

Committee:	Date:
Planning and Transportation	24 October 2017
Subject: Morley House 26 - 30 Holborn Viaduct And City Temple 31 Holborn Viaduct London EC1A 2AT Demolition of 26-30 Holborn Viaduct and the erection of a part ground plus 9 storey and part ground plus 7 storey building for hotel (Class C1) use, with servicing access from Plumtree Court; and change of use of the City Temple lower ground and extended mezzanine floor, with removal of raked gallery and creation of new floorspace at mezzanine levels, to provide flexible office workspace (Class B1) use with associated new and altered windows, entrances doors/canopies, roof plant, and other incidental works (12,450sq.m GEA).	Public
Ward: Farringdon Within	For Decision
Registered No: 17/00165/FULMAJ	Registered on: 7 April 2017
Conservation Area:	Listed Building: Grade II

Summary

Planning permission is sought for the demolition of Morley House (7,428 sq.m GIA) and its replacement with a hotel (Class C1, 11,589sq.m GIA, 191 rooms). Planning permission and listed building consent are sought for the change of use of the lower floors of City Temple to flexible office space (Class B1, 1,646sq.m GIA) and external alterations including new ventilation, fenestration, plant and the formation of an entrance off Plumtree Court. All applications are dealt with in this report.

City Temple is in need of modernisation but the church is unable to raise the funds necessary to carry out the works. The owners of Morley House approached the church with a proposal to refurbish City Temple in exchange for a long lease of the two lower floors of City Temple for flexible office use which is supported by the church. The office space would complement the function of the hotel and the works would secure the long term future of City Temple.

The proposal would result in the loss of 4,020sq.m of office space on the Morley House site. This is considered to be acceptable in this instance. The applicant has provided the necessary viability information and it has been independently assessed concluding that it would be unviable to redevelop or

refurbish the site for office use. Although the office space on the Morley House site would be lost the scheme does make provision for 1,646sq.m of flexible office space on the lower floors of City Temple.

The proposal is acceptable in design terms and in terms of its impact on the grade II listed City Temple, the setting of surrounding listed buildings, local views and LVMF views.

Representations have been submitted that raise queries over the feasibility of constructing the scheme, servicing arrangements, taxi drop offs and refuse collection arrangements. The applicant has provided sufficient information to address these matters at this stage. Further details of certain matters would be secured by condition and through the section 106 agreement.

The proposed redevelopment of Morley House is considered to be acceptable in policy terms and the works would secure the long term future of City Temple.

The following recommendation relates to the planning application covering the redevelopment of Morley House and the works associated with the provision of the new office space in City Temple. There are separate recommendations before your Committee relating to an application for Listed Building Consent and an application to carry out works to the upper levels of City Temple.

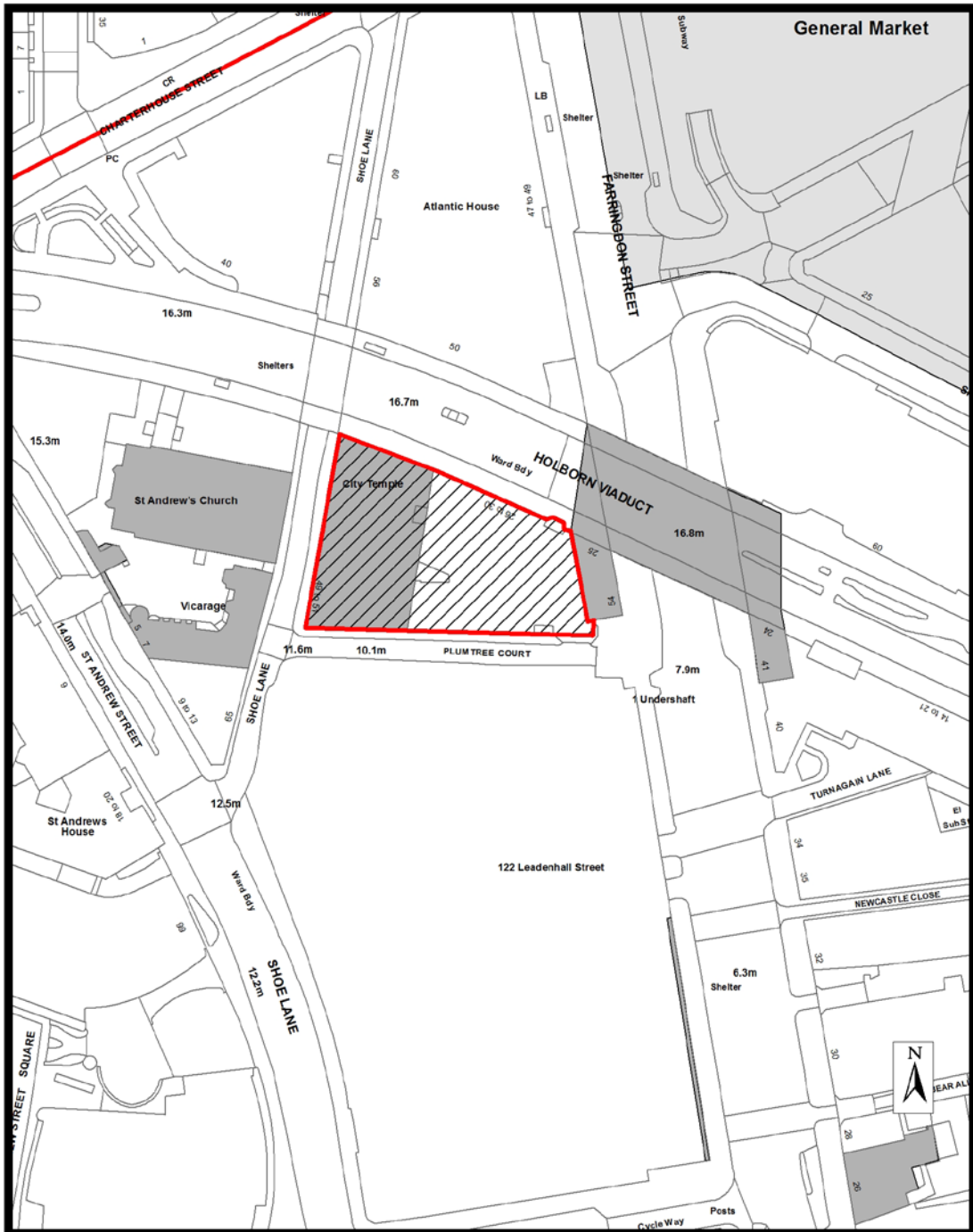
Recommendation

(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) the Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);

(b) planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed;

Site Location Plan



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ADDRESS:
Morley House, 26-30 Holborn Viaduct

CASE No.
17/00165/FULMAJ

-  **SITE LOCATION**
-  **22 BISHOPSGATE**
-  **LISTED BUILDINGS**
-  **CONSERVATION AREA BOUNDARY**



DEPARTMENT OF THE BUILT ENVIRONMENT





Main Report

Site

1. The site is located on the south side of Holborn Viaduct. It occupies the majority of the street block bounded by Holborn Viaduct to the North, Farringdon Street to the east, Plumtree Court to the south and Shoe Lane to the west.
2. The subject buildings comprise Morley House (7,428sq.m) and the grade II listed City Temple (4,194sq.m). Morley House is a 1980s office building. Due to the change in levels across the site the building has six storeys to Holborn Viaduct and nine storeys to Plumtree Court with the exception of a five storey wing in the south west corner of the site. The building has a double height basement. Its exterior is clad in Portland stone with a slate mansard roof.
3. Morley House is in office use (Class B1, 4,020sq.m), education use at third floor level (Class D1, 783sq.m) and retail use at mezzanine and ground floor levels (Class A1 and Class A2, 1,025sq.m). The site is currently leased on a peppercorn rent to a charity called 'Aid for All'.
4. City Temple is a grade II listed church (Class D1 designed by Henry Francis Lockwood and dates back to 1873. It was extensively reconstructed in 1956 owing to Second World War bomb damage. The building has four storeys on to Holborn Viaduct and six storeys on to Plumtree Court. It has a stone façade and Palladian portico. Internally it comprises the church, a large assembly hall, suite of meeting rooms and ancillary residential accommodation.
5. The site is not within a conservation area. There are a number of listed buildings within the vicinity. These include the Grade I listed Church of St Andrew Holborn, the Grade II listed Farringdon Street Bridge and its associated south east and south west pavilion buildings, St Andrew's Rectory, Court House and Vestry Clerk's Office at 5-7 St Andrew Street. The site lies within a number of the policy areas of the Mayor of London's London View Management Framework views. Immediately to the south is a site under construction. The remaining two pavilions have been rebuilt to match the two listed ones to the south.

Relevant Planning History

6. An application was submitted in 2013 to redevelop Morley House for hotel, retail and leisure use (Classes C1, A3, D2). The application was withdrawn in 2014.
7. There have been other minor planning applications on the site which are not relevant to this application.

Proposals

8. Planning permission and listed building consent are sought for:
 - The demolition of Morley House and its replacement with a building for hotel use (Class C1, 11, 589 sq.m, 191 rooms) with ancillary restaurant, bar/café, gym, spa and conference facilities. The building would be ground plus part 7 storeys onto Holborn Viaduct and ground plus 9 storeys on to Plumtree Court with two lower levels on to Plumtree Court and a basement. The main entrance would be off Holborn Viaduct.
 - Internal works to City Temple. An existing lower level mezzanine level would be extended. The use of the extended mezzanine and lower ground floor level (Plumtree Court side of the building) would be changed from church use (Class D1) to flexible cellular and open plan office workspace with an ancillary cafe (Class B1, 1,646sq.m). The interior of the upper levels of the City Temple would be refurbished. These works have been approved under The Ecclesiastical Exemption (Listed Buildings and Conservation Areas) (England) Order 2010 and do not require the submission of an application for listed building consent.
 - External works to City Temple comprising the insertion of four double height windows to the Shoe Lane elevation at first floor level, the insertion of four grilles to the internal lightwell of the east elevation, upgrade of an existing plant enclosure, the addition of a new roof plant enclosure and new windows and a new entrance at ground floor level off Plumtree Court. Planning permission is required for the external works associated with the ecclesiastically exempt internal works.
9. The works are covered under two applications for planning permission (ref. 17/00165/FULMAJ and 17/00781/FULL) and one application for listed building consent (17/00166/LBC). The content of each application can be summarised as below:
 - 17/00165/FULMAJ – The redevelopment of Morley House and the change of use of the lower floors of City Temple with its associated external alterations.
 - 17/00166/LBC – The internal and external works associated with the change of use of the lower floors of City Temple.
 - 17/00781/FULL – External works associated with the ecclesiastically exempt internal refurbishment works to the upper floors of City Temple. (The applicant wanted to keep these works separate from the main redevelopment application).

10. This report covers all three applications.

The Connection between Morley House and City Temple

11. City Temple moved to Holborn Viaduct in 1874 and was re-opened in 1958 following bomb damage. The Victorian frontage was retained with a new building added behind. The building accommodates worship space, church halls, ancillary residential accommodation and ancillary meeting rooms which are used by external organisations and groups including Sainsbury's, NHS, Hogan Lovells, City Law School and The Welsh Male Voice Choir.
12. While the building remains functional many of its key elements including the lifts and electrics have started to break down to the point where it is no longer economical to repair them. In addition the rake on the seating in the church is insufficient meaning that people sitting in the gallery cannot see the preacher standing in the pulpit.
13. Over the past 20 years City Temple Church Meeting have looked at ways to repair or redevelop City Temple building. None of the plans and options proved financially viable. In 2015 it was determined that it would cost £2.5 million to repair and improve the building in order to meet the church's future vision and that they could not fund or fund raise this amount.
14. The Church was subsequently approached by the current owner of Morley House with a proposal to refurbish City Temple building to meet future needs of the church in exchange for a long lease of the two lower floors of City Temple for flexible office use (Class B1). Such office space would complement the use of the hotel.
15. The Church considered this option to be beneficial for the following reasons:
 - It would allow historic features of City Temple to be retained while making best use of the gallery space that has become functionally useless.
 - The refurbishment of City Temple would be fully funded without risk to City Temple congregation.
 - City Temple could expand its ministry vision in a building more suitable for that purpose.
 - This option could be completed with the least amount of disruption to the ministry of City Temple.
16. The proposed works to City Temple would allow the church to fulfil its future vision in terms of the provision of:
 - An extended prayer room.
 - Improved ancillary residential accommodation.
 - A higher quality worship space that would allow the greater congregational participation and flexibility they require.

- Facilities to enable “hospitality outreach” (welcoming people within the building). Ancillary meeting rooms and conference facilities would be available that could be let to various churches, charities and businesses and new catering facilities would be provided. Such facilities would enable the church to secure a future income stream.
 - High quality space to conduct training.
17. The proposed works would secure the long term future of City Temple and allow the church to remain in the City.

Consultations

18. The application was advertised on site and in the local press. The residential premises of The Vicarage 5 – 7 St Andrew Street, St Andrew’s Church Lodge and 5 St Andrew Street were individually consulted.
19. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.
20. The Greater London Authority (GLA) supports the principle of development in strategic planning terms. In order to ensure that the application is London Plan compliant the following matters need to be addressed:
- Sustainable development: additional energy efficiency measures should be considered in order to address the shortfall in carbon savings. Further information on overheating and the proposed CHP should also be provided to confirm compliance with London Plan climate change policy.
 - Transport: A contribution to cycle hire and a taxi rank should be secured. Cycle access, construction and servicing arrangements should be further clarified.
21. Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited have submitted representations in respect of the scheme and have been in talks with the applicant about the proposal. Overall they support the provision of a hotel in this location but want consideration to be given to the following:
- Clarification as to whether the gym and restaurant facilities would be solely for the users of the hotel or whether they would be available to members of the public. This has implications for the number of deliveries. Clarification as to whether the servicing trip numbers account for these uses.
 - Approval of the Construction Management Plan and Construction Logistics Plan should be a pre-commencement condition. Local stakeholders and Transport for London should be consulted on the details. The document should include details of how works could be completed without access to

Plumtree Court in case the street is inaccessible due to other works taking place in the locality i.e. the adjacent development and public realm enhancements.

