

Committee:	Date:
Planning and Transportation	24 February 2021
Subject: 2-3 Finsbury Avenue London EC2M 2PF Demolition of the existing buildings and construction of a new building arranged over three basement levels, ground and 37 upper floors to provide an office-led, mixed use development comprising commercial, business and service uses (Class E), flexible commercial, business and service uses /drinking establishment uses (Class E/Sui Generis); and learning and non-residential institutions uses (Class F1); creation of a new pedestrian route through the site at ground floor level; hard and soft landscaping works; outdoor seating associated with ground level uses and other works incidental to the development.	Public
Ward: Bishopsgate	For Decision
Registered No: 20/00869/FULEIA	Registered on: 4 November 2020
Conservation Area:	Listed Building: No

Summary

Planning permission is sought for: Demolition of the existing buildings and construction of a new building arranged over three basement levels, ground and 37 upper floors to provide an office-led, mixed use development comprising commercial, business and service uses (Class E), flexible commercial, business and service uses /drinking establishment uses (Class E/Sui Generis); and learning and non-residential institutions uses (Class F1); creation of a new pedestrian route through the site at ground floor level; hard and soft landscaping works; outdoor seating associated with ground level uses and other works incidental to the development.

An Environmental Statement accompanies the scheme.

The proposed development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. The office space would be complemented by an exemplar 'Open Learning Hub' (Class F1) at ground, first and second floor levels at the north west corner, facing onto Wilson Street and Sun Street. The vision for the Open Learning Hub is to create a shared resource and an accessible and inclusive route into the knowledge and expertise of the City for use by local communities and networks.

The proposed development would deliver the highest architectural quality through two dynamic towers coherently connected by a podium which would deliver an engaging, distinctive and vibrant building designed to be responsive at a macro and local context. The development would be a positive and lasting addition to the skyline and the streetscapes and represents a responsive approach to bulk, height, scale, massing, quality of materials and detailed design.

The building would be designed to high sustainability standards, incorporating a significant element of climate resilience, energy efficiency, targeting BREEAM 'Outstanding' and adopting Circular Economy Principles and integrated urban greening.

Dedicated areas of planting and greening would be incorporated into the development through a combination of external terraces with perimeter planting; green walls; and new tree planting at ground level within the surrounding public realm.

The scheme delivers significant public realm enhancements, including a generously proportioned north-south passageway through the site, connecting Sun Street and Finsbury Avenue Square with a minimum of 732 sqm of active ground floor commercial units (suitable for drinking establishments and restaurants).

The increase in floorspace and occupation places extra pressure on the comfort and safety of the City's streets. The overall width of the existing pavements around the site would be enlarged to increase their capacity and improve pedestrian comfort levels. Overall, the PCLs are much improved due to the setting back of the building and the new, step free, public pedestrian route through the development.

Objections have been received from neighbouring occupiers at One Crown Place (OCP) relating to the design, massing and the impact on townscape views of the development, its impact on designated and non-designated heritage assets and the impact on the environment and amenity (daylight and sunlight) of the immediately surrounding area and the building at One Crown place. This report has considered these impacts, and conditions have been recommended to mitigate the impacts including the implementation of wind mitigation measures.

The site does not lie in an area which is considered to be inappropriate for a tall building. The site is considered suitable for tall buildings having regard to the criteria set out in policy CS14(3) of the Local Plan. The proposed height is considered acceptable in the context of an existing and emerging cluster of tall buildings on the City Fringe. The proposal complies with Local Plan Policy CS14, draft City Plan Policy S12, London Plan Policy 7.7 and draft Publication London Plan D9. The proposal would not harm and would protect pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and draft

Publication London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. Following rigorous assessment, it is concluded that the proposal would preserve the setting and significance of St Paul's Cathedral and comply with LVMF SPG and Protected Views SPD.

The proposal would preserve the special interest/significance and setting of 1 Finsbury Avenue, Park House and Garden House , Britannic House , Salisbury House , 25 London Wall, Lutyens House, The Flying Horse Public House St Botolph without Bishopsgate Church St Botolph Church Hall , Bishopsgate Parish Memorial and drinking fountains and over throws. The proposal would preserve the special interest/significance and setting of the Finsbury Circus, Bunhill Fields and Finsbury Square, Bishopsgate and Sun Street Conservation Areas. In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting. The application proposals accord with London Plan policy 7.8, Local Plan policies CS12, DM12.1, DM12.3 and DM12.4, draft Publication London Plan policy HC1 and with the emerging City Plan policy HE1. The objective set out in section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in particular that of preserving the settings of listed buildings is achieved.

The proposed development would have a Major Adverse impact on the daylight and sunlight to a number of rooms within the soon to be completed development at One Crown Place. Despite failure to comply with BRE criteria , it is not considered that the proposal would result in an unacceptable impact on residential amenity in the context of the location of the site in a densely developed City Centre location, and will not reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels. As such, the extent of harm is not considered to be such as to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is also the view of officers that the proposals would not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, and that London Plan policy 7.6B is complied with. Officers also consider that surrounding housing will enjoy sufficient daylight and sunlight which is appropriate for its context, and that draft Publication London Plan policy D6D is complied with In any event, it is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace and contributing to the City's primary business and professional services function, outweighs the identified Major Adverse impact.

The development would regenerate the Liverpool Street area through improved public realm connectivity and activation and represents good growth. This development would be an exemplary in its progressive approach to sustainable, circular, accessible and behavioural design addressing many of the key issues facing the City, London and the UK by providing a state of the art workplace that contributes to the local environment, City workers and local communities.

It is the view of officers that the proposal complies with the development plan when considered as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached.

Recommendation

(1) That the Chief Planning Officer be authorised to grant planning permission for the above proposal in accordance with the details set out in the attached schedule, subject to:

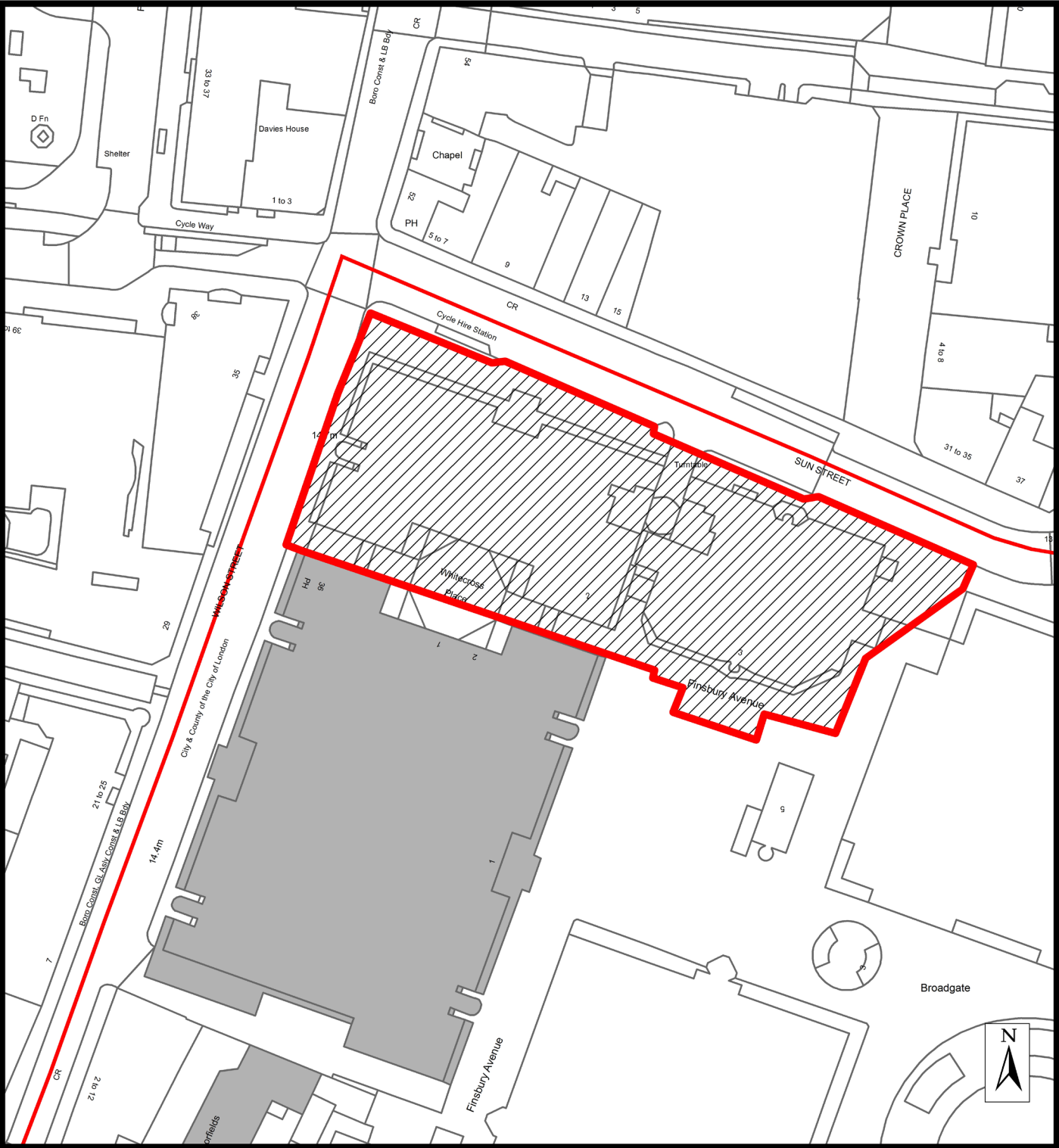
a) The Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);

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

(2) 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 Highway Act 1980.

(3) That your Officers be authorised to provide the information required by regulations 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, and to inform the public and the Secretary of State as required by regulation 30 of those regulations.





Site Location Plan



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ADDRESS:
2-3 Finsbury Avenue, London EC2M 2PA

CASE No.
20/00869/FULEIA

-  **SITE LOCATION**
-  **LISTED BUILDINGS**
-  **CONSERVATION AREA BOUNDARY**
-  **CITY OF LONDON BOUNDARY**



Wilson Street / Sun Street Corner Aerial



Wilson Street / Sun Street Corner



Sun Street (Looking East)



Wilson Street (Looking North)



Finsbury Avenue Square



Finsbury Avenue Square



Main Report

Environmental Impact Assessment

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - a) To examine the environmental information
 - b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination
 - c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to above is up to date. A reasoned conclusion is to be taken to be up to date if, in the opinion of the relevant planning authority, it addresses the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development. The draft statement attached to this report at Appendix A and the content of this report set out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions address the significant effects of the proposed development on the environment that are likely to arise as a result of the proposed development and that reasoned conclusions set out in the statement are up to date.
5. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information to be examined and taken into account by your Committee.

6. The Environmental Statement is available online, together with the application, drawings, relevant policy documents and the representations received in respect of the application.
7. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The additional information (being further information and any other information) which forms part of the environmental information is also available online along with any further representations received in conjunction with the information.

