.
- 6.56 The detailed design and layout of the Proposed Development has evolved through extensive and close engagement with the City who have fed back detailed comments during a series of pre-application meetings and workshops, including in relation to height, massing, architecture and materiality, all of which have been taken into account. In addition, the Proposed Development has had the benefit of technical input, including daylight and sunlight at pre-application meetings. Details of how the consultation has informed the design is set out in the Statement of Community Involvement section within the Design and Access Statement.

#### **Townscape and heritage considerations**

- 6.57 The site is not located within a Conservation area nor does it contain a listed building. It does however lie adjacent to the Grade II Listed Barbican Estate and is surrounded on three sides by the Barbican and Golden Lane Conservation Area, so has the potential to impact the setting of nearby designated heritage assets.
- 6.58 A full assessment of the effects on local and wider views, as well as on the historic environment, is included within the accompanying Heritage, Townscape and Visual Impact Assessment ('HTVIA'), prepared by the Townscape Consultancy. This confirms that the Proposed Development would constitute an improvement on the existing situation by way of the introduction of higher quality architecture to the Site.
- 6.59 Whilst the Proposed Development would present an increase in height, this is as such to match the surrounding vernacular. Its materiality and articulation present a modern interpretation of that of the adjacent Barbican Centre – rooting the new building comfortably within its context. The effect of this is a net improvement to townscape profile and character – with beneficial effects in views both within the immediate vicinity and from within the wider adjacent Conservation Area.
- 6.60 From longer range views, the Proposed Development contributes positively as it is considered to add to the layered townscape; where currently the existing building is experienced as a gap.



There would be some visibility of the uppermost levels but as above, this would be perceived positively insofar as it would blend the Barbican Estate with the neighbouring Golden Lane Estate. It would therefore not adversely impact any designated heritage assets nor on the experience of them in key views.

- 6.61 In all therefore, the HTVIA confirms that the Proposed Development would not result in harms to any of the identified designated or non-designated heritage assets. Whilst it would result in a change to setting, this would only complement a viewer's appreciation of the surrounding assets – reading as a net positive addition to this area and enhancing and completing the street scene from both Beech Street and the Barbican podium above.
- 6.62 The Proposed Development is acceptable when considered against the NPPF; Development Plan Policies, notably London Plan Policies HC3 and HC4, Local Plan Policies CS12, DM12.1 and CS13; Draft City Plan Policy S11; and relevant guidance, including that published by Historic England and the GLA.

#### **Landscaping, Public Realm and Urban Greening Factor**

- 6.63 As set out above, London Plan Policy H16 requires co-living developments to provide a sufficient degree of high quality external amenity space which is meaningful and high quality. The benefits of quality landscaping are set out in further detail in both London Plan Policies D3 and D8. The former requires new developments to maximise opportunities for urban greening and landscaping. The latter goes further, and notes that a public realm within and across a new development should be safe, inclusive and designed pursuant to its requisite function and intended use.
- 6.64 London Plan Policy G5 requires new developments to contribute towards the urban greening of London. This should be achieved through the incorporation of high quality landscaping, planting and sustainable drainage. In this respect, the Policy notes the Mayor's recommendation for a target of 0.4 for predominantly residential developments.
- 6.65 Local Plan Policy CS19 requires developments to encourage healthy lifestyles for all the City's communities. This should be achieved through the improvement of existing and creation of new highly quality open spaces – particularly those which are publicly accessible.
- 6.66 Local Plan Policies DM10.2-4 combined set out the importance of new developments delivering a high quality provision of urban greening. Whilst this can come forward in many forms, their benefits in delivering high quality amenity space, visual and environmental enhancement and net biodiversity gains are noted.
- 6.67 As detailed in the supporting Design and Access Statement, there are two types of open space across the development for use by residents - the rear courtyard and the roof terrace. Alongside, there is further incidental landscaping in the form of a city garden along the Beech Street frontage which is fully publicly accessible. These spaces seek to balance useability and



durability with wider operational requirements with a view to delivering high quality landscaping and greening.

- 6.68 Amenity space aside, an extensive green roof with a minimum settled depth of 80mm is proposed on the upper most floor which will be purely for biodiversity benefits and therefore not publicly accessible. The green roof will be edged with permeable paving for the purpose of maintenance only.
- 6.69 These spaces combined meet the requirements of policy insofar as they deliver an extensive suite of landscaping with species rich vegetation in the form of ground cover planting, boxed planters, green walls and trees. This provision is balanced against the operational requirements of the Proposed Development – insofar as it seeks to retain as much of the existing built footprint as possible within its highly built up context.
- 6.70 The resulting Urban Greening Factor value of the Proposed Development is 0.22. Whilst noted that this falls short of the recommended 0.4 set out in the London Plan, per above this sufficiently balances the need to maximise greening and biodiversity with the operational requirements of the new building (plant, access, maintenance, inclusivity); and with the constraints presented through maximum built retention. This is therefore considered compliant with policy.