- It should be confirmed that Part M compliant routes would be provided to the hotel from the proposed accessible car parking space and local transport nodes.
- The submitted documentation identifies 64 additional taxis per day. The approval of a Hotel Operational Site Management Plan to include the management of taxis should be required as a pre-commencement condition. Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited should be consulted on the details. Drop off on Holborn Circus/Holborn Viaduct should be prioritised and traffic studies should be carried out to provide a designated taxi drop off facility for a development of this size.
- The development is car free with the exception of 1 disabled space. The Transport Assessment states that any demand for car parking could be accommodated in the locality through designated spaces. A valet service would be offered if necessary for disabled drivers. A review of local parking spaces should be carried out to confirm that it meets predicted demand. Details of the valet parking should be secured in the Operational Management Plan.
- Consideration should be given to visitor cycle parking.
- The Hotel Operational Site Management Plan should include arrangements for managing any coach parties. Coach access should be prohibited via St Andrew Street or Shoe Lane.
- There are safety concerns over vehicles reversing into the servicing bay. It is noted that the City Highways team accept the proposed arrangements therefore robust operational measures would need to be specified in the Delivery and Servicing Management Plan (DSMP). The DSMP should reference the applicant's preference to use smaller vehicles and include details of how the delivery booking system would be managed. It should be a condition of the section 106 agreement that the hotel could only accept a single delivery at a time.
- Final details of refuse collection arrangements should be secured by condition to include details of clear head heights within the loading bay. It should be clarified whether the refuse store serves City Temple and the hotel. Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited should be consulted on the submission of the final refuse storage and collection arrangements.
- It is anticipated that the hotel and new workspace would generate 10 – 11 trips per day. Additional information should be provided to verify the trip numbers. The applicant should commit

to a maximum number of trips per day which avoid peak hours and this should be secured by condition. Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited should be consulted on the servicing details.

- The application contains limited information as to the activities that will take place at roof level. It should be conditioned that nothing breaches the proposed roof line and details of all acoustic outputs, maintenance access and venting should be conditioned.
 - The Flood Risk Assessment should reference consideration of adjoining properties.
 - Consideration should be given as to how our building/UKPN substation assets will be monitored for movement during demolition and construction.
22. The above matters are dealt with under the considerations section of the report. The representation by Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited makes the following further general comments: the applicant should sign up to the considerate contractor scheme and the applicant should consider refurbishing the public staircase between Farringdon Street and Holborn Viaduct.
23. A letter of objection has been received from the Guild Vicar of St Andrew's Church and the Bishop of Fulham who lives in the vicarage at 5 – 7 St Andrew Street. While he supports the principle of a new hotel development on the site he has the following concerns about the proposal:
- Demolition and construction – the vicarage faces onto Shoe Lane, at its junction with Plumtree Court. The documentation shows that construction traffic will pass along St Andrew Street, Shoe Lane and Plumtree Court. This will cause disturbance. Demolition and construction traffic should be required to use Holborn Viaduct.
 - Servicing – in the interests of traffic management and to minimise noise and disturbance vehicles should undertake all deliveries and servicing from Holborn Viaduct and not Plumtree Court.
24. The letter further notes that the Guild Church Council of St Andrew Holborn have considered the application and express strong concerns about the proposal to build and service a large hotel using Shoe Lane and Plumtree Court which adjoin listed and residential buildings. They encourage the applicant to provide reassurance that the aforementioned issues would be addressed by amendments or conditions in order to mitigate the concerns raised.
25. Transport for London have the following comments to make:
- Access for cyclists should be clarified. It appears that the hotel and office cycle parking is accessed via steps.

- A formal taxi rank should be provided as part of the proposals.
 - Further details should be provided on the management of the blue badge parking bay in the light of the access controls on Plumtree Court.
 - Four short stay cycle parking spaces should be provided for the offices and hotel.
 - The trip generation figures do not account for the ancillary facilities within the hotel.
 - A contribution should be secured towards a cycle hire docking station.
 - It would need to be demonstrated that the construction and demolition process would not have a detrimental impact on the central line tunnels that are in close proximity to the site.
26. One letter of support has been received from Reverend Rodney Woods, Minister of City Temple. He notes that without urgent major repair and updating of the building, City Temple's history and mission will cease. The present situation is unsustainable for the medium to long term. The proposed scheme is a viable option to secure the future of this church.

Policy Context

27. The development plan consists of the London Plan and the City of London Local Plan. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix A to this report.
28. There is relevant City of London and GLA supplementary planning guidance in respect of Planning Obligations, Sustainable Design and Construction and London Views Management Framework.
29. Government Guidance is contained in the National Planning Policy Framework (NPPF).

Considerations

30. The Corporation, in determining the planning application has the following main statutory duties to perform:-
- to have regard to the provisions of the development plan, so far as material to the application and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
- to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
- In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990);

the effect of the duties imposed by Section 66(1) is to require decision-makers to give considerable weight and importance to the desirability of preserving the special architectural and historic interest of the listed building.

31. Paragraph 131 of the NPPF advises, “In determining planning applications, local planning authorities should take account of:
 - The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - The positive contribution that conservation of heritage assets can make to sustainable communities, including their economic vitality; and
 - The desirability of new development making a positive contribution to local character and distinctiveness.”
32. The NPPF states at paragraph 14 that ‘at the heart of the NPPF is a presumption in favour of sustainable development which should be seen as a golden thread running through both plan-making and decision-taking.....For decision-taking this means: approving development proposals that accord with the development plan without delay...’ It further states at Paragraph 2 that:

“Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise’.
33. It states at Paragraph 7 that sustainable development has an economic, social and environmental role.
34. Chapter 12 of the NPPF sets out the policy principles for Conserving and enhancing the historic environment. Paragraph 132 states that “When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation”.
35. In considering the planning application before you, account has to be taken of the statutory and policy framework, the documentation accompanying the application, and views of both statutory and non-statutory consultees.
36. The principal issues in considering this application are:
 - The extent to which the proposals comply with Government policy advice (NPPF);
 - The extent to which the proposals comply with the relevant policies of the Development Plan;
 - Whether the loss of office accommodation in Morley House is acceptable;

- Whether the provision of office space (Class B1) in City Temple is acceptable;
- The acceptability of the loss of retail (Class A1/A2) and education use (Class D1);
- The acceptability of providing a hotel use on the site;
- The appropriateness of the design of the hotel in the context of views and impact on the setting of the surrounding listed buildings;
- The impact of the physical works on the grade II listed City Temple;
- Impact of the proposal on daylight and sunlight to adjoining residential occupation;
- The impact of the proposal in terms of highways and servicing; and
- Whether the proposal is acceptable in terms of sustainability and access arrangements.

Loss of Office (Class B1) Accommodation in Morley House

37. The redevelopment of Morley House would result in the loss of 4,020 sq.m of office floorspace. Local Plan policies CS1 and DM1.1 seek to protect office accommodation where it is considered to be suitable for long term viable office use and there are strong economic reasons why loss of that accommodation would be inappropriate. The Office Use Supplementary Planning Document (SPD) sets out detailed criteria for evaluating the long term viability of office accommodation and requires the submission of a viability appraisal and evidence of marketing in support of an application for change of use.
38. Marketing evidence has been previously submitted to support an earlier application for the redevelopment of Morley House from office to hotel use in 2013 (13/00747/FULMAJ). The building was subsequently purchased by the current applicant. No further marketing exercise has been carried out as pre-application discussions were taking place with the City Corporation about the potential for a hotel redevelopment. Although no additional marketing evidence has been provided, the applicant's viability study has considered the office development and lettings market in this part of the City and refers to comparable office transactions to support the assertion that there is no viable market for continued office use.
39. The applicant's viability appraisal was undertaken by BNP Paribas and considers a number of development scenarios:
 - Scenario A: a refurbishment of the existing office building
 - Scenario B: a refurbishment of the existing office building taking into consideration the impact of the adjacent development

Scenario C: a demolition of the existing building and construction of an office building with the same development envelope as the proposed hotel scheme.

40. The viability appraisal also considers the economic viability of the wider City Temple Quarter development to demonstrate the deliverability of the overall scheme. Although the application relates to a wider proposal than just the redevelopment of the existing office building for hotel use, for the purposes of meeting the requirements of Local Plan policies CS1 and DM1.1 the key consideration is whether the existing office building is suitable and viable for longer term office needs and, therefore, the assessment does not consider the wider viability of City Temple Quarter proposal.
41. The City Corporation appointed independent consultants, JLL, to undertake a review of the applicant's viability appraisal and advice on whether the continued use of the premises or redevelopment for a new office would be viable within the terms of Local Plan policy. JLL's assessment has been undertaken in line with RICS Guidance 'Financial Viability and Planning' (2012).
42. Both the applicant's viability appraisal and the JLL review for the City Corporation have been made publicly available and placed on the Planning Register on the City Corporation's website.
43. The applicant's viability appraisal has been prepared using an industry standard Argus Developer tool, which compares the estimated value of the completed hotel development (Gross Development Value) with development costs (including land value, construction costs, infrastructure costs, professional fees and required planning contributions), to derive an estimate of potential profit from the development. The potential profit is compared with a benchmark profit assumption for the type of development and location. If the potential profit is significantly below the benchmark, then the scheme is considered to be unviable and unlikely to proceed.
44. In considering the applicant's viability assumptions, JLL has had regard to their experience in the City market in relation to rents and rent free periods, comparable letting evidence and office availability, advice from their in-house cost consultancy team and their experience in development finance and marketing/disposal. This has resulted in a number of variations in inputs to the viability model to those proposed by the applicant, including higher rental assumptions, lower finance and marketing and disposal costs, but additional risk items on construction leading to higher construction cost estimates. For Scenario B, the applicant has applied a discount to potential rental levels reflecting the potential impact of the adjacent development on light levels to Morley House. JLL has accepted that there will be some loss of light from the adjacent development, but consider that the impact on rent levels had been over-stated and that rental levels should be above those suggested in the applicant's viability assessment.

45. A key consideration in assessing the viability of Morley House is the assumed land value. The applicant has assumed a land value of £38.5m, which was the purchase price paid for the existing building in May 2014. The Office Use SPD requires “a valuation of the building in its existing use, ignoring the hope value of an alternative use”. JLL has looked therefore at comparable office land transactions in August 2017 to determine an appropriate land value for consideration in the viability appraisal. The May 2014 purchase price equates to a value of approximately £740 per sq ft. Comparable evidence suggest that offices have been transacting at between £600 per sq ft and £1,000 per sq ft (August 2017). At £740 per sq ft, the value assumed for Morley House lies within the range of comparable transactions and the advice from JLL is that the figure of £38.5m is a reasonable assumption for vacant possession of Morley House in the current office market, albeit that the £38.5m figure in the applicant’s appraisal has been derived on a different basis.
46. Using revised assumptions, as set out above, and the agreed land value, JLL have re-run the viability appraisal for the 3 scenarios tested by the applicant. This gives the following figures for profit on-cost
 - Scenario A: -37.5%
 - Scenario B: -40.9%
 - Scenario C: 0.4%
47. These figures indicate that the refurbishment options (Scenarios A and B) have a significant negative return. For the redevelopment option, the potential return is marginally positive, but not at a level where a developer would consider delivering the scheme, which JLL advise would be a profit on cost in the range of 18-20% in the current market.
48. To provide some sense testing of the viability results, JLL were asked to re-run their appraisals with developer profit as a fixed cost within the model and residual land value as the output. For this assessment, JLL assumed a fixed profit on cost of 15% for the refurbishment scenarios and 20% profit on cost for the redevelopment option. This modelling approach gives the following land value per sq ft of net internal area:
 - Scenario A: £218
 - Scenario B: £185
 - Scenario C: £292
49. For the refurbishment options, the land values are considerably below any vacant property transactions in the City, confirming that refurbishment of the existing building is not a viable option. For the redevelopment option, the land value is closer to potential market values, but JLL’s advice is that this figure is still below the level expected in this part of the City and would not be a viable option.
50. In conclusion, whilst JLL disagreed with some of the inputs in the applicant’s appraisal, their conclusion is that both office refurbishment and redevelopment options would produce returns significantly below

the level necessary for a developer to bring forward an office scheme. The loss of office accommodation at Morley House is considered therefore to accord with the provisions of Local Plan policies CS1 and DM1.1.

The Provision of Office Accommodation (Class B1) in City Temple

51. Although the proposal would result in the loss of 4,020sq.m of office space on the Morley House site, it would provide 1,646sq.m of flexible office floorspace (Class B1) in City Temple. The space would function separately from the church and would offer office and meeting room hire with café/break out space. It is intended that the space would be made available for external hire and would provide flexible, adaptive workspace meeting the demands for agile working and start up accommodation in the City. It is envisaged that the space would be managed by the hotel initially and the office space would be linked to the hotel.
52. The provision of such space is welcomed in accordance with policy DM1.1 of the Local Plan and it is recognised that the space would be important in securing the long term future of City Temple.

Loss of an education use (Class D1)

53. The redevelopment of Morley House would result in the loss of 783 sq.m of education use. Policy DM22.1 of the Local Plan seeks to resist the loss of social and community facilities unless replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility. In redevelopment schemes the loss of facilities would only be permitted where it has been demonstrated that the existing floor space has been actively marketed on reasonable terms for public social and community floor space.
54. The third floor of Morley House is not currently being used for education use. It was occupied by Williams College who vacated the building in 2012 to move to Stratford. The BNP Paribas Marketing and Viability report which accompanies this application states that Morley House was actively marketed for all lawful uses with limited interest for educational or social/community use. It is therefore considered that the proposal would not be contrary to the aims of policy DM22.1 of the Local Plan.

Loss of a retail use (Class A1/A2)

55. The redevelopment of Morley House would result in the loss of 1,025sq.m of retail use (Class A1, Class A2). The retail space has been vacant since 2012.
56. The site is located on a Retail Link as defined by the Local Plan. Policy DM20.2 of the Plan seeks to resist the loss of retail frontage within the Retail Links. The mix of uses in the Links should include A1 shops, but a variety of uses will be permitted.
57. The loss of retail is considered to be acceptable in this instance as the hotel would provide an ancillary café/bar on Holborn Viaduct which would be open to members of the public. This would provide an active

frontage and contribute towards enlivening the retail link. The location of the café/bar would be secured by condition.

