

Committee:	Date:
Planning and Transportation	28 January 2020
Subject: 61-65 Holborn Viaduct London EC1A 2FD Demolition of existing building structure and erection of a mixed-use building comprising four basement levels, lower ground, ground and ten upper storeys for (i) hotel use (Class C1) at part basement levels one to four, part lower ground, part ground and part first, and second to tenth floors levels; (ii) restaurant / bar use (Class A3/A4) at part tenth floor level; (iii) office workspace use (Class B1) at part basement levels one to three, part lower ground and part first floor levels; (iv) flexible hotel / cafe / workspace (Sui Generis) at part ground floor level; (v) a publicly accessible terrace at roof level and; (vi) ancillary plant and servicing, hard and soft landscaping and associated enabling works.	Public
Ward: Farringdon Within	For Decision
Registered No: 19/01038/FULMAJ	Registered on: 30 September 2019
Conservation Area:	Listed Building: No

Summary

The above scheme proposes a mixed-use scheme that provides:

3,741 sq.m of offices

1. An hotel with 382 bedrooms and suites
2. A flexible hotel, café and workspace at ground level
3. A restaurant bar at the 10th floor level and a public terrace at the 11th floor level with a dedicated access route.

The building will be faced with an extensive green wall, making it the greenest building proposed in the City to date. It is appropriate in design terms both in its local context, in its impact on the setting of listed buildings and on the LVMF Views.

The proposed hotel will support the business City and the Culture Mile and is well located in relation to public transport.

The proposed offices are geared to the requirements of the City and would support start-ups, SMEs and small businesses. The reduction in office area, whilst contrary to policy, is warranted in this case by the nature of the provision and the delivery of an hotel in this highly accessible location at an entrance to the Culture Mile.

The buildings is capable of satisfactory servicing.

The scheme has attracted a number of comments which are capable of being dealt with by condition or obligation clauses. One objection has been received on behalf of the Holy Sepulchre Church Newgate Street. negotiations in this regard are continuing.

On balance, the development is regarded as acceptable in land-use terms and is a progressive and exciting response to an increase in urban greening appropriate to this location.

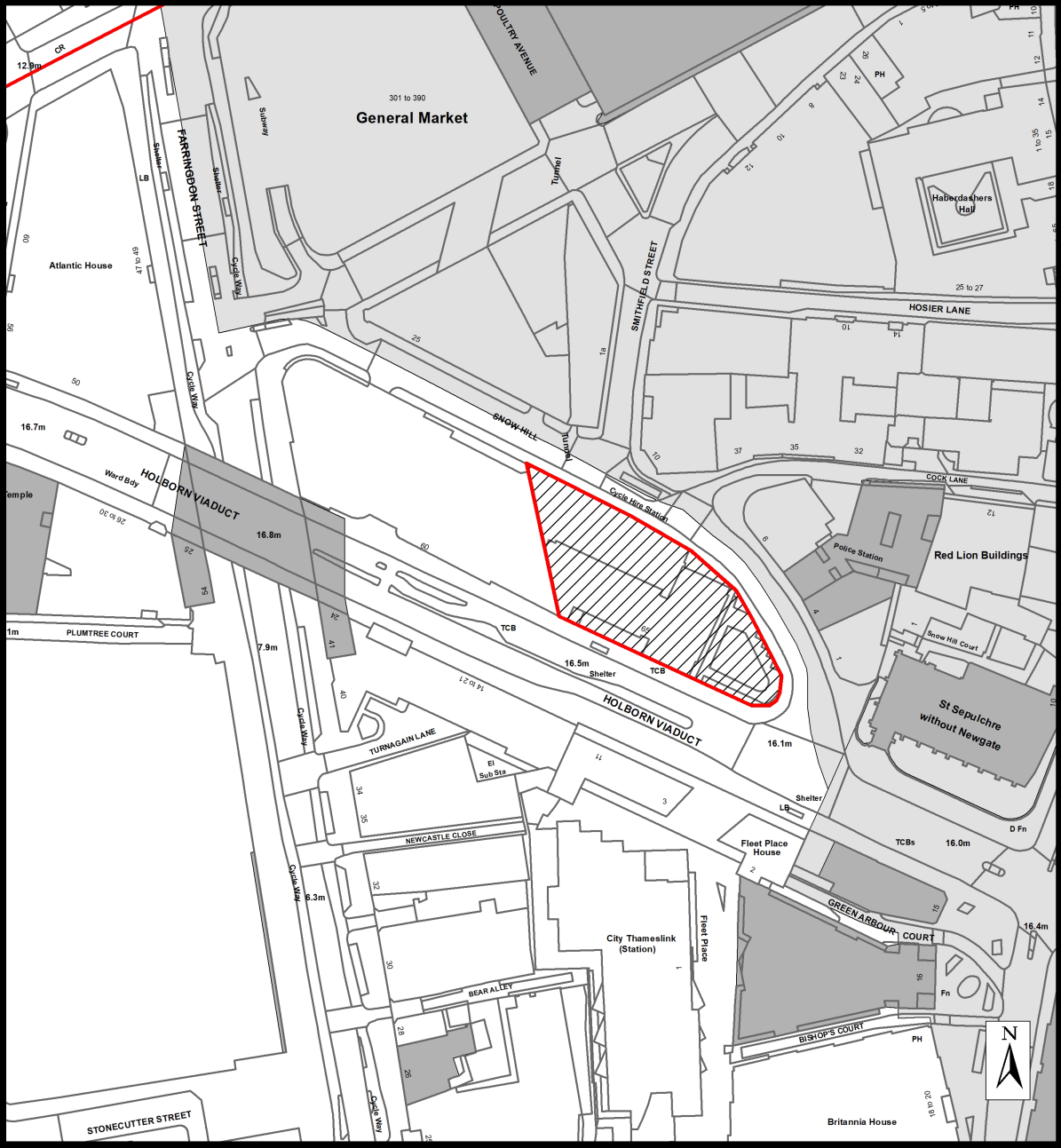
Recommendation

It is recommended that planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

Planning obligations and other agreements being entered into under section 06 of the Town & Country Planning Act 1990 and Section 278 of the Highways 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.

That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in 'Planning Obligations' under Section 106 and any necessary agreements under Section 278 of the Highways Act 1980.

Site Location Plan



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ADDRESS:

61 - 65 Holborn Viaduct

CASE No.

19/01038/FULMAJ

- CITY BOUNDARY
- SITE LOCATION
- LISTED BUILDINGS
- CONSERVATION AREA BOUNDARY



DEPARTMENT OF THE BUILT ENVIRONMENT



Main Report

Site

1. 61-65 Holborn Viaduct is located on the north side of the street at the junction with Snow Hill.
2. The site is occupied by a vacant 1950's T-shaped office building with an area of 7,977 sq. m. serviced from Snow Hill. The building varies in height from 50.3 to 67.1m and features a small walled private open space at the junction.
3. To the east is the Grade 1 listed Church of Holy Sepulchre without Newgate with further listed buildings surrounding the site. The Smithfield Conservation Area lies to the north. The site is within the Newgate Conservation Area to the south and East and is within the Culture Mile area which is a key strategy area in the Draft 2036 Local Plan.

Thameslink Station lines run to the south of the site and the railway tunnels run beneath the site.

Planning history

4. Before 2014 minor alterations were approved to the existing building. In June 2014 planning permission was granted for the demolition of the building and its redevelopment to provide a building in two parts. One part provided a basement, lower ground floor, ground and 8 upper floors of offices, with an area of 10,800 sq. m. and the other part, a 246-bedroom hotel with 10 upper floors and an area of 9,033 sq.m.
5. This scheme created a building with two identifiable parts and retained a green space at the eastern end of the site.
6. This permission lapsed on 30 June 2019. A separate prior approval was granted in 2019 to facilitate the demolition of the building in order to enable works on the site to commence earlier than would otherwise have been possible and was subject to conditions in the event of the works not commencing immediately.