#### **Biodiversity Net Gain**

- 6.71 Paragraph 180 in the NPPF requires development to promote conservation and enhance priority habitats whilst pursuing opportunities for securing measurable net gains. This is a point followed through into London Plan Policy G6, which requires developments to reduce deficiencies in access to nature and manage biodiversity on site to secure a net biodiversity net gain.
- 6.72 The need to maximise biodiversity net gain is reinforced in Local Plan Policies DM10.4 and DM19.2 which both concern environmental enhancement and the need for development to promote biodiversity and urban greening; and Policies CS15 and CS19 which require developments to adopt sustainable design approaches with regards to open space and ecology.
- 6.73 A Biodiversity Net Gain Assessment has been submitted as part of this application which demonstrates that, with the amenity spaces, city garden and green roof proposed, the Proposed Development will deliver a biodiversity net gain. This is therefore in compliance with policy and exceeds the minimum 10% biodiversity increase set out in Schedule 7A of the Town and Country Planning Act 1990.



### **Circular Economy and Whole Life Carbon Cycle**

- 6.74 The London Plan policies D3 ‘Optimising site capacity through a design-led approach’, and SI7 ‘Reducing waste and supporting the Circular Economy’ set out a policy framework that supports the delivery of a circular built environment. Local Plan policy CS 15 also states that development should “avoid demolition through reuse of existing building or their main structures...”.
- 6.75 A Whole Lifecycle Carbon (WLC) Assessment and a Circular Economy Statement have been prepared and are submitted in support of the planning application. They have been prepared in accordance with the relevant guidance prepared by the Mayor and draft CoL guidance.
- 6.76 The WLC Assessment details the extent of the existing building being retained and demolished and the extent of new material added. A key part of this is the key actions that will be explored to reduce whole life-cycle carbon emissions in the Proposed Development. Such actions include the targeted 60% recycled steel content within the steel rebar on the upper floor extension; retention of as much concrete frame as possible up to level 5; and a targeted 70% recycled gypsum content in the newly introduced gypsum.
- 6.77 The WCL Assessment confirms that the Proposed Development, on a like for like comparison with a typical residential proposal (rather than Co-Living) would meet the aspirational WLC benchmark.
- 6.78 The Circular Economy Statement submitted sets out the benefits of the proposed retention and extension strategy of the existing building – in is so far as it presents the optimum balance of minimal waste and most efficient use and operation. In this respect, the pre-demolition audit and re-use strategy demonstrates that 98% of the demolition waste derived will be diverted from landfill for either recycling or re-use. Of this, 20% of the new building elements are envisaged to comprise recycled or re-used content.
- 6.79 In all respects therefore, the principles of WLC and Circular Economy have been adhered to and fully integrated into the design evolution and envisaged construction / operation of the Proposed Development.

### **Energy and sustainability**

- 6.80 The energy strategy has been developed in line with the City of London Local Plan (2015-2026), the London Plan 2021 (March 2021) and associated Energy Assessment Guidance (June 2022).
- 6.81 The Proposed Development is to be an all-electric non-combustion development, which will be connected to adistrict heat network. A series of energy-based targets have been used to drive the design:



- A fabric first approach;
- Energy efficient delivery of heating and cooling;
- The use of SAP 10.2 carbon emission factors;
- Aiming to meet the GLA Be Lean requirements;
- BREEAM score of 78%.

6.82 Passive design principles, efficient systems, and services have been promoted in the building. The energy strategy for the proposed development is:

- A fabric performance improvement over Building Regulations.
- Mechanical ventilation with heat recovery (MVHR) in the studio units and commercial spaces to provide background ventilation requirements;
- Connection to the CitiGen district heat network to provide space heating, cooling and DHW. It is noted in this respect that this district heating network is not fully renewable which has impacts on the Proposed Development's ability to meet BREEAM Excellent. However, it is understood that a review of this network is ongoing beyond the scope of this application.
- Renewable energy generation from roof mounted photovoltaics;

6.83 The calculations for the energy strategy have been carried out using the SAP 10.2 CO<sub>2</sub> emission factors. The Site wide results indicate a regulated carbon saving of 6.3 tCO<sub>2</sub>/year, which is 13% of the site's regulated carbon emissions of 50.3 tCO<sub>2</sub>/year. Despite the energy performance of the proposed building, there will still be a requirement for carbon offset payments to be made.

