

Background Papers

Letter - Historic England 2/11/2018

Letter – Twentieth Century Society 14/11/2018

Letter with officers' report – Mayor of London 3/12/2018



Historic England

LONDON OFFICE

Mr Michael Blamires
Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
LONDON
EC2P 2EJ

Direct Dial: 020 7973 3707

Our ref: P00983710

2 November 2018

Dear Mr Blamires

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**1-2 BROADGATE LONDON EC2M 2QS
Application No. 18/01065/FULEIA**

Thank you for your letter of 24 October 2018 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely



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Michael Blamires
Department of the Built Environment
City of London

Sent by email: PLNComments@cityoflondon.gov.uk

14 November 2018

Our ref: 10 07 04

Dear Michael Blamires,

18/01065/FULEIA 1-2 Broadgate

The Twentieth Century Society has been notified of the above application. The application seeks permission for the demolition of the existing buildings at 1-2 Broadgate and the construction of a new building on the site. The Society wishes to **object** to the above application and our comments are set out below.

1-2 Broadgate is the only remaining building from the early phases of the Broadgate development that has not been demolished or substantially altered. These earlier phases of development were built between 1985 and 1987, and designed by Group 2 at Arup Associates, led by Peter Foggo. Foggo's team also completed the masterplan for the entire scheme, with the later phases 5-12 being designed by Chicago based practice Skidmore, Owings and Merrill. Broadgate was internationally acclaimed upon completion and has been described as England's most important post-war commercial development.

In 2011 English Heritage considered all of the buildings constructed in phases 1-4 of the Broadgate development to be worthy of listing at Grade II* in recognition of its outstanding quality and more than special architectural and historic interest. Erosion of the legibility of Broadgate as a group has resulted in a lessening of the remaining buildings' architectural and historic interest, however the Society still considers 1-2 Broadgate to be a non-designated heritage asset, and the wider complex including landscaping and public art to be an area of historic character. Broadgate has been praised as being a successful development of the 1980s office boom period, a character of building which is rapidly being lost in the City of London.

The above proposals seek consent to demolish 1-2 Broadgate, which the Society is opposed to in light of the building's historic and architectural interest. We also consider the proposed new building to be unsympathetic to the character of the remaining elements of Broadgate landscaping and public realm, including the Broadgate Circle and Fulcrum Sculpture by Richard Serra. Broadgate was widely celebrated for its unprecedented provision of public space and leisure facilities within a speculative office development, and for the numerous commissions for new public artworks.

Broadgate's designer Peter Foggo was also responsible for 1 Finsbury Avenue, located adjacent to the site. Designed and built earlier than Broadgate, the relationship between these two buildings reflects the level of prosperity and resulting development of the fringes of the City of London during the late 1970s and 80s. 1 Finsbury Avenue is listed at Grade II and we consider the proposed new building to be harmful to the setting of this listed building.

The Society considers 1-2 Broadgate to be a non-designated heritage asset worthy of preservation. Its historical significance is part of the history of the City of London's development in the post-war era. Broadgate has been widely celebrated for the quality of its design and has served as inspiration for many similar projects nationwide and further afield. We object to the demolition of 1-2 Broadgate and to the harm proposed by the new building to the character of the wider Broadgate development, and to the setting of 1 Finsbury Avenue.

I trust that these comments are of use to you. Please do not hesitate to contact me if you have any further queries.

Yours sincerely,



Grace Etherington

Caseworker

Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

GREATER LONDON AUTHORITY

Development, Enterprise and Environment

Michael Blamires

Development Division
Department of the Built Environment
City of London
PO Box 270
Guildhall
London EC2P 2EJ

Department: Planning

Your reference: 18/01065/FULEIA
Our reference: GLA/4687/01/AP
Date: 3 December 2018

Dear Mr. Blamires

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008.**1-2 Broadgate, City of London****Local planning authority reference: 18/01065/FULEIA**

I refer to the copy of the above planning application, which was received from you on 5 November 2018. On 3 December 2018, the Mayor considered a report on this proposal; reference GLA/4687/01. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not comply with the London Plan, for the reasons set out in paragraph 51 of the above-mentioned report; but that the possible remedies set out in that paragraph of this report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the application. You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission it need not consult the Mayor again (pursuant to Article 5(2) of the Order), and your Council may therefore proceed to determine the application without further reference to the GLA. However, you should still send a copy of the decision notice to the Mayor, pursuant to Article 5 (3) of the Order.