Site and Surroundings

8. The Site is located at the north west corner of the Broadgate campus, on the northern side of Finsbury Avenue Square. It has frontages to Finsbury Avenue Square and Whitecross Place to the south, Sun Street to the north and Wilson Street to the west. The Site is 0.49 hectares (ha) in area.
9. Broadgate is located on the north eastern edge of the City of London. Immediately north of Sun Street lies the London Borough of Hackney in an area identified in the London Plan as the City Fringe. Immediately to the west across Wilson Street and to the northwest is the London Borough of Islington. Liverpool Street Station and Bishopsgate lie to the east of the site, beyond which is the London Borough of Tower Hamlets.
10. The Broadgate campus is a major office location serving the financial, legal and other sectors. The campus is undergoing a process of renewal to ensure that it remains a global business destination and is the subject of major investment in the redevelopment and refurbishment of existing buildings.
11. The existing site comprises two 1980s office buildings (2 and 3 Finsbury Avenue) providing approximately 22,359sq.m (GEA) of office (B1) and 663sq.m (GEA) of ground floor retail. The buildings were designed by Arup Associates and were constructed during 1986-1988, following the first phase of development of the Broadgate masterplan.
12. 2 Finsbury Avenue aligns with 1 Finsbury Avenue, to the south; 3 Finsbury Avenue is located east of number 2 and forms the northern edge of Finsbury Avenue Square. The 5 Broadgate development, which was completed in 2015, is located immediately to the east of the Site.
13. To the north of the site, on the opposite of Sun Street within the London Borough of Hackney, is One Crown Place, a part 6, 28 and 33 storey mixed used development of office, retail, hotel and residential apartments, which incorporates the locally listed Georgian terrace at 5 - 15 Sun Street.

Relevant Planning History

Certificate of Immunity from Listing

14. The existing buildings at 2 and 3 Finsbury Avenue buildings are not listed and are the subject of a Certificate of Immunity from Listing (ref: 1463185) that was issued by the Secretary of State on 03 December 2015, and renewed on 27 June 2019, which is valid until 27 June 2024.

2016 Redevelopment Scheme

15. Planning permission was granted on 29 March 2018 (application reference: 16/00149/FULEIA) for:

Demolition of existing buildings and construction of a building arranged over three basement floors, ground and 32 upper floors plus mezzanine and three rooftop plant levels (168.4m AOD) to provide office accommodation (Class B1) (61,867sq.m); flexible retail uses (for either class A1, A2 or A3) at part ground and mezzanine levels (4,250sq.m GIA); cafe/restaurant uses (Class A3) at 13th floor level (1,291sq.m); flexible retail uses (for either class A1 or A3) at part ground floor level (248sq.m); a flexible space for office, conferencing, events and/or leisure use (for either Class B1, D1 or D2) at 13th to 18th floor levels (5,333sq.m) and a publicly accessible roof terrace and associated facilities at 13th floor level; hard and soft landscaping works; servicing facilities; and other works incidental to the development (total floor area 85,378sq.m GIA).

16. The planning permission approved the demolition of the two existing buildings on the site and their replacement with a new single office-led mixed-use building. The permitted scheme comprises four elements: a 36 storey tower on its eastern end; a lower 13 storey central section stepping up to a 20 storey tower towards the west before stepping down to eight storeys on the western end to Wilson Street.
17. The permitted scheme comprises 85,378 sq.m (GIA) of floorspace, incorporating the following land uses:

Use (Class)	Floor Area (sq.m GIA)
Office (Class B1)	61,867
Flexible conference and events centre / office (Class D1/D2/B1)	5,333
Flexible retail (Class A1/A2/A3)	4,250
Flexible retail (Class A1/A3)	248
Café/restaurant (Class A3)	1,291
Publicly accessible roof terrace	895
Total	85,378

18. A new ground level pedestrian route was included in the scheme in the form of a retail arcade providing public access diagonally through the

site linking Finsbury Avenue Square and the junction of Sun Street and Wilson Street. Condition 1 attached to that planning permission provides that the development permitted shall be begun for the expiration of six years for the date of the permission. The planning permission is still extant.

Meanwhile Uses

19. Temporary planning permissions have been granted for meanwhile uses within the existing buildings, pending the redevelopment of the site. The permissions include:
- Theatre space with ancillary studios / workshops and café (1,649 sq.m GIA) at part ground and first floor of 2 Finsbury Avenue (16/1319/FULL dated 16 March 2017);
 - Either / or a mixture of office / conferencing events space / assembly and leisure uses at seventh floor level of 2 Finsbury Avenue (1,201 sq.m GIA) (16/1319/FULL dated 16 March 2017); and
 - Retail / café / restaurant / non-residential institutions at part ground floor level of 3 Finsbury Avenue (300 sq.m GIA) (18/00159/FULL dated 10 May 2018).

Proposal

20. Planning permission is sought for:
- Demolition of the existing buildings and construction of a new building arranged over three basement levels, ground and 37 upper floors to provide an office-led, mixed use development comprising commercial, business and service uses (Class E), flexible commercial, business and service uses / drinking establishment uses (Class E/Sui Generis); and learning and non-residential institutions uses (Class F1); creation of a new pedestrian route through the site at ground floor level; hard and soft landscaping works; outdoor seating associated with ground level uses and other works incidental to the development.*
21. The proposed development would comprise four elements: a 38 storey tower on the eastern end; a lower 13 storey central podium stepping up to a 22 storey tower towards the west before stepping down to nine storeys on the western end on to Wilson Street. The maximum height of the proposed development would be 170.29m AOD.
22. The proposed development would comprise a total of 106,615 sq.m (GIA) of floorspace, incorporating the following land uses:

Use (Class)	Floor Level	Floor Area (sq.m GIA)
Commercial, Business & Service Use (Class E)	G – L02	4,309
Commercial, Business & Service Use / Drink Establishment Uses (Class E / Sui Generis)	G	1,075
Offices (Class E)	L01-L35	83,301
Learning (Class F1)	G-L02	2,194
Plant, BOH, Storage	B01, 02, 03, above ground plant floors, lift machine room	15,736
Total		106,615

23. The applicant is seeking a 5 year consent for the following reasons:
- 'The scheme forms part of a campus masterplan with 1 Broadgate next in the programme;
 - 1 Broadgate is due to commence in May 2021.
 - A pre-let would be required for British Land and GIC to commit to and deliver 2FA in parallel;
 - Securing planning permission is part of the pre-let strategy;
 - If a pre-let is not secured delivery will need to be staggered and the existing SME tenancies in 2FA extended;
 - A longer time limit would provide some flexibility in light of current market uncertainty and the JV's significant commitment to 1 Broadgate.'
24. It is considered that having regard to the extent and sequencing of development being undertaken by the applicant in the Broadgate campus, a 5 year consent is considered reasonable to allow some flexibility for its implementation and in such circumstances is considered acceptable.
25. The three basement levels would contain plant, servicing areas, cycle parking and associated facilities and other ancillary spaces to serve the uses above ground.
26. The scheme is an office led development that would provide a minimum of 83,301sqm (GIA) of new flexible office floorspace (Class E) across first to 35th floors. Part of the ground floor of the development would be allocated to provide lobby space and access to the upper office floors, with level access to these areas achieved from entrances on the southern side of the development facing Finsbury Avenue Square.

27. The development would include a 'social lobby' at first floor level, which is intended to operate as a communal entrance to the building's workspaces across the upper levels. A winter garden is proposed at 12th and 13th floor levels between the east and west towers, which would provide a shared amenity space for the office occupiers of the building.
28. Active ground floor frontages would be provided around the perimeter of the development through flexible commercial uses (Class E) that are proposed at ground floor level, including a minimum of 732sq.m of retail floorspace that would be secured by condition. Part of the ground floor, which addresses Whitecross Place and Finsbury Avenue Square would include the flexibility for drinking establishment use alongside the wider commercial uses.
29. The development would include an 'Open Learning Hub' (Class F1) at ground, first and second floor levels at the north west corner, facing onto Wilson Street and Sun Street. The vision for the Open Learning Hub is to create a shared resource and an accessible and inclusive route into the knowledge and expertise of the City. It has been designed to encompass informal and informal learning offers through flexible space that could be utilised by local communities and networks, as well as hosting a range of learning providers from local non-profit organisations to national institutions and global brands.
30. The offer and programme for the learning hub would be developed in consultation with potential operators, community partners, institutions, businesses and end users. The delivery and management of the Open Learning Hub would be secured through the Section 106 Agreement.
31. Hard and soft landscaping is proposed within the public realm to building on existing and recent public realm works within and around the Broadgate campus. The overall width of the existing pavements around the site would be enlarged to increase their capacity and improve pedestrian comfort levels.
32. A new north – south pedestrian route is proposed within the development at ground floor between Sun Street and Finsbury Avenue. This would further develop the existing orthogonal network of public routes within the campus and greatly improve the permeability of the site.
33. The existing public 'Chromorama' sculpture would be required to be relocated from its current position at the northern entrance to Finsbury Avenue Square, which would be secured through the Section 106 Agreement.
34. Dedicated areas of planting and greening would be incorporated into the development through a combination of external terraces with perimeter planting; green walls; and new tree planting at ground level within the surrounding public realm.

35. A total of 1,422 long stay cycle spaces would be provided at basement level one and 100 short stay cycle spaces located at ground floor level, within the building and the surrounding public realm.
36. Cycle spaces within the building would be accessed from Wilson Street, with a dedicated cycle ramp that would provide access to the basement level long stay cycle parking. The cycle entrance has been designed to be generous and highly visible as cyclists' approach/exit the building and to reduce the need for cyclist to dismount upon entering. A cycle workshop space would be provided at ground floor level adjacent to the cycle entrance, allowing for on-site bicycle maintenance and repair when necessary.
37. The servicing of the building would take place within a dedicated service area at second basement level, which would be accessed via two dedicated service vehicle lifts from Wilson Street.

Consultations

Pre-Application Consultation

38. The applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders.
39. The Applicant created a consultation website (2finsburyavenueconsultation.co.uk) was launched in September 2020 which featured an introduction to the proposals, a virtual consultation page, a feedback page and information on how to contact the project team. The website received 203 sessions and 378-page views over the course of the consultation between 1 - 13 September 2020.
40. A virtual consultation was created to replicate the features of a traditional public exhibition. The virtual consultation comprised interactive banners which attendees could view on a laptop or handheld device.
41. The Applicant hosted four webchat sessions across two days where members of the public could log on to the consultation and speak directly to members of the project team.
42. Following receipt of the applications they have been advertised on site and in the press and have been consulted upon twice, including under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Copies of all received letter and e-mails making representations are attached in full and appended to this report.
43. A summary of the representations received, and the consultation responses is set out in the table below. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

Consultation Response	
Historic England	Historic England did not wish to comment on the application.
Greater London Authority	<p>The principle of development is strongly supported, but the following changes might lead to the application becoming compliant with the London Plan and Publication London Plan:</p> <ul style="list-style-type: none"> • Principle of development: Given the proposal's contribution to the strategic functions of the CAZ and provision of publicly accessible space within the building, the principle of development is strongly supported in strategic planning terms in line with London Plan Policies 2.10, 2.11 and 7.7 and Publication London Plan Policies D9, SD4 and SD5, subject to the public's access to the "Open Learning Hub" being robustly secured in the Section 106 agreement • Heritage and urban design: The approach to design is broadly supported, with well activated frontages, improved permeability across the Broadgate Campus and height and massing that reflects the emerging cluster of tall buildings around Bishopsgate. The less than substantial harm that would be caused to historic assets would be outweighed by the public benefits of the scheme. • Transport: The new pedestrian route should be publicly accessible at all times and secured via the Section 106 agreement, short-stay cycle parking increased and clarification provided in terms of Blue Badge parking. Contributions toward the proposed TfL Cycleway and cycle hire are sought; and a cycle promotion plan, full delivery and servicing plan and construction logistics plan should be secured by condition. • Sustainable development: Additional information with respect to connecting to the Citigen network and the provision of photo voltaic is required; the urban greening proposed off-site across the Broadgate Campus should be robustly secured by the Corporation; and further information on the circular economy is required.
Heathrow Safeguarding	Heathrow Safeguarding had no objections, but advised that if a crane is to be used for construction, red omnidirectional lights will need to be applied at the highest point of the apparatus.
Crossrail Ltd	Crossrail Ltd did not make any comments on the application.