Provision of a hotel (Class C1)

58. Policy DM 11.3 states that new hotel development will be permitted if it does not prejudice the primary business function of the City and is not contrary to policy DM 1.1, which states that a change of use from office to other uses will be acceptable if a site is no longer suitable for office use. Policy DM 11.3 further states that new hotel development will not be acceptable unless satisfactory arrangements for pick-up/drop-off, services delivery vehicles and coaches, appropriate to the size and nature of the hotel and that any proposal should not have an undue impact on the amenity of neighbouring occupiers.
59. Within the immediate locality hotels are proposed at 61-65 Holborn Viaduct (246 bedrooms) approved in 2012 and due to open in 2019 and at 25 - 26 Furnival Street an apart-hotel was approved in 2015 to provide 50 bedrooms and due to open 2018. The applicants have demonstrated that the site is not viable for office use. Suitable transport and servicing arrangements have been proposed, which are covered in the relevant section of this report.
60. The principle of hotel use on the site is considered to be acceptable in accordance with policy DM11.3 of the Local Plan. The hotel would be well located to support activities within the Culture Mile.

Design

Morley House

61. The new building to replace Morley House has been designed to relate positively to its surroundings by combining a contextual stone faced element to front Holborn Viaduct between the two adjoining listed buildings, with a more extensively glazed main body of the building which exerts its own identity above the Holborn Viaduct elevation and wraps around to Shoe Lane and Plumtree Court. A taller element raises an additional two storeys behind the bridge pavilion building and continues around the rear of the building to lower the apparent height of the Holborn Viaduct frontage.
62. Along Holborn Viaduct the stone frontage would raise five stories to a cornice that respects the line of those of its neighbours. Above the cornice the stone façade steps back to provide an attic storey. At ground and first floor the façade is deeply recessed to complement the double height ground floors of City Temple and the pavilion. Pilasters divide the set-back bays and continue upwards to provide an appropriate rhythm and further articulation and modelling to the limestone façade. The windows within the stone facade are set within dark metal surrounds to link the architectural appearance of this façade to that of the main building that would be visible above and behind. The main entrance to the hotel would be located towards the centre of this façade with tall automatic doors to the reception area and a vitreous enamel canopy projecting outwards.

63. The façades of the main building would be faced in a unitized glass curtain wall that comprises a narrow grid of black opaque glass infilled by an arrangement of full-height clear vertical glazing and horizontal partially fritted glazing with an opaque black glass spandrel panel below. On the Holborn Viaduct frontage the glazed element rises between two and four further storeys above the attic storey of the stone façade. The glazed façade is set back from the stone attic storey to downplay its height. The total height of the Holborn Viaduct frontage is between eight and ten storeys above local ground level.
64. To the south, along Plumtree Court the ground level is approximately eight metres lower allowing for an additional two storeys above ground and a basement below. The top floor is recessed to create a top to the building at the shoulder level of the much larger neighbouring building currently under construction to the south. The building would be seen to wrap around the rear of the bridge pavilion building at a height and manner that is visually comparable to the relationships that exist between the other three pavilions and their adjoining buildings. A double height stone base at ground and first floor level would visually support the building and would include openings for a double height secondary entrance and windows, the servicing bay, and ventilation louvres.
65. The roof level would be used to accommodate photovoltaic panels, maintenance equipment and plant. Green roof areas would be provided further details of which would be required by condition.
66. The bulk, height, massing and appearance of the new building is considered to be acceptable and would accord with policies CS10 and DM10.1 of the Local Plan.

City Temple

External Changes

67. The external alterations to City Temple are confined to the provision of new fenestration, a new entrance on Plumtree Court, alterations to existing fenestration and doors, the insertion of ventilation grilles, and new and extended areas of rooftop plant. Details of these alterations are as follows:
68. On the western, Shoe Lane, elevation four large double height windows would be inserted at 1st floor level to provide daylight to the new conference facility introduced at this level. Two of the new windows would replace smaller existing windows, and two would be entirely new.
69. At pavement level on the Shoe Lane frontage five sets of full height internally opening windows would be inserted replacing one set of doors and a number of smaller windows. The new windows would provide natural light to the proposed lower ground floor café space and increase the degree of activation and interest to the street at this level. Two new louvre panels would be inserted on this frontage to provide air for new plant in the basement.

70. On the Plumtree Court frontage a new entrance to the lower workspace level and a new large window into this area would increase interest and activity to street. An existing entrance would be upgraded with new doors.
71. The existing plant enclosure on the roof would be slightly enlarged and an additional plant room established on the southern part of the building's roof.

Internal Alterations

72. The upper levels (ground and above) of City Temple would remain in church (Class D1) use and the internal refurbishment works have been approved by the United Reform Synod Property Committee under The Ecclesiastical Exemption (Listed Buildings and Conservation Areas) (England) Order 2010 in October 2017.
73. The works covered by the application include the refurbishment of the entrance foyer, remodelling of the ground floor sanctuary/meeting rooms, removal of the raked first floor gallery and replacement with two new mezzanine floors for the provision of conference and meeting space, refurbishment of the third floor level as meeting rooms and ancillary residential accommodation and insertion of a replacement lift and services with new/extended plant.
74. As the lower levels (below ground) of City Temple would be changed to office use (Class B1) the ecclesiastical exemptions do not apply and listed building consent is required for the internal works to these floors. At present the lower ground floor is used as a hall with a mezzanine level above. The mezzanine would be extended. It is proposed that toilet facilities would be provided for the church. New partitions would be inserted to provide open plan and cellular office space and an ancillary café area.

Impact of the Works on the Significance of City Temple

75. NPPF paragraph 129 requires local planning authorities to identify and assess the significance of any heritage asset that may be affected by a proposal. City Temple has particular historical, evidential, communal and aesthetic values that contribute to its significance. These values can be summarised as follows: Historical: City Temple was built in 1873 by the practice of Lockwood and Mawson in a high Victorian style for a congregation that traces its origins back to the 1640s. Evidential: The only remaining parts of the original structure are its elaborate Holborn Viaduct façade, the plain brick façade to Plumtree Court, and the small section of decorative façade at the SE corner of the building facing Shoe Lane. Aesthetic: The building is a hybrid of High Victorian frontage with a 1950s modernist rebuild and interior designed to work as an integrated reconstruction following severe damage during the Second World War. Communal: City Temple is an active church with a long associated with this building and location.
76. NPPF paragraph 131 requires local planning authorities to take account of: The desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their

conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness. Paragraph 132 requires that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, that significance can be harmed or lost through alteration or destruction. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

77. In response to these requirements, the proposals aim to ensure the long term future of City Temple. The elements of the existing building that make the most important contribution to its significance; the external appearance and full height parts of the Sanctuary would be refurbished. The proposals retain and refurbish the parts of the building with high levels of heritage significance to continue to be used as a place of worship appropriate for the current needs of the congregation.
78. The proposed external works and internal works to the lower floors would not detract from the overall heritage significance of the building. The lower hall is an undecorated utilitarian space in poor condition. Its contribution to the building's significance is to provide ancillary "church hall" space. Although this space would be and converted to another use, its function within the building would continue through the use of the office space and the new upper level facilities.
79. The loss or reconfiguration of the internal areas which make the least contribution to the overall heritage significance of the building and their change of use to flexible office use, would provide an income that would allow the long term maintenance of the building. The church would remain on the site and would continue to make a positive contribution to the local distinctiveness of this part of the City.
80. The changes to the exterior of the building would be limited. The new windows would be recessed into the surrounding stonework in a manner that references the existing window treatments. Their proportions would reflect the hotel building's double height 2nd & third floor windows. These windows would be visible in views of the new building and City Temple looking south eastwards across Holborn Viaduct. The existing Plumtree Court elevation of the building is of a simple design that has been subject to numerous alterations in the past. The insertion of the new fully glazed entrance is an appropriate enhancement to this elevation. The other external changes are minor in extent. All external alterations would have minimal impact on the significance of the building.
81. The works are not considered to detract from the special architectural or historic interest of the listed building in accordance with policy DM12.3 of the Local Plan.
82. The applicant has agreed to carry out the works to City Temple prior to the first occupation of the hotel to ensure this part of the development

is delivered. This would be secured through the section 106 agreement.

Setting of Adjacent Listed Buildings

83. The increased height of the proposed hotel building and its appearance have been carefully considered to ensure that they would not have a detrimental impact on the settings of the adjoining Grade I listed Church of St Andrew Holborn, or the Grade II listed Farringdon Street Bridge and its associated south east and south west pavilion buildings. The relationship between the replacement building and the adjoining south western pavilion and Farringdon Street Bridge is considered satisfactory and in conformity with the existing setting of the other three bridge pavilions.
84. The relationship of the building with City Temple, and its setting, has been carefully considered. The new Holborn Viaduct stone façade would form an appropriate street frontage linking the two adjoining listed buildings whose proportions and materials are referenced in the new elevation. This is in terms of storey heights, the location and proportion of windows and the string course/cornice detailing. The upper levels of the building have been sculpted back to enable views of City Temple's lantern to continue in longer distance views looking west along Holborn Viaduct.
85. The neighbouring Grade I listed Church of St Andrew Holborn, rebuilt by Christopher Wren, sits at a lower level than the Holborn Viaduct pavement level and is set back from the street frontage. The church is separated from City Temple by Shoe Lane and Shoe Lane Bridge which carries Holborn Viaduct over the street. The focus of views of the church is generally the tower located at its western end furthest from City Temple and Morley House. Only in more distant views from the west do views of the church tower align with the development site. From this distance the proposed building would be visible but only as part of the general pattern of development behind the church. In closer views the setting of the church is not harmed by the proposals.

Townscape and Local Views

86. The building is designed to have a contextual relationship to its wider surroundings whilst maintaining a clear identity of its own. The massing, materials and form of the proposed building have been developed to ensure that the overall scheme represents an enhancement to the immediate locality. The applicants have undertaken a comprehensive analysis of a series of verified visual montages that demonstrate the above points and illustrate how the building would successfully integrate into the surrounding townscape.

London View Management Framework

87. The Mayor's London View Management Framework (LVMF) is Supplementary Planning Guidance to the London Plan. The LVMF sets

out the strategic context for the protection of identified landmarks. The site lies within the following LVMF policy areas:

1. The Wider Setting Consultation Area for LVMF View 2A.1 which protects the view of St Paul's Cathedral from Parliament Hill.
 2. The Wider Setting Consultation Area and Viewing Corridor for LVMF View 4A.1 which protects the view of St Paul's Cathedral from Primrose Hill.
 3. The Background Wider Setting Consultation Area for LVMF View 5A.2 which protects the view of St Paul's Cathedral from Greenwich Park.
 4. The Background Wider Setting Consultation Area for LVMF View 6A.1 which protects the view of St Paul's Cathedral from Blackheath Point.
88. The height of the building would be lower than the protected development plane for the LVMF View 4A.1 from Primrose Hill, and lower than the consultation thresholds for the other views. The proposals are therefore in compliance with London Plan policies 7.10, 7.11 and 7.12.

Design and Heritage Conclusion

89. The works are considered to be acceptable in design and heritage terms in accordance with the requirements of the NPPF and policies CS10, DM10.1, CS12, DM12.1 and DM12.3 of the Local Plan.

Daylight, Sunlight

90. The scheme has been assessed in terms of its impact on the daylight and sunlight levels to the residential dwelling at 5 – 7 St Andrew's Street. The figures show that there would be no change to daylight and sunlight levels as a result of the proposed scheme.

Sustainability & Energy

BREEAM

91. The development has been designed to enable achievement of an "Excellent" BREEAM rating. The developer is targeting 7 out of a possible 9 credits for water, 13 out of 22 for energy and 3 out of 3 for air quality (NOx emissions). A post construction BREEAM assessment would be required by condition.

Energy

92. The submitted energy statement demonstrates that the development has been designed to achieve a 19% improvement in carbon emissions over the 2013 Building Regulations requirements. This would be achieved through on-site energy efficiency measures such as CHP and photovoltaic panels. The site is not currently served by the Citigen district heating and cooling network notwithstanding a facility to connect to a future CHP network has been included in the design of the hotel.
93. London Plan policy 5.2 requires non domestic developments to achieve a 35% improvement in carbon emissions compared with the 2013

Building Regulations. A carbon offsetting contribution would be required to account for the shortfall in carbon emission reduction. This would be secured through the section 106 agreement.

94. A series of conditions are recommended in respect of air quality.

Flood Risk

95. The site falls within the City Flood Risk Area as defined by the Local Plan due to surface water flood risk in the vicinity. The submitted Flood Risk assessment shows that although there is surface water flood risk in the area this site is not directly at risk. This is confirmed by the City of London Strategic Flood Risk Assessment 2012 – 1000 year return period map.
96. The applicant's Flood Risk Assessment states that the entrances and exists on Holborn Viaduct and Plum Tree Court are set above the modelled flood extent for a 1 in 100 year event and therefore there should be no need to provide specific flood resistance measures. As a precaution the basements will be designed with an appropriate level of waterproofing.

Transport, Servicing & Parking

Deliveries and Servicing

97. Policy DM16.5 of the Local Plan requires the provision of onsite servicing areas to allow all goods and refuse collection vehicles to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear.
98. The submitted delivery and servicing management plan details that the hotel and office use would generate a maximum of 12 deliveries in one day. This includes deliveries for the ancillary restaurant, café, bar, gym and spa facilities. The restaurant, café and bar would be available to members of the public and there would be some limited non hotel guest use of the spa and gym.
99. A loading bay with a single 8-metre loading space would be provided on the lower ground floor of the new building and would be accessed from Plumtree Court. The deliveries for the new office space and the hotel would be accepted from this loading bay. Deliveries to the church use would continue to be from the surrounding streets, usually Shoe Lane (north of Plumtree Court).
100. A single loading space has been assessed as being adequate for the development provided that deliveries are appropriately scheduled and spaced to ensure that two vehicles are not attempting to access the development at the same time. Consideration has been given to the possibility of persons who are not hotel guests using the restaurant, café, bar, gym and spa facilities (which are ancillary to the hotel use) as this has implications for the quantum of goods needing to be delivered to operate these facilities.