The proposed scheme

7. The proposed scheme provides a mixed hotel and office scheme located across four basements, ground and 10 upper floors. Level 10 will provide a skybar associated with the hotel and Level 11 will provide a separate public viewing terrace to which there will be a dedicated lift and a biodiverse roof. The scheme will retain an open space area at the eastern end, albeit of a reduced area and in part oversailed by the building, which will be available to the public.
8. The hotel will provide 382 bedrooms and suites and will support both the Business City and the Culture Mile and the emerging 7-day a week City.
9. The office workspace, with an area of 3,741 sq. m. has been designed to be flexible and could accommodate small start-ups and larger companies of 25-50 people.

10. The lower levels are designed as a co-working space with communal break-out spaces and shared meeting rooms.
11. The ground floor is designed as public informal meeting space and will provide a food and beverage offer to the wider public whilst providing a reception for the hotel. There is a separate entrance to the office area and a separate entrance for the public rooftop area.
12. The building is designed with a substantial coverage of greening and would be the greenest building in the City.

Consultations

13. Following receipt of the application the application has been advertised and consulted on. Copies of all the letters and emails received are attached.
14. Views of other City of London Corporation departments have been taken into account in the preparation of this scheme and some detailed matters are addressed by the proposed conditions and the terms of the S106 agreement. These include matters such as noise, fume extraction and ventilation, construction and security.
15. Natural England has no comments.
16. The London Borough of Lewisham and Tower Hamlets have no comments in relation to the Views.
17. Thames Water has requested a condition in respect of wastewater infrastructure and has advised of the proximity of the development to a strategic water main and the requirement for the surface water to be addressed in accordance with the London Plan. The condition has been included.
18. Transport for London does not object but has requested the imposition of a condition which has been included in the schedule.
19. Network Rail has no significant objection provided the developer complies with the requirements of its Asset Protection Team and an informative is attached dealing with this matter.
20. The Rev'd David Ingall of Holy Sepulchre without Newgate has raised a number of concerns in relation to the impact of the development on daylight and sunlight, the height of the building and the impact on residential amenity from noise and from construction. He has requested that his comments are taken as a 'holding objection' which may be removed following negotiations which he describes as positive.
21. Policy Context
22. The development plan consists of the London Plan and the City of London Local Plan.
23. The Mayor of London and the City of London have prepared draft plans which are material considerations to be taken into account.
24. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

25. The Draft London Plan is at an advanced stage and it is anticipated that it will be adopted by the Mayor of London in February 2020. It takes forward many of the policy positions of the existing plan whilst strengthening and adding to others.
26. In relation to this scheme the Draft Plan continues to support a mixed use, hotel and office scheme in CAZ and within Culture Mile. The changes that are most relevant to this scheme are those that encourage good growth, enhance climate change, good design and sustainability requirements and further support requirements for public access and routes through sites.
27. Government Guidance is contained in the National Planning Policy Framework (NPPF) February 2019 and the Planning Practice Guidance (PPG).
28. There is relevant supplementary planning guidance in respect of; Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Mayoral CIL 2 Charging Schedule (April 2019), Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Newgate Conservation Area Character Summary (1999) and Smithfield Conservation Area SPD (2012).

Planning considerations

29. The Corporation, in determining the planning application has the following main statutory duties to perform:
30. To have regard to the provisions of the development plan, so far as material to the application, to any local finance considerations, so far as material to the application, and to any other material considerations (Section 70 Town & Country Planning Act 1990);
31. 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);
32. 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). When, as in this case, harm is caused to the significance of a listed building by reason of development within its setting, considerable importance and weight should be given to the desirability of preserving

the setting of the listed building/s when carrying out the exercise of balancing public benefits and harm to significance.

33. The NPPF 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”.
34. Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11
35. For decision-taking this means:
 - c) approving development proposals that accord with an up-to-date development plan without delay; or
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
36. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
37. Paragraph 131 of the NPPF states “In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.”
38. Paragraph 190 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.
39. The principal issues in considering this application: -
 - The extent to which the proposals comply with the relevant policies of the London Plan and the Local Plan
 - The proposed use of the site
 - The design approach
 - The impact of the proposal on the setting of adjoining listed buildings and conservation areas.

- The impact on the LVMF
- The impact on transportation and highways including the impact on pedestrians and vehicle movement.
- Planning obligations and CIL

Proposed uses

Office use

40. The proposed office area of 3,741 sq. m. represents a reduction of 4,236 sq. m. of B1 office floor space over the existing on the site.
41. The office is located over four levels and provides:
 - An incubator hub at Basement 2
 - A small format office centre at Basement 1
 - Self-contained offices at the Lower Level
 - Larger self-contained offices at the first floor (for over 20 employees)
42. The offices will be managed by an officer provider, providing space for start-ups and SMEs.
43. It is anticipated that the office area will be occupied at a density of one desk per eight sq.m. providing approximately 380 desks, which is not dissimilar to the occupation of the previous building. The ground floor sui generis use with an area of 1,1014 sq.m. could provide opportunities for flexible working and meetings.
44. Local Plan Core Strategic Policy CS1 seeks to ensure that the City provides additional office accommodation to meet demand from long term employment growth and Policy DM1.1 seeks to protect office accommodation. A loss of office floorspace is considered inappropriate where it would:
 - Prejudice the primary business function of the City
 - Jeopardise the future assembly and delivery of large office development sites
 - Remove existing stock for which there is demand in the office market or long-term viable need
 - Introduce uses that adversely affect the existing beneficial mix of commercial uses.
45. The previous office building on this site has been vacant for more than 10 years and permission was previously granted (but since expired) for a mixed-use office and hotel scheme on the site. The planning statement states that the previous office floorplates did not meet modern day working or the demands of the future growth sectors for agile flexible workspaces. The loss of the previous space equates to 0.08% of the existing office stock of the City and the proposal will provide a similar number of desks at a higher density to the existing.
46. Policy DM 1.1 resists the loss of existing B1 office stock if there is a demand for such space or a long-term viable need. No viability evidence

has been provided to demonstrate that office use would not be viable in the longer term, as required by Policy DM1.1 and the Office Use SPD. Exceptionally, as set out in paragraph 3.1.8 of the Local Plan, the loss of an individual office development to other commercial uses may be acceptable where the proposed alternative use meets the wider objectives of the Plan. The applicant has sought to demonstrate that the reduced quantum of office floorspace provides higher quality accommodation better suited to the City's future office needs and that the hotel use addresses the City's aspirations for the North of the City, in particular, its aspirations for Culture Mile, and other policy priorities, including delivering a high quality of design, active frontages and urban greening.

47. The proposed office floorspace is flexible to meet the needs of a diverse range of high growth companies and small - medium sized enterprises, with space for start-ups and space for move-on accommodation for growing SMEs. The planning statement suggests that the proposed ground floor flexible workspace will be used for informal meetings and business socialising.
48. The incubator hub at Basement 2 has no natural light and the small format office centre at Basement 1 is lit from a lightwell so somewhat limiting its attractiveness. In recognition of this a reduced charge or an initial 3 month charge free period will be sought as part of the S106 Agreement.
49. The proposed level of provision of 3,741 sq.m. GIA of B1 accommodation, providing modern, flexible space for start-ups and SMEs would enhance the City's office accommodation offer, broadly replicate the number of office desks in the previous building and address the needs of growing sectors of the economy in line with Local Plan ambitions.
50. Policy DM1.5 encourages a mix of commercial uses within office developments which provide support services for its businesses, worker and residents. The uses proposed would complement the business City and contribute to the diversity of the City office market with the provision of co-working space.

Hotel use

51. Policy CS11 allows new hotel development where it supports the City's business or cultural role and resists hotels where they would compromise the City's business function. DM 11.3 advises that new hotel accommodation will only be permitted where it does not prejudice the primary business function of the City and is not contrary to policy DM1.1.
52. A mixed-use hotel and office development on this site (12/00105/FULMAJ) was previously approved. The site lies within the City's Culture Mile, which has been identified as a Strategic Cultural Area in the draft London Plan and where the City Corporation is seeking to enhance the City's and the wider London cultural offer. Draft Local

Plan Policy S24 indicates that additional hotel provision will be encouraged on appropriate sites within the Culture Mile area.