Natural England	Natural England had no objection to the application.
London City Airport	City Airport had no objection to the application, subject to information being submitted regarding the operation of cranes on the site.
Thames Water	Thames Water had no objection, subject to additional information being submitted regarding the wastewater needs of the development. Also requested were details in respect to safeguarding water mains.
Twentieth Century Society	The Twentieth Century Society objected to the application on the grounds that it considers 2 Finsbury Avenue to be a high quality building and an important Non-Designated Heritage Asset, and that there is potential for there to be a sympathetic upgrade. This is addressed in the Design and Heritage section under Demolition of the Existing Building.
NATS Safeguarding	NATS had no objection to the application.
Royal Borough of Kensington and Chelsea	RBKC had no objection to the application.
London Borough of Richmond upon Thames	LB of Richmond upon Thames had no objection to the application.
London Borough of Hammersmith and Fulham	LB of Hammersmith and Fulham had no objection to the application.
London Borough of Hackney	LB of Hackney objected on grounds of harm to heritage/townscape and residential amenity. The massing and height is cited as reducing the amount of daylight and sunlight nearby residents would experience. The proposal would visually dominate the Grade II listed Flying Horse PH, Sun Street Conservation Area and locally listed buildings 5-15 Sun Street. These are addressed in the following sections: Designated Heritage Assets impact on the setting and significance: Listed Buildings, Flying Horse Public House; Conservation Areas, Sun Street Conservation Area; and Non-designated heritage assets, 5-15 Sun Street.
London Borough of Southwark	LB of Southwark did not make any comments on the proposed development.
London Borough of Tower Hamlets	LB of Tower Hamlets did not have any objections to the application.
City of Westminster	The City of Westminster did not wish to comment on the application.

Representations (objections)	
Owner/occupier of Flat 1, 12a Finsbury Square	<p>The objector stated that the proposed development would cause harm to the historic character of Finsbury Square. They also objected on the grounds that the massing of the proposed development would have a detrimental effect on the local microclimate.</p> <p>Response to Comments: The applicants have undertaken various assessments to assess the impact of the proposed development on the microclimate (including wind, thermal comfort, air quality, daylight and sunlight). The results of the assessment are set out in the main body of the report and overall conclude that subject to compliance with the recommended conditions and s106 obligations, the microclimate conditions remain acceptable and in compliance with policy and suitable for the intended uses.</p>
Forsters on behalf of AMTD London Development Co Ltd, owners of One Crown Place	<p>The owners of One Crown Place (OCP) have submitted a detailed objection and accompanying supporting documents to the proposals regarding the potentially adverse effect on OCP and the wider City of London. In summary the grounds of objection contained in the letter cover the following matters.</p> <p>There are concerns that the methodology used to assess the daylight and sunlight impacts of the Application on OCP is not consistent with the BRE Guidelines. The key concerns with Chapter 11(Daylight, Sunlight, Overshadowing, Light Pollution and Solar Glare) of the Environmental Statement (ES) are as follows:</p> <p>Chapter 11 assesses the impact on OCP in terms of Average Daylight Factor (ADF) but does not assess the No Sky Line (NSL) or Vertical Sky Component (VSC). It also principally assesses the difference between the 2016 Application and the Application for the Site, concentrating on what additional effects are caused as opposed to what full effects are caused when comparing the Application against the true existing baseline.</p> <p>VSC</p> <p>A full VSC assessment should have been undertaken as part of this Application, as well as the NSL and ADF assessments. This should include details on the extent of the impacts from the baseline position (i.e. the Site in its existing form) and the levels of retained VSC that would be experienced by the OCP residents with the Application scheme built.</p> <p>AMTD have received advice from their daylight and sunlight consultants (GIA). GIA advise that any analysis should include an assessment of the impact on all floors of OCP</p>