101. To ensure that deliveries are spaced so that two vehicles are not attempting to access the development at the same time and that the loading bay operates with optimal efficiency and safety, six requirements would be imposed through the section 106 agreement for the development. These are as follows:
- The deliveries to the hotel (including its ancillary restaurant, café, bar, gym and spa facilities) and to the office space within City Temple would be pre-booked using an appropriate online vehicle booking system, the records of which would be available to the City to check for compliance on request. All vehicles that are not booked in would be turned away.
 - If and when the City institutes an access-only traffic arrangement on Plumtree Court (at its junction with Shoe Lane), goods vehicles and any other motor vehicles involved in making deliveries to the hotel (including its ancillary restaurant, café, bar, gym and spa facilities) and to the office space within City Temple would only be permitted to access Plumtree Court once the previous goods vehicle or other motor vehicle involved in making deliveries had exited Plumtree Court. Vehicles presenting themselves at the access control prior to the previous vehicle exiting would be turned away even if they were appropriately booked in. The developer has accepted this arrangement for operating the access controls.
 - Deliveries not be accepted during specified periods to be agreed as part of the section 106 negotiation, to include (but not necessarily be limited to) 7.00 a.m. to 9.00 a.m. and 5.00 p.m. to 7.00 p.m. from Monday to Friday (excluding bank and public holidays).
 - Goods being delivered to the hotel (including its ancillary restaurant, café, bar, gym and spa facilities) and to the office space within City Temple not be accepted from or dispatched onto or into any motor vehicle other than one waiting for that purpose wholly within the dedicated loading bay within the building (i.e., goods would not be accepted from motor vehicles waiting on street).
 - All vehicles exiting the loading bay within the building shall do so in a forward direction and in a forward gear (which, for larger vehicles that would not be able turn around within the loading bay, implies that these vehicles will reverse into the loading bay). This is critical to ensure that vehicles are not reversing out of the loading bay onto the street, which can be dangerous as the façade of the building would obscure the driver's sightlines.
 - All vehicles manoeuvring into, out of and within the loading bay shall do so under the supervision of an appropriately trained and experienced banksman employed by the hotel operator.
102. Details of final trip numbers and servicing arrangements would be provided in the section 106 agreement. Subject to these restrictions it is

considered that the servicing arrangements would be satisfactory in accordance with policy DM16.5 of the Local Plan. Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited would be consulted on the final servicing details.

Cycle Parking

103. Cycle parking for 38 hotel and office staff is provided on the lower ground floor of the development, with access to the hotel's bicycle store being via the loading bay, which is itself accessed from Plumtree Court. The proposed restrictions on the periods during the working week when deliveries may be accepted, which would be secured through the section 106 agreement for the development, would ensure that there are no goods vehicles manoeuvring in the loading bay during the peak periods for cyclists to be accessing the bicycle store through the loading bay.
104. The cycle parking for the office use could be accessed from Plumtree Court via a lift within the building. Alternatively the Shoe Lane entrance could be used with a 'wheeling ramp' running alongside the stairs.
105. The cycle parking is compliant with the London Plan standards for long-stay cycle parking (32 spaces) and provides an additional 6 spaces to partially compensate for the inability to provide short-stay (visitor) parking on site. This is considered to be best practice and the inability to provide short-stay parking on site is fully accepted given the desirability of ensuring 100% site coverage in the City's very dense urban context.
106. The City would not seek a contribution towards a cycle hire docking station as required by TfL. The Planning and Transportation Committee's instruction is that the City has sufficient cycle hire docking stations and that substantial expansion of the scheme should only happen if a strategy for this is first agreed by the Committee.

Car Parking and Coach Parking

107. The development would be car free in accordance with policy 16.5 of the Local Plan, except for one disabled parking space proposed on the lower ground floor of the hotel. This is in accordance with adopted planning policy and will serve to meet the City's objectives around reducing traffic congestion and improving air quality. A condition would ensure that the disabled parking space is permanently laid out, marked out and reserved for disabled parking badge (blue badge) holders.
108. The applicant has confirmed that it is anticipated that the majority of trips to the site would be by public transport. As such it is not considered that it would be necessary to secure a survey of car parking spaces in the locality as suggested in the representation by Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited.
109. Coach parties would not use the hotel. This would be set out in the Operational Management Plan which would be required by condition.

Taxi Pick Up and Drop Off

110. The hotel's main entrance and address will be on Holborn Viaduct and this is the most likely location for taxi pick up and drop off, particularly as the proposed physical access controls regulating access to Plumtree Court will slow entry and exit to that street and the need for passengers to cross the cycle track on the western side of Farringdon Street would make Farringdon Street a less attractive location for pick up and drop off.
111. The delivery and servicing management plan for the development will include a provision that hotel staff calling taxis for hotel guests must specify that the taxi picks up the guest on Holborn Viaduct unless another location is specifically requested by the guest.
112. Details of the management of taxis would be secured through the Operational Management plan details of which would be required by condition. Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited would be consulted on the details.
113. The City is not seeking the designation of an on street taxi rank as these must be public facilities and not monopolised by individual developments. The location of such facilities is best decided strategically according to an assessment of need. Furthermore, the City does not wish to encourage hotel guests to choose a taxi for their journey as opposed to public transport.

Demolition and Construction

114. Ordinarily details of deconstruction and construction logistics would be required by condition and submitted following the grant of planning permission. Given the constraints in the locality of the application site e.g. the vehicle controls on Plumtree Court, loading restrictions on Holborn Viaduct, works taking place on the adjacent site and the City's Shoe Lane public realm improvements draft details have been provided at application stage. The applicant has been in liaison with Farringdon Street Partners Limited and Farringdon Street Limited (Nominee) and the City over these details.
115. It is proposed that the deconstruction of Morley House and the strip out of City Temple would be undertaken primarily internally with materials being taken out of the existing servicing bay and along Plumtree Court. Should this option be compromised by works taking place in the locality at the time of deconstruction, the feasibility of using Holborn Viaduct would be investigated.
116. During the fit out of City Temple the ground floor entrances off Shoe Lane would be used. If the City is undertaking works to Shoe Lane an alternative arrangement would be established.
117. During the construction of the hotel, Holborn Viaduct would be used subject to the necessary consents being obtained from the City and the

viaduct structure being capable of taking the necessary loadings (or can be strengthened to take the necessary loadings).

118. Final demolition and construction logistics and management plans would be required by condition prior to the commencement of such works. The Local Planning Authority will undertake to consult TfL and Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited on the proposed works.
119. In order to manage the impacts of the deconstruction and construction on surrounding occupants conditions have been included requiring the submission of details of a scheme for the protection of nearby residents and commercial occupiers from noise, dust and other environmental effects during deconstruction and construction.

Refuse Storage and Collection

120. Policy DM17.1 of the Local Plan states that waste facilities must be integrated into the design of buildings.
121. A dedicated refuse store for the hotel and new office space would be provided at ground floor level accessible from the service area. Refuse for the new office workspace would be transported to the hotel refuse store via a connecting walkway on the mezzanine level.
122. A condition is recommended requiring the submission of further details of the refuse storage and collection arrangements. Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited would be consulted on the details submitted pursuant to this condition.
123. Refuse generated from the upper floors of City Temple would be placed on Shoe Lane for collection by the City as per the existing arrangement.

Access

124. Local Plan Policy DM 10.8 Access and Inclusive Design requires that developments meet the highest standards of accessibility and inclusive design. The proposed development would provide level access via the main entrances.
125. At least 10% of the hotel rooms would be accessible for people with disabilities, which would be required by condition.
126. A condition is included requiring the submission of an accessibility management plan prior to the occupation of the hotel including details of accessible car parking provision as well as drop off and collection arrangements for disabled visitors.

Archaeology

127. The site is in an area of archaeological potential, located on the west bank of the river Fleet valley and outside the Roman and medieval walled city. There is high potential for environmental, medieval and post-medieval evidence, which have been recorded on the site and in the vicinity and it is likely that archaeological remains survive despite the impact of previous developments across the site.

128. The existing buildings on the site have respectively three basement levels (Morley House) and two basement levels (City Temple). The proposed development would have an impact on archaeological remains in the western part of the site (the new hotel) where new foundations and a lift pit are proposed.
129. Conditions are included to cover archaeological evaluation, a programme of archaeological work and foundation design.

Planning Obligations and Community Infrastructure Levy

130. The development would require planning obligations in a Section 106 agreement to mitigate the impact of the proposal and make it acceptable in planning terms and to contribute to the improvement of the City’s environment and facilities. It would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
131. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
132. The CIL contributions are set out below.

Mayoral CIL

Liability in accordance with the Mayor of London’s policies	Contribution	Forwarded to the Mayor	City’s charge for administration and monitoring
Mayoral Community Infrastructure Levy payable	£217,700	£208,992	£8,708.00
Mayoral planning obligation net liability*	£64,619	£64,619	£3,500
Total liability in accordance with the Mayor of London’s policies	£282,319	£273,611	£12,208.00

Net liability on the basis of the CIL charge remaining unchanged and subject to variation.

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£326,550	£310,223	£16,327
City Planning Obligation Affordable Housing	£87,080	£86,209	£870
City Planning Obligation Local, Training, Skills and Job Brokerage	£13,062	£12,931	£132
Non-financial Monitoring	£1,750.00	-	£1,750
Total liability in accordance with the City of London's policies	£428,442	£409,363	£19,079

City's Planning Obligations

124. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Local Procurement Strategy
- Local Training Skills and Job Brokerage Strategy Construction and End Use
- Highways/S278 Agreement
- Travel Plan
- Carbon Offsetting
- Delivery Service Management Plan to include the required measures.
- Prohibition on occupation of the hotel until the works to City Temple are complete and the offices are available for occupation.

125. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations as necessary.

Monitoring and Administrative Costs

126. A 10 year repayment period would be required whereby any unallocated affordable housing and local training skills and job brokerage contribution sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
127. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Conclusions

129. The principle of redeveloping Morley House for hotel use is considered to be acceptable. The loss of office use has been justified through the submission and independent assessment of viability information. The new hotel is acceptable in terms of its design, impact on adjacent listed buildings, impact on views and impact on daylight and sunlight levels to a nearby residential dwelling. Sufficient information has been provided to demonstrate that the development would function operationally in terms of its impact on the surrounding highways, delivery and servicing and refuse collection.
130. The provision of office space on the lower floors of the listed building would be welcomed in terms of the requirements of policy DM1.1 of the Local Plan. The physical works to the listed building in association with the provision of the office space would not detract from its architectural or historic significance. The scheme provides the opportunity to secure the long term future of City Temple.

Background Papers

Internal

25.04.2017 Memo Department of Markets and Consumer Protection

10.10.2017 Email Department of Markets and Consumer Protection

External

Design and Access Statement February 2017

Knight Frank Hotel Demand Study October 2016

Hilson Moran Noise Survey Report rev. 02 28 February 2017

Aecom City Temple Quarter Flood Risk Assessment February 2017

Caneparo Associates Workplace Travel Plan February 2017

BNP Paribas Real Estate Office Viability and Market Report March 2017

Extended Phase 1 Habitat Report February 2017

Hilson Moran Energy Strategy rev. 03 28 February 2017

Townscape and Visual Impact Assessment February 2017

Statement of Community Involvement February 2017

Caneparo Associates Transport Assessment February 2017

Planning Resolution Planning Statement

Aecom Air Quality Assessment February 2017

Caneparo Associates Delivery and Servicing Plan September 2017

TPP Outline Construction Logistics Plan September 2017

Eric Parry Architects City Temple Planning Drawings Supporting Document
October 2017

City Temple Quarter, 26-30 Holborn Viaduct and City Temple, Holborn
Viaduct. Historic Environment Assessment, February 2017. MoLA

21.04.2017 Letter DP9 Farringdon Street Partners Limited and Farringdon
Street (Nominee) Limited

24.04.2017 Letter David Osborne, Shiva Hotels Ltd

28.04.2017 Email Thames Water

02.05.2017 Email Natural England

05.05.2017 Email Network Rail

05.05.2017 Letter Transport for London

09.05.2017 Email Jonathan Baker Guild Vicar, St Andrew Holborn and
resident 5 – 7 St Andrew Street

10.05.2017 Letter DP9 Farringdon Street Partners Limited and Farringdon
Street (Nominee) Limited

10.05.2017 Letter Point 2 Surveyors Ltd (Daylight and Sunlight information)

10.05.2017 Email David Williams

21.09.2017 Email David Williams
27.09.2017 Letter Historic England
28.09.2017 Letter GLA
28.09.2017 Email David Williams
29.09.2017 Emails David Williams
02.10.2017 Email David Williams
04.10.2017 Email David Williams
05.10.2017 Letter Farringdon Street Partners Limited and Farringdon Street
(Nominee) Limited
06.10.2017 Emails David Williams
09.10.2017 Email David Williams
10.10.2017 Email Natural England
10.10.2017 Letter London Underground

Appendix A

London Plan Policies

The London Plan policies which are most relevant to this application are set out below:

Policy 2.10 Enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ) and as a strategically important, globally-oriented financial and business services centre.

Policy 2.11 Ensure that developments proposals to increase office floorspace within CAZ include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in the plan.

Policy 3.18 Support proposals that enhance school and educational facilities and resist loss of education facilities unless it can be demonstrated there is no on going or future demand. Encourage multiple use of educational facilities for community or recreational use

Policy 4.1 Promote and enable the continued development of a strong, sustainable and increasingly diverse economy;

Support the distinctive and crucial contribution to London's economic success made by central London and its specialist clusters of economic activity;

Promote London as a suitable location for European and other international agencies and businesses.

Policy 4.2 Support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.

Policy 4.5 Support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision.

Policy 5.2 Development proposals should make the fullest contribution to minimising carbon dioxide emissions.

Policy 5.3 Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation. Major development proposals should meet the minimum standards outlined in supplementary planning guidance.

Policy 5.6 Development proposals should evaluate the feasibility of Combined Heat and Power (CHP) systems, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

Policy 5.7 Major development proposals should provide a reduction in carbon dioxide emissions through the use of on-site renewable energy generation, where feasible.

Policy 5.9 Reduce the impact of the urban heat island effect in London and encourage the design of places and spaces to avoid overheating and excessive heat generation, and to reduce overheating due to the impacts of climate change and the urban heat island effect on an area wide basis.

Policy 5.10 Promote and support urban greening, such as new planting in the public realm (including streets, squares and plazas) and multifunctional green infrastructure, to contribute to the adaptation to, and reduction of, the effects of climate change.

Policy 5.11 Major development proposals should be designed to include roof, wall and site planting, especially green roofs and walls where feasible.

Policy 5.13 Development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so.

Policy 6.3 Development proposals should ensure that impacts on transport capacity and the transport network are fully assessed.

Policy 6.9 Developments should provide secure, integrated and accessible cycle parking facilities and provide on-site changing facilities and showers for cyclists, facilitate the Cycle Super Highways and facilitate the central London cycle hire scheme.

Policy 6.13 The maximum standards set out in Table 6.2 should be applied to planning applications. Developments must:

ensure that 1 in 5 spaces (both active and passive) provide an electrical charging point to encourage the uptake of electric vehicles

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

Policy 7.2 All new development in London to achieve the highest standards of accessible and inclusive design.

Policy 7.3 Creation of safe, secure and appropriately accessible environments.