53. The proposed hotel development would support the further development of the City's Culture Mile and contribute towards meeting the aims of the London Plan. The accompanying market report submitted by the applicant indicates that midscale hotel supply is lower per net office space and per employee than the rest of central London. It also indicates that the north-west of the square mile has the lowest number of hotel rooms within convenient walking distance. The site is adjacent to the City Thameslink station and close to the new Crossrail Station at Farringdon.

Retail use

54. The site is not within a designated Principal Shopping Centre (PSC) but is located on a Retail Link as defined in Local Plan policy DM20.2; Whilst no separate retail uses are proposed the proposed restaurant, bars and café/ meeting space will support the retail link, provide an active frontage, provide amenity to City workers, residents and visitors and enhance vibrancy.

Open Space, Public Realm

55. Local Plan Policy DM 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces where they do not overlook residential premises. Local Plan Policies DM10.2 (Design of green roofs and walls) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs and walls. Policy CS19 protects existing open space, ensuring that it is replaced on redevelopment by space of equal or improved quantity and quality.
56. The existing private green space at ground floor would be replaced by a new publicly accessible open space on the corner of Holborn Viaduct and Snow Hill. The public realm along Holborn Viaduct would be improved with the inclusion of the public pocket plaza with an urban garden in front of the hotel entrance which would include high quality landscaping, stone seats/benches and table and three reflective pools. Along Holborn Viaduct ten large planters with sit-able edges and ornamental grasses are proposed together with living walls, seven multi-stem trees, six public bench seats and 16 stone plinth seats.
57. In addition to the publicly accessible open space at ground floor, the proposal provides a free, publicly accessible roof-top garden and, terrace which includes high quality hard and soft landscaping (540sq.m). An extensive green roof (361sq.m) would be located on the north side of the roof. Green roofs are important not only for their aesthetic value when viewed from surrounding taller buildings, but for their contributions to biodiversity, reduction in rainwater run-off, insulation and urban cooling. Planting on the green roof should be appropriate to the location

and height of the roof. Conditions have been applied requiring details of the green roof, the planting and requirements for bird boxes as well as rainwater attenuation and harvesting for irrigation.

58. The nature of this green buildings will require additional irrigation and highway cleansing. In order to ensure that the irrigation of the green wall does not impact negatively on the highway a detailed irrigation strategy is required. A condition is set out in the schedule as well as a drainage condition.
59. The public terrace would be free for members of the public (no booking required) who would arrive via a set of dedicated lifts from ground floor level. The area would be planted with a 'wildflower meadow', shrub planting, ornamental shade-tolerant trees and two reflective pools at the centre of the space and intimate raised garden 'rooms' with hedge planting and seating facing Holborn Viaduct. Beneath the terrace it is proposed there would be a restaurant/bar use (Class A3/A4) (514sq.m) at part tenth floor level (Skybar) and include a terrace overlooking the City, including views of St. Paul's Cathedral and nearby St Sepulchre without Newgate Church. There are residential properties on Cock Lane (28 flats) at No's 32 and 37 slightly further north at No 10 Hosier Lane (124 flats). Environmental Health have suggested time and day restrictions on the use of the proposed roof terrace to safeguard amenity of adjoining premises in accordance with Policy DM15.7 and DM21.3.

Urban Greening

60. The building would be covered in a substantial green wall covering 3,700sq.m with a mix of plants (in the region of 400,000) of ecological value which would act as a green link for wildlife. It would collect rainwater as the soil would absorb water slowing down run-off and reducing the risk of flooding.
61. Living green walls have numerous environmental benefits. Information supporting the application sets out that the proposed green wall will generate 7 tonnes of oxygen in a year ; extract 9 tonnes of CO₂ annually; filtering 483kg of particulate air-borne pollution; absorbing nitrogen dioxide and other volatile organic compounds ; positively influencing the heat island effect by lowering the temperature 3 degrees C around the building and biodiversity benefits of green living walls. In addition, green walls are considered to be beneficial for sound absorption as well as having a positive impact on physical and mental well-being.
62. An Urban Greening Factor (UGF) calculation based on the draft London Plan Policy G5 has been submitted with the application. The red line planning application boundary includes the following surface cover types as set out in the table below.

Surface Cover Type	Area (sq.m)	UGF (Draft London Plan)	Score
Living walls	3985	0.6	2391
Biodiverse roof garden (extensive 150mm depth)	620	0.7	434
Permeable paving (roof garden)	500	0.1	50
Trees (x9 – 5m dia/15sq.m area)	135	0.6	81
Water feature	21	0.2	4.2
Flower rich perennial planting (in planters)	12	0.7	8.4
Flower rich perennial planting (outside planters)	7	0.7	4.9
Total	5280	-	2974
Calculating UGF Score			
Site Area (sq.m)	2163		
UGF Calculation (sq.m)	2974/2163		
UGF Score Total	1.37		

63. The UGF for this application at 1.37 substantially exceeds the Mayor of London's draft London Plan UGF target score of 0.3 for commercial development and the UGF requirements in the emerging City of London draft Local Plan.

Design

Bulk and Massing

64. The scheme's height at 11 storeys (55m AOD) is considered appropriate both in terms of local townscape and views of St Paul's from a number of key Protected Vistas in the London Views Management Framework.
65. The height relates to the townscape character of Holborn Viaduct and is appropriately scaled in relation to other buildings on the north side and creates an appropriate statement on a prominent bookend corner site of townscape importance.
66. The existing building, by reason of its staggered building line and incongruous form provides a poor definition to the Snow Hill and Holborn Viaduct street frontages and when compared to the previous 1880's building on the site, fails to adequately denote or celebrate this important bookend corner site. The bulk, height, building line and massing of the

proposed building provides a cleaner and denser urban grain in a more coherent and convincing manner.

Design Approach

67. The design approach of a wholly living green walled building facade framing recessed windows wrapping around both Holborn Viaduct and Snow Hill, is eye-catching and radical. The green walled facade mirrors the diagonal structural bracing of the building cantilevering over the subterranean railway tracks. It appears as a latticed pattern of horizontal and diagonal lines enclosing angled window openings, providing an architectural honesty and coherence in the approach to the green facade. The proposal represents an exemplar of “Green Living / Botanical architecture” which is a new genre of architecture to address climatic and environmental challenges.
68. Living green walls have numerous environmental benefits. Information supporting the application sets out that the proposed green wall will generate 7 tonnes of oxygen in a year ; extract 9 tonnes of CO₂ annually; filtering 483kg of particulate air-borne pollution; absorbing nitrogen dioxide and other volatile organic compounds ; positively influencing the heat island effect by lowering the temperature 3 degrees C around the building and biodiversity benefits of green living walls. In addition, green walls are considered to be beneficial for sound absorption as well as having a positive impact on physical and mental well-being.
69. The Urban Greening Factor has been calculated as 1.37 and would to date be the greenest building in London in terms of the Urban Greening Factor and in terms of the living green wall is likely to be the largest in Europe.
70. The green wall would include some 400,000 plants (average of 100 plants per m²) consisting of native and ornamental grasses, shrubs and herbaceous perennial plants. The green wall would be curated to create a changing palette of colour, texture and shadows and will remain green throughout the year. The living wall system comprises of vertical planting trays made from 100% recycled material incorporating an organically grown medium and a fully automatic irrigation system to enable every area of the wall to have the correct amount of water. The maintenance regime would ensure adequate moisture level, the wellbeing of the plants and the application of feed and nutrients.
71. The fire safety aspects of the green wall has been assessed by the City’s District Surveyor and found to be acceptable subject to maintenance conditions and obligations. The proposal comprises a non-combustible green wall construction with a built-in irrigation system which is connected to a fire alarm system so it can act as a drencher system in the event of a fire. The District Surveyor will be consulted on the maintenance plan required under condition.
72. Although such a genre of living wall architecture may not be architecturally appropriate everywhere in the City, especially in sensitive areas with a more unified or specific townscape character, it is

considered an appropriate architectural response at this location. In particular, the green living walled building will create an appropriate backdrop and foreground to Holy Sepulchre Church alongside the green landscaped churchyard and mature canopy of the London Plane trees. The expansive green façade will contribute positively in softening the currently somewhat hard townscape of Holborn Viaduct. Holborn Viaduct consists of a diverse and eclectic architectural ensemble with robust stone, brick, metal framed and glazed facades. Within this townscape setting there is considered to be an opportunity for a radical green walled architectural statement.