Please note that the Transport for London case officer for this application is Gavin McLaughlin, e-mail GavinMcLaughlin@tfl.gov.uk, telephone 020 3054 7027.

Yours sincerely



John Finlayson

Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Nicky Gavron, Chair of London Assembly Planning Committee
National Planning Casework Unit, DCLG
Lucinda Turner, Tfl
Tim Holtham, DP9 Ltd, 100 Pall Mall, London SW1Y 5NQ

planning report GLA/4687/01

3 December 2018

1-2 Broadgate

in the City of London

planning application nos. 18/01065/FULEIA

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

Demolition of existing buildings and construction of a building arranged over two basement levels, lower ground, upper ground and 12 upper floors plus rooftop plant to provide flexible retail, leisure and mixed retail/leisure uses, restaurant; hard and soft landscaping works; outdoor seating associated with ground level retail and other works incidental to the development.

The applicant

The applicant is **Bluebutton Properties UK Limited** and the architect is **Allford Hall Monaghan Morris**.

Strategic issues summary

Principle of development: In view of the proposed development's contribution to the wider strategic functions of the CAZ, with the delivery of new office, retail and leisure floorspace, the principle of development is strongly supported in strategic planning terms in line with London Plan Policies 2.10 and 2.11 and draft London Plan Policies SD4 and SD5; an affordable housing contribution should be made as per the tariff established within the City of London Corporation Planning Obligations SPD (paragraphs 15-18).

Urban, heritage and inclusive design: The approach to design is supported and the proposed development would not harm the conservation areas and other heritage assets in the vicinity or impact on strategic views. The proposed building would be in the background of St. Paul's Cathedral, but would be consistent with the height of other nearby buildings in this view. In terms of heritage, the impact would be localised and neutral (19-25).

Climate change: The carbon dioxide savings for the domestic element fall short of the London Plan and draft London Plan targets; therefore, the applicant must explore additional measures aimed at achieving further carbon reductions. The approach to flood risk management is broadly supported; however, the surface water strategy does not comply with London Plan Policy 5.13 and draft London Plan Policy SI13 (paragraphs 26-32).

Transport: The following are required: a Crossrail contribution in the S106 agreement; Cycle Hire memberships for all employees of the first occupiers of the land uses proposed; increased short-stay cycle parking; and, a full construction logistics plan (CLP). Further discussions with respect to the Broadgate Campus/Liverpool Street public space masterplan and a wayfinding strategy are also required (paragraphs 34-47).

Recommendation

That the City of London Corporation be advised that the application does not yet comply with the London Plan and draft London Plan for the reasons set out in paragraph 51 of this report. However, the resolution of these issues could lead to the application becoming compliant with the London Plan and draft London Plan.

Context

1 On 5 November 2018, the Mayor of London received documents from the City of London Corporation notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008 the Mayor has until 9 December 2018 to provide the Corporation with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make. This report sets out information for the Mayor's use in deciding what decision to make.

2 The proposed scheme would be referable to the Mayor under Category 4 of the Schedule to the Order 2008:

- **Category 4:** *"Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State under article 10(3) of the GDPO."*

3 Once the City of London Corporation has resolved to determine the application, if it is minded to grant permission it is required to refer it back to the Mayor for his decision as to whether to direct refusal or allow the Corporation to determine it itself.

4 The environmental information for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 has been taken into account in the consideration of this case.

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

Site description

6 The application site is approximately 0.7 hectares and is located on the southern side of Finsbury Avenue Square with frontage onto Eldon Street to the south, Finsbury Avenue to the west and Broadgate Circle to the east. The site is currently occupied by an office building (with some retail and leisure use), which is located within the southwest corner of the Broadgate Campus.

7 The site is located within the Central Activities Zone and falls within the Protected Vista from Assessment Point 9A.1: King Henry's Mound (Richmond Park) to St. Paul's Cathedral. There are Grade II listed buildings in proximity, including Roman Catholic Church of St Mary Moorfields, Park House and Garden House and 1 Finsbury Avenue. The site is not in a conservation area, but Finsbury Circus Conservation Area, New Broad Street Conservation Area and Bishopsgate Conservation Area are nearby.

8 The site is highly accessible by public transport, with Liverpool Street station in proximity providing national rail and underground services on the Central, Metropolitan, Circle and Hammersmith & City lines, as well as 17 bus routes. Docklands Light Railway and Waterloo & City line services are within walking distance at Bank station, as are Northern line services and additional national rail services and bus routes at Moorgate station. From 2019, Elisabeth Line services will also serve Liverpool Street, with an entrance located immediately south of the site on Liverpool Street itself.