Policy 7.4 Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

Policy 7.6 Buildings and structures should:

a be of the highest architectural quality

b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm

c comprise details and materials that complement, not necessarily replicate, the local architectural character

d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings

- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

Policy 7.8 Development should identify, value, conserve, restore, re-use and incorporate heritage assets, conserve the significance of heritage assets and their settings and make provision for the protection of archaeological resources, landscapes and significant memorials.

Policy 7.12 New development should not harm and where possible should make a positive contribution to the characteristics and composition of the strategic views and their landmark elements identified in the London View Management Framework. It should also, where possible, preserve viewers' ability to recognise and to appreciate Strategically Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated Viewing Places.

Policy 7.14 Implement Air Quality and Transport strategies to achieve reductions in pollutant emissions and minimise public exposure to pollution.

Relevant Local Plan Policies

CS1 Provide additional offices

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.

DM1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

- a) prejudicing the primary business function of the City;
- b) jeopardising the future assembly and delivery of large office development sites;
- c) removing existing stock for which there is demand in the office market or long term viable need;

- d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

CS4 Seek planning contributions

To manage the impact of development, seeking appropriate developer contributions.

CS10 Promote high quality environment

To promote a high standard and sustainable design of buildings, streets and spaces, having regard to their surroundings and the character of the City and creating an inclusive and attractive environment.

DM10.1 New development

To require all developments, including alterations and extensions to existing buildings, to be of a high standard of design and to avoid harm to the townscape and public realm, by ensuring that:

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;

- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

- 1) To encourage the installation of green roofs on all appropriate developments. On each building the maximum practicable coverage of green roof should be achieved. Extensive green roofs are preferred and their design should aim to maximise the roof's environmental benefits, including biodiversity, run-off attenuation and building insulation.
- 2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.8 Access and inclusive design

To achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished), open spaces and streets, ensuring that the City of London is:

- a) inclusive and safe for of all who wish to use it, regardless of disability, age, gender, ethnicity, faith or economic circumstance;
- b) convenient and welcoming with no disabling barriers, ensuring that everyone can experience independence without undue effort, separation or special treatment;
- c) responsive to the needs of all users who visit, work or live in the City, whilst recognising that one solution might not work for all.

CS11 Encourage art, heritage and culture

To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Destination Strategy.

DM11.3 Hotels

Proposals for new hotel and apart-hotel accommodation will only be permitted where they:

- a) do not prejudice the primary business function of the City;
- b) are not contrary to policy DM1.1;
- c) contribute to the balance and mix of uses in the immediate locality;
- d) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
- e) provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;

- f) are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
- g) ensure continuing beneficial use for historic buildings, where appropriate.

CS12 Conserve or enhance heritage assets

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.

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

CS13 Protect/enhance significant views

To protect and enhance significant City and London views of important buildings, townscape and skylines, making a substantial contribution to protecting the overall heritage of the City's landmarks.

CS15 Creation of sustainable development

To enable City businesses and residents to make sustainable choices in their daily activities creating a more sustainable City, adapted to the changing climate.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide

and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.
2. On-site waste management, through techniques such as recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
 - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
 - b) the benefits of the development outweigh the flood risk to future occupants;
 - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

- a) all sites within the City Flood Risk Area as shown on the Policies Map; and
- b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM20.2 Retail links

To encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
 - c) it has been demonstrated that there is no demand for another similar use on site.
2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

- a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
- b) in locations which are convenient to the communities they serve;
- c) in or near identified residential areas, providing their amenity is safeguarded;
- d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

SCHEDULE

APPLICATION: 17/00165/FULMAJ

Morley House 26 - 30 Holborn Viaduct And City Temple 31 Holborn Viaduct London

Demolition of 26-30 Holborn Viaduct and the erection of a part ground plus 9 storey and part ground plus 7 storey building for hotel (Class C1) use, with servicing access from Plumtree Court; and change of use of the City Temple lower ground and extended mezzanine floor, with removal of raked gallery and creation of new floorspace at mezzanine levels, to provide flexible office workspace (Class B1) use with associated new and altered windows, entrances doors/canopies, roof plant, and other incidental works (12,450sq.m GEA).

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Works shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the development process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme.
REASON: To protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.
- 3 Before any works hereby permitted are begun a revised Air Quality Assessment shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the development minimises emissions and exposure to air pollution and will comply with the City of London Air Quality Supplementary Planning Document during its operational phase. If the development is not at least air quality neutral, a scheme to mitigate the air quality impact of the

development shall also be submitted and approved in writing by the Local Planning Authority prior to any works taking place. The mitigation scheme shall prioritise mitigation on-site unless it can be demonstrated that on-site provision is impractical or inappropriate. The approved mitigation shall be implemented as agreed prior to the first occupation of the development and maintained thereafter.

REASON: In order to positively address local air quality, particularly nitrogen dioxide and particulates PM10 in accordance with the City of London Air Quality Strategy 2015 and the following policy of the Local Plan: DM15.6 and policies 7.14B c and d of the London Plan. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 4 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

- 5 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

- 6 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 7 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 8 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure/subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.
REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure/underground water utility infrastructure.
- 9 The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) for all of the foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent), have been submitted to and approved in writing by the local planning authority which:
(i) provide details on structures
(ii) accommodate the location of the existing London Underground structures and tunnels
(iii) accommodate ground movement arising from the construction thereof
(iv) and mitigate the effects of noise and vibration arising from the adjoining operations within the structures and tunnels
The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition

shall be completed, in their entirety, before any part of the building hereby permitted is occupied.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2011 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

- 10 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall include relevant measures from Section 3 of the Mayor of London's Construction Logistics Plan Guidance for Developers issued in April 2013, and specifically address [driver training for] the safety of vulnerable road users through compliance with the Construction Logistics and Cyclist Safety (CLOCS) Standard for Construction Logistics, Managing Work Related Road Risk. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.
- 11 Before any construction works hereby permitted are begun details of sustainable drainage systems to be incorporated into the development and a lifetime maintenance plan shall be submitted to and approved in writing by the local planning authority. A Lifetime Maintenance Plan for the SuDS system shall include:
- o A full description of how the system would work, it's aims and objectives and the flow control arrangements;
 - o A Maintenance Inspection Checklist/Log;
 - o A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
- The measures shall be incorporated in accordance with the approved details and maintained in accordance with the maintenance plan for the lifetime of the building.
REASON: To improve sustainability, reduce flood risk and reduce water run off rates in accordance with the following policies of the Local Plan: DM15.5 and DM18.1.
- 12 Refuse storage and collection facilities shall:(a) be provided within the curtilage of the site to serve each part of the development in accordance with details which must be submitted to and approved in writing by the Local Planning Authority prior to work commencing;

and(b) thereafter be maintained as approved throughout the life of the building.

REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 13 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 14 Before any construction works hereby permitted are begun details of any rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.
REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 15 No construction works shall begin until details of the extent of the ancillary bar/cafe area on the Holborn Viaduct frontage of the hotel have been submitted to and approved in writing. The area shown on the approved plans for the ancillary bar/cafe area shall be implemented in accordance with the approved details and shall not at any time be used for any other purpose unless otherwise agreed in writing by the Local Planning Authority.
REASON: To ensure that the Holborn Viaduct retail link would not be adversely affected by the proposal in accordance with the following policy of the Local Plan: DM20.2.

- 16 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;

- (b) details of typical bays of the development's stone façade and curtain wall system;
- (c) typical details of new stonework including expansion joints;
- (d) details of new ground level elevations on Holborn Viaduct and Plumtree Court;
- (e) details of the new ground level entrances on Holborn Viaduct and Plumtree Court;
- (f) details of all alterations to the Shoe Lane and Plumtree Court elevations of City Temple including new entrances and alterations to windows, etc;
- (f) details of new windows;
- (g) details of service bay entrance door(s);
- (h) details of soffits, hand rails and balustrades;
- (i) details of junctions with adjoining premises;
- (j) details of the integration of window cleaning or maintenance equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level; and
- (k) details of all ground level surfaces including materials to be used;

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 17 Details of the position and size of the green roof(s), the type of planting and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 18 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the ancillary restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the ancillary restaurant use takes place.
REASON: In order to protect residential/commercial amenities in and around the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

- 19 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.

REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 20 The operation of the premises shall not take place until an Operational Management Plan has been submitted to and approved by the local planning authority detailing:

1. The duties of the staff employed at the premises to discourage, noise, disturbance and anti-social behaviour;
2. A smoking control scheme relating to the supervision and/or control of any smoking patrons outside the premises;
3. A dispersal scheme relating to the dispersal of patrons leaving the premises after 22:00;
- 4, The management of taxis;
5. The restriction of coach parties; and
6. The circumstances and time periods, which trigger the need for a review of the operational management plan.

REASON: To ensure the good management of the venue to protect residential amenity and to ensure compliance with the following policies of the Local Plan: DM15.7 and DM21.3.

- 21 At least 5% of the hotel rooms shall be wheelchair accessible and a further 5% shall be designed to be adaptable for wheelchair accessibility and all such rooms shall be so maintained for the life of the building.

REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: CS10.

- 22 Prior to the occupation of the hotel an Accessibility Management Plan shall be submitted to and approved by the Local Planning Authority including details of accessible car parking provision for disabled visitors to the building. Such provision shall thereafter be operated in accordance with the approved Accessibility management Plan (or any amended Accessibility Management Plan that may be approved by the Local Planning Authority) for the life of the building.

REASON: To ensure that adequate access arrangements and car parking provision is made for disabled users of the hotel in accordance with the following policies of the Core Strategy: CS10; CS11.

- 23 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.

REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.

- 24 (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
- (b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
- (c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.
- REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

- 25 The proposed office development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed office premises due to noise from the neighbouring non-office premises and shall be permanently maintained thereafter.
- A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.
- REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

- 26 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.

REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 27 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 28 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 29 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 30 No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 31 No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 32 No amplified or other music shall be played on the roof terraces.
Reason: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 33 Any generator on the site shall be used solely on intermittent and exceptional occasions when required in response to a life threatening emergency or an exceptional event requiring business continuity and for the testing necessary to meet that purpose and shall not be used at any other time. At all times the generator shall be operated to minimise noise impacts and emissions of air pollutants and a log of its use shall be maintained and be available for inspection by the Local Planning Authority.

Reason: To minimise adverse air quality in accordance with policies DM15.6 and DM 21.3 of the Local Plan and policies 7.14 B a and c of the London Plan.

- 34 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.
- 35 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 36 Designated car parking spaces shall be provided on the site for use by people with disabilities in accordance with the requirements of the London Plan and the space(s) shall be marked out accordingly and maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking.
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.
- 37 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 38 a. No CHP plant in the thermal input range 50kWth to 20MWth with NOx emissions exceeding that specified in Band B of Appendix 7 to the GLA Sustainable Design and Construction Supplementary Planning Guidance published April 2014 (or any updates thereof) shall at any time be installed in the building.
b. Prior to any CHP plant coming into operation the following details must be submitted to and approved in writing by the Local Planning Authority:
1. The results of an emissions test demonstrating compliance with Part A of this condition and stack discharge velocity carried out by an accredited laboratory/competent person; and
2. An equipment maintenance schedule demonstrating that the emission standard would always be met.

c. The CHP plant shall at all times be maintained in accordance with the approved schedule.

REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.

- 39 Unless otherwise agreed in writing by the local planning authority all combustion flues must terminate at least 1m above the highest roof in the development, or as detailed in the air quality assessment, whichever is higher, in order to ensure maximum dispersion of pollutants.
REASON: In order to ensure that the proposed development does not have a detrimental impact on surrounding occupiers and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2015 and the Local Plan DM15.6.
- 40 No boilers that have a dry NO_x emission level exceeding 40 mg/kWh (measured at 0% excess O₂) shall at any time be installed in the building.
REASON: To comply with policy DM15.6 of the Local Plan and policies 7.14B a and c of the London Plan.
- 41 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: EPA CTQ 00 PLN 000 rev. P1; EPA CTQ 00 PLN 001 rev. P1; EPA CTQ 00 PLN 197 rev. P1; EPA CTQ 00 PLN 197 rev. P1; EPA CTQ 00 PLN 198 rev. P1; EPA CTQ 00 PLN 199 rev. P2; EPA CTQ 00 PLN 199 rev. P2; EPA CTQ 00 PLN 200 rev. P1; EPA CTQ 00 PLN 201 rev. P1; EPA CTQ 00 PLN 203 rev. P2; EPA CTQ 00 PLN 204 rev. P1; EPA CTQ 00 PLN 205 rev. P2; EPA CTQ 00 PLN 206 rev. P1; EPA CTQ 00 PLN 207 rev. P1; EPA CTQ 00 SEC 200 rev. P1; EPA CTQ 00 SEC 201 rev. P1; EPA CTQ 00 SEC 202 rev. P1; EPA CTQ 00 ELE 200 rev. P1; EPA CTQ 00 ELE 201 rev. P2; EPA CTQ 00 ELE 202 rev. P1; EPA CTQ 00 ELE 203 rev. P1; EPA CTQ 05 PLN 297 rev. P5; EPA CTQ 05 PLN 298 rev. P6; EPA CTQ 05 PLN 299 rev. P7; EPA CTQ 05 PLN 300 rev. P6; EPA CTQ 05 PLN 301 rev. P7; EPA CTQ 05 PLN 302 rev. P5; EPA CTQ 05 PLN 303 rev. P7; EPA CTQ 05 PLN 304 rev. P6; EPA CTQ 05 PLN 305 rev. P5; EPA CTQ 05 PLN 306 rev. P5; EPA CTQ 05 PLN 307 rev. P5; EPA CTQ 05 PLN 308 rev. P5; EPA CTQ 05 PLN 309 rev. P5; EPA CTQ 05 PLN 310 rev. P5; EPA CTQ 05 SEC 300 rev. P4; EPA CTQ 05 SEC 301 rev. P4; EPA CTQ 05 SEC 302 rev. P2; EPA CTQ 05 SEC 303 rev. P1; EPA CTQ 05 SEC 304 rev. P1; EPA CTQ 05 ELE 300 rev. P3; EPA CTQ 05 ELE 301 rev. P3; EPA CTQ 05 ELE 302 rev. P3; EPA CTQ 05 ELE 303 rev. P1

REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

- 1 In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

- 2 The applicant is advised to contact Thames Water Developer Services on 0800 009 3921 to discuss the details of the piling method statement.
- 3 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmangement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.
- 4 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Water pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 5 There is a Thames Water main crossing the development site which may/will need to be diverted at the Developer's cost, or necessitate amendments to the proposed development design so that the aforementioned main can be retained. Unrestricted access must be available at all times for maintenance and repair. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.