73. In oblique views the generous planting will relate satisfactorily to the dark brown metal (such as weathered Corten steel) of the window reveals which will have a complementary natural, quality and colour. The depth of reveals of the window openings and their dynamic angular shapes will enhance the depth of modelling and vibrancy of the elevations, especially in oblique views.
74. The curved corner facing east makes a convincing and dynamic statement on this corner site. The manner in which the curved façade on the corner angles outwards gives the impression of a prow to the building, an appropriate response given the townscape importance of this corner without over-dominating the Church to the east.
75. The building's proportions are considered convincing with a double height recessed base visually supporting the upper storeys and providing an appropriate ground / street level presence on an important thoroughfare. The recessed corner with its cantilevered form over the pocket park assists in emphasizing the entrance to the public roof terrace in wayfinding terms.
76. In comparison with the inactive, inward looking office facades of the existing building, the scheme provides active frontages on all elevations enlivening the public realm and creating vibrancy which will transform the area and substantially enhance the public realm.
77. The ground floor facades have an undulating curvaceous quality providing modelling and visual interest in oblique views and areas of shelter for seating underneath the cantilevered upper storeys on Holborn Viaduct and the corner plaza. This will be complemented by circular masonry seating and water features and the facades will include projecting metal fins to emphasise the undulating facades of the lower storeys.
78. The building is visually terminated by a recessive final storey set back generously from the building frontage, relating satisfactorily with the recessed roof storeys of other buildings on the north side of Holborn.
79. A pocket plaza is provided on the south east corner of the site underneath the cantilevered eastern corner of the building. This public space will face south and east and include informal seating and water features encouraging the public to dwell and would be sheltered from inclement weather or shaded in the height of summer. It has the

potential to be a successful dwell space for groups given its proximity to the proposed Museum of London and Thameslink station.

80. The pocket park will have an appropriate generosity of space with a double height of 7m between the ground floor and the soffit of the cantilevered upper storeys. Entrance to the public viewing terrace would be via a generously scaled dedicated entrance from this public space.
81. The roof level terrace at Level 11 will provide exceptional views of the City including St Paul's Cathedral, the Old Bailey, the City Cluster, Smithfield Market as well as Holy Sepulchre. From a height of 50 metres the views from this public terrace will have a dynamic three-dimensional quality with landmarks appreciated against open sky. The terrace will receive copious sunlight throughout the year. The terrace will include generous soft landscaping and seating set back from the perimeter to provides contemplative areas for quiet dwelling. The balustrade will be 1.8m. in height.
82. The northern part of the roof will include a non-accessible green roof/wildflower garden to prevent overlooking to residential properties to the north and provide biodiverse habitats. The roof plant is enclosed by a screen and therefore concealed from public viewpoints.
83. A draft lighting strategy is submitted which indicates a restrained and appropriate lighting approach in accordance with the City's Lighting Strategy which would be subject to a condition.
84. The building is capable of accommodating street lights in accordance with the City requirements and their exact location and fixing will be subject to a condition.

Wind

85. A pedestrian level wind assessment of the proposed Citicape development was undertaken using Computational Fluid Dynamics (CFD) simulations, looking at the Existing site with Existing Surrounding Buildings and the proposed development with Existing Surrounding Buildings.
86. The existing site has wind conditions suitable for sitting to standing use during the windiest season. These wind conditions are expected of a low to medium rise urban area such as this part of London where the majority of the surrounding buildings are of a similar height to each other. During the summer season, wind conditions are generally one category calmer.
87. Wind conditions around the Site would remain similar to the existing when the Proposed Development is completed as it is similar in height to the surrounding buildings and therefore would not change the local aerodynamics. All areas of the Proposed Development would be suitable for the intended use, including the ground level amenity space at the south-east corner of the Site and at the Level 10 terrace. All thoroughfare and entrance locations at ground level would be suitable for the intended use.

88. Overall, all areas in and around the Proposed Development would be suitable for the intended use with no occurrences of strong wind exceedances and no mitigation measures are necessary.

London Views Management Framework

89. The London View Management Framework (LVMF) is a key part of the Mayor's strategy to preserve London's character and built heritage. It explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views. The LVMF provides Mayoral Supplementary Planning Guidance (SPG) on the management of 27 strategically important views designated in the London Plan. It elaborates on the policy approach set out in London Plan policies 7.10, 7.11 and 7.12 and came into effect on 16 March 2012. London Plan requires that new development should not harm and where possible should make a positive contribution to the characteristics and composition of strategic views and their landmark elements.

View 3A.1 – Kenwood

90. The site lies within the landmark viewing corridor of the Kenwood Protected Vista (London Panorama). The proposal does not breach the threshold height of the landmark viewing corridor which rises from 55.437 m to 56.125 m across the site and will not harm the appreciation of St Pauls Cathedral from this view.

View 2A.1 – Parliament Hill

91. The site lies within the landmark viewing corridor of the Parliament Hill Protected Vista (London Panorama) focussing on St Paul's Cathedral. The proposed development does not breach the threshold height of the landmark viewing corridor which rises from 55.115m to 55.735m across the site. The visual demonstrates ensure that St Paul's Cathedral and its western towers remain recognisable in accordance with LVMF guidance.

View 4A.1 – Primrose Hill

92. The site lies within the Wider Setting Consultation Area of the Primrose Hill Protected Vista (London Panorama) focussing on St Paul's Cathedral. The consultation threshold is a constant plane of 52.1m AOD at this point as the site lies within the vista foreground. The proposal breaches this height by some 1.48m. However, the scheme is located some distance to the east of the Cathedral and to the left of a taller building in the foreground (outside the City) and will not harm the appreciation or views of St Paul's Cathedral or other landmarks identified in this LVMF view.

View 5A.2 – Greenwich Park

93. The site lies within the Wider Setting Consultation Area (background) of the Greenwich Park Protected Vista (London Panorama). The proposal breaches the consultation threshold height by some 1.48m. However, the scheme is located some distance to the east of the Cathedral and will not harm the appreciation or views of St Paul's Cathedral or other landmarks identified in this LVMF view.

View 6A.1 – Blackheath Point

94. The site lies within the Wider Setting Consultation Area (left lateral) of the Blackheath Point Protected Vista (London Panorama). The proposal breaches the consultation threshold height by some 2.62 m. However, the scheme is located some distance to the north east of the Cathedral and will not harm the appreciation or views of St Paul's Cathedral or other landmarks identified in this LVMF view.

Impact on significance and setting of listed buildings

A number of listed buildings are located in close proximity of the site.

Holy Sepulchre Without Newgate Church

95. The proposal will appear as an eye-catching neighbour to this Grade 1 listed Church but not in a manner which harms its setting or significance. The Church, on Holborn Viaduct, is characterized by the mature canopy and greenery of the imposing London Plane trees and its grassed churchyard. The green walled facades of the proposed building will relate comfortably with this landscaped setting enabling the robust stone Church and its tower to be read against a foreground and background of greenery. The height and scale of the proposed building on this key townscape book end site is considered appropriate and is located at a sufficient distance from the Church so as not to over-dominate. In this respect the proposal is not considered to harm the setting or significance of the listed Church or the ancillary buildings to its rear.