6.84 To truly achieve net zero-carbon buildings and bridge the gap between design theory and measured reality, the New London Plan (policy SI2) has proposed an additional stage of the energy hierarchy: 'Be Seen'. This stage will require the calculation of the actual operational energy performance of major development during planning stage, as-built stage, and in-use stage. The operational energy will be monitored and verified and reported via the Mayor's 'be seen' monitoring portal for at least five years.

6.85 In this respect it should be noted that once the CitiGen district heating network is decarbonised, the above figures are likely to shift with a resulting substantial decrease in regulated carbon emissions. The opportunity to submit an updated energy assessment at this point is therefore requested.

#### **Transport and accessibility**

6.86 A Transport Statement, prepared by Markides, accompanies this planning application and demonstrates the acceptability of the Proposed Development in respect of likely impact on transport and highways.





- 6.87 The Transport Statement demonstrates that the Site is in a suitable location to accommodate car free development, given its inherently accessible location with respect to public transport facilities (lying within a Public Transport Accessibility Level (PTAL) area of 6b) and local services and amenities.
- 6.88 Following discussions with the City, a single on-street disabled parking space is proposed to the north of the Site, to ensure suitable access for all.
- 6.89 Cycle parking is proposed for the Site and is considered to be offered at a level suitable for the needs of residents, staff and visitors.
- 6.90 The trip generation shows that there will be a decrease in the number of person trips and vehicular movements to and from the Site, meaning that there will be a positive impact on the existing highway network.
- 6.91 It is considered that the Proposed Development performs well with respect to TfL's Healthy Streets indicators and the overarching strategic objectives of the Mayor's Transport Strategy and Vision Zero.
- 6.92 In summary, it is evident that the Site is in a suitable location to accommodate the development proposals, and they comply with both local and national planning policy and do not result in a significant impact on the highway and transport network.
- 6.93 The Proposed Development complies with the NPPF (chapter 9), London Plan Policies T1 (which promotes walking through improved public realm), T3 (which requires development to contribute towards better transport capacity, connectivity and safeguarding), T4 (which requires development to assess and mitigate transport impacts), T5 (which encourages cycling prioritisation) and T6 (which sets out parking standards); Local Plan Policies CS16 (which aims to improve efficiency of travel); DM3.4 (which requires the implementation of traffic management and highways security measures), DM16.2 (which encourages new pedestrian routes), DM16.3 (which establishes cycle parking requirements), DM16.4 (which highlights the need for facilities to encourage active travel), and DM16.5 (which states the new development should be car-free); and Draft City Plan Policies DE4 (which encourages improved wayfinding), VT3 (which encourages new schemes to be car-free), AT1 (which supports pedestrian prioritisation), AT2 (which promotes active travel) and AT3 (which outlines requirements for cycle parking).

### **Daylight and Sunlight**

- 6.94 Local Plan Policy DM10.7 and Draft City Plan Policy DE8 both seek to resist development which would "reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels", taking account of the Building Research Establishment's (BRE) guidelines and best practice.



- 6.95 Anstey Horne have undertaken a Daylight & Sunlight Assessment which includes a technical assessment of the effect of the Proposed Development upon the existing surrounding properties, having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (third edition, 2022).
- 6.96 The assessment considers the effects on the following properties:
- 6-9 Bridgewater Square.
  - 10 to 15 Bridgewater Square.
  - Ben Jonson House.
  - Shakespeare Tower.
  - Defoe House.
- 6.97 The headline adherence rates for the site are as follows:
- 391 (84%) of the 464 windows tested for VSC achieve the guideline values.
  - 256 (94%) of the 271 rooms tested for daylight distribution achieve the guideline values.
  - 69 (85%) of the 80 rooms tested for APSH achieve the guideline values on an annual basis and 60 (75%) achieve the guideline values on a winter basis.
- 6.98 The neighbouring property Shakespeare Tower achieves full adherence to the BRE guidelines for both daylight and sunlight.
- 6.99 The assessment confirms that the majority of the neighbouring windows and rooms meet the guideline values. Where windows and rooms have been identified to fall short of the guidelines, these are mainly isolated to the neighbouring property at 6-9 Bridgewater Square which contains windows and rooms on its south elevation which face directly into the courtyard and therefore onto the development site. Many of these windows and rooms have limited daylight and sunlight levels in the existing condition and are therefore sensitive to further change. Therefore, any meaningful development of the site would cause reductions outside of the guidelines. It is worth noting that the vast majority of the affected rooms within this building are bedrooms which are generally considered less important in terms of daylight and sunlight availability. All bar one of the living rooms within this property face away from the development site and will therefore experience no alterations in their light levels as a result of the proposed development.
- 6.100 Any impacts to the neighbouring properties are considered to be within the intention and application of the BRE guidelines and the Proposed Development is considered to be compliant. This approach also follows the direction of Draft City Plan Policies DE8, S8, D8 and S12.