	<p>which contain residential accommodation (i.e. 7th floor upwards). The Application only includes the analysis of the impacts on Levels 7-20 of OCP as this was included within the 2016 Application and these floors were assessed within the OCP internal daylight levels assessment previously. However, the proposed massing of the current application is noticeably larger than the 2016 Application and it is expected that Levels 20+ to be included within the assessment.</p> <p>From the indicative VSC analysis undertaken by GIA on behalf of AMTD, there will be a number of windows impacted severely with retained levels of below 15% (and many with below 10% retained VSC) when comparing the proposed scheme against the true existing baseline. This indicative analysis also demonstrates that those windows worst effected, i.e. experiencing greater than 40% VSC losses and retaining VSC levels well below 10%, will increase for the Application compared to the 2016 Application. Without full analysis (i.e. VSC, NSL and ADF) on all residential levels, it is not possible to understand the true and full impact of the Application on the daylight potential of OCP.</p> <p>Baseline Information -</p> <ul style="list-style-type: none"> • The daylight and sunlight assessment within Chapter 11 of the ES outlines that the 2016 Application had a 'major adverse' (significant) impact on the OCP residents facing the development in both daylight and sunlight terms. It is noted that the significance of these impacts was not outlined clearly within the 2016 Application ES Chapter. • There is no information provided within the ES chapter on the extent and severity of such impacts from the existing position and the summary tables and text simply outline the number of pass and fails under some of the required daylight tests (ADF and NSL) and the APSH for sunlight. Instead, the focus of ES is very much on the incremental increase in impacts from the 2016 Application as a result of the Application. As such, the daylight impact is categorised as 'negligible' and the sunlight impact as 'minor adverse' (not significant). It is particularly concerning that the sunlight impacts identified within the ES Chapter with a number of additional failings identified on top of the already 'major adverse' (significant) impacts identified from the 2016 Application, the severity of which is not recognised in this chapter. • The reliance on the 2016 Application scheme to justify the impacts over and above those caused previously by those now caused by the Application is not acceptable.
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	<p>Instead it should be considered that the focus of the assessment should be on the overall total impacts of the Application, which is supported by the QC Opinion appended to this objection.</p> <ul style="list-style-type: none"> • Concerns are raised regarding additional overshadowing impacts on OCP terraces and open space. When compared to the baseline, the proposal would result in a 'major adverse' (significant) impact on three of the OCP terraces and a 'minor adverse' (not significant) impact on one area of open space. One western terrace would result in a significant reduction in sunlight from the increased massing of the development (Ref 8 within Annex 5 of the Daylight and Sunlight Appendices). • It would be an error of law for the Council to determine the New Application on the basis that the BRE Guidelines have been applied but with an evidence base that considers ADF alone, and not VSC in respect of the Site. This would be a clear misdirection given the unambiguous wording of the relevant parts of the BRE Guidelines; • Whether or not the permission granted pursuant to the 2016 Application has been commenced, it would be legally erroneous for the Council to assess the environmental impacts of the Application on the basis that, as contended in the Environmental Assessment accompanying that application, the only "meaningful" consideration is an assessment of the difference between the consented scheme and the Application, as opposed to assessment of the difference between the current 'on the ground' situation and the development proposed by the Application; and • As the ES accompanying the Application does not properly apply the BRE Guidelines, there is, therefore, no evidence currently before the Council to enable it rationally to conclude that there is compliance with relevant planning policies, as cited in the enclosed opinion. The grant of planning permission on the basis that, on the evidence base currently accompanying the Application, these policies have been complied with would be vulnerable to judicial review. • The Application should respond to the residential development to the north and seek to minimise amenity impacts on residential units as far as possible. This application exacerbates these already significant impacts further by increasing the bulk and mass of the proposal and does not take into consideration the amenity impacts of the residential units within the OCP development. For the reasons set out above, AMTD and their expert team consider that the impact of the Application on the OCP
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	<p>residential units immediately adjacent to the Site, will be adverse, and severe. The impacts stemming from the 2016 Application were already significant and the increased massing and height proposed within the Application have only exacerbated these impacts further.</p> <p>Response to Comments: The Applicant's Daylight & Sunlight consultant, GIA, has undertaken further modelling as requested by AMTD which has been submitted under separate cover pursuant to Regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.</p> <p>AMTD made a number of comments, which included the following:</p> <ul style="list-style-type: none"> (i) Policy DM10.7 in the Local Plan requires that account be taken for the BRE Guidelines on site Layout Planning for Daylight and Sunlight. (ii) In assessing impact on daylight the BRE Guidelines indicate that there is likely to be a significant adverse effect if either the vertical sky component ("VSC") or daylight distribution guideline is not met. (iii) AMTD contend that the assessment in the ES was defective as it did not contain an assessment of impact on VSC when considering likely effects on One Crown Place. (iv) AMTD contend that the appropriate comparison to make is between the baseline (i.e. the existing position) and the proposed development and not between the proposed development and the scheme for which planning permission was granted in March 2018. (v) AMTD contended that the relevant daylight (VSC, No Sky Line "NSL" and Average Daylight Factor ("ADF")) and sunlight (Annual Probable Sunlight Hours "APSH") should be provided for all residential levels in One Crown Place and not just levels 7-20). <p>The information contained in the ES addendum includes</p> <ul style="list-style-type: none"> (a) Vertical Sky Component (VSC) assessment of daylight impacts to One Crown Place; (b) Extension of all daylight (VSC, NSL and ADF) and sunlight (APSH) assessments to all residential levels of One Crown Place (7th to 33rd) (the October 2020 ES focused on levels 7 – 20); (c) Commentary on daylight, sunlight and overshadowing results and residual effects against the existing baseline conditions;
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	<p>(d) Supplementary commentary on daylight, sunlight and overshadowing results when considering the effects of the Consented Scheme on One Crown Place, and discussion around the comparison of these results with the results of the Proposed Development; and</p> <p>(e) Extension of the light pollution assessments to all residential levels of One Crown Place (7th to 33rd) (the October 2020 ES focused on levels 7 – 20).</p> <p>The information now before the City includes:</p> <p>(i) An assessment of VSC to the neighbouring apertures of the One Crown Place development, including an assessment of the 1,548 relevant windows.</p> <p>(ii) An assessment of the proposed development against NSL with 620 relevant rooms in One Crown Place being assessed.</p> <p>(iii) An assessment using the ADF methodology.</p> <p>Of the 496 windows where BRE criteria are not satisfied , 51 would experience an alteration in VSC between 20-29.9%, which is considered a Minor Adverse effect, and 94 would experience an alteration between 30-39.9%, which is considered a Moderate Adverse Effect. The remaining 351 windows would experience an alteration in excess of 40%, which is considered a Major Adverse effect.</p> <p>For NSL, 563 of the 620 (90.8%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.</p> <p>Of the 57 remaining affected rooms, four would experience an alteration in NSL between 20-29.9%, which is considered a Minor Adverse effect, and four would experience an alteration between 30-39.9%, which is considered a Moderate Adverse Effect. The remaining 49 rooms would experience an alteration in excess of 40%, which is considered a Major Adverse effect.</p> <p>Overall, only considering the VSC and NSL methods of assessment, the effect of the Proposed Development on One Crown Place when compared with the existing Baseline Scenario is considered to be Major Adverse (significant).</p> <p>A total of 176 rooms were assessed for sunlight within One Crown Place, of which 123 (69.9%) would meet the BRE's criteria for both Annual and Winter PSH.</p> <p>For Annual PSH, 146 of the 176 (82.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.</p> <p>Of the 30 remaining rooms affected annually, four would experience an alteration in Annual PSH between 30-39.9%, which is considered a Moderate Adverse effect,</p>
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	<p>whilst 26 would experience an alteration in excess of 40%, which is considered a Major Adverse effect. London Plan policy 7.6B(d) provides that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings.</p> <p>Policy D6D of the draft Publication London Plan provides that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that it is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.</p> <p>Local Plan policy DM10.7(1) states: 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.</p> <p>Draft City Plan 2036 policy DE8(1) states Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the Building Research Establishment's guidelines.</p> <p>In considering impact on the sunlight and daylight, including overshadowing of amenity areas, enjoyed by those living at One Crown Place (when it is occupied) it is necessary to ask whether the development proposed in the current application</p> <ul style="list-style-type: none"> • Would cause unacceptable harm to amenity • Is of a design which ensures that those living in existing dwellings (including One Crown Place) would have sufficient daylight and sunlight that is appropriate to its context. • Would reduce daylight and sunlight available to the dwellings in One Crown Place to unacceptable levels, taking account of the BRE guidelines. • would cause those living in existing dwellings (including One Crown Place) to enjoy sunlight and daylight which is appropriate to context and acceptable living standards taking account of the BRE guidelines. <p>On the basis of the assessment set out in the environmental statement and, in particular the ES Addendum, is not considered that the proposal would result in unacceptable harm to the amenity of surrounding residential properties, and in particular, 1 Crown Place whether through impact on daylight,</p>
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	<p>sunlight or overshadowing. It is considered that surrounding residential properties would enjoy sufficient daylight and sunlight appropriate to their context, and that the overshadowing effects would not be unacceptable. Although the BRE criteria would not be complied with in the instances set out above, it is not considered that daylight and sunlight available to nearby dwelling would be reduced to unacceptable levels. It is considered that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards . As such the extent of harm arising from the proposed development when compared with the existing baseline is not considered to be such that it would conflict with London Plan Policy 7.6B, draft Publication London Plan policy D6, Local Plan Policy DM10.7 and Policy DE8 of the draft Local Plan.</p> <p>The March 2018 planning permission remains a lawful planning permission that remains capable of being implemented until March 2024. The ability to carry out the development authorised by that planning permission is a material consideration to be taken into account when determining this application. It is the view of officers that, were planning permission to be refused for the current application, there is a reasonable prospect that development would be carried out in reliance on the March 2018 planning permission.</p> <p>In considering the current application account can be taken of the impact on residential amenity of adjoining occupiers that would be likely to occur were the development authorised by the March 2018 planning permission to be carried out. The effects on daylight and sunlight arising from the March 2018 scheme are assessed in the ES, including in the ES addendum.</p> <p>It is important to note that the conclusion reached by officers that the impact of the proposed development on the sunlight and daylight available to the residential accommodation and amenity areas at One Crown Place is acceptable is based upon an analysis of the effect of the proposed development when compared with existing (baseline) circumstances. That analysis does not depend upon any comparison between the development proposed in this application and the development permitted by the March 2018 planning permission.</p> <p>Increased Massing:</p> <ul style="list-style-type: none"> • The proposal scheme would result in an approximate uplift in GIA sqm of 25% above that approved under the 2016 application and would largely be accommodated above ground.
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	<ul style="list-style-type: none"> • There would be a noticeable uplift in height and bulk on the Western Tower as well as the western podium element of the proposal. • Concerns are raised regarding the appearance of a decreased gap between the western and eastern towers. Whilst parts the 'gap' between the towers is the same or similar to the 2016 Application, in other parts it appears from analysis that the gap between the towers does reduce. • Reducing the 'gap' will likely have a further implication on the outlook and sense of enclosure experienced by the residents looking south from the southern residential tower within the OCP scheme. This was a key point within the 2016 Application and the 'gap' between the towers should be retained to protect the amenity of residents. <p>Response to Comments:</p> <p>The retention of a gap between the towers that is the same approximate width and location as that within the consented scheme is provided. The gap between the two towers is c.74mm less than that of the consented scheme. This represents a 0.7% difference from that within the consented scheme, which is well within normal measuring and construction tolerances. Such a negligible difference would have no noticeable effect on the outlook or sense of enclosure from the One Crown Place development in comparison to that of the consented development.</p> <p>Impact on Heritage Assets and Townscape:</p> <ul style="list-style-type: none"> • The proposed development is high density, highly visible and immediately to the south of the Sun Street Conservation Area, creating a large-scale continuous wall with towers extending up from it. • Regarding the impact of St Paul's, the views from Westminster Pier (View 2 within the TVIA) and Richmond Park (View 1 within the TVIA) seem to be pushing unprecedented boundaries where the Application becomes the new definition of 'sky edge' to the right and left of the dome respectively. • For the OCP approved scheme, the effect of the view from Westminster Pier was also tested 7 metres either side of the established viewpoint as requested by the GLA. A similar assessment should be provided for the Application so decision-makers can understand the impact outside of the established viewpoint within the LVMF. • The application scheme would cause an unacceptable
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	<p>backdrop to the dome, which would be much more obtrusive than the 2016 Application and the cluster of consented schemes already in the backdrop of views 7 and 7T from Waterloo Bridge near the National Theatre. It is considered that the proposal damages the setting of an important Grade I listed building, equating to 'less than substantial harm' of the highest level which could never be balanced by public benefits.</p> <ul style="list-style-type: none"> • Designated heritage assets in the vicinity of the development site will be harmed as a result of a very dominant neighbour. • The effect on locally listed buildings in the London Borough of Hackney and opposite the site will be server in nature. <p>Response to Comments:</p> <ul style="list-style-type: none"> • The principle of a tall building in this location is considered in the Design and Heritage section – Principle of a Tall Building. A detailed Townscape and Heritage Visual Impact Assessment has been undertaken to understand visibility of the development and the impact on LVMF, townscape, listed building and conservation areas. The impact on the setting of the Sun Street Conservation Area is considered in the Design and Heritage section, Conservation Areas. The distribution of massing and permeable routes would ensure the development is broken down into clear architectural components that have a human scale at street level rather than reading as a single volume. • The impact of the development on St Paul's Cathedral from viewpoints LVMF 8A.1 and LVMF 9A are considered in Design and Heritage Section, London View Management Framework. The development complies with the LVMF SPD London View Management Framework (LVMF) relevant tests for each linear view. There has been no objection to the impact on St Paul's Cathedral in these LVMF views from the GLA, Historic England, LB Richmond or City of Westminster. For View 8A.1 there has been no request from the GLA for further assessment to be undertaken to either side of the viewpoint. The Stage 1 letter states in relation to View 8A.1 the tower would not be visible and the visual framework around the strategic landmark would be maintained. As regards View 9A.1 the Stage 1 letter states the development would appear as part of a cluster of tall buildings emerging around Bishopsgate and this would not detract from the viewer's ability to recognise the Cathedral. • The view from the Southbank outside the National
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	<p>Theatre is included in the HTVIA View 7 and 7T. The impact on this view is considered in Design and Heritage section Other Key Views (non LVMF). This is not a LVMF view but a townscape view and views of St Pauls Cathedral along the Southbank are identified as important in the Protected Views SPD. It is not supported that there would be less than substantial harm to this townscape view and the setting and significance of St Pauls Cathedral within the view. The setting is not pristine and the Cathedral and the development would read as part of an existing cluster of towers which are the established setting of St Pauls in the view. There would be no worsening of the setting or the ability to appreciate the significance of St Pauls Cathedral. There are no objections from Historic England or the GLA to the impact on this view.</p> <ul style="list-style-type: none"> • The impact on designated heritage assets is addressed in Design and Heritage section, Designated heritage assets impact on significance and setting • The impact on non-designated heritage assets in particular 5-15 Sun Street is addressed in Design and Heritage section, Non designated heritage assets <p>Wind and Thermal Comfort:</p> <ul style="list-style-type: none"> • The City's Thermal Comfort document was adopted after the application was submitted and therefore, there is no reference to this document within the submission material. This information should be provided and any impacts to the OCP amenity space outlined. • Initial concerns are raised regarding increased windiness in certain public areas without providing mitigation measures, and how this adverse impact meets the City's guidance. This is particularly true in areas along Wilson Street and the thoroughfare between the site and 5 Broadgate. <p>Response to Comments:</p> <p>The applicants submitted a thermal comfort assessment after the City published the Thermal Comfort Guidelines in December 2020. The information in the thermal comfort assessment draws together information relating to, daylight, sunlight, overshadowing and wind into a separate evaluation which focuses on the microclimate of public spaces. (This underlying information already forms part of the Environmental Statement.)</p> <p>The submitted Thermal Comfort Assessment assess the impact on One Crown Place and the surrounding public spaces and this is set out in the report. Overall, the Proposed Development's impact on thermal comfort on the terrace level amenity spaces of One Crown Place and surrounding public</p>
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	<p>spaces is expected to range between beneficial and negligible and suitable for the intended use.</p> <p>The applicant has submitted a wind microclimate assessment which includes an assessment on the impact on the surrounding public spaces. Whilst the conditions to the east, between the proposed development 5 Broadgate would become one category windier than the existing situation the conditions would remain suitable for the intended use. Notwithstanding, a condition has been recommended for the applicants to explore further mitigation measures in this area to improve the wind conditions.</p>
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Policy Context

44. The development plan consists of the London Plan and the City of London Local Plan. The Mayor of London and the City of London have prepared draft plans which are material considerations to be taken into account in the determination of the planning application.
45. The Draft London Plan is at an advanced stage. It takes forward many of the policy positions of the existing plan whilst strengthening and adding to others. On the 13th March 2020 the Secretary of State directed the Mayor not to adopt the Plan due to it not satisfactorily addressing a number of national policies in respect of housing ambition, small sites, industrial land and aviation.
46. Following an exchange of correspondence and further directions issued by the Secretary of State on 10th December 2020, the Mayor approved the 'Publication London Plan' which is intended to address the Secretary of State's directions on 13th March 2020 and 10th December 2020. On 21st December 2020 the Mayor sent the draft Publication London Plan to the Secretary of State for his consideration.
47. The Secretary of State responded on the 29th of January 2021 formally confirming that the version of the London Plan provided on the 21st December 2020 contained the modifications necessary to conform with the previous directions. As it has passed through the Examination in Public, and there are no longer any barriers to the adoption of the plan it is expected to that the new London Plan will be published shortly. As such it can be afforded significant weight as a material consideration.
48. Given that there is likely to be a period of time between any resolution to grant planning permission and the permission being issued, to allow for the negotiation of the S106 agreement, it is possible that the new London Plan will be adopted before the permission is issued, should members resolve to grant planning permission.
49. In relation to this scheme the draft Publication London Plan continues to support a mixed-use office scheme in the Central Activities Zone (CAZ). 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.

50. The draft City Plan 2036 was agreed by the Court of Common Council in May 2020 for pre-submission, Regulation 19, consultation. The Plan is therefore a material consideration in the determination of planning applications. As the plan has not yet reached the regulation 19 stage, it can only be afforded limited weight. Regulation 19 consultation has been paused until early 2021 to enable the City Corporation to update policies in light of changes to the Use Class Order. These changes have been agreed by the Planning & Transportation and Policy & Resources Committee and will be considered by Court of Common Council in January 2021. However, the fundamental principles in relation to this application remain unchanged.
51. The London Plan and Local Plan policies and supplementary planning guidance documents that are most relevant to the consideration of this case are set out in Appendix B to this report.
52. Government Guidance is contained in the National Planning Policy Framework (NPPF) 2019 and the Planning Practice Guidance (PPG) which is amended from time to time.