4 and 5 Snow Hill

96. These Grade 2 listed buildings (which includes Snow Hill Police Station) are located at mid-terrace in the tight urban block on the north side of Snow Hill. The dynamic green façade of the proposed development will appear as a strong and eye-catching element in views along Snow Hill and Holborn Viaduct in the foreground in views of the listed buildings. There will be a dynamic contrast between the robust masonry and the dynamic softer green facades of the new development which is considered appropriate and an interesting juxtaposition. The setting and significance of these listed buildings will not be harmed.

Holborn Viaduct

97. The Grade 2 listed bridge and its associated Gatehouses are a distinctive Victorian landmark in this part of the City. The proposed development will be viewed in the foreground and background of the bridge where it will appear as an eye-catching green façade contrasting with the stone and glazed façades on Holborn Viaduct but merging in a convincing manner with the mature tree canopy of the London Plane trees on the south side of Holy Sepulchre Church. The setting and significance of the listed Viaduct and gatehouses will not be harmed.

1-8 Holborn Viaduct

15 Old Bailey

98. The Grade 2 listed building, built originally as a hotel, stands to the south east of the site. The proposed development will appear as a green walled façade in the foreground and background of the listed building in views along Holborn Viaduct and Snow Hill. The green facades will contrast with the robust stone facades of the listed building in a convincing manner, in particular, in views along Snow Hill, where the living green façade will relate attractively with the mature London Plane trees framing views of the listed building. The setting and significance of the listed building will not be harmed.

Smithfield Market (West Market and Poultry Market)

99. These Grade 2* and Grade 2 listed buildings stand to the north of the site. In views along West Smithfield and West Poultry Avenue, the green walled facades of the proposed development will appear as an eye-catching backdrop looking south west but not in a manner which harms the setting or significance of either listed building.

The Old Bailey (Central Criminal Court)

100. This Grade 2* listed building is located to the south east of the development. In views west, in particular along Newgate Street, the proposal will appear as a green walled prow behind the mature London Plane trees of Holy Sepulchre churchyard which will contribute positively in creating a green backdrop in views of the north elevation of the Old Bailey. Furthermore, the public roof terrace which forms part of the proposal will offer exceptional new elevated public views of the cupola of the Old Bailey, a significant public benefit. The development is not considered to harm the setting or significance of this important listed building.

The Viaduct Tavern (126 Newgate Street)

101. This Grade 2 listed corner public house is located to the east of the site. In views westwards along Newgate Street the green walled facades and corner prow of the proposal will appear alongside the London Plane trees in St Sepulchre's churchyard contributing positively to the green backdrop to the listed pub. The setting or significance of the listed building will not be harmed.

St Paul's Cathedral

102. Although some distance away to the south east, the impact of the proposal on London wide views of St Paul's is discussed in the assessment of LVMF views. The free to visit public roof terrace which forms part of the proposal will offer high quality elevated public views of St Paul's which is considered to be a significant public benefit.

Impact on the significance of conservation areas

The site is adjacent to or in close proximity to two conservation areas, Newgate and Smithfield.

Smithfield Conservation Area

103. This Conservation Area is located to the north and east of the site. The proposed development marks a major approach to the Conservation Area and will appear as an eye catching green walled façade in views along Snow Hill and Smithfield. The proposal will not harm the setting, character and appearance of these views and will appear as a convincing frontage, re-introducing the tight grain and definition of Snow Hill as was the case in the 1880's building destroyed in the war as well as providing a softer green backdrop in these views.

Newgate Street Conservation Area

104. This Conservation Area is located to the south and east of the site and includes Holy Sepulchre's Church. The principal impact of the proposal in these views is the appearance of the green walled prow of the development merging with the mature canopy of the London Plane trees in churchyard in views westwards. This impact is considered to be a positive one which complements the listed Church's setting. The setting, significance, character and appearance of the Conservation Area is not harmed.

Non-designated Heritage Assets

105. The proposed development would not impact on the significance of any non-designated heritage assets in its vicinity.

Inclusive Design

106. The proposed scheme has been designed to be inclusive and stepfree access to all parts of the building and roof terraces is secured.
107. It provides a designated wheelchair accessible parking space and including charging and mobility scooter charging.
108. 5% of the cycle spaces are capable of accommodating larger/adapted cycles and with a suitable shower and WC is provided adjacent.
109. 10% of the hotel bedrooms are wheelchair accessible, 9% of which are designed for independent use and 1% for assisted use with the provision of a fixed ceiling track hoist and peninsular layout toilet en-suite.
110. In addition, an accessible baby changing facility and a changing places toilet is to be provided in the reception area.
111. At least one lift is to be designed so that it can be used as part of the evacuation strategy.
112. The Access Officer welcomes the comprehensive Access Statement and seeks the preparation of an Accessibility Management Plan in accordance with the London Plan. However, she has a number of details comments in relation to positioning and width of doors, access width, width of ramps, materials and manifestations and seating provisions.
113. Details of these will be required by Condition as well as the provision of an Access Management Plan.

Transport implications

Servicing

- 114. The building is serviced from a loading bay located to the north of the site accessed from Snow Hill. It provides space for a single disabled parking bay and bays and for two service vehicles at any one time.
- 115. The loading area is located above the railway tunnels' slab and due to structural constraints can only accommodate vehicles up to 7.5tonnes.
- 116. This requires the site to be serviced by smaller vehicles which the developer has indicated is feasible (and this will be the subject of a condition) except for the refuse vehicles which will require refuse to be collected from the street. A bin store is located to the rear of the loading bay and the bins will be brought out in accordance with a management strategy, to be agreed so that they are not left in the street. A S278 agreement will be required to mitigate any impact on cycling as Snow Hill is part of the future cycling programme.
- 117. The applicant has predicted that there will be 16 deliveries per day to service both the offices and the hotel.
- 118. The scheme would be subject to the requirement for a Delivery and Servicing Plan to be agreed that would restrict the number of vehicles and require that there would be no deliveries between the hours of 7am-10am, 12noon-2pm and 4pm-7m.
- 119. A booking system would be required for all deliveries as well as a Consolidation Strategy which would be secured through the hotel group's other two hotels located within 1.5 miles of the site.
- 120. A legal agreement would require the developer to strengthen the pipe subway next to the entrance to the loading bay at the developer's expense in order to enable 7.5 tonne vehicle movements to cross it.

Cycle parking

- 121. The scheme provides 109 long-stay cycle parking spaces and 27 short-stay cycle parking spaces (total 136).
- 122. The Draft London Plan would require a minimum of 97 long-stay and 48 short-stay cycle parking spaces (total 145) in order to be compliant.
- 123. The proposals for the long-stay cycling parking exceed the Draft London Plan, although the short-stay cycle parking is not compliant.
- 124. The applicant has provided 12 additional long-stay cycle parking spaces in lieu of short-stay cycle parking, pointing out that 20% of the people who eat at the restaurant are expected to be hotel guests. The applicant argues that providing additional cycle parking spaces would amount to double counting. During negotiations the applicant increased its short-stay cycle parking spaces offer by a further 13 resulting in the 27 outlined. This is considered to maintain an appropriate balance between cycling parking provision and an exceptional public realm
- 125. There should be a minimum of 11 showers and locker provision for 109 respectively (1 shower per 10 cycle parking spaces, and one locker per

cycle parking space and this would be subject to a condition. For information the showers are located in two places: lower ground (7 showers) for the office and retail uses and at Basement 3 (4 showers) for hotel workers.

126. The developer has agreed to enter discussions around a S278 agreement which may provide some public cycle parking, in addition to that proposed as well as more spaces on their private land.

Coach parking

127. The hotel will not attract coaches and the applicant has accepted a Section 106 clause limiting their use by restricting group bookings.

