

## APPENDIX 6

### POLICY ANALYSIS AND EVALUATION

1. The **London Plan** includes the following policies:
  - i) **Policy 2.10 “Central Activities Zone – Strategic Priorities”** which says that the Mayor will and boroughs should sustain and enhance the City of London as a strategically important globally-oriented financial and business services centre.....
  - ii) **Policy 2.11 “Central Activities Zone – Strategic Functions”** which says the Mayor will and boroughs should secure completion of essential new transport schemes necessary to support the roles of CAZ, including Crossrail, and realise resultant uplifts in development capacity to extend and improve the attractions of the Zone
  - iii) **Policy 4.2 “Offices”** which says that the Mayor will, and boroughs should recognise and address strategic as well as local differences in implementing this policy to meet the needs of the central London office market by sustaining and developing its unique and dynamic clusters of “world city” functions and by encouraging renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility
  
2. The City of London **Local Plan** includes the following policies:
  - i) under Implementation And Delivery it states that the City Corporation will, where necessary, use its land and property ownership to assist with site assembly and use its compulsory purchase powers to enable the high quality development the City needs; and
  - ii) **Strategic Objective 1** which is “to maintain the City’s position as the world’s leading international and financial and business centre”
  - iii) **Core Strategic Policy CS1** which is: “To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London’s role as the world’s leading international financial and business centre, by:
    1. Increasing the City’s office floorspace stock by 1,150,000 m2 gross during the period 2011 – 2026 to meet the needs of projected long term economic and employment growth, phased as follows:

2011 – 2016:	650,000 m2
2016 – 2021:	250,000 m2
2021 – 2026:	250,000 m2

A pipeline of at least 750,000 m<sup>2</sup> gross office floorspace with planning permission but not yet commenced will be maintained to provide office occupier choice.

2. Encouraging the assembly and development of large sites, where appropriate, to meet the accommodation needs of the City's biggest occupiers, protecting potential large office sites from piecemeal development and resisting development that would jeopardise the future assembly and delivery of large sites.
3. Encouraging the supply of a range of high quality office accommodation to meet the varied needs of City office occupiers.
  - iv) **Policy DM 1.2** which is "To .... Promote the assembly and development of large office schemes in appropriate locations".
  - v) **Policy DM 1.5** which is "To encourage a mix of retail and commercial uses".
  - vi) **Policy DM 1.3** which is "To promote small and medium sized businesses in the City by encouraging...."
  - vii) **Policy DM 10.7** relating to sunlight and daylight includes the statement in supporting text paragraph 3.10.42 that 'If a development is considered acceptable in planning terms and has planning permission, but it not proceeding due to rights to light issues, the City Corporation may consider acquiring interests in land or appropriating land for planning purposes to enable development to proceed.
  - viii) **Policy CS12** relating to the historic environment is "To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors, by: (1) safeguarding the City's listed buildings and their settings, while allowing appropriate adaptation and new uses. (2) Preserving and enhancing the distinctive character and appearance of the City's conservation areas, while allowing sympathetic development within them."
3. The key benefits of the Development are as follows:
  - 3.1 The proposed building would provide 13,000 sq. m (GEA) of high quality office accommodation to meet demands of the City's commercial occupiers: an increase of 4390 sq. m. (GEA) in office floorspace. Using the London Plan's assumed density of one person per 12 sq.m. (NIA) the number of office workers in the new building would be 772 compared to 477 in the existing building;
  - 3.2 The revised scheme complies with policies for the provision of offices. There is continuing need for additional office space since the original application was submitted in 2011, particularly in the context of Crossrail opening in 2018/19 and the benefit of maximising the opportunities to provide

office accommodation within close proximity of the Crossrail stations at Liverpool Street and Moorfields;