Considerations

Relevant Statutory Duties

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

National Planning Policy Framework

55. In respect of sustainable development, the NPPF states at paragraph 10 that 'at the heart of the Framework is a presumption in favour of sustainable development.' At paragraph 11(c) the NPPF states that for decision-making this means 'approving development proposals that accord with an up-to-date development plan without delay...'.
56. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:
 - a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);

- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
 - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)
57. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
 58. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 103 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health”.
 59. Paragraph 111 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.
 60. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 124 advises that “The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities”.
 61. Paragraph 127 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.
 62. Paragraph 131 sets out that 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.
 63. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 151 states that new developments should increase the use and supply of renewable and low carbon energy and heat through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.

64. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. 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.
65. Paragraph 192 of the NPPF advises, "In determining applications, local planning authorities should take account of:
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
 - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
 - c) the desirability of new development making a positive contribution to local character and distinctiveness."
66. Paragraph 193 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.
67. Paragraph 194 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) Grade II listed buildings, or Grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, Grade I and II* listed buildings, Grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."
68. Paragraph 196 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given to the desirability

of preserving or enhancing the character or appearance of the conservation area.

69. Paragraph 197 states “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Other Guidance

70. The Historic England Good Practice Advice notes, including Note 3 ‘The Setting of Heritage Assets’.

Considerations in This Case

71. In considering the planning application before you, account has to be taken of the documents accompanying the application, the environmental information including the Environmental Statement, the further information, any other information and consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
72. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the whole plan the proposal does or does not accord with it. It is considered that the scheme is in accordance with the development plan.
73. The principal issues in considering this application are:
- The extent to which the proposals comply with Government policy advice (NPPF) and with the relevant policies of the Development Plan;
 - The economic benefits of the proposal
 - The appropriateness of the proposed uses
 - The appropriateness of a tall building in this location
 - The appropriateness of height, bulk, massing and design of the proposals
 - The impact on strategic views in the Local Views Management Framework, Protected Views and on local townscape views
 - The impact of the proposal on designated heritage assets and their settings in both the City of London, London Borough of Islington and London Borough of Hackney including amongst others: Sun Street Conservation Area, Bunhill and Finsbury Square Conservation Area; Finsbury Circus Conservation Area; The Running Horse Public House; and 1 Finsbury Avenue
 - The impact on non-designated heritage assets of 5-15 Sun Street, public spaces and pedestrian layout of Broadgate
 - The proposed public realm benefits and cultural/community offer
 - Transport, servicing, cycle parking provision and impact on highways
 - The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, solar

glare, thermal comfort, pedestrian comfort, sunlight and light pollution

- The environmental impacts of the proposal including wind microclimate, flood risk, air quality, building resource efficiency, demolition and whole life cycle – carbon, energy consumption, climate resilience, sustainability and urban greening and biodiversity

Economic Development

74. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.
75. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
76. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs).
77. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
78. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly

growing population will create the demand for more employment and for the space required to accommodate it.

79. The London Plan 2016 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy 2.10). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and policies 2.11 and 4.3 provide for exemptions from mixed use development in the City in order to achieve this aim.
80. The London Plan projects future employment growth across London, projecting an increase in City employment of 116,000 between 2016 and 2036, a growth of 22%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
81. The draft Publication London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
82. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.
83. The draft City Plan (2036) policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
84. The Broadgate campus, within which the site is located is a major office location serving the financial, legal and other sectors. The campus is undergoing a process of renewal to ensure that it remains a global business destination and is the subject of major investment in the redevelopment and refurbishment of existing buildings.
85. Within the emerging Local Plan the site is located with the Liverpool Street Area of Change and Policy S26 seeks to encourage the development of flexible and collaborative office space to meet the needs of potential start-ups, business growth and the development of the tech and fintech eco-system

86. The proposal would provide 83,301 sq.m (GIA) of office floorspace, a net uplift of 61,462sq.m (GIA) which would contribute significantly to the above policy aims and objectives.
87. Despite the short term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations and as outlined in the City of London document: London Recharged: Our Vision for London 2025.

Proposed Uses

88. The proposed development would be arranged over three basement levels, ground and 37 upper floors to provide an office-led, mixed use development comprising 85,009sq.m of office floorspace (Class E); 4,397sq.m GEA of commercial, business and service uses (Class E); 1,097sq.m of flexible commercial, business and service uses /drinking establishment uses (Class E/Sui Generis); 2,239sq.m GEA of learning and non-residential institutions uses (Class F1).

Proposed Office Accommodation

89. Strategic Policy CS1 of the City of London Local Plan 2015 and policy 4.2 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2036 and policy E1 of the Draft Publication London Plan
90. The existing site contains 21,839sq.m of office floorspace and a minimum total of 97,724sq.m is proposed which would provide an additional 75,885sq.m (GIA) of office floorspace. The proposed new workplace accommodation includes large, adaptable floors in the podium, supporting a wide range of flexible working arrangements. The two tower elements are joined by a podium block at lower levels, the West Tower would have access to several amenity spaces whilst the taller East Tower offers floorspace which can be adapted to be suitable for a range of occupiers. The amenity spaces include a 'Social Lobby' which is a communal entrance to the building's workspaces split across both ground and first floors. It is envisaged this would create spaces that offers opportunities for collaboration and wellbeing.

91. The additional and improved office accommodation supports the aims of Local Plan Policy CS1 and the provision of flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with adopted and emerging Local Plan policies.

Affordable Workspace

92. Policy DM1.3 of the 2015 City of London Local Plan encourages the provision of accommodation for small and medium sized businesses or occupiers which is flexible and adaptable. Policy S4 of the draft City Plan 2036 seeks to ensure that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, start-up companies and those requiring move on accommodation.
93. The Publication (Dec 2020) London Plan policy (E3) recognises the need for additional affordable workspace, particularly in locations defined in a local Development Document where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of the area. However, London Plan Policy E3 does not require affordable workspace provision across London; it indicates that Local Plans may include policies for site-specific locations or for certain kinds of affordable workspace based on local evidence of need and viability.
94. The Liverpool Street Key Area of Change in the draft City Plan 2036 (Policy S26), in which the proposed development site is located, seeks development that will support the area's status as the gateway to the City's Culture Mile area and promotes flexible and collaborative office space to meet the needs of potential start-ups, business growth and development of the tech / fintech sectors. However, Policies S4 and Policy S26 in the emerging City Plan 2036 do not 'require' affordable workspace, nor do they define a specific proportion of workspace that should be suitable for micro, small and medium sized enterprises.
95. The proposal includes the provision of 33 desk spaces, either within the development or elsewhere in the Broadgate campus which would be secured in the S106 agreement. This is an increase of 32% on the number of desk spaces secured within the previously consented scheme and is considered to accord with both the current and emerging Local Plan.

Proposed Retail

96. The application site is not located within a designated Principal Shopping Centre (PSC) or Retail Link as set out in the Local Plan (2015). The existing site contains 623sq.m of retail floorspace including two retail units at ground floor level (HOP Vietnamese and Theatre Deli Cafe Bar). It is proposed a maximum total of 1,960sq.m of retail floorspace (Class E/Sui Generis) would be provided and a minimum total of 732sq.m.

97. A minimum amount of retail floorspace (i.e. 732sq.m) within the Commercial, Business and Service Use Class (Class E) and flexible Commercial, Business and Service/Drinking Establishment/Wine Bar/Public House (Class E/Sui Generis) floorspace will be secured by planning condition, which would ensure there will be no net loss of retail on site. The proposed elevations along Sun Street, Wilson Street and Whitecross Place would create active and vibrant frontages containing retail provision. The 'Social Lobby' at first floor level as referred to earlier in the 'Office' section above would also increase the potential for a café/retail kiosk.
98. The application proposes flexible retail space that is adaptable to changing retail demand. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character. The intention behind the Government's recent changes to the Use Classes Order is to allow flexibility for businesses to adapt and diversify to meet changing demands, therefore a more flexible and fit for purpose retail use as proposed would be deemed acceptable subject to a condition to ensure no net loss of retail on the site.

Open Learning Hub/Local training opportunities

99. Policies CS22 and CS8 in the City of London Local Plan 2015, and policies S1 and S20 in the emerging City Plan 2036 recognise the role that the Local Plan can play in tackling employment and training disparities. Policies seek to secure training and skills programmes through planning obligations associated with major development schemes, particularly for residents on the Middlesex and Mansell Street Estates and people in neighbouring boroughs.
100. The development proposes an Open Learning Hub which the application states "is conceived as a flexible hub which can respond to need and act as a platform for local communities and networks, as well as hosting a range of learning providers, from local non-profits to national institutions and global brands, united by their social values and commitments to learning and development, and inclusion". It therefore offers the potential to make a significant contribution towards training and skills opportunities for local communities and its details, provision and management will be secured via the S106 agreement. These further details of the hub together with a management plan will ensure that the facility is designed from the outset to provide services and facilities that benefit local communities and to be a welcoming and accessible place for those communities to visit.

Design and Heritage

Demolition of the existing Building 2-3 Finsbury Avenue:

101. Historic England have assessed 2-3 Finsbury Avenue the buildings which form the application site. Their most recent assessment in 2019 concluded these existing buildings do not meet the requirements for

statutory protection. The buildings have a Certificate of Immunity until June 2024. The number of recent permitted and merging schemes within Broadgate Campus would mean that there is no longer a uniform architectural approach. However, there is an historic network of pedestrian routes through the Estate which is intrinsic to the campus and its character and the plan is identified as a non-designated heritage asset. The impact of the development on the plan of Broadgate Estate is assessed in the Design and Heritage section under Non Designated Heritage Assets.

102. The options for retention / reuse of 2-3 Finsbury Avenue have been explored but for the reasons outlined lined in the Circular Economy section of the report, this approach was considered to provide a materially less sustainable, less usable and less efficient building than could be offered by a more comprehensive redevelopment. Conditions attached to any decision would require the auditing of the existing fabric of 2/3 Finsbury Avenue as part of the demolition process for with a management plan for reuse to reduce landfill, waste and carbon emissions.

The Building's form, height and massing:

Principle of a Tall Building and relationship to the City Fringe Cluster

103. The current proposal includes two towers which constitute tall buildings under the adopted Local Plan (CS 14, para 3.14.1) and the emerging City Plan S12(1) since both towers will significantly exceed the height of their general surroundings and exceed 75m AOD.
104. The site is not an area identified as 'inappropriate for a tall buildings' in either Plan. Proposals for tall buildings are to be permitted only on those sites which are considered suitable having regard to the potential effect on the City skyline; the character and amenity of their surroundings, including the relationship with existing tall buildings; the significance of heritage assets and their settings; and the effect on historic skyline features. (CS 14(3) in the Local Plan). An assessment must also be undertaken against the criteria set out in S12(2-5) in the emerging City Plan, and the wider provisions of the Development Plan.