Public Transport

128. The site has the highest level of public transport provision with a PTAL of 6B. the site is opposite Holborn Viaduct Thameslink station, close to Farringdon Underground the Elizabeth Line station and the underground stations for St Paul's and Chancery Lane are in close proximity. The site is close to a large number of bus routes running past the site or close by. This high level of provision is likely to reduce the demand for taxis.
129. The building is anticipated to attract 3,552 persons per day. The pavements adjoining the site are of a generous width and with the set-backs along the southern edge and the accessible public space at the corner will result in an acceptable impact on the public realm.

Projections

130. There are no projections proposed over the public highway. The planting system is within the red line ownership boundary and without any containers projecting into the public highway.

Security

131. The scheme has been designed taking into account Secure by Design principle as well as recognising the nature of the proposed uses, the public terrace and the proximity of the site to other sensitive site users.
132. CCTV is to be incorporated and access would be controlled to non-public parts of the building.
133. The high-level terrace will be managed through security checks and CCTV and the enclosing glazed balustrade will be 1.8m. high to limit the potential risk of suicides.

Energy and sustainability

134. BREEAM: The Energy Statement and Sustainability Strategy prepared by the Applicant indicates that this development has been designed to achieve a BREEAM rating of "Excellent" for both the hotel and the office areas. For the City's priority credits the BREEAM pre assessment shows that high credits have been achieved for Energy and Materials with lower scores for Water and Pollution. The City is an Air Quality Management

Area and an area of water stress therefore every effort should be made to improve the water and pollution BREEAM credits.

135. A post construction BREEAM assessment is required by condition with the aim of maximising BREEAM credits for the City's priorities: Energy, Materials, Water and Pollution.
136. Energy Strategy: The Energy Statement shows that this development has been designed to achieve a carbon reduction of 37.16% compared to a Building Regulations compliant building. This has been achieved through energy efficiency measures, the use of Aerothermal heat pumps and high efficiency gas boilers.
137. Although no carbon offsetting contribution is required a S106 carbon offsetting agreement is required in case the final development fails to meet carbon targets
138. This development has been designed to comply with London Plan targets for major development. The new London Plan target is anticipated to require all new development to be zero carbon, and the City has an aspiration to be combustion free, therefore any further improvement to carbon performance should be sought

Archaeology

139. The site is an area of archaeological potential situated to the west of the Roman and medieval walled City, to the north of a major Roman road and on the eastern edge of the Fleet River valley. There is potential for Roman remains including burials, and features associated with or adjacent to the Roman road and 19th century remains. An Historic Environment Assessment and an Archaeological Evaluation Report has been submitted with the application.
140. The archaeological reports set out the archaeological potential and impact of the existing building. There would be no remains surviving where the rail tunnel crosses the west part of the site or the southern edge which is adjacent to Holborn Viaduct. The results of the archaeological evaluation have shown that the archaeological potential is limited and only cut features such as pits and wells are likely to have survived. There is potential for Roman remains to have survived.
141. Conditions are recommended to cover a programme of archaeological work and foundation design to record archaeological remains affected by the proposed development.

CIL and Planning Obligations

142. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

143. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
144. From 1 April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayor's planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
145. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£3,461,955	£3,323,477	£138,478

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	£1,833,600	£1,741,920	£91,680
City Planning Obligation Affordable Housing	£488,960	£484,070	£4,8902
City Planning Obligation Local, Training, Skills and Job Brokerage	£73,344	£72,611	£733
Carbon Reduction Shortfall (as designed)	£380,214	£380,214	£0
Section 278 Design and Evaluation	£	£	£0
City Planning Obligation Monitoring Charge	£1,750	£0	£1750
Total liability in accordance with the City of London's policies			£99,053

City's Planning Obligations

146. 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.

- Highway Reparation and other Highways obligations
- Delivery and Servicing Management Plan to include consolidation
- Travel Plan/cycling promotion plan
- Restriction of coaches
- Local Training, Skills and Job Brokerage Strategy (Construction)
- Local Procurement
- Carbon Offsetting
- Section 278 Agreement
- Reinforcement of the pipe subway prior to commencement
- Free public access to the roof terrace
- Incubator space for start-ups at a reduced charge or an initial 3 month charge free period to be subject to further negotiation.

147. 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

148. A 10-year repayment period would be required whereby any unallocated 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.

149. 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.

Site Specific Mitigation

150. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the area. In some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

Residential Amenity

151. With the exception of the residential unit in the tower of Holy Sepulchre without Newgate Church there are no residential units which adjoin the site. However, there are 28 residential units in 32 and 37 Cock Lane and 124 residential units in 10 Hosier Lane, 6 residential units at 8-9 Giltspur Street and one unit in the Watch Tower, Giltspur Street.

152. There is potential that noise emanating from the terrace could result in disturbance to adjoining residents.

153. A condition will be imposed requiring no amplified, live or other music to be played on the terrace.
154. Environmental Health have requested that there be no use of the terrace at Levels 10 and 11 between 11pm-8am and at no time on Sunday or Bank holidays.
155. In that there this is in conjunction with an hotel and a public terrace it is considered that this is overly restrictive and that Sunday and Bank holiday opening should be allowed with a closing time of 9pm.

Noise

156. Conditions have been imposed to mitigate the noise impact from the operation of plant and mechanical systems including extraction systems for ventilation and fumes.

Demolition and Construction

157. Demolition to slab level ?? is being undertaken in accordance with the previously approved prior approval.
158. Construction and any outstanding demolition will be subject to conditions in accordance with the normal practice to safeguard the amenity of adjoining occupants and residents.

Conclusion

159. The development is regarded as acceptable in land-use terms and is a progressive and exciting response to an increase in urban greening appropriate to this location subject to compliance with the recommended conditions and the conclusion of the Section 106 agreement which would include S278 requirements.

Background papers

The Revd David Ingall Letter 21 October 2019

Network Rail email 31 October 2019

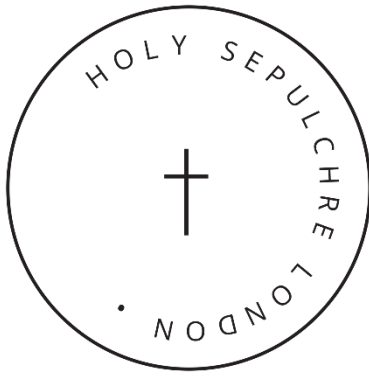
Transport for London letter 17 October 2019

Thames Water email 29 October 2019

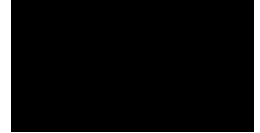
London Borough of Lewisham email 6 November 2019

London Borough of Tower Hamlets letter 30 October 2019

Natural England email 14 November 2019



Rev'd David Ingall,
Holy Sepulchre London,
Holborn Viaduct,
London,
EC1A 2DQ



21 October 2019
6156.01

L Hart Esq
Case Officer City of London,
Planning Department
PO Box 270 Guildhall
London EC2P 2EJ

Dear Mr Hart

Your ref: 19/01038/FULMAJ - 61-65 Holborn Viaduct, London EC1A 2FD
By email [PLNComments@cityoflondon.gov.uk] and post

I am writing as the Rector of Holy Sepulchre London (also known as St. Sepulchre-without-Newgate) and on behalf of the Parochial Church Council, in regard to the application referenced above for a planning consent under consideration by your Department.

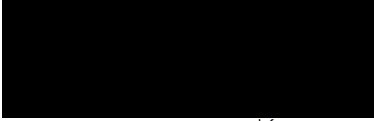
In particular:

1. There are Daylight and sunlight implications for the church, and these have not yet been addressed.
2. The proposed development has implications for the setting of the Grade I Listed building. In particular, the height of the new building will be increased if the scheme is constructed as shown on the application, and the green walling for the façade whist striking will have a material impact both aesthetically and possibly in relation to wind borne abrasion, etc.
3. There appear to be a number of roof terraces on the proposed development at differing levels in close proximity to the church and in particular, the residential accommodation within the southwest porch of the church. This has the potential to cause significant overlooking and noise.
4. There are concerns about the impact that demolition and construction related dust, noise, vibration and structural movement could have on the church, both as a physical Heritage Asset, and a Place of Worship / community use building.