- 6 There are large water mains adjacent to the proposed development. Thames Water will require 24 hours access for maintenance purposes. Please contact Thames Water Developer Services, Contact Centre on Telephone No: 0800 009 3921 for further information.
- 7 The applicant is advised to contact London Underground Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; excavation; construction methods; security; boundary treatment; safety barriers; landscaping and lighting.
- 8 The City of London Corporation has an Air Quality Supplementary Planning Document which provides requirements and guidance regarding minimising emissions and exposure to poor air quality, for example CHP and boiler emission limits and stack heights. See www.cityoflondon.gov.uk/airqualityplanning.

17/00165



From: Bishop of Fulham
To: PLN - Comments
Subject: Morley House / City Temple
Date: 09 May 2017 08:35:15

For the attention of Gemma Delves

Dear Gemma (if I may)

Town and Country Planning Act 1990

Morley House 26-30 Holborn Viaduct Your ref 17/00165/FULMAJ
City Temple 31 Holborn Viaduct Your Ref 17/00166/LBC

I write both in my personal capacity as a resident (together with my wife and family) at St Andrew's Vicarage, 5-7 St Andrew St EC4A 3AF, and also as the Guild Vicar of St Andrew's Church, Holborn, a post I hold alongside that of Bishop of Fulham in the Diocese of London.

While I do not oppose in principle the development of a new hotel on this site, I have very serious concerns about these particular proposals as they relate to the process of demolition and construction, and to the servicing of the new hotel after it is built. These concerns lead me to oppose this application in its present form.

My perspective as a resident is this. While the address of the residential unit (the Vicarage) at St Andrew Holborn is 5-7 St Andrew St, the building in which I and my family live in fact faces at the rear directly onto the north western side of Shoe Lane, as is evident from all the drawings of the location. There is an entrance to the property on Shoe Lane, opposite the junction with Plumtree Court. Our kitchen window is directly opposite the City Temple, facing it across Shoe Lane; bedrooms and other living space in the house looks out onto Shoe Lane. While the address is St Andrew St, **we effectively live on Shoe Lane, directly at the point of intersection with Plumtree Court.**

There is no recognition of this whatsoever in any of the documents included in the planning application, where reference is repeatedly made to Shoe Lane and Plumtree Court as if there was no residential component to those streets. This is emphatically not the case. My family and I live in the heart of the area which will be impacted by this development.

Having lived through much of the building work associated with the erection of the new Goldman Sachs building, and suffered considerable noise pollution and other nuisance associated with that work, the consequences of this application will be to cause us to suffer a further prolonged period of major disturbance. This is because it appears that the proposals envisage all the construction traffic accessing the site via St Andrew St, Shoe Lane and Plumtree Court. These are narrow streets and difficult for large construction vehicles to manoeuvre in easily. All the construction traffic will be literally passing beneath the windows of our home which overlook Shoe Lane. I know how very disruptive this is, particularly during the middle of the day, on Saturdays and during what seem to be the inevitable occasional periods of night working.

I therefore wish to ask the Corporation to require the developers to access the site from the

main road, ie from Holborn Viaduct. This would substantially mitigate the disturbance inflicted on myself and my family, though of course we would still be living just opposite a building (City Temple) being partly demolished and rebuilt.

My second area of concern relates to the plans as presented in the documents for serving the new hotel once it is open for business. Again, the proposals speak repeatedly of using Shoe Lane and Plumtree Court for deliveries, drop-off and collection without giving any sense either that this is a residential area, or of an understanding that these streets are narrow and not at all suited for vehicles to pass one another. Laundry will be collected daily, refuse and perishable goods more than once a week, other items weekly. All of these will add up to turn Shoe Lane and Plumtree Court into areas of significant traffic flow and no doubt often at unsocial hours, with large vehicles stopping, no doubt leaving engines running, and then reversing to get out on to main roads again. Both in terms of traffic management and because of the nuisance effect on me and my family and subsequent occupants of the Vicarage, **I would urge again that all servicing, drop-off and delivery is routed through Holborn Viaduct and not using these small and difficult side-streets.**

Yesterday evening the GCC (Guild Church Council – the governing body of elected representatives of the parish) of St Andrew, Holborn considered this planning application. In view of the disturbance which the Council believes these proposals will cause to those working in the St Andrew Holborn Foundation offices (which also face onto Shoe Lane opposite City Temple), and to services taking place in the church, and finally because of the potential risk to the fabric of the Grade I listed church and ancillary buildings, the Council unanimously passed this motion: (proposed by Sue Johns, Churchwarden & Trustee, seconded by Adriana Solari, Safeguarding Officer)

This Guild Church Council expresses its strong concerns about proposals to build and subsequently service a large hotel using Shoe Lane and Plumtree Court which adjoin listed and residential buildings. It would encourage the applicant through its agent to provide reassurance on the above issues and to propose amendments or suitable conditions to be applied to the permission by the Corporation to mitigate these concerns.

In conclusion may I add that I was given no information about these proposals prior to the delivery of the statutory notice dated 14 April. In particular, I received no invitation to the exhibition referred to in the documents as having taken place in September last year. I have come late, therefore, to realising the full implications for myself, my family, future residents of the Vicarage, and the staff, worshippers and fabric of St Andrew's Church.

I wish strongly to object to this application as it presently stands.

Thank you very much for your attention,

Yours sincerely

+Jonathan Baker
Guild Vicar, St Andrew Holborn
Resident, 5-7 St Andrew St

DIOCESÉ OF LONDON



The Rt Revd Jonathan Baker
The Bishop of Fulham

The Vicarage, 5 St Andrew Street, London, EC4A 3AF, UK

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Delves, Gemma

From: Delves, Gemma
Sent: 10 October 2017 19:40
To: Delves, Gemma
Subject: FW: City Temple Quarter - Letter of Support from City Temple
Attachments: CT City Letter 24.11.16 RW (1).pdf

From: David Williams [mailto:David@planningresolution.co.uk]
Sent: 28 September 2017 22:40
To: Delves, Gemma
Cc: Philip Atkins
Subject: City Temple Quarter - Letter of Support from City Temple

Hi Gemma

Further to your earlier request for a letter of support for the proposal from the City Temple, please find attached letter and email previously sent around the time of submission from Revd Dr Rodney Woods, Minister of City Temple to Ted Rayment below.

Revd Dr Rodney Woods will be attending the Members exhibition/tours on the 12th October and will continue to convey his full support directly.

With kind regards

David

David Williams MRTPI
Director



www.planningresolution.co.uk

From: Rodney Woods <rod.woods@city-temple.com>
Date: Friday, 16 December 2016 at 07:48
To: Ted Rayment <ted.rayment@cityoflondon.gov.uk>, "Chipperfield, Rob" <Rob.Chipperfield@cityoflondon.gov.uk>
Subject: City Temple Redevelopment

Dear Ted & Rob,

I wanted to follow up the letter I sent a couple weeks ago with a personal note. At the outset, I want you to know that I have not been asked or encouraged to send this email; I am sending it at my own initiative. I awoke this morning with a strong sense of urgency to send it.

I know that you both are familiar with the proposals regarding City Temple and Morley House. I also realise that the idea of a hotel is outside normal City planning policy. At the same time, it seems that the preservation and enhancement of the City's heritage assets, such as City Temple, are clearly within the City's planning strategy.

Frankly, City Temple is at an existential crisis moment in its history. Our roof is leaking, our lift is on proverbial life support and our electrics — while according to our electrical survey are safe but insufficient for 21st century standards — are deteriorating rapidly. Earlier this year we completed spending about £15k making some stop-gap repairs to our

electrics to ensure their continued safety. All this is not even to mention the serious need for general redecoration and repair throughout the building. Our most recent strategic quinquennial ("strategic" in that it examined the genuine needs for the present and future ministry of CT alongside the condition of the building) estimated the costs of repairs and updates at £2.5m. This figure is likely closer to £3m.

We have no reasonable prospects within ourselves to raise the resources necessary to complete essential repairs, let alone the other repairs needed in the building. The URC as a small denomination does not have the resources. As a church, we are not filled with "City types" for whom £1m would be just part of their bonus. There are no grant-making bodies through which we could reasonably raise the needed funds. We really have exhausted our options.

For City Temple, the agreement with Morley House is truly a once-in-a-generation opportunity not only for the preservation of City Temple but also the enhancement of City Temple — both as a heritage asset and a thriving Christian church. If planning for this redevelopment does not go through, then City Temple will likely not survive much longer. As a minister, I spend almost as much time just trying to hold the building together as I do promoting the charitable objects of the church, something that simply cannot continue.

I hope you agree that it would be a tragedy for City Temple no longer to serve the City of London as a viable Christian church and a significant, one-of-a-kind heritage asset in the City. The City is genuinely faced with the prospect of having new buildings all around us and a new garden at St. Andrew's alongside a dying and decrepit City Temple building. However, it also has the ability to ensure this does not happen, at little cost to itself with *slight* variation to City planning policy and at no cost to City Temple.

In saying all these things, I don't want to give the impression that City Temple is a struggling congregation with little hope of survival. Although we face significant challenges — most all of which would be resolved by the redevelopment! — City Temple is thriving by many measures, especially considering our location. We are the last remaining historic English Free Church in the City of London still meeting weekly in its own building. We are one of the few City churches that has a genuinely diverse congregation — culturally, economically, and socially. We have active people in our church who have been recently homeless as well as those who work in finance. We have no majority ethnic group in our church. Each year we see at least 50,000 people through our doors. We have a recent partnership with ForMission College in which we serve as their London campus. We have a "house of prayer" that involves people from at least a dozen different churches. Our congregational giving is about 50% over budget this year. We serve as a "community centre" for many groups. We serve as a "resource" for many other churches and ministries of various orientations. On top of all this, we have a dynamic vision for the future.

I am sorry this email has gone longer than I had intended. If there is *anything* I can do to speed up the process of getting planning approval for this redevelopment, then please let me know. I would gladly attend meetings, write emails/letters or take whatever action may be required. For City Temple, getting planning approval is *incontrovertibly urgent*. Please let me know if you have any questions whatsoever. And please help us get this redevelopment approved.

I genuinely believe this entire project is a really good scheme, not only for City Temple but also for the City of London. When considered as an overall percentage of office space in the City of London, or even in the Holborn area (or even as a portion of new offices built since I came to City Temple), the potential loss of office space really is very *insubstantial* — much less than a small percentage of one percent. However, the gain of having a renewed heritage asset ready for the next generation and thriving into the future is *priceless*. Truly, this could be an authentic *legacy* that would enhance the lives of many and outlive all of us.

Thank you for reading. Have a blessed Christmas holiday.

All the best,

Rod

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CITY TEMPLE – THE URGENT NEED FOR ADAPTATION

Overview

Over the past 20 years, City Temple has seriously considered several different ways to redevelop or revitalise the present building, none of which have been both financially viable and suitable for the present and future ministry of City Temple in light of its vision – except for the present option. Without urgent major repair, updating and adaptation of the building, City Temple's history and mission will cease.

History of the City Temple

The City Temple traces its history back to 1640, when it first gathered as a group of people in a meeting house on Anchor Lane. Thomas Goodwin was the first recorded minister, but the group may have been meeting for many years before Goodwin joined them. Although the church has met in a variety of places under a variety of names, throughout its history the City Temple has remained committed to the City of London.

Being in the City of London is an integral part of City Temple's identity and sense of mission – as it has been throughout its history. Currently, the City Temple is the only historic English free church still meeting each week in the City of London in its own building.

Throughout its history, the City Temple has been a very influential church throughout the UK in terms of nonconformity. It has retained that influence even though like many churches it has experienced a number of ups and downs.

In the 1960s, the City Temple began a slow process of decline in terms of attendance, as did many city-centre churches. However, in the 1990s the City Temple began to grow and regain its vitality, in part because of a vision that brought the best of City Temple's past together into a new perspective on its future.

The City Temple Building Today

The City Temple moved to Holborn Viaduct in 1874 under the ministry leadership of Joseph Parker. The current building opened in 1958 after being rebuilt because of the bomb damage it suffered in World War II. The building retained the Victorian frontage and rear eastern tower of the original 1874 structure, but was otherwise rebuilt in 1958.

This new building was a product of its times: its sanctuary showed it to be a preaching-centered church. It had counselling rooms and two flats on the top floor to accommodate two staff members. The lower hall was a combination of theatre/cinema and is now only occasionally used for exams and other hire (due to its lack of daylight).

The one other major failing of the building is the gallery. Unfortunately, as the building was being erected the team realised that there was insufficient rake on the gallery. This meant that people sitting in the gallery would not be able to see the preacher standing on the platform in a conventional pulpit. Consequently, at the last minute they designed a "flying pulpit" which would easily be seen by people sitting in the gallery. Tragically, this design feature has proved to be both non-functional and unused.

Whilst the requirements and function of ministry in 2016 have very much changed from that found in 1958, this now works around the building due to its inflexible and antiquated services, layout and design. Over the past 10 years many of the key systems of the building

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such as the boilers, lift and the electrics have begun to break down, substantially to the point where it is no longer economical to repair these systems. Subsequently, the Church Meeting of City Temple began to realise that it would have to take urgent action and make plans before the present City Temple building further deteriorates and becomes unusable and uninsurable.

Whilst various applications have been made by the Church for grant aid over recent and current years to assist refurbishment and restoration, the monies have only resulted in piecemeal temporary repairs and fail to address the fundamental failings and needs of the listed building.

Over the past 10 years, the City Temple Church Meeting has looked seriously at a number of ways to repair or redevelop the City Temple building. They have spent considerable sums of money examining a number of different plans and scenarios to provide the City Temple congregation with suitable facilities within the City of London that would allow them to continue their ministry.

Although several of the plans and ideas were thought to have considerable potential, none of them proved to be financially viable or acceptable from a planning or ministry standpoint.

Current Position

In 2015, the City Temple undertook a strategic quinquennial survey of the building. The survey was strategic in two key ways.

First, the survey was conducted with the ministry vision of City Temple in mind, examining the suitability of each area and system of the present building for the present and future ministry of City Temple.

Second, the survey considered the costs not only for repairing the present building but also for bringing the present building up to a 21st-century standard in terms of its systems. In the end, it was determined that the cost of repairing and improving the building considering the present and future ministry vision of City Temple would be at around £3 million.