9 The site therefore records the highest possible public transport accessibility level (PTAL) of 6b. The nearest section of the Transport for London Road Network (TLRN) is the A10, Bishopsgate, which is just over 250 metres to the east.

Details of the proposal

10 Full planning permission is sought for the demolition of the existing building and the redevelopment of the site to provide a 12-storey building (plus two basement levels, lower and upper ground and roof plant level), comprising: 44,889 sq.m. of office floorspace; 7,112 sq.m. of flexible retail floorspace (A1/A3/A4); 2,029 sq.m. of flexible leisure floorspace (D2/SG); 11,247 sq.m. of flexible and retail floorspace (A1/A3/A4/D2/SG); and, 963 sq.m. of restaurant floorspace (A3).

Case history

11 GLA officers had pre-application discussions on this scheme on 24 July 2018. The advice report (pre-application report reference number GLA/4687) issued by GLA officers concluded that the principle of a mixed-use development at the scale proposed was supported in strategic terms in view of its contribution towards increasing office, retail and leisure space within the CAZ. However, any future planning application would need to address the issues raised in this report on urban and inclusive design, sustainable development/climate change mitigation, and transportation as part of the application submission to ensure compliance with the London Plan and draft London Plan.

Strategic planning issues and relevant policies and guidance

12 For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the City of London Local Plan (January 2015), and the 2016 London Plan (Consolidated with Alterations since 2011).

13 The relevant issues and corresponding policies are as follows:

- Central Activities Zone *London Plan; CAZ SPG;*
- Mix of uses *London Plan;*
- Heritage and urban design *London Plan; Shaping Neighbourhoods: Character and Context SPG; London View Management Framework SPG;*
- Inclusive design *London Plan; Accessible London: Achieving an Inclusive Environment SPG;*
- Sustainable development *London Plan; Sustainable Design and Construction SPG; Mayor's Environment Strategy;*
- Transport *London Plan; Mayor's Transport Strategy;*
- Crossrail *London Plan; Mayoral Community Infrastructure Levy; and, Use of planning obligations in the funding of Crossrail and the Mayoral Community infrastructure levy SPG*

14 The following are relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance.
- Draft London Plan (consultation draft December 2017 and minor suggested changes August 2018), which should be taken into account on the basis explained in the NPPF.

Principle of development

15 London Plan Policies 2.10 and 2.11 and Policies SD4 and SD5 of the draft London Plan support the provision of office, retail and entertainment uses in the Central Activities Zone. The site is currently occupied by a building providing offices at the upper levels, with retail and a gym at ground and basement level. The proposed development would deliver 66,240 sq.m. (GIA) of modern commercial floorspace across various use classes, including office, retail and leisure. The quantum of floorspace proposed equates to uplift of 24,804 sq.m., with increased provision across

all the existing uses. More efficient floorplates would also be provided, hence an increase in employment density would be enabled. The applicant has submitted a retail impact assessment, which demonstrates that the retail development proposed would not cause harm to the vitality and viability of existing established town/shopping centres in the surrounding area.

16 To support the vibrancy and vitality of the CAZ, London Plan Policies 2.11 and 4.3 also promote the inclusion of housing in the mix of uses. Paragraph 4.17 of the London Plan, nevertheless, allows a degree of flexibility with respect to the provision of mixed uses in the CAZ - in recognition of the fact that it may not always be suitable to provide housing on-site. Having considered the characteristics of this scheme, which would help to sustain an important cluster of CAZ business activity, GLA officers accept an absence of on-site housing in this case. Under these circumstances, contributions to off-site housing/affordable housing are normally sought as a planning obligation as per the tariff established within the City of London Corporation Planning Obligations SPD.

17 In order to address the requirements of London Plan Policy 4.3, an affordable housing contribution should therefore be made as per the tariff established within the City Corporation Planning Obligations SPD. The associated financial contribution should be secured by way of the Section 106 agreement and full details should be provided before the Mayor considers the proposal at Stage 2.

18 In view of the proposed development's contribution to the wider strategic functions of the CAZ, with the delivery of new office, retail and leisure floorspace, the principle of development is strongly supported in strategic planning terms in line with London Plan Policies 2.10 and 2.11 and draft London Plan Policies SD4 and SD5.

Urban, heritage and inclusive design

19 Policies contained within chapter seven of the London Plan and chapter 3 of the draft London Plan, specifically look to promote development that reinforces or enhances the character, legibility, permeability and accessibility of neighbourhoods. It sets out a series of overarching principles and specific design policies related to site layout, scale, height and massing, internal layout and visual impact as ways of achieving this.