The Church has had initial discussions with the agent for the proposed Developer. These discussions have been very positive, and we are hoping to agree suitable mitigation measures in order to address the issues detailed above, which would enable us to support the application. However, the discussions

are on-going and likely to continue to be so for some time. Until such time as suitable mitigation measures have been agreed, please could the Corporation of London Planning Department take this emailed letter as a means of lodging a 'holding objection' to the proposed scheme, as submitted?

Yours sincerely

A black rectangular box redacting the signature of David Ingall.

David Ingall
(Rector, and Chair of the PCC, Holy Sepulchre London)

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 2.18 Protect, promote, expand and manage the extent and quality of and access to London's network of green infrastructure.

Policy 3.2 New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

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 4.6 Support the continued success of London's diverse range of arts, cultural, professional, sporting and entertainment enterprises and the cultural, social and economic benefits that they offer to its residents, workers and visitors.

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 SPG

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 5.12 Development proposals must comply with the flood risk assessment and management requirements set out in PPS25 and address flood resilient design and emergency planning; development adjacent to flood defences will be required to protect the integrity of existing flood defences and wherever possible be set back from those defences to allow their management, maintenance and upgrading to be undertaken in a sustainable and cost effective way.

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

Policy 5.15 (Water Use and Supplies) sets out a series of ways to achieve the objective “to protect and conserve water supplies and resources”. This includes supporting schemes which incorporate water saving measures.

Policy 5.17 (Waste Capacity) states that development proposals should seek to reduce waste production and also encourage reuse and recycling, through on-site facilities and space.

Policy 5.18 Encourage development waste management facilities and removal by water or rail transport.

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 6.10 (Walking) encourages new developments to “ensure high quality pedestrian environments and emphasise the quality of the pedestrian and street space.”

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

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. does 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 7.10 Development in World Heritage Sites and their settings, including any buffer zones, should conserve, promote, make sustainable use of and enhance their authenticity, integrity and significance and Outstanding Universal Value.

Policy 7.11 (London View Management Framework) Manage the impact of development on key panoramas, river prospects and townscape views.

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 7.13 Development proposals should contribute to the minimisation of potential physical risks, including those arising as a result of fire, flood and related hazards.

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

Policy 7.15 Minimise existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals and separate new noise sensitive development from major noise sources.

Policy 7.19 Development proposals should, wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity.

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.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

- a) new accommodation suitable for small and medium sized businesses or occupiers;
- b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
- c) continued use of existing small and medium sized units which meet occupier needs.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

CS3 Ensure security from crime/terrorism

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing

public and corporate confidence in the City's role as the world's leading international financial and business centre.

DM3.2 Security measures

To ensure that security measures are included in new developments, applied to existing buildings and their curtilage, by requiring:

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;
- c) that security is considered at the concept design or early developed design phases of all development proposals to avoid the need to retro-fit measures that impact on the public realm;
- d) developers to seek recommendations from the City of London Police Architectural Liaison Officer at the design stage. New development should meet Secured by Design principles;
- e) the provision of service management plans for all large development, demonstrating that vehicles seeking access to the building can do so without waiting on the public highway;
- f) an assessment of the environmental impact of security measures, particularly addressing visual impact and impact on pedestrian flows.

DM3.5 Night-time entertainment

- 1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:
 - a) the amenity of residents and other noise-sensitive uses;
 - b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
- 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS4 Seek planning contributions

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

CS5 Meet challenges facing North of City

To ensure that the City benefits from the substantial public transport improvements planned in the north of the City, realising the potential for rejuvenation and "eco design" to complement the sustainable transport infrastructure.

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.

DM10.3 Roof gardens and terraces

- 1) To encourage high quality roof gardens and terraces where they do not:
 - a) immediately overlook residential premises;
 - b) adversely affect rooflines or roof profiles;
 - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
 - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

The City Corporation will work in partnership with developers, Transport for London and other organisations to design and implement schemes for the enhancement of highways, the public realm and other spaces. Enhancement schemes should be of a high standard of design, sustainability, surface treatment and landscaping, having regard to:

- a) the predominant use of the space, surrounding buildings and adjacent spaces;
- b) connections between spaces and the provision of pleasant walking routes;
- c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
- d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
- e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
- f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
- g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;

- h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
- i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
- j) the use of high quality street furniture to enhance and delineate the public realm;
- k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

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 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 Allow hotels in suitable locations

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 by (inter alia) allowing hotels that support the primary business or cultural role and refusing hotels where they would compromise the City's business function.

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.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

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.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.
4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.
5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.3 Cycle parking

1. On-site cycle parking must be provided in accordance with the local standards set out in Table 16.2 or, for other land uses, with the standards of the London Plan. Applicants will be encouraged to exceed the standards set out in Table 16.2.
2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

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.

CS18 Minimise flood risk

To ensure that the City remains at low risk from all types of flooding.

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.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

To encourage healthy lifestyles for all the City's communities through improved access to open space and facilities, increasing the amount and quality of open spaces and green infrastructure, while enhancing biodiversity.

DM19.1 Additional open space

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.

2. New open space should:
 - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
 - b) provide a high quality environment;
 - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
 - d) have regard to biodiversity and the creation of green corridors;
 - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

Developments should promote biodiversity and contribute to urban greening by incorporating:

- a) green roofs and walls, soft landscaping and trees;
- b) features for wildlife, such as nesting boxes and beehives;
- c) a planting mix which encourages biodiversity;
- d) planting which will be resilient to a range of climate conditions;
- e) maintenance of habitats within Sites of Importance for Nature Conservation.

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.

CS21 Protect and provide housing

To protect existing housing and amenity and provide additional housing in the City, concentrated in or near identified residential areas, as shown in Figure X, to meet the City's needs, securing suitable, accessible and affordable housing and supported housing.

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:
 - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;

b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.

5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

SCHEDULE

APPLICATION: 19/01038/FULMAJ

61-65 Holborn Viaduct London EC1A 2FD

Demolition of existing building structure and erection of a mixed-use building comprising four basement levels, lower ground, ground and ten upper storeys for (i) hotel use (Class C1) at part basement levels one to four, part lower ground, part ground and part first, and second to tenth floors levels; (ii) restaurant / bar use (Class A3/A4) at part tenth floor level; (iii) office workspace use (Class B1) at part basement levels one to three, part lower ground and part first floor levels; (iv) flexible hotel / cafe / workspace (Sui Generis) at part ground floor level; (v) a publicly accessible terrace at roof level and; (vi) ancillary plant and servicing, hard and soft landscaping and associated enabling works.

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three 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 Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.
REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction
- 3 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 be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. 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.

- 4 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 be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. 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.

- 5 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or 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.

- 6 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. 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.

- 7 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.

- 8 There shall be no construction or excavation on the site 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 and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition 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 demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution)

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

- 9 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, pumps, green roof, design for system exceedance, design for ongoing maintenance,; surface water flow rates shall be restricted to no greater than 2 l/s from one outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 150m³;
 - (b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works
- REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
- 10 The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) have been submitted to and approved in writing by the local planning authority which:
- (i) provide details on all structures
 - (ii) written approval from London Underground prior to works commencing
 - (iii) accommodate the location of the existing London Underground structures and tunnels
 - (iv) accommodate ground movement arising from the construction thereof.
- Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2015 Table 6.1 and 'Land for Industry and Transport' Supplementary Planning Guidance 20

- 11 All unbuilt surfaces shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.
- 12 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.
- 13 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.
- 14 The roof terraces on levels 10 & 11 hereby permitted shall only be used or accessed between the hours of 08:00 and 23:00 on Monday to Saturday and between 0800 and 2100 on Sundays and Bank Holidays other than in the case of emergency.
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.