The appropriateness of a tall building on the site was analysed under 16/00149/FULEIA based on a rigorous assessment of strategic and local townscape views. The principle of a tall building and the approved heights in this location outside of the City Cluster Area was considered acceptable given the relationship to adjoining and emerging cluster of consented tall buildings to the north and east of the site. Part of the site is located in a wedge shaped area which falls between two Protected Vistas, the Background Wider Consultation Areas for LVMF 9A.1 King Henry VIII's mound and the second, LVMF 8A.1 Westminster Pier, both focussing on St Paul's Cathedral. This provided an opportunity for the consented tall building within this narrow wedge between these Protected Vistas as have other tall buildings in LB Hackney. In assessing the previous application, the GLA advised that the site was appropriate for a tall building, was of high architectural

quality and would not adversely affect strategic views, the setting of listed buildings or heritage assets and would not cause harm to the historic environment.

105. A further thorough townscape and heritage impact assessment continues to identify this as an appropriate location for a tall building and there are no material planning or policy changes to divert from this position. The proposed towers would adjoin an emerging cluster of permitted towers including those under construction and completed on the Hackney / City of London boundary in the London Plan "City Fringe Opportunity Area". The site subject of this application lies just outside the boundary of the Opportunity Area, which runs along the opposite side of Sun Street in Hackney. The proposed development would not be the tallest element in the emerging cluster of buildings in this part of the City Fringe.
106. The emerging cluster of tall building on site and to the north and east include:
- Broadgate Tower Primrose Street City of London completed 178.4 m AOD
 - One Crown Place Sun Street – LB Hackney expected completion 2021 137.2m AOD
 - Bavaria House Appold Street LB Hackney consented 169.99m AOD
 - Principal Place Worship Street LB Hackney 176.7m AOD
 - 2/3 Finsbury Avenue 168.4m AOD Approved 170.289 m AOD the current proposal
107. Strategically a tall building on this site supports good growth, London Plan and City Plan policies. Broadgate falls within the area to which Local Plan policy CS5 applies, The North of the City and in the Draft City Plan 2036 emerging policy Liverpool Street Key Area of Change. The emerging policy supports extensive change in the area with the opening of the Elizabeth Line, completion of new office floorspace and retail and leisure facilities which are currently under construction and supports the redevelopment of Broadgate to deliver: increased flexible office ; active frontages; links with educational institutions and activities to support a night time economy.

In summary, it is considered that the principle of a tall building is acceptable given that the tall building element is not located in an area deemed as inappropriate under Policies CS 14 and S21 subject to the provisions in particular of CS 14(3) and S12(2-6), assessed below, amongst the wider provisions of the Development Plan.

Height, massing and footprint

108. Since the approved application patterns of working; sustainability standards; social sustainability and inclusiveness; and the Broadgate Campus itself (100 Liverpool Street, 135 Bishopsgate, 1 Broadgate, 1

Finsbury Avenue, Exchange Square) have all transformed. The approved ARUP development is a high quality and well-designed scheme but some aspects do not fulfil the current targets : of sustainability performance; limited adaptability; wellbeing vision; microclimatic design; the western terrace floor plates are not flexible; and the visitor experience at Level 13 would be unsatisfactory due to microclimate.

109. As part of the overall architectural design review the limits of the proposed massing were reassessed in relation to context in close, mid and long range relationships. The revised distribution of massing responds to the surrounding urban scale and is very similar to the approved application. The re-examination of views both local and strategic demonstrated there were possibilities to increase the height and footprint particularly of the western block. The application proposes an increase of 21, 236 m² GIA of increased volume above ground compared to the approved application.
110. The ground floor footprint would be recessed and covered permeable walkway would be orientated in a north/south direction. Overall, the footprint would be similar to the approved application with increases and decreases in the round. However there would be a widening of the public highway particularly on Sun Street. The built form above would over sail particularly on the Sun Street elevation and this would increase by up to 1.4m in parts compared to the approved scheme. The over sail would include a striking dynamic canopy providing a sheltered environment for pedestrians introducing a folded roof plane to provide a unique experience to reinforce human scale at street level.
111. Like the approved development the proposed form comprises four distinct parts and steps down east to west across the site comprising an east tower G+37 storeys, west tower G+ 24 storeys and central lower podium G+13 storeys which conjoins the east and west tower. The massing of the podium then steps down to the west to G+9 storeys with a series of split green terraces at L10 and L11. This stepping down responds to the more modest scale of development on Wilson Street and Sun Street junction as opposed to the taller consented towers to the east. As in the approved scheme the proposed composition of the east and west towers is informed by the relationship to the emerging cluster north of the Broadgate campus, especially as experienced from local townscape, LVMF and other key views. In particular, the massing is modelled to be concealed behind the dome and drum of St Paul's from both recognised LVMF viewpoints from the Southbank and Westminster Pier
112. The east tower has a maximum height of 170.289m AOD this represents an increase of 1.89m AOD compared to the approved application 168.390m AOD. The footprint of the east tower is similar to the consented scheme with slight increases to the north and northwest. However, the overall height and massing is reduced by the dynamic roof form which pulls the corners of the crown down to 163.040m AOD to create a unique and dynamic silhouette compared to

the flat roof form of the approved scheme. The architectural approach comprises a distinctive and elegant folding 'V', resulting in more distinctive elevations that would be modulated with the movement of sunlight. The remodelling is considered to add visual interest and be a compatible addition to skyline views at a local and macro level supported by the Townscape, Heritage and Visual Impact Assessment (THVIA).

113. The west tower proposes the most significant increase in height and massing and therefore bulk compared to the consented scheme. The maximum height would range 115.25 m AOD - 107.975m AOD and again would incorporate a more dynamic roof form compared to the approved scheme which repeated the flat roof and was a maximum height of 103.4m AOD. The footprint of the west tower would be increased on all elevations most notably by up to 5m on the north west elevation. However due to the chamfered footprint and geometrically modelled elevations the resulting massing in views remains appropriate for the site and wider context supported by the Heritage and Townscape Impact Assessment (THVIA).
114. The central podium including winter garden is slightly lower than the approved application 73.030 m AOD provides a gap between the east and west towers. This gap is reimagined in this scheme but with negligible changes in width and alignment. This visual break reduces the perceived bulk of the two towers in key views and preserves the background to St Pauls Cathedral from Westminster Pier. The podium at the Wilson Street elevation would be pulled forward by 2m compared to the approved scheme and the height to the terrace level would increase 55.975m AOD compared to approved application 50.4m AOD. This would continue to deliver a height and massing which is compatible with the local context which has a finer urban grain and this has been supported by a series of kinetic viewpoints along Wilson Street, Sun Street and in approaches from Finsbury Square in the THVIA.
115. The height and massing has been informed by its setting within Broadgate, local and macro context. As a tall building this would contribute to the emerging and dynamic cluster of tall buildings around the north and north east of Broadgate. The massing and height would result in a refined, distinctive and expressive built form on the skyline and in most views. The height of the eastern tower would comfortably integrate with the emerging setting of taller buildings in terms of scale and would serve as a landmark and improving urban legibility and way finding.
116. There are a number of benefits from this reimagined approach compared to the approved scheme and which have evolved and been refined through the pre-application process. The proportions and geometry of the west tower has been further adjusted to improve the

relationship to Finsbury Square and the articulation and distribution of the towers creates a better microclimate around Sun Street and Wilson Street compared to the approved application. The increased massing of the western tower offers more flexible, useable floorplates and the towers' design maintains the important sky gap between the two masses. The reconfigured footprint enables a more generous passageway connecting Sun Street and Finsbury Avenue Square and provides opportunities to improve the activity and use of the public realm.

Architecture, Urban Design and Public Realm

117. The proposed scheme successfully integrates benefits of energy and carbon sustainability innovatively with a strong architectural identity. It is considered to be an exemplary design, attractive and would create inviting spaces for people to work, shop, and study, contributing to the sense of place and to Broadgate's quality and prominence as a destination space. The proposal has architectural integrity and a design narrative which could be appreciated at a macro scale, as an object on the skyline and equally at a detailed, human scale where the building meets the ground. It would use high quality materials, open new pedestrian routes through the site, create new open spaces and would enhance the existing public realm.
118. The approach for the new proposal is conceptualised as a 'vertical campus'; an interpretation of the conventional idea of a campus; a cluster of buildings separated by open spaces and amenities. The proposal reimagines this as a vertically stacked cluster of buildings (in this case, office spaces) separated by green and amenity volumes, which would be distinguished by contrasting materiality and shape in the building's facades and would take advantage of south and west-facing sunny aspects.
119. In distant views, the architecture would be appreciated for its striking geometry, dynamic silhouette and facades which would change in shape and texture from different viewpoints. The 4 components would be faceted, accentuating the architectural geometry of the building and creating an irregular roof profile. The design proposes strong diagonal seams of steel structure which crisscross the 4 components, dividing the direction of the angled windowed facade, and the light they would reflect – an innovative and aesthetic application of solar shading which would form part of the energy strategy for the building.
120. The diagonals are complimented by triangular, unshaded double height windows, which would appear to horizontally 'cut' into the façade and break up the vertical dominance of the towers. These would house the amenity spaces which form a key element of the building's composition and legibility and, equally, the work environment ethos promoted within the building. The proposed amenity volumes separating the office spaces would take the form of mixture of enclosed glazed and open-to-air garden terrace areas as well as internal 'breakout' spaces designed with a focus on wellness and biophilia, where tenants could congregate, dwell and enjoy at various interval throughout the building.

121. Adaptability to flex to the working needs of tenants and changes over time has been incorporated in the design of the proposed building. The floor plates could be subdivided to accommodate varying numbers of occupiers and/or work space formats; dedicated entrances from the social lobby could be accommodated; areas identified as 'soft spots' within the floor plate would enable occupiers to remove parts of the floor to create double height spaces between storeys and some of the glazed amenity spaces may become open air balconies. This flexibility would allow the building to remain relevant to future tenant needs over the lifetime of the building whilst also retaining its high design qualities and architectural integrity.
122. The development would be predominantly glazed with metal linear elements of high quality with a refined warm palette of colours to reflect the existing buildings within Broadgate campus as well as the wider townscape. This would suitably integrate the building within its context. The detailing of interfaces and junctions within the building's composition are well considered and final construction details would be provided as conditions to ensure design quality is delivered.
123. The base of the building footprint has been sculpted and carved out to create a generous base, animated by retail and active frontages on all sides, predominantly glazed, improving the public amenity particularly on Sun Street and the junction with Wilson Street where pavements are narrow and facades are predominantly inactive and uninviting. The proposal includes a striking architectural metal soffit which would rise and fall in peaks and troughs around the building, which would denote an inviting parade of vibrant internal spaces, double height in some spaces, and create a human-scale relationship between the building and the pedestrian experience on the street. The chamfered building corners would help to mitigate wind conditions and a wind canopy is proposed over the entrance of Whitecross place at the entrance of Wilson Street designed in conjunction with a tree planting scheme to manage wind conditions at ground, the details of which would be secured by condition.
124. Proposed above the ground floor is the publicly – accessible Social Lobby, an open and informal arrival space which would act as the portal to the office floors above and a common area which building tenants would arrive at and potentially connect.
125. The innovative façade is proposed as a concertina surface of alternating windows and opaque cladding, designed to maximise views but optimise the balance of solar gain and shade depending on the orientation of the façade. This three-dimensional surface would work on many levels; it would provide optimal internal natural day light for building users, it would create exterior visual interest and would contribute to the building's solar shading and energy efficiency
126. The proposed building is designed to have no rear or "back of house" elevation and would contribute to the public realm in the round. At the base, back of house functions would be concealed and designed to mitigate their impact on the public realm; The East elevation proposes

high level louvers and fire exits which would be shrouded by a generous soffit to ground green wall, the details of which will be conditioned as part of the consent for this application. The servicing entrance proposed on the West elevation would use high quality materials consistent on all elevations and has been designed to house any waiting delivery vehicles within the building and off the highway maintain pedestrian priority around the base of the building; the majority of plant requiring an external position is proposed at roof level which would be well concealed in the roof profile.