20 The scheme is well thought out and generally responds positively to its immediate context in terms of ground floor layout and massing arrangement. The proposal improves significantly on the form and quality of the existing building, with stepped massing at the upper levels and high levels of active frontage at ground level, with retail activity along Eldon Street and Finsbury Avenue as well as facing on to Finsbury Avenue Square. The proposed development would also significantly improve permeability across the Broadgate Campus, providing easy links to existing and future transport services and public spaces that are nearby.

21 The proposed materials would be consistent with the palette evident in the surrounding area. The Corporation's planning officers should seek to secure a high quality of design through conditions linked to facade details and additional material specification.

Heritage

22 The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the tests for dealing with heritage assets in planning decisions. In relation to conservation areas, for all planning decisions "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area". Regarding listed buildings, all planning decisions should "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". The NPPF states that when considering the impact of the proposal on the significance of a designated heritage asset, great weight should

be given to the asset's conservation and the more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

23 As set out in paragraph 7 of this report, there are designated heritage assets within the vicinity of the site. The applicant has submitted a Townscape, Built Heritage and Visual Impact Assessment within the Environmental Statement, which considers the proposals' impact on heritage assets. Having analysed this assessment, and having regard to the statutory duty in respect of listed buildings in the Planning (Listed Buildings and Conservation Areas) Act 1990, and the relevant paragraphs in the NPPF, GLA officers consider that the impact from the proposed development would be localised and would have neutral effects on local heritage assets given that it is a replacement building with similar massing and height. There would be no harm to the significance of heritage assets and proposal therefore accords with London Plan Policy 7.8 and Policy HC1 of the draft London Plan.

London View Management Framework (LVMF)

24 The site sits within the background of London View Management Framework Protected Vista 9A.1 King Henry VIII's Mound (Richmond Park) – St. Paul's Cathedral. The Townscape, Built Heritage and Visual Impact Assessment, however, demonstrates that the proposed development would sit in the same position as the existing building and have a similar height to 5 Broadgate, which is to the right of the Cathedral in the view. Given the proposed height and siting of the building, the development would preserve the viewer's ability to recognise and appreciate the dome of the Cathedral and, therefore complies with London Plan Policy 7.12 C and draft London Plan Policy HC4.

Inclusive design

25 London Plan Policy 7.2 and Policy D3 of the draft London Plan seek to ensure that proposals achieve the highest standards of accessible and inclusive design. Access routes, entry points, and movement within the building and the across the site have been designed to be accessible in line with draft London Plan Policy D3 and London Plan Policy 7.2. Accessible WC facilities would also be provided in appropriate numbers and locations. This inclusive approach has also been incorporated into the design of the proposed pocket park.

Climate change

Energy strategy

26 The applicant has submitted an energy assessment in accordance with London Plan Policy 5.2 and draft London Plan Policy SI2. An on-site reduction of 363 tonnes of CO₂ per year in regulated emissions compared to a 2013 Building Regulations compliant development is expected, which is equivalent to an overall saving of 20%. The carbon dioxide savings fall short of the target set out in Policy 5.2 of the London Plan and draft London Plan SI2. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions, including the maximisation of the use of photovoltaics.

27 Further information is also required in relation to the heat pumps; efficiency of the boiler; connection to the district heating network; size and layout of the energy centre; and, energy efficiency measures. The applicant has confirmed that £ 514,637 will be paid into the borough's offset fund; this amount should be updated following additional on-site measures.

28 Full details of the outstanding issues relating to energy have been provided directly to the applicant and the Corporation.

Flood risk, sustainable drainage and water efficiency

29 A brief flood risk assessment (FRA) has been submitted as part of the drainage strategy; however, insufficient evidence has been provided to demonstrate that the approach to flood risk management for the proposed development complies with London Plan Policy 5.12 and draft London Plan Policy SI12. The applicant should therefore commit to assessing sewer and groundwater flooding risks in further detail and adopting suitable flood resistance and resilience measures where necessary.

30 The surface water drainage strategy addresses the drainage hierarchy, and notes that rainwater harvesting and green roofs would be possible options; however, only attenuation tanks are proposed as the main SuDS measure. This approach does not comply with London Plan Policy 5.13 and draft London Plan Policy SI13, as it does not give appropriate regard to the drainage hierarchy. Further details on how SuDS measures at the top of the drainage hierarchy, including rainwater harvesting and green roofs, would be included in the development should be provided as well as additional attenuation storage volume calculations and exceedance information.