- 6.101 With regards to daylight and sunlight quality within the Proposed Development, Anstey Horne have undertaken an Internal Daylight & Sunlight Assessment which analyses the quality in the co-living rooms and internal and external amenity spaces. In summary, a total of 102 rooms within the Proposed Development were assessed, which comprised a mix of private co-living rooms and communal amenity spaces. Of these, 39 met the BRE guidelines – of which, 29 achieved the BRE’s “high” rating for sunlight with the remainder achieving “medium” rating.
- 6.102 In this regard, the communal spaces at ground floor served by windows on the south frontage are also shown to exceed the BRE guidelines; where the co-working space achieves BRE’s “high” rating for sunlight with the dining room achieving “medium” rating.
- 6.103 Within the context of the highly built up context and the strategy to retain as much of existing built fabric as possible, this provision is considered to provide an appropriate balance where all future occupants would have access to well sunlight internal amenity spaces.
- 6.104 With regards to the sunlight quality of the external amenity spaces, the Internal Daylight & Sunlight Assessment confirms that the roof terrace achieves two hours of sunlight to 63% of its area on 21<sup>st</sup> March. This is comfortably above the BRE guideline of 50% of area.

#### **Waste and Servicing**

- 6.105 A Delivery, Servicing and Site Waste Management Plan, prepared by Markides, and submitted with this application sets out the servicing and waste collection strategy and has been developed in consultation with the City of London Highways and Waste Officers.
- 6.106 The existing vehicular access to the Site is via a controlled roller shutter and measures approximately 2.7m in height, restricting the form of vehicle that is able to access the area to cars and vans only.
- 6.107 Given the nature of the existing vehicular access to the Site, it is not considered that this is used for routine deliveries or servicing. The majority of deliveries will therefore take place on Bridgewater Street, away from the primary road network. However, space for one van is provided at the top of the ramp, accessed via the existing vehicle access. This can be used for any planned deliveries arranged by prior agreement, such as for maintenance vehicles for the substation situated within the courtyard area of the Site, that may dwell for longer periods of time than standard service or delivery vehicles.
- 6.108 The majority of deliveries will dwell for only short periods, such as parcel deliveries, taking the parcels to the main desk for collection and then leaving. Delivery vehicles can dwell for up to 40 minutes at a time, however, given the nature of the deliveries it is not expected that many, if any, will stop for this long. For larger deliveries, such as linen, the applicant would coordinate the timings of these deliveries to ensure that they took place outside of the peak periods, with staff at the site assisting with the loading and unloading of the vehicle as required.



6.109 In terms of refuse collection, two storage locations will be provided; one within the basement area and one on the ground floor within the vicinity of the existing vehicle access to the site off of Bridgewater Street. The following provisions are made which have been agreed with the City's Street Environment Team:

- 5No 1,100lt bins for recycling;
- 4No 1,100lt bins and 1 500lt bin for waste; and
- 1No 500lt bin for food waste.

6.110 In preparation for collection days, staff will take the bins from the basement level and place them into the ground floor store. These bins will then be collected from Bridgewater Street.

6.111 It is proposed to install a dropped kerb in front of the store to enable ease of collection for the larger Eurobins proposed. A dropped kerb application would be undertaken on grant of consent to implement this.

6.112 In summary, the Proposed Development will operate in accordance with the requirements of London Plan Policy T7 (which highlights delivery, servicing and construction requirements) and Local Plan Policies CS17 and DM17.1 (which outline requirements for waste facilities) as well as overarching sustainability and waste minimisation guidance and principles.

### **Fire**

6.113 London Plan Policy D12 requires all development proposals to achieve the highest standards of fire safety, and that major developments should submit a Fire Statement.

6.114 An outline Fire Statement is duly submitted as part of the application, which sets out how the scheme would comply with functional requirements of Building Regulations. Key to this is the provision of two staircases to assist in safe egress, an evacuation lift and a robust escape strategy. The fire strategy also meets the requirements of London Plan Policy D1.