- 15 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.
- 16 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 17 No cooking shall take place within any Class A1, A3, A4 or A5 unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. 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. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- 18 Unless otherwise approved by the LPA there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 19 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

- 20 Unless otherwise approved in writing by the Local Planning Authority, before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.
REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DM10.1.
- 21 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.
- 22 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.
- 23 (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.

- 24 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.

- 25 The development shall not be occupied until confirmation has been provided that either:- 1. Capacity exists off site to serve the development, or 2. A housing and infrastructure phasing plan has been agreed with Thames Water. Where a housing and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan, or 3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed.

Reason: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents.

- 26 The development shall not be occupied until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows from the development have been completed; or - a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

Reason: The development may lead to no / low water pressure and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development.

- 27 No construction shall take place within 5m of the water main unless information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.

Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure.

- 28 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 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 water utility infrastructure.

- 29 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) 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.

- 30 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.

- 31 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

- 32 The whole of the development shall only be serviced by vehicles of up to 7.5tonnes for the life of the building.
REASON: To ensure that all delivery vehicles can enter the loading bay and service off-street in accordance with the following policies of the Local Plan: DM16.1, DM21.3.
- 33 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety
- 34 The proposed development shall provide 19,179 sq. m of Class C1 hotel floorspace (382 rooms), 3,741 sq. m of B1 office floorspace, 1,014 of flexible hotel/cafe/workspace (sui generis), 514 sq. m of Class A3/A4 restaurant/bar and 514 sq. m of publicly accessible roof terrace.

Reason: to ensure the development is carried out in accordance with the approved plans.
- 35 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.
- 36 Permanently installed pedal cycle storage shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 109 Long Stay pedal cycles (5% of which should be for larger/adapted cycles) and 27 short-stay pedal cycles. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking. A minimum of 11 showers and 109 lockers shall be provided and maintained.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

- 37 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 the proposed new facade(s) including typical details of the fenestration and entrances;
 - (c) details of loading bay doors;
 - (d) details of ground floor elevations;
 - (e) details of the green wall planting
 - (f) details of windows and external joinery;
 - (g) details of soffits, hand rails and balustrades;
 - (h) details of external terraces including planting and biodiversity measures e.g. bird boxes;
 - (i) details of junctions with adjoining premises;
 - (j) details of the integration of window cleaning equipment, cradles and the garaging thereof, plant, flues, fire escapes, solar panels and other excrescences at roof level
 - (k) details of plant, plant enclosures and ductwork;
 - (l) details of ventilation and air-conditioning for the A3, A4 and sui generis uses.
 - (m) details of external lighting
 - (n) an advertisement strategy
- 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.
- 38 A minimum of 10% of the hotel bedrooms shall be wheelchair accessible, comprising 9% designed for independent use and 1% for assisted use as set out in the Access Statement.
Reason: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8
- 39 Prior to first occupation of the hotel an Accessibility Management Plan shall be su

- 40 No servicing of the premises shall be carried out between the hours of:

07:00hrs and 09:00hrs, 12:00hrs and 1400hrs, 16:00hrs and 19:00hrs, Mondays to Fridays.

Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To manage traffic, avoid congestion and manage the safe and convenient movement of pedestrians and cyclists in the area and to reduce air and noise pollution, in accordance with the following policies of the Local Plan: DM15.7, DM15.7, DM16.1, and DM16.

- 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:

6174-20-195; 6174-20-196; 6174-20-197A; 6174-20-198A; 6174-20-199A; 6174-20-200A; 6174-20-201B; 6174-20-202; 6174-20-203; 6174-20-204; 6174-20-205; 6174-20-206; 6174-20-207; 6174-20-208; 6174-20-209; 210A; 6174-20-211; 6174-20-300; 6174-20-301; 6174-20-400; 6174-20-401; 6174-20-402; 6174-SK-120 REV A

INFORMATIVES

- 1 Given the proximity of the proposed development to Network Rail's land and the risk this poses to Network Rail's railway tunnels, Network Rail requests the developer contacts AssetProtectionLondonSouthEast@networkrail.co.uk prior to any works commencing on site, and also to agree an Asset Protection Agreement with them to enable approval of detailed works. The design will need to satisfy Network Rail's Asset Protection team that the proposed developed will have minimal impact and interface with the tunnel and the railway infrastructure within.

- 2 The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office J185 sq.m

Retail J165 sq.m

Hotel J140 sq.m

All other uses J80 per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of J75 per sq.m for offices, J150 per sq.m for Riverside Residential, J95 per sq.m for Rest of City Residential and J75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 3 The investigation and risk assessment referred to in condition **** must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site. The contents of the scheme must be submitted to and approved in writing of the Local Planning Authority. The investigation and risk assessment must be undertaken by competent persons and a written report of the findings must be produced. The written report must be submitted to and approved in writing by the Local Planning Authority. The report of the findings must include:

(i) a survey of the extent, scale and nature of contamination;

(ii) an assessment of the potential risks to:

- human health,
- property (existing or proposed) including buildings, open spaces, service lines and pipes,
- adjoining land,
- groundwaters and surface waters,
- ecological systems,
- archaeological sites and ancient monuments;

(iii) an appraisal of remedial options, and proposal of the preferred option(s).

This investigation and risk assessment must be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.

- 4 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a)

The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)

Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d)

Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

Air Quality

(e)

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Boilers and CHP plant

(f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

(j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be

obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Noise Affecting Residential Properties

(m)

The proposed residential flats are close to busy roads and are in an existing commercial area which operates 24 hours a day. The scheme should include effective sound proofing of the windows and the provision of air conditioning or silent ventilation units to enable the occupants to keep their windows closed to benefit from the sound insulation provided. This may need additional planning permission.

(n)

The proposed residential units are located in a busy City area that operates 24 hours a day and there are existing road sweeping, deliveries, ventilation plant and refuse collection activities that go on through the night. The units need to be designed and constructed to minimize noise disturbance to the residents. This should include acoustic treatment to prevent noise and vibration transmission from all sources. Sound insulation treatment needs to be provided to the windows and either air conditioning provided or silent ventilation provided to enable the windows to be kept closed yet maintain comfortable conditions within the rooms of the flat. This may need additional planning permission.

Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof

level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

(r)

From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: www.smokefreeengland.co.uk.

- 5 The Director of Markets and Consumer Protection states that any building proposal that will include catering facilities will be required to be constructed with adequate grease traps to the satisfaction of the Sewerage Undertaker, Thames Water Utilities Ltd, or their contractors.

- 6 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.

- 7 The correct street number or number and name must be displayed prominently on the premises in accordance with regulations made under Section 12 of the London Building Acts (Amendment) Act 1939. Names and numbers must be agreed with the Department of the Built Environment prior to their use including use for marketing.

- 8 Consent may be needed from the City Corporation for the display of advertisements on site during construction works. The display of an advertisement without consent is an offence. The City's policy is to restrain advertisements in terms of size, location, materials and illumination in order to safeguard the City's environment. In particular, banners at a high level on buildings or scaffolding are not normally acceptable. The Built Environment (Development Division) should be consulted on the requirement for Express Consent under the Town & Country Planning (Display of Advertisements) (England) Regulations 2007.

- 9 The Department of the Built Environment (Transportation & Public Realm Division) must be consulted on the following matters which require specific approval:

(a) Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works. In this regard the City of London Corporation operates the Considerate Contractors Scheme.

(b) The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the Department of the Built Environment Transportation and Public Realm Division is recommended to ensure the design of the building provides for the inclusion of street lighting.

(c) The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway).

You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner. Please contact the Corporate Property Officer, City Surveyor's Department.

(d) Bridges over highways

(e) Permanent Highway Stopping-Up Orders and dedication of land for highway purposes.

(f) Declaration, alteration and discontinuance of City and Riverside Walkways.

(g) The provision of City Walkway drainage facilities and maintenance arrangements thereof.

(h) Connections to the local sewerage and surface water system.

(i) Carriageway crossovers.

(j) Servicing arrangements, which must be in accordance with the City of London Corporation's guide specifying "Standard Highway and Servicing Requirements for Development in the City of London".