31 The proposed development generally meets the requirements of London Plan Policy 5.15 and draft London Plan Policy SI5. The applicant should make a stronger commitment to water harvesting and reuse, to reduce consumption of wholesome water across the entire development site. This can be integrated with the surface water drainage system to provide a dual benefit.

32 Full details of the outstanding issues relating to flood risk and sustainable drainage have been provided directly to the applicant and the Corporation.

Green infrastructure

33 London Plan Policies 5.10, 5.11 and 7.21 seek to retain existing trees of value, or mitigate their loss, and require developments to incorporate urban greening measures. Draft London Plan Policies D1, G1, G5 and G7 embed urban greening measures into the planning process. There are currently 14 trees on, or adjacent to, the application site, which have been assessed as Category B or C. Of this total, 13 trees would be removed to accommodate the proposed development, and 16 replacement trees—11 mature and 5 multi-stemmed—would be planted. Other greening measures proposed, include green roof terraces, green walls and planters. This approach is supported in this instance given the site's location within a highly urbanised location.

Transport

Trip generation and transport impact

34 The local area is receiving significant strategic transport investment, including London Underground improvements at Bank and Moorgate stations and the introduction of Elisabeth line services from 2019. The trip generation associated with the development is therefore unlikely to result in a site-specific impact on London's strategic walking, cycling, public transport and highway networks. Due to improvement works at Liverpool Street rail and bus stations, bus route 214 is currently not serving Eldon Street. Further significant changes to the local bus network are expected in 2019, subject to public consultation. Whilst the exact future service patterns are currently unclear, TfL is likely to recommence services along Eldon Street. If any Section 278 works are agreed with the City of London Corporation, TfL should be re-consulted.

35 The trip distribution assumes 90% of rail users will use the new internal route to Liverpool Street. To ensure accuracy this should be reviewed, with consideration given to the location of the new station entrance being directly accessible by crossing Eldon Street and soon becoming a major landmark at street level. Similarly, the Pedestrian Comfort Level (PCL) analysis provided for Eldon

Street should be reviewed to ensure pedestrian safety at the site's main frontage. The application also suggests that 18% of trips generated at the new development would be cycling trips. That mode share, which assumes that all long-stay cycle parking at the new development would be full every day, has also been used in the trip generation analysis of cumulative impacts caused by other local developments. The trip generation should therefore be reviewed bearing in mind the above observation. Finally, the approach taken to determine the development's impact on rail trips across all services at Liverpool Street should also be verified using census data to understand the origin of trips.

Site and surroundings

36 The cycling and servicing accesses to the development are satisfactory. Servicing vehicles would not access the site from the Transport for London Road Network (TLRN) and the shared servicing yard serving Broadgate South to the north would provide opportunities for consolidation and re-timing to reduce freight impacts. Cyclists would access the development from a shared space on Finsbury Avenue.

Healthy Streets

37 The direct walking route proposed from Liverpool Street station, which would be continuously flat with no level changes, is welcomed. Twenty-four-hour public access (all year round) to all new pedestrian routes established across the site should be secured by the City Corporation. In addition, the applicant should provide wayfinding for this site including, Legible London signage, which should be secured through the Section 106 agreement.

38 The applicant and City Corporation should investigate robust traffic calming measures and restricting vehicle access on Eldon Street, which would free up new space for pedestrians and help to reduce the dominance of vehicles on London's streets in accordance with draft London Plan Policy T2. This could be timed to apply at only certain times of day if some servicing access needs to be maintained. Further discussions on this matter should take place prior to determination.

39 It is also noted that the applicant is currently developing a masterplan for the streets in the surrounding vicinity, and ongoing discussion with TfL about how public realm improvements could mitigate the impact of additional demand from this development is welcomed.

Deliveries and servicing

40 Servicing for the development is proposed via an existing basement access from Broad Lane, which vehicles can enter an underground servicing area which would be shared with the rest of the Broadgate campus. Approximately 250 servicing trips per day are forecast.

41 The general servicing strategy for the development is satisfactory and the location of vehicular access off the TLRN is welcomed in accordance with draft London Plan Policy T7. The draft Deliveries and Servicing Plan (DSP) is satisfactory in principle and this should be secured by condition to enable monitoring and enforcement.