This figure clarified the thinking of the Church Meeting very quickly as it realised that there was no way that the Church Meeting could fund or fund-raise £3 million and would, if ever successful, only refresh the existing unwieldy and unfit accommodation at lower ground floor, basement and first floor – giving little prospect of an enhanced sustainable income to support the on-site and off-site ministry.

This forced the church to examine other possible scenarios for the redevelopment of the building, including a mixed-use church and office building and a mixed-use church and residential building. Both these scenarios seemed viable but both also had numerous issues that concerned the Church Meeting, creating much opposition for both scenarios within the church fellowship.

Then, an 'opportunistic and one-off' scenario presented itself when City Temple was approached by the Morley House Group who had purchased the Morley House building next to City Temple for redevelopment as a hotel. They offered to work with City Temple to redevelop its building in a way that preserved its status as a heritage asset while providing for its life for the next 30-50 years.

Although the change of use of the mixed-use building at Morley House to a hotel would involve the loss of some B1 Office floorspace, to which the City Planning Policy is generally

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resistant, we believe the development would not only provide a much needed and complementary business/visitor hotel, but also advance the City's heritage asset strategy. Advancing the heritage asset strategy would in this instance seem significantly to outweigh the very slight increase to office space that a redeveloped Morley House might supply.

In light of the City Temple's position set out above, and the need for the Morley House proposal in land use policy terms to address the loss of some B1 Office floorspace occurring from the proposed change of use to hotel, the opportunity for both parties to work in collaboration and partnership to a mutually beneficial end was explored in detail. After considerable discussion and consultation, City Temple and Morley House developed a strategy that not only seemed mutually beneficial but also seemed to add significant benefit to the area around City Temple.

As such, in exchange for a long-lease on the two lower floors of City Temple for use as B1 Office space to offset some of the loss from the change of use at Morley House, the proposed hotel use would in turn subsidise the substantial cost of refurbishment of City Temple, bringing it up to a 21st-century standard and making it suitable for the present and future Ministry of City Temple in light of City Temple's ministry vision.

This would bring significant heritage, financial, and long-term sustainable operational benefits to the City Temple; that is to the overriding public benefit in the City and wider afield.

The City Temple Elders Meeting and Church Meeting spent almost a year reviewing and negotiating the proposal in order to ensure that it might receive the building that it needed for the next 30 to 50 years. In the end, the City Temple enthusiastically has embraced this redevelopment option because it presented a unique combination of advantages:

- Retaining a number of the historic features of the City Temple building, while making the best use of the gallery space that had become functionally useless for the church;
- Retaining almost the same amount of usable square footage as the present building, despite the loss of two floors, and improving the quality and flexibility of same;
- Obtaining risk free funding for the whole of the redevelopment of the City Temple;
- Enabling City Temple to advance and expand its ministry vision for the foreseeable future in a building more suitable for the task;
- Achieving completion with the least amount of disruption to the ministry of City Temple.

In the end, the Church Meeting realised that this was the only viable and feasible option, all things considered, for the redevelopment of the City Temple building so that the church could continue and expand its ministry into the 21st century. The final confirmation that this option was the best way forward came when City Temple realised that the changes proposed throughout the entire building – including the portion leased to Morley House – would be almost identical to the changes we would want to make if we had received funding to do the entire project ourselves. We discovered that these changes had even been initially proposed at the beginning of our redevelopment deliberations almost 20 years ago.

It is estimated that the total financial cost of this option will be circa £7million, all of which is to be provided by the Morley House Group, assuming they obtain Planning, Listed Building Consent and Ecclesiastical Exemption permission to proceed with the mixed hotel, workspace and church development.

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The Proposed Works

Under an Ecclesiastical Exemption application, the following works are proposed to substantially refurbish the City Temple for the ministry's purposes:

- A new entrance foyer and remodelling of ground floor Sanctuary/meeting rooms;
- Removal of raked first floor gallery and replacement with two new floors and windows, to provide modern day business meeting conference space (540 sq m GIA);
- Refurbishment of third floor level as Church and external conference meeting rooms ancillary residential community accommodation (10 rooms);
- Replacement of lift; and
- Replacement of services with new/extended rooftop plant.

In conjunction, the following works are proposed to City Temple to facilitate the use of the lower ground and mezzanine floors as flexible and adaptive B1 Office space under the planning and listed building application that also includes the hotel;

- A change of use of the City Temple lower ground and mezzanine floor from non-residential institution (Class D1), with creation of new floorspace at mezzanine level (1591 sq m GIA), to provide flexible/adaptive office workspace (Class B1) use;
- Insertion of internal atria in mezzanine floor to bring light into the lower levels;
- Lowering/enlargement of fenestration and insertion of ventilation grills on the lower ground and mezzanine floor on the Shoe Lane façade of City Temple.
- Insertion of new pedestrian entrances on the Plumtree Court and Shoe Lane elevations of City Temple;
- Erection of a canopies over the new entrances on the Plumtree Court and Shoe Lane elevations of City Temple;
- Insertion of new fenestration and AHU grills on the Plumtree Court and Shoe Lane elevations of City Temple; and
- Insertion of additional glass doors at existing entrance on Shoe Lane.

Conclusion

As result of the extremely poor condition of the listed building, City Temple must take immediate action. It no longer has the time to defer decisions or to investigate other possibilities.

Key building systems – such as the lift, the roof and the electrics – face catastrophic breakdown if action is not taken right away. Already, the repair and maintenance of the present building presents an overwhelming drain on the City Temple financial resources. Without action, City Temple will quickly run out of funds with no reasonable prospects of generating additional revenue.

Although solidly constructed overall, the building is no longer fit for purpose and suitable for the present and future ministry of the City Temple. Unless City Temple can redevelop the present building along the proposed lines, it is highly questionable whether City Temple will be able to continue its ministry into the near future, let alone for another 376 years.

In addition to the physical and spiritual benefits that would flow from such works, it should be noted that the Church are actively seeking to widen the commercial day to day use of the accommodation in support of the charitable objects of City Temple. As the space will be designed and fitted out to the same high quality as the proposed workspace at basement levels, discussion has been taking place with the Morley House group over shared booking

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systems and staff, so that the City Temple Church and workspace provide a truly integrated offer: -

- A 'new' (722 sqm) hall that meets the modern-day requirements of the Church and community providing flexible concert/exhibition/conference hall with improved lighting, a flat floor, modern seating and full AV/sound;
- Replacement and extended first (gallery) floor providing (270 sq m GIA) larger office/business and conference space;
- New second floor providing (270 sq m GIA) small flexible rooms for flexible church (and external business hire);
- Refurbished Third floor with 10 church staff/visitor bedrooms, communal kitchen/living room and modernized conference/meeting rooms for church and external business hire renewed business;
- Separate B1 workspace at lower ground and basement providing 2 full new floors of flexible and affordable B1 workspace (1,591 sq m GIA) with direct access onto Shoe Lane and Plumtree Court.

This proposal brings positive change to the heritage and community asset that is City Temple, including better revealing and enhancing its significance, and providing adaption to new uses whilst retaining and repairing the building.

We therefore strongly urge the City to support the joint proposals for the City Temple and Morley House and keen to meet with Senior Officer and Members of the Corporation to further this discussion in the hope of securing clear and unequivocal support.

Submitted by
Revd Dr Rodney Woods, Minister
City Temple URC
London

Consultants

DGM/LO/DP2294

5th October 2017

City of London
Environment Department
Po Box 270
Guildhall
London
EC2P 2EJ

FAO: Gemma Delves



DP9 Ltd
100 Pall Mall
London SW1Y 5NQ

Registered No. 05082507

020 7004 1700
020 7004 1790

www.dp9.co.uk

Dear Madam,

**MORLEY HOUSE, 26-30 HOLBORN VIADUCT AND CITY TEMPLE,
31 HOLBORN VIADUCT, LONDON, EC1A 2AT
APPLICATION REFERENCES: 17/00165/FULMAJ AND 17/00166/LBC**

We write on behalf of our clients, Farringdon Street Partners Limited and Farringdon Street (Nominee) Limited, with regards to the two aforementioned applications, and further to our letters dated 21 April 2017 and 10 May 2017.

Whilst our clients remain in support of the overall principle of the redevelopment of Morley House, there still remains some concerns with the proposed development overall, and in particular with the proposed construction and delivery sequences.

We note that a Construction Logistics Plan (CLP) prepared by TPP and a Delivery and Servicing Management Plan (DSMP) prepared by Caneparo Associates, have now been issued to the CoL for consideration. However, our review of these plans indicate that they still fail to address some of the comments we have highlighted as a concern in our previous correspondence.

Our client is also aware that this site will require a Hotel Management Plan to be approved by City of London officers as a pre-occupation condition. This condition should include reference to the following:

- Agreement of approved hours for deliveries avoiding peak periods;
- Details of how the occupier will adhere to the Barrier Operating Arrangements including the restriction to a single vehicle at the Morley House site at any time; and
- Means of dealing with taxi and coach arrivals and departures.



In light of the above, we have therefore appended to this letter an updated table with our comments and recommendations which we ask are considered in the determination of the application. In addition, and further to the proposed condition above, we have also included what we consider to be additional suitable conditions that should be included on any decision notice.

Yours faithfully,

DP9 Ltd

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Document	Page / Paragraph Reference	Issue	Comment	Requests / Recommendations
1	-	Land Uses	Clarification is required as to whether the restaurant and gym will be solely to support the hotel/ workshop or whether they will also be available for external users. The implication of this being a restaurant that is publicly accessible is an increase in trip numbers generally and more specifically for service vehicle trips.	Clarification of the type and size of restaurant proposed. Confirmation of anticipated trip numbers based on the above. Trip numbers relating to restaurant use have not been provided in the DSMP and therefore it is assumed that no additional trips on top of the 8 for hotel land use would be required.
2	Planning Statement Page 38, Para. 6.188	Construction Management Plan	It is stated that a Draft Construction Management Plan has been produced by Henry Construction as part of the submission. Whilst this was not submitted with the application, we are aware that a Construction Logistics Plan has been produced by TPP and was issued to the CoL in September 2017.	CMP / CLP to be discussed further with key local stakeholders, including our clients, and comments relating to feasibility of access (dependent on timelines) are agreed.
3	Design and Access Statement Page 26		Whilst we welcome the production of this report, our client still has concerns with the content and the consideration towards the ongoing works in the vicinity of the site.	CMP / CLP to be issued to TFL for approval where any use of the TLRN (Via Farringdon Street) is proposed with reference to the imminent construction of the cycle superhighway in this area.
4	Design and Access Statement Appendix E, Accessibility statement (Section 4.6)	Accessible Bay Access	It is mentioned that the route from the accessible bay to the hotel reception will be external via Plumtree Court, less than 50 metres, level and designed to meet Part M requirements. Plumtree Court has a gradient of 1:20 and a part M compliant approach, an street is unlikely to be achievable due to the c.a. 1m level change between the parking bay and the access doors.	The approval of the CMP to be a pre-commencement condition and the Farringdon entities to be consulted on its terms as a requirement for the condition. The CMP must include details of how all works could be completed without the need for access via Plumtree Court since other works in the area will mean there are long periods of time when this street will be inaccessible.
5	TA Page 21, Para. 6.19	Taxis	The net change in development trips identifies 64 additional taxis per day (130 two-way movements). There will be an additional 8 two-way taxi movements in the AM peak and 10 two-way movements in the PM peak. These movements will have an impact on our clients' site.	Further information regarding the accessible routes to and from the development from key transport nodes to be provided. Details relating to Part M compliance to be confirmed.
6	TA Page 25, Paras. 7.17 - 7.22	Taxis	It is stated that it is not possible to implement a specific taxi drop off area for the hotel, either on Holborn Viaduct or on Farringdon Street. The suggestion is to adopt a flexible approach whereby taxis are able to drop off informally in the vicinity of the site. The TA states that taxis will drop off/pick up on Holborn Viaduct as they are able to do so, despite its use as a bus lane. Taxis (including mini cabs) would also be able to stop on on-street parking bays around the site on Farringdon Road and Shoe Lane. Private hire vehicles (PHVs) would be unable to pick up or drop off on either Farringdon Street or Holborn Viaduct and would therefore need to find an alternative location, likely to be Shoe Lane or Plumtree Court.	The approval of a "Hotel Operational Site Management Plan" to include the management of taxis for the site to be a pre-occupation condition and the Farringdon Street entities to be consulted on its terms as a requirement of the condition. Recommended taxi access via Holborn Circus / Holborn Viaduct is prioritised. Traffic studies may be required to justify the reduction in length of the bus lane and the provision of an on-street facility available for a development of this size.