127. Active travel would be celebrated in this proposal with the inclusion of a feature cycle entrance adjacent to the Open Learning Hub , leading to cycle workshop for repairs, and generous changing and cycle storage facilities.
128. An existing sculpture at the North-East corner of the site would be relocated as part of public realm works in the scheme, the details of which would be secured by condition.
129. Lighting, in accordance with the adopted City Lighting Strategy, is proposed to enhance visual amenity and minimise light trespass. It would be contextual, building on the components of spatial character design guidance for the Liverpool Street area in the adopted Strategy. The full details including the management of lighting would be ensured via condition.

Townscape, Heritage and Visual Impact

130. The impact of the height, massing and design of the development has been carefully considered through pre-application using 3 -d modelling and 52 verified townscape views (THVIA). These include LVMF and local townscape views from a variety of locations including Sun Street, Wilson Street, Finsbury Avenue Square and Broadgate Circle as well as views from nearby and more distant conservation areas and listed buildings to understand the impact on the significance of their setting.

London View Management Framework

131. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the Capital's character and identity at a strategic level.
132. 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. Detailed visual management guidance is provided in the Mayor's 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.
133. The proposed tall buildings would be located so that they are outside of the background consultation area of the two principal LVMF viewing corridors Westminster Pier (8A.1) and Kings Henry's Mound (9A.1).

Particular attention is given to these views and to the River Prospects where the magnitude of potential impact is greater, here addressed in turn.

Linear Views

Westminster Pier (8A.1)

134. The linear view is from Westminster Pier and adjacent to Victoria Embankment towards St Paul's Cathedral. The lower western tower element would be located behind and therefore concealed by the dome and peristyle of St Paul's Cathedral whilst the taller east tower would be located behind the Whitehouse Building (formerly Shell Building) to the right. The middle lower part of the building would be in the gap between the two towers and the open sky to the right of the Cathedral will remain.
135. Therefore, the proposal is considered to be in accordance with the guidance for this view (para 170 of the LVMF). In particular, the proposal would preserve the viewer's ability to recognise or appreciate the dome, peristyle and south-west tower of St Paul's Cathedral which would remain with a clear sky backdrop.

Kings Henry VIII's Mound (9A)

136. The proposed tower would be located in alignment with the Broadgate Tower beyond and therefore there would be no further encroachment on the background consultation area than currently exists. It would adjoin the consented cluster of towers to the north of St Paul's Cathedral. Although the tower would result in this cluster of permitted schemes being closer to St Paul's the generous gap to the left of St Paul's is maintained and the proposal would be screened by the canopies of the mature trees in this view. In this respect, the tower would be wholly concealed in summer when the trees are in full leaf and screened by branches in winter.
137. Therefore, the proposal is considered to be in accordance with the guidance for this view (para 175 and 176 of the LVMF). The proposal is subordinate to the St Paul's Cathedral and would preserve the viewer's ability to recognise and appreciate the dome of the Cathedral and the clear sky background profile of the upper part of the dome would remain.

River Prospects

Waterloo Bridge downstream (15B.1 and 15 B.2)

138. St Paul's Cathedral is identified as the Strategically Important Landmark and this is an iconic view both in daytime and night time. The proposed towers would appear as part of the cluster of consented towers to the left of St Paul's Cathedral from and between Assessment points 15B.1 and 15B.2. The eastern tower would in front and conceal Broadgate Tower and appear slightly taller. The proposal would bring the northern cluster somewhat closer to the Cathedral but a very generous gap would still exist between the development and the

Cathedral and neither tower would affect its clear sky backdrop and would not dominate or cause a 'canyon effect' around the Cathedral. The viewer's ability to recognise and appreciate St Paul's Cathedral as a Strategically Important Landmark would not be diminished.

139. At night time St Paul's Cathedral is floodlit and readily distinctive on the skyline. The proposed development would add to the night time articulation of the skyline and is positioned well to the left of St Paul's reading as part of a group of tall buildings which is far less visually prominent at night time compared to the City Eastern Cluster. A lighting strategy is required as a condition and lighting proposals will be required to be fully compliant with policy and the City Lighting Strategy.
140. The proposal is considered to be in accordance with guidance for this view in paragraphs 262-267 of the LVMF. The proposal would draw the emerging cluster of tall buildings slightly closer to St Paul's Cathedral but in a manner which preserves the composition of the view and the Cathedral's relationship with its clear sky background and does not dominate the dome or western towers in accordance with paragraph 264.

The South Bank : Gabriel's Wharf viewing platform (16B.1 16B.2)

141. St Paul's Cathedral is identified as the Strategically Important Landmark. The proposed development would be wholly concealed behind the eastern tower behind St Paul's Cathedral and the western tower behind St Paul's Cathedral and Moor House from and between Assessment points 16B.1 and 16B.2. The views and setting of St Paul's Cathedral and other heritage assets in this view would not be harmed and comply with paras 280-283.

Hungerford Bridge downstream (17B.1 and 17B.2)

142. St Paul's Cathedral is identified as the Strategically Important Landmark. The impact on the views eastwards from Hungerford Bridge is very similar to that from Waterloo Bridge. The east tower would be viewed alongside the consented cluster of towers in front of and would appear slightly taller than Broadgate Tower between Assessment points 17B.1 and 17B.2 in this view. The tower would read as part of the emerging northern cluster and add visual distinction without being dominant due to the muted colours and slender silhouettes. The western tower would also be visible but would appear as part of the dense urban layers of the lower skyline. The muted palette of colours and slender silhouette would add to the distinction of the tower would read as a slender silhouette. The proposed tower would not harm the appreciation, views or setting of St Paul's Cathedral.
143. The proposal is considered to be in accordance with the guidance for this view (paras 301 to 305 of the LVMF). In particular, the setting of St Paul's is preserved, and the tower is grouped with the northern cluster of tall buildings.

London Bridge downstream (11B.1 and 11 B.2)

144. The development would be outside of these viewpoints on the periphery to the left of the viewing experience. The proposals would not harm the setting of the Tower of London World Heritage Site, which is in the extreme east of the view or harm the wider settings of the listed Adelaide House, Custom House, St Magnus the Martyr or Billingsgate Market. The proposal is considered to be in accordance with the guidance for this view (paras 202 to 205 of the LVMF). In particular, Tower Bridge would remain the dominant structure in the view and the viewer's ability to easily recognise its profile and the Outstanding Universal Value of the World Heritage Site would not be compromised.

Millennium Bridge (13A.1 and 13B.1)

145. From these viewpoints the tower would be seen on the skyline above the riverside buildings alongside the consented towers in the emerging cluster and a significant distance to the east of St Paul's Cathedral.
146. Therefore, the proposal is considered to be in accordance with the guidance for this view (paras 227 to 229 and 234 to 236 of the LVMF). In particular, the proposal would preserve the peristyle, drum and dome's prominence in the view of St Paul's Cathedral.

Tower Bridge (10A.1)

147. This LVMF view is identified also as a key view in the Tower of London World Heritage Site Local Setting Study, its focus is on the Tower of London. In this view, the proposed east and west towers would be wholly concealed behind 100 Bishopsgate and foreground buildings and would have no impact on the view. In this respect the proposal would not compromise views or the setting of the Tower of London World Heritage Site or its Outstanding Universal Value.
148. Therefore the proposal does not dominate the Tower of London or compromise the ability to appreciate the Outstanding Universal Value of the World Heritage Site and would relate satisfactorily to existing skyline features in consolidating the City cluster of towers; as such the proposal is in accordance with the guidance for this view (paragraphs 183 to 187 of the LVMF).

City Hall: the public terraces and Queen's Walk (25A.1 and 25 A.2 and 25A.3)

149. The principal focus of all three views is the strategic landmark of the Tower of London on the eastern side of the view. The proposed east and west towers would be concealed from view behind the Three Quays development and the consented schemes in the City's Eastern Cluster of tall buildings. The Outstanding Universal value and setting of the Tower of London World Heritage Site would not be compromised.
150. The proposal is considered to be in accordance with the guidance for this view (paras 414 to 415 and 418 to 419 of the LVMF) and Policy 7.10B of the London Plan. The proposal would not compromise the viewer's ability to appreciate the Outstanding Universal Value, integrity,

authenticity or significance of the World Heritage Site, does not dominate the World Heritage Site and relates positively to the Tower of London. Consequently, the World Heritage Site would continue to dominate its surroundings.

Summary of LVMF Impacts

151. The proposal would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS 13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and Draft Publication London Plan Policy HC4 and guidance contained in the LMVF SPG.

Other Key Views (non LVMF)

The Monument to the Great Fire

152. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposal falls outside the identified viewing areas from the Monument and would not harm or conceal views of important heritage assets in the view.

St Pauls' Cathedral

153. The proposal would not harm views of or the setting or significance of St Paul's Cathedral. The proposal would not harm views within and out of or the setting or significance of the St Paul's Conservation Area.
154. The proposal would be visible from the Golden Gallery of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding and views from the Cathedral. The development would not obscure or detract from any City skyline landmarks and would be an attractive addition to the skyline. The proposed eastern tower would be visible in front of and partially screening both Principal Place and Broadgate Tower. The eastern tower would be slightly taller in the group each reading distinctively rather than as a single mass. The group would remain subordinate to the eastern city cluster of tall buildings. It is considered the new development would preserve the composition and character of these views.
155. The Protected Views SPD includes views from River Bridges and the Southbank. The new development would be visible from Gabriel's Wharf/Blackfriars Bridge and Southwark Bridge and would read as a distant tower with others above the rooflines of riverside foreground buildings.
156. Along the Southbank the development would be visible in the context of St Pauls Cathedral as a kinetic experience eastward from Waterloo Bridge to Blackfriars Bridge. In these views the relationship of the east tower to St Pauls would vary depending on the viewpoint. There are moments when the development would directly abut the dome

including the view alongside the National Theatre on Waterloo Bridge and from locations close to the Oxo Tower. In these views St Paul's Cathedral is not currently experienced against a clear sky. The development would read as part of the permitted distant cluster of towers in this north area. In these views the eastern tower would now be imperceptibly taller than the approved application but the muted palette of colours would appear as a soft addition to the skyline in terms of colour finish and silhouette positively contrasting with the colouration and silhouette of St Pauls' without appearing dominant.

157. In conclusion there would be a similar visual impact to existing and there would not be a worsening to the backdrop of St Paul's Cathedral which complies with guidance of the Protected Views SPD.

Fleet Street/Ludgate Hill: The Processional Approach to St Paul's Cathedral

158. The proposal would not be visible from the Processional Approach to St Paul's Cathedral on Fleet Street or Ludgate Hill. It would leave this kinetic townscape experience unaffected, in accordance with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

Tower of London World Heritage Site – Impact on Outstanding Universal Value

159. The Tower of London World Heritage Site is located a substantial distance to the south east of the scheme. The proposed development will be concealed from key viewpoints of and from the tower (including those identified in the World Heritage Site Local Setting Study) and therefore will not harm any of the attributes of the Outstanding Universal Value of the World Heritage Site including setting.