Construction

42 A full construction logistics plan (CLP) should be submitted and secured by condition. It should follow new TfL guidance (available from <https://tfl.gov.uk/info-for/urban-planning-and-construction/transport-assessment-guide/guidance-by-transport-type/freight>). Although this guidance sets out the need for the CLP to be in two parts; outline and full, the full part of the CLP is required pre-commencement as it is necessary to mitigate construction impacts and manage risks at the outset of the development process.

43 Construction access directly from Eldon Street or Bishopsgate A10 will not be supported. The Construction Management Plan (CMP) submitted with the application must therefore be revised as requested by TfL. TfL also may not support any construction access during morning, lunchtime and evening peak hours which in the City of London should be considered 7-9.30am, 12-2pm and 4-7pm.

Car and cycle parking

44 The proposed development is car-free, which is welcomed in accordance with draft London Plan policy T6. Given the wide range of step-free public transport available within close walking distance, including Crossrail once it opens, the absence of disabled parking is considered acceptable.

45 A total of 743 long-stay cycle parking spaces would be provided, including 34 accessible spaces and 33 foldable bike lockers. This accords with the London Plan and draft London Plan standards. The applicant has provided empirical evidence in the application on the availability and current usage of public cycle parking across the Broadgate Campus (including sites further north), which shows crowding and capacity issues, with all the short-stay cycle parking full sometimes during the day. However, only 10 short-stay cycle parking spaces are proposed on Finsbury Avenue, compared to the draft London Plan minimum requirement of 121 spaces. This is unacceptable and should be increased, as short-stay cycle parking in the City of London is already under acute pressure. Once confirmed, all cycle parking should be secured by condition, discharged in consultation with TfL and designed and delivered in accordance with the London Cycle Design Standards.

Cycle hire

46 Due to the proximity of Cycle Hire docking stations at Finsbury Circus, Liverpool Street and Moorfields, Moorgate and the lack of short-stay cycle parking provision, the City of London Corporation should consider securing Cycle Hire membership for all employees of the first occupiers of the land uses proposed through the section 106 agreement and, if secured, the travel plan. This would help encourage cycling in accordance with draft London Plan Policies T2 and T5.

Crossrail S106 contribution

47 The proposed development is in the Crossrail Central London Charging area as identified in the Crossrail SPG. Therefore, the appropriate Crossrail contribution based on the uplift in floorspace should be secured in the Section 106 agreement. The quantum of uplift must be confirmed prior to determination.

Local planning authority's position

48 City Corporation planning officers have engaged in pre-application discussions with the applicant, and it is understood that officers are supportive of the principle of development.

Legal considerations

49 Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision to approve the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged, or direct the Corporation under Article 6 of the Order to refuse the application. Should the Corporation resolve to refuse the application, there is no requirement to

consult the Mayor again. There is no obligation at this present stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

50 There are no financial considerations at this stage.

Conclusion

51 London Plan and draft London Plan policies on CAZ, LVMF, heritage, urban and inclusive design, climate change and transport are relevant to this application. Whilst the principle of the development is supported, the application does not comply with the London Plan and draft London Plan. The following changes might, however, lead to the application becoming compliant with the London Plan and draft London Plan:

- **Principle of development:** In view of the proposed development's contribution to the wider strategic functions of the CAZ, with the delivery of new office, retail and leisure floorspace, the principle of development is strongly supported in strategic planning terms in line with London Plan Policies 2.10 and 2.11 and draft London Plan Policies SD4 and SD5.
- **Heritage, urban and inclusive design:** The approach to design is supported and the proposed development would not harm the conservation areas and other heritage assets in the vicinity or impact on strategic views. The proposed building would be in the background of St. Paul's Cathedral, but would be consistent with the height of other nearby buildings in this view. In terms of heritage, the impact would be localised and neutral.
- **Climate change:** The carbon dioxide savings fall short of the target set out in Policy 5.2 of the London Plan and draft London Plan SI2. The applicant should consider the scope for additional measures aimed at achieving further carbon reductions, including the maximisation of the use of photovoltaics. Further information is also required in relation to the heat pumps; efficiency of the boiler; connection to the district heating network; size and layout of the energy centre; and, energy efficiency measures.
- **Transport:** The following are required: a Crossrail contribution in the S106 agreement; Cycle Hire memberships for all employees of the first occupiers of the land uses proposed; increased short-stay cycle parking; and, a full construction logistics plan (CLP). Further discussions with respect to the Broadgate Campus/Liverpool Street public space masterplan and a wayfinding strategy are also required.

For further information, contact the GLA Planning Team:

Julietta McLoughlin, Chief Planner

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