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		<p>Therefore, there is a considerable risk that a high percentage of available parking bays around the site will be utilised by PHVs and taxis awaiting fares associated with this development. This would have significant impact upon the number of available spaces for other users and traffic circulation around our clients' building. Taxis dropping off or dwelling on Plumtree Court will not be acceptable to our client due to potential impacts on operations. Allowing taxis to drop off or dwell on Shoe Lane north will also generate congestion on this narrow street and could impact the safety of pedestrians and cyclists.</p>
<p>7</p> <p>TA</p>	<p>Page 31, Para. 8.16</p> <p>Taxi Rank</p>	<p>The Applicant also mentions that it is pertinent to note that a TMO for Stonecutter Street provides for a taxi rank on Stonecutter Street for licensed vehicles. This should not be assumed since the current traffic order for Stonecutter Street (following the Section 6 closure notice) is for "no vehicles except for access".</p> <p>There are no proposals for a new taxi rank in the area as part of the Shoe Lane Area Enhancement scheme being undertaken by CoL and the applicant would therefore be required to investigate locations for a new taxi rank if their operations intend to rely on such a facility.</p>
<p>8</p> <p>TA</p>	<p>Page 23, Paras. 7.2 - 7.7</p> <p>Parking</p>	<p>The development is proposed to be car free except for 1 accessible space in the loading bay. The Applicant states that any demand for car parking could be accommodated in on-street pay and display facilities and/or designated disabled spaces within the area. Reference is made to on-street spaces nearby on Shoe Lane, St Andrew Street and St Bride Street, the enclosed on-street parking area on Thavies Inn and an NCP off-street car park on Little New Street. A valet service is also proposed in the TA if necessary for disabled drivers with a member of staff parking the car on-site or in a nearby location.</p> <p>Both the increase in on-street parking as well as the valet parking service for disabled drivers will increase circulatory traffic movements around the vicinity of the development as drivers look for an on-street parking space.</p>
<p>9</p> <p>TA</p>	<p>Page 26, Paras. 7.8 - 7.11</p> <p>Cycle Parking</p>	<p>16 long stay cycle spaces are proposed for the hotel staff which exceeds the London Plan 2016 standards. 22 spaces have been provided for the City Temple workspaces which meets London Plan 2016 standards. It is mentioned that in addition to on-site cycle parking there is a Cycle Hire docking station and Sheffield Stands on-street in the vicinity.</p> <p>There is no mention of any visitor cycle parking to be provided on-street for the development which would mean pressure is placed on existing on-street cycle parking facilities.</p>
<p>10</p> <p>TA</p>	<p>Page 26, Para. 7.31</p> <p>Coach Parking / Drop Off</p>	<p>The trip generation states that as coaches will be discouraged, the proportion of coach journeys estimated in TRAVL has been</p>
		<p>Applicant to provide details of potential locations for taxi ranks and how the taxi and PHV movements will be managed by the operator, prior to commencement of the development.</p> <p>This should be secured by condition in the "Hertal Operational Site Management Plan".</p>
		<p>A review of occupancy of local parking spaces should be undertaken to demonstrate that there is sufficient on-street space to accommodate the predicted level of demand. If a valet service is to be included in the "operational management plan" for the site, then evidence of the location of this parking provision (including leasing information) should be provided.</p>
		<p>Details of any on-street cycle parking to be provided to meet planning requirements and anticipated demand should be provided.</p>
		<p>Notwithstanding the consideration of a condition against coach access as part of the travel plan for the development, there is always the possibility</p>

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			<p>redistributed across other non-car modes.</p> <p>The TA states coach trips are envisaged to be low and that they will be actively discouraged. It is stated that if necessary/ appropriate, the Applicant would be willing to accept a condition of obligation secured by legal agreement prohibiting coaches from attending the development.</p> <p>There could be issues enforcing such a condition and no procedure is identified if a coach were to arrive at the site. It would not be possible for a coach to access Plumtree Court or Shoe Lane north due to the street geometry and therefore an option to allow for occasional coach access via Holborn Viaduct must be considered.</p>	<p>that some parties may arrive by coach in the future.</p> <p>For this reason, an operational strategy for occasional coach arrivals should be included in the "Final Operational Site Management Plan". This strategy must prohibit coach access via St Andrew Street or Shoe Lane as these streets are unsuitable for this use.</p>
<p>11</p> <p>TA</p> <p>DSMP</p>	<p>Page 26 Paras 7.23 - 7.27</p> <p>Pages 4 - 5 Paras 2.1 - 2.7</p>	<p>Servicing Bay Access</p> <p>An off-street servicing bay has been provided at the south-east corner for the site to facilitate servicing for the hotel and ancillary uses, which would be directly accessible from Plumtree Court via Shoe Lane.</p> <p>It is stated that this will facilitate servicing for the hotel, office workspace and ancillary uses.</p> <p>It is stated that most deliveries to the hotel would be undertaken by small and medium sized vehicles e.g. transit vans with the occasional requirement to accommodate larger vehicles up to 7.5T/ 8 metre box van, and that the applicant is committed to using delivery vehicles up to 4.6t van as far as is reasonably practicable.</p> <p>The tracking shows a 7.5T box van driving along Plumtree Court in forward gear but then reversing into bay. Reversing movements would conflict with high pedestrian/cycle flows along Plumtree Court with these users accessing the wider Shoe Lane Quarter and our clients' building, including the pedestrian/cycle entrance on Plumtree Court. No consideration is given to the road safety implications of vehicles reversing into the bay. Swept paths for all vehicle types requiring access to the loading bay have been provided for review.</p> <p>CoL have confirmed that they are accepting of the requirement to reverse into the service bay based on the low vehicle numbers predicted. Whilst our client accepts the position taken, the road safety aspects of allowing reversing within the public highway remains a significant concern.</p> <p>It should be noted that whilst the swept path manoeuvres are relatively straightforward on plan, Plumtree Court has a gradient steeper than 1:20 in places which will make any reversing manoeuvres considerably more difficult.</p> <p>Only 1 bay appears to be proposed within the building which would be located adjacent to the accessible bay. With the spatial constraints, it</p>	<p>Noting the requirement of vehicles to reverse within the public realm to gain access to the loading bay, robust operational measures must be specified within the DSMP as to how this manoeuvre will be managed so as to minimise any potential risks to vulnerable road users on Plumtree Court. It should be conditioned that all vehicles must reverse in to the loading bay and exit in a forward gear as this will minimise the risk of conflicts on Plumtree Court.</p> <p>Further detail within the DSMP as to how the applicant has committed to using smaller vehicle e.g. a maximum percentage or number of larger vehicle allowable per week as a target within the DSMP.</p> <p>Further detail on delivery booking system and confirmation of commitment to avoid delivery bookings during peak hours.</p> <p>CoL have confirmed that the applicant will accept a condition to limit the number of deliveries to a single vehicle at any one time. This will be enforced at the entry to Plumtree Court by way of the Barrier Operating Arrangements as defined in Schedule 9 of the S106 agreement between the City of London and Farringdon Street Partners Ltd.</p> <p>Details of waste collection location and operations including confirmation of clear heights within the loading bay should be provided to demonstrate off-street collections are allowed for.</p> <p>Commitment to not collecting any waste, or handling any goods on Plumtree Court and details of internal goods and waste routes to allow for this should be provided. The approval of the DSMP including full swept path analysis to be a pre-commencement condition.</p>	

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12	TA	Pages 26-27, Paras. 7.28 - 7.31	Delivery and Servicing Trips	<p>appears unlikely that more than one servicing/delivery vehicle could unload at a time.</p> <p>The TA forecasts 4 delivery trips per day for the City Temple. For the hotel 44 deliveries per week are forecast, or 6-7 per day. It is therefore anticipated the City Temple Workspace and the hotel will generate c. 10-11 trips per day.</p> <p>The hotel trip forecasts are based on delivery information obtained for a recently opened hotel and appear to have been calculated at a high level from this.</p> <p>Confirmation is required on the hotel that this information has been sourced from.</p> <p>An assessment has been undertaken of the proposed uses (Hotel, restaurant and workspace) using SIVG's internal servicing model. This identifies a forecast delivery and servicing trip generation of 20 or more vehicles per day which is significantly higher than the Caneparo forecasts. This comprises 3 office vehicle trips, 6 hotel vehicle trips and 11 restaurant trips.</p> <p>It is recommended that the Applicant undertakes service vehicle surveys of similar lead uses to those proposed in order to accurately calculate forecast anticipated delivery and service vehicle movements. The recently permitted hotel scheme at 3-5 Creed Court estimated approximately 23 deliveries per day based on survey information that was submitted as part of this application.</p>	<p>Additional survey information to be provided to verify likely service vehicle numbers.</p> <p>Clarification of the proposed restaurant usage (hotel only or open to all) as this would significantly affect the likely trip numbers.</p> <p>Clarification on the proposed star rating for the hotel. If this is to be 4* / 5* then re-assessment of service trips based on local relevant surveys should be carried out.</p> <p>The applicant should commit to a maximum number of deliveries per day based on the trip forecast provided within the application as a target within the DSMP. This should be secured by condition.</p>
13	TA	Page 28, Para. 7.33	Delivery and Servicing Management Plan	<p>A draft DSMP prepared by Caneparo has now been received, which is welcomed.</p> <p>However, our client is concerned that the number of deliveries could in fact be more than stated in the document (i.e. Table 1 on page 6 - Hotel Deliveries). There are also concerns with the number of deliveries stated in paragraphs 2.11 and 2.12.</p> <p>Phonette Court will be extremely busy with pedestrian and cyclists, as well as providing access to the childcare facilities in our clients' building and therefore it is imperative that deliveries associated with the Morley House development must avoid the hours of 07:45-09:30; 11:45-13:45; and 16:45-18:45.</p>	<p>Delivery and Servicing Management Plan to be provided that commits to the operations proposed. DSMP to include times restrictions for deliveries to avoid peak hours.</p> <p>DSMP to be coordinated with our clients' arrangements.</p> <p>DSMP to be included and in accord with the requirements of the Barrier Operating Arrangements as defined in Schedule 9 of the S106 agreement between the City of London and Farrington Street Partners Ltd.</p> <p>The approval of the DSMP to be a pre-commencement condition and the Farrington entities to be consulted on its terms as a requirement of the condition.</p>
14	TA DSMP	Page 28, Para. 7.34 Page 9	Refuse Collection	<p>Refuse collection would be undertaken via Plumtree Court.</p> <p>A dedicated refuse store for the hotel has been provided at surface level and will be directly accessible from Plumtree Court. Access will be made available for the council's refuse vehicles between 0600 - 1530 hours Monday to Friday. Refuse for the new office spaces on City Temple will be transported to the hotel refuse store. Clarification</p>	<p>Waste Management Strategy (WMS) to be provided to CoL prior to the grant of planning permission.</p> <p>WMS to demonstrate how all refuse collection can occur from within the confines of the site and not within the public highway.</p> <p>WMS to include details of clear head heights within the loading bay and</p>

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			<p>is required if the refuse stores will include waste for both City Temple and the hotel. The TA includes no breakdown of waste calculations and does not detail waste volumes or bin numbers.</p> <p>Due to the limited width of Plumtree Court any vehicle waiting on street will block access for other users. It should also be noted that Plumtree Court has a gradient of 1:20 and therefore manoeuvring full bins for collection on this gradient could be difficult and dangerous. It is expected that all refuse collection operations should therefore occur from inside the loading bay where a suitable level surface can be provided and also where the waste collection operation will not disrupt access for other road users. It should also be noted that waste collection times should target off-peak hours for pedestrian movement to further avoid conflicts between pedestrians and vehicles.</p>	<p>vehicle specification to demonstrate that collections can safely occur off-street.</p> <p>The approval of the waste management strategy to be a pre-commencement condition and the Farningham Street entities to be consulted on its terms as a requirement of the conditions.</p>
General Observations and Comments				
15	Planning Statement	Consultation	<p>The applicant states that they have met with our client five times in the lead up to submission. This is incorrect.</p>	-
16	-	Service of Street (City Temple)	<p>Our client questions whether this is a viable option given the current 278 design and the new use?</p>	<p>All deliveries for the Morley House site should be via the off-street loading bay with distribution via internal goods routes. Operational details to be provided within the DSMP.</p>
17	-	Demolition and Construction Logistics	<p>The applicant has provided us with an updated demolition and construction plan that identifies 3 alternative construction traffic routes. In respect of the physical demolition and construction of the building the works can be carried out utilizing the Holborn Viaduct option and thus not utilizing the 2 options of Shoe Lane and Plumtree Court. Both these roads have construction and public realm improvements work prior to the occupation in Mid 2019 as well as introducing traffic calming measures to improve the pedestrian safety within the area.</p> <p>In addition, Plumtree Court will be controlled, from a vehicle access perspective, by the bollard protocol and will contain a staff entrance to our clients' building, the child care entrance and entrance for 455 bikes. The public realm and design of Plumtree Court has been upgraded to reflect the importance of this entrance; rather than it being the back of house entrance. It is felt that the use of these roads for construction traffic should be restricted.</p>	<p>Details of logistics to be submitted and approved prior to determination of the application / as a pre-commencement condition.</p>
18	Design and Access Statement	Design	<p>Due to the proximity of our clients' building there is limited information available to describe the activities within the roof. There is not any reference to where there are penetrations, access routes or even plant.</p> <p>The roof should be the 5th elevation as it will be viewed from our clients' building at close proximity, in addition to other surrounding buildings.</p>	<p>Request a restriction within a planning permission that does not allow anything to breach the roof line in the sections.</p> <p>The approval of all acoustic outputs, maintenance access and the venting strategy for the site to be conditioned.</p>

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				<p>The applicant should provide details as part of this application confirming the proposals for the following;</p> <ol style="list-style-type: none"> Flues for boilers, generators, CHP are within the proposed sections Kitchen extract from the restaurant – how is this proposed? Is this with an ecology unit? No access to the roof is permissible by guests or staff apart from for maintenance requirements. These areas should not be used as break out areas and should not be made available to guests. Building management units for cleaning – where are they housed and how are they accessed? Plant allocation is contained within the section and elevations of the application – confirmation of acoustic attenuation requirements to be confirmed Confirmation of any active lawns within the roof area for supply or extract to be confirmed – any toilet extract for example? 	
19	-		Cleaning Cradle	<p>Details to be provided of the proposal and how this relates to the Plumtree Court elevation. For other maintenance, will this be carried out / maintained from the street?</p>	
20	-		Movement Monitoring	<p>Proposal to be provided which sets out how our clients' building / UKPN substation assets will be monitored for movement during demolition and construction.</p>	<p>Details to be submitted and discharged by condition to be attached to any permission.</p>
21	-		Occupation of Hotel	<p>Triggers for various works to the hotel, including neighboring City Temple works, to be completed prior to occupation.</p>	<p>Condition restricting occupation to be included on any permission.</p>
22	Flood Risk Assessment		Adjoining Properties	<p>The Flood Risk Assessment (FRA) needs to reference the considerations of adjoining properties.</p>	<p>Updated FRA to be submitted prior to determination of the application.</p>
23	-		Considerate Contractor Scheme and Local Employment Opportunities	<p>Should planning permission and listed building consent be granted, the applicant is to sign up to the Considerate Contractor Scheme and provide details of local employment opportunities.</p>	<p>Requirement to be conditioned / be an obligation within the S106 Agreement.</p>
24	S106 / S278 commitment		Adjoining Staircase	<p>The public staircase between Farringdon Street and Holborn Viaduct is a public asset that provides a direct access between the two levels served by the proposed hotel. This public asset is in need of refurbishment.</p>	<p>It is recommended that improvements to the public staircase are included within the applicant's commitments.</p>
25	-		Construction	<p>An understanding of the logistics to the site is very important – as raised above – but logistics around the perimeter of the site also need to be considered. For example, where will the site accommodation be located? What are the fire evacuation measures etc.? The applicant should be committed to engage with the local building owners to agree these logistics.</p>	<p>Details to be provided within CMP / DMP which are yet to be submitted to the Council.</p>

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26	Noise Survey	-	Survey Dates	<p>The Noise Survey that has been submitted with the application is dated 28 February 2017. However, the data included within the survey demonstrates that the noise survey was conducted in two parts: a 24-hour survey in December 2012, plus a 4-day survey in January 2013. We therefore question whether this data is still reliable given it is now at least 5 years old.</p>	<p>Revised Noise Survey to be submitted using up to date data.</p>
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