## **7. Planning Obligations and Section 106**

7.1 Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) states that a planning obligation may only constitute a reason for granting planning permission for a development if the obligation is:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonably related in scale and kind to the development.

7.2 Paragraph 55 of the NPPF states, 'Local planning authorities should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations'. Paragraph 57 reinforces the requirement that planning obligations meet the tests set out in Regulation 122 of the CIL Regulations.

### **Planning Obligations SPD**

7.3 The City's Planning Obligations SPD (implemented from 1 October 2021) applies standard formulae and charges calculated based on the net uplift of floorspace for contributions towards local skills, training and employment, and local procurement; and affordable housing. Alongside this sits a Code for Local Employment and Procurement, also adopted from 1 October 2021. Any planning obligations resulting from applying the Planning Obligations SPD are expected to be secured through a Section 106 Agreement.

### **Draft Section 106 and Heads of Terms**

7.4 In accordance with the City's Planning Obligations SPD we anticipate the Section 106 Agreement associated with the Development to include the draft Heads of Terms listed below. This will be subject to further discussion with officers during the determination of the planning application.

- Affordable housing contribution.
- Annual construction monitoring contribution.
- Local Procurement.
- Local Training, Skills and Employment Initiatives (including contribution).
- Carbon Off-setting Contribution.
- Relevant highway works (secured via S278 Agreement).
- Evaluation and design fee payment.
- Delivery and servicing management plan.
- Travel plan.
- Local procurement strategy.
- Monitoring Costs.



### **Community Infrastructure Levy (CIL)**

- 7.5 The Development will be liable for City of London CIL and Mayoral CIL (MCIL2). CIL is chargeable on the net additional increase in floor-space measured in Gross Internal Area (GIA).
- 7.6 The rates have been set out below in accordance with the proposed co-living use (Sui generis). These rates will be subject to indexation.
- City of London - £75 per sqm (all other uses rate).
  - Mayoral CIL 2 - £80 per sqm.
- 7.7 A CIL Additional Information form has been completed and submitted with the planning application to allow the subsequent liability to be calculated.



## 8. Conclusions

- 8.1 As assessed within this Planning Statement, the Proposed Development represents a well-designed, sustainable, high-quality co-living development.
- 8.2 The Proposed Development provides a sensitive extension to accommodate a change of use from a dated office building to deliver much needed new homes in an established residential area. The Proposed Development is high quality in nature and it represents an enhancement of the existing Site context.
- 8.3 The planning application is supported by technical reports and policy analysis demonstrates that the Proposed Development is consistent with policy across a wide range of disciplines including design, loss of office, co-living, energy and sustainability, townscape and heritage, transportation and daylight/sunlight. Moreover, the Proposed Development has been brought forward following close pre-application engagement with the City's Planning and Design Officers, who have been supportive of the Proposed Development.
- 8.4 The proposed optimisation of the Site's capacity to deliver new high quality co-living accommodation, whilst retaining the existing building, has the ability to offer significant improvements to the immediate local context and the wider area in terms of economic, social and environmental benefits. In particular the following benefits will be delivered by the Proposed Development:
- The delivery of an exemplar building refurbishment scheme demonstrating the highest standards of sustainable re-use and Site intensification, with Whole Lifecycle Carbon and Circular Economy principles running to the core of design thought;
  - Rejuvenate a tired and underutilised office building;
  - Provision of much needed new homes which will make a significant contribution towards the City's housing targets.
  - Payment in lieu contribution towards affordable housing.
  - Create enhanced street level activation and footfall to benefit the wider area;
  - Incorporation of a high quality extension to the existing building, that appropriately responds to the surrounding townscape and heritage assets;
  - £1.9m additional residential expenditure per annum with an estimated £1m being spent within CoL.
  - 100 jobs generated over the two year construction phase; 15 FTE created during the operational phase; and a further 20 FTE being induced by the additional residential spending.
  - Planting and greening achieving habitat and biodiversity enhancements with a total biodiversity net gain and an Urban Greening Factor of 0.22;
  - Delivers a high quality sustainable building, which targets a BREEAM rating of 78% and has been designed to incorporate a number of efficiency measures;



- The proposed co-living use will support the primary business function of the City by providing accommodation suitable for workers and it supports the 'Destination City' programme initiative.
- 8.5 This Planning Statement has assessed the Proposed Development against the Development Plan and other relevant planning policy and guidance at national, regional and local level, as well as other material considerations and has concluded that the Proposed Development is compliant on all relevant planning matters.
- 8.6 On this basis, planning permission should be granted for the Proposed Development without delay.