- 3.3 Building stock in the immediate vicinity has to be increased to accommodate the inevitable increases in occupier demand. This location, combined with its gateway positioning and prominence warrants a larger building and one of high quality
- 3.4 The site is ideally located to benefit from the proximity of the Crossrail line now under construction. Office use on this site would complement the core business function of the City by taking advantage of the substantial public transport improvements created by Crossrail and realise the potential for rejuvenation of the area in accordance with CS5, North of the City Key City Places Strategy
- 3.5 The existing 6 retail units would be replaced by 4 larger upgraded units (from the existing total of 3,003 sq m to the proposed total of 3,424 sq m) (including enhanced provision for Barclay's Bank), enhancing the vitality and viability of the Principal Shopping Centre;
- 3.6 Although the existing building may be a worthy example of the Brutalist style and an example of Seifert's work, it is not considered to be a convincing building architecturally and its contribution to this part of the Finsbury Circus Conservation Area is a poor one. It is not considered an undesignated heritage asset. It is considered to harm the setting of the surrounding heritage assets and make a negative contribution and therefore neither preserves nor enhances the character and appearance of the Finsbury Conservation Area.
- 3.7 The height and bulk of the building is diminished by the manner in which the upper / rear block is set back from the front block as a separate visual element. The front block, which is 8 storeys high (40m), shares the same building line and height with Britannic House to the south. Although at 11 storeys high (56.28m AOD) the rear block is of significant scale it is set back from the Moorgate frontage by 4.5m and from the South Place frontage by some 1.5m. This is considered to be an adequate set back to ensure that the upper storeys would appear as a recessive architectural element.
- 3.8 The Development is not considered to harm the character and appearance of the Finsbury Conservation Area. A small horizontal sliver of the roof would be visible above Rover Plate House from Finsbury Circus, and this element is seen against the backdrop of the City Point and Ropemaker Place towers. Similarly, in the view west along South Place the northeast elevation of the building would be seen against the backdrop of City Point tower and the proposal is considered appropriate in design, bulk and materials
- 3.9 The development adjoins the Grade 2\* listed Britannic House. designed by Edwin Lutyens and built in 1927 and is an elaborately carved Portland stone building in a free classical style.
- 3.10 The design of the redevelopment proposal has an abstract simplicity which is considered appropriate so as not to visually compete with the refined and

intricate detailing of both Britannic House and Electra House further to the south.

- 3.11 Although, the proposal is significantly higher than Britannic House, the height is not dissimilar to the existing consented scheme. In addition the dark grey metalwork would not visually compete with the cream colour of the Portland stone of Britannic House. In this respect, the upper storeys would appear as a backdrop element. The roofline of Britannic House is currently not an intact and unaltered roofline and is compromised by the existing party wall and plant rooms and one of the characteristics of this part of the City is views of listed buildings against a backdrop of taller buildings. In this respect the relationship of the upper storeys of the proposal to Britannic House is not considered harmful.
- 3.12 The impact of the proposal on the Grade 2 listed London Guildhall University (Electra House) is limited. The most significant impact would be from the junction of Moorgate and London Wall where the lower and upper parts of the development would be visible to the north of Britannic House but against the backdrop of the similar scaled Helican House on Finsbury Pavement. This wider view encompasses the large scale developments of Moor House and the City Point tower and the dynamic contrast in scale between modest scaled historic buildings and large scale new developments is a distinctive characteristic of this townscape. The proposed scheme would not harm the setting of the Grade 2 listed modest Victorian terraced buildings of 118 and 118a London Wall and 83 and 87 Moorgate.
- 3.13 A little to the south of the site and on the opposite side of Moorgate is the Grade 2 listed 137-141 Moorgate, a red brick and Portland stone building from 1900. The scheme would have a very limited impact on this listed building and would not appear as a significant backdrop to the building from street level views.
- 3.14 For the reasons set out at 3.6 to 3.13 above, the impacts of the Development on heritage assets are considered positive overall.
4. In conclusion the use of S227 to enable the operation of S237, if necessary, will facilitate the carrying out of the Development which will contribute to the achievement and improvement of the economic well-being of the City as a whole (through the provision of offices to meet demand) and of the environmental and social well-being of this part of the City (through the enhancement of the Principal Shopping Centre, the Finsbury Circus Conservation Area and the Grade II\* listed 1 Finsbury Circus