Local townscape and other views

160. Given the scale of the proposed tower, it would have an impact on other views both in the City and in the wider area of central London. These have been reassessed in detail.
161. The proposal would appear as a prominent development in local views within the public spaces such as Exchange Square, Broadgate Circle and pedestrian thoroughfares of the Broadgate Campus. The development would be impactful in approaches to the site in relation to immediate local townscape from Eldon Street, Finsbury Avenue Square, Wilson Street, Sun Street, Finsbury Square as well Finsbury Circus which is slightly further from the site. The development would be prominent but not in a manner which is harmful or especially dominant as it will either be viewed appearing above midrise buildings such as 100 Liverpool Street or alongside the significant scale of existing tall buildings including: 5 Broadgate; the emerging developments at 1-2 Broadgate; and the consented towers in Hackney including, 1 Crown Place and 13-14 Appold Street. The development would read as a positive addition complementing and enriching the diversity of the wider Broadgate context and local townscape as an architecturally distinctive landmark and a vibrant addition to the skyline and streetscape.

162. In views northwards along London Bridge the proposed southern and eastern faces of the eastern tower would be visible on the skyline to the right of the Old Stock Exchange tower and the left of the cupola of 68 King William Street. The proposed development would encroach on the clear sky background of the cupola of 68 Kings William Street which is within Bank Conservation Area. The eastern tower would read as a distant background built form and the angled roof form and muted palette of materials would reduce any visual impact. The cupola would remain distinctive in the view and on the skyline. As a kinetic experience the tower would become concealed in approaches across London Bridge towards the north bank.
163. In views westwards along Fournier Street, Brick Lane, and from Christ Church Spitalfields, the development would have a significant architectural presence on the skyline. In these views the eastern tower is again either experienced alongside other permitted towers and other significant new schemes in Broadgate or the western end of Spitalfields Market or as a distinctive isolated addition to a view in the distant background. In views eastwards from Chiswell Street both towers would be experienced as a distant and elegant landmark amongst other taller buildings. The impact of the proposal would not be harmful to these wider views and townscapes or to the significance or setting of any identified designated heritage assets within the views.
164. Other views that have been assessed including Somerset House Terrace and St James' Park and the proposal does not harm these views or the setting of heritage assets within these views.
165. In terms of the townscape, the THVIA concludes that the impact the development has on the townscape is beneficial with no negative impact. Officers concur with this assessment and consider the impacts of the proposed development on townscape views is neutral to minor beneficial.

Designated Heritage Assets - impact on the setting and significance

Listed Buildings

166. The impact of the proposal has been assessed on the setting of a large number of listed buildings in the vicinity of the site both within and outside the City of London and it is not considered to harm the special historic and architectural interest or significance or the setting of these.

1 Finsbury Avenue (grade II)

167. To the south is the Grade 2 listed 1 Finsbury Avenue a midrise 1982-4 office building designed by Arup Associates. The development would have an immediate impact on its setting. The extent of special interest of the designated heritage asset resides in the external envelope where the form, structure and aesthetic are unaltered. 1 Finsbury Avenue forms part of the Broadgate Campus and addresses Wilson Street, Finsbury Avenue Square and Whitecross Place and has a

distinctive, architecture, scale and materiality. The robust and complex architecture of 1 Finsbury Avenue as a piece of design is not reliant on its relationship with 2/3 Finsbury Avenue as part of its setting and significance and it reads as standalone piece of urban architecture in the round.

168. Taller and midrise buildings juxtaposed with lower more historic buildings and an evolving diverse architecture have become the established setting of 1 Finsbury Avenue. In particular, 5 Broadgate, 1-2 Broadgate, Finsbury Avenue Square and the planned layout of Broadgate contribute to this setting.
169. The proposed development and increase in scale and architecture would have a significant impact on the setting of the listed building in views along Wilson Street, Finsbury Avenue Square and Sun Street. The lower scale 9 storey and tiered green terraces at L10 and L11 step down to the Wilson Street frontage of the development and would create an appropriate bookend to the townscape. This would achieve a comfortable transition to the listed building in views northwards and southwards along Wilson Street and is respectful to the scale of the Wilson Street elevation of the listed building.
170. The loss of the appearance of the stair towers of the listed building seen against open sky would slightly diminish the building's setting in views northwards along Wilson Street. However, the permitted 1 Crown Place development in Hackney currently has a similar impact. The different materials and contrasting architectural language of the proposed development would ensure the listed building remains prominent and discernible in its setting. The listed building would also remain as a prominent part of Finsbury Avenue Square enclosing the western perimeter and distinct from the new development. The building line relationship and pedestrian route width to Whitecross Place would be preserved.
171. Overall, the proposal would result in major change to the setting of 1 Finsbury Avenue, but not in a manner which would undermine that significance, which would be preserved.

St Botolph without Bishopsgate Church (grade I) St Botolph Church Hall (grade II) , Bishopsgate Parish Memorial (grade II) and drinking fountains and over throws (grade II)

172. The proposed development would be visible in views northwards from the St Botolph's Churchyard within the settings of a number of designated heritage assets. The principal setting for these designated heritage assets which positively contributes to their significance is St Botolph's Churchyard an intimate and enclosed green space with lawns and shrubs and the fine grained commercial retail buildings on the south side of Liverpool Street. The wider setting is the surrounding townscape which is mixed in character and quality with many tall buildings as well as more historic buildings juxtaposed in views of the listed buildings. Dashwood House tower in the foreground is particularly prominent. Although not contributing to significance these

taller buildings are part of the existing urban setting. The proposed development would rise above 100 Liverpool Street in the background of views from the Churchyard gardens. The development would be immediately noticeable but would form part of the context of established and emerging tall buildings which is already characterised by tall modern buildings in the wider urban setting including 13-14 Appold Street.

173. It is considered the proposal would result in a major change to the setting of this group of listed buildings but not in a manner which would undermine that significance, which would be preserved.

Park House and Garden House (grade II), Britannic House (grade II), Salisbury House (grade II) , 25 London Wall (grade II) Lutyens House (grade II*) all in Finsbury Circus

174. The development would be a significant addition on the skyline and in views above the roofscapes around Finsbury Square which contains a number of listed buildings including Park House and Garden House, Britannic House, Salisbury House, 25 London Wall and Lutyens House . A series of sequential views including night time and winter demonstrate the upper parts of the eastern and western towers would be prominent in northward views particularly eastwards and from Circus Place most notably rising above the roofscape of the Grade II listed inter war Park House and Garden House.
175. The principal feature of these listed buildings in Finsbury Circus are the central garden and the planned layout of the Circus about which the buildings are positioned and address. These aspects strongly contribute to the listed buildings heritage significance as a planned development and there is a defined sense of enclosure. From within the gardens in views to the east and south along Circus Place the tall buildings within the City's Eastern Cluster are visible. In views west the tall buildings around Moorgate Station and Barbican Towers are visible. In views north 1 Crown Place, 1-2 Broadgate (consented) and 13-14 Appold Street would all be visible above the roofline of Park House and Garden House and form part of the setting for these listed buildings. Although not contributing to the significance of the listed buildings in Finsbury Circus tall buildings are an existing part of their wider urban setting.
176. The GLA has identified the visibility of the development above rooftops would cause a degree of less than substantial harm to the significance or appreciation of listed buildings in Finsbury Circus. Your officers do not agree with that assessment. There is no harm to the significance or appreciation of these listed buildings. Furthermore the setting of these listed buildings in Finsbury Circus is to varying degrees already characterised by a wider urban backdrop of completed or permitted taller new development and the presence of the mature plane tree canopy of Finsbury Circus would partially filter many of these towers even in the winter. This emerging background urban setting also

remains distinct of the listed buildings and their architectural and historic interest.

177. It is considered the proposal would result in a moderate change to the setting of Park House and Garden House, Britannic House, Salisbury House, 25 London Wall, Lutyens House all in Finsbury Circus but not in a manner which would undermine that significance, which would be preserved.

Flying Horse Public House (grade II)

178. This Grade 2 listed 19th century corner pub lies opposite the site on Sun Street which has a curved corner defining south west corner of Sun Street and its setting is defined. The height and massing of the proposed development would have an immediate impact on the setting of this modest public house. The existing setting of the listed building is diverse with a mixed townscape comprising historic smaller scale buildings such as 11-15 Sun Street which adjoins the listed building juxtaposed with contemporary tall buildings and contemporary striking architecture to the east of Sun Street. The proposed development would become a distinctive and differently scaled backdrop to the listed building and adjoining terrace in views along Sun Street and in this context the proposed development would be similar in nature to the relationship with other tall buildings in the immediate context. The western part of the proposed development opposite the listed building would step down to 9 storeys in response to the modest scale of the junction of Wilson Street and Sun Street. In this respect, the development would not harm the setting of the listed building.
179. Overall, the proposal would result in major change to the setting of the Flying Horse Pub but not in a manner which would undermine significance, which would be preserved.

Other Listed Buildings

180. The impact of the proposals on the settings of other listed buildings has been assessed in the THVIA within and outside the City of London. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to: the relative distance of the proposal where it would not appear unduly prominent; the presence of other tall buildings that characterise the existing emerging settings; and existing built fabric blocking the view of the proposed development in the backdrop. The THVIA assessment that the effect on significance and setting would be neutral or minor is concurred with and the proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these listed buildings.

Conservation Areas

181. The impact of the proposal has been assessed on the setting of a large number of conservation areas in the vicinity of the site both within and outside the City of London. In particular there would be an impact on the setting of the following Conservation Areas close to the development.

Finsbury Circus Conservation Area (City of London)

182. This Conservation Area lies some distance to the south of the site and is centred on Finsbury Circus itself. Finsbury Circus is a grade II Registered Park and Garden. The principal feature of the setting of the gardens and the conservation area is the central gardens and surrounding Edwardian stone buildings and the Circus layout. Significant views are from the Circus itself looking into the gardens from around the edge and looking outwards from across the gardens to the buildings beyond. The City's taller buildings are visible in these views from the east, west and south out of the Circus above the rooflines of foreground buildings. These background and taller buildings are part of the existing setting of the Conservation Area and the Registered Park and Garden.
183. The proposed development would be most impactful on the skyline in views northwards from Circus Place on the south side of the Conservation Area and eastwards from the west side of the Circus where it would appear as a prominent element albeit partially screened by the mature plane trees of the central gardens. The development would form part of an emerging cluster and be visually distinctive and an elegant addition to the group distinct from Edwardian foreground buildings. Contrary to the GLA conclusions the moderate change is not considered harmful to the significance or appreciation of historic assets including the Conservation Area or its significance or status as a Registered Park and Garden.

Bishopsgate Conservation Area (City of London)

184. This Conservation Area lies to the south and east of the site. The tower would be visible on the skyline in numerous views from the Conservation Area. In particular, the eastern tower would appear as a prominent element on the skyline in views northwards from the Churchyard of St Botolph without Bishopsgate Church. The impact is not considered harmful given the more assertive impact of Dashwood House tower in the foreground as well as the permitted towers in Hackney which are also form part of the setting of the Conservation Area. The emerging cluster of tall buildings have become part of the established background and now form part of the setting to the Conservation Area.
185. The moderate change is not considered harmful to the significance or setting of the Conservation Area.

Bunhill Fields/Finsbury Square Conservation Area (L.B Islington)

186. The site lies to the west of this Conservation Area within the LB of Islington where the development would be visible from numerous vantage points. The Conservation Area is dominated by three green spaces Finsbury Square, Bunhill Fields Burial Ground and the former Artillery Ground. The open prospects of these three spaces allows longer views of the surrounding urban landscape.
187. A number of sequential views have been undertaken from Finsbury Square, the top half of the east and west tower would be prominent above the midrise office buildings on the east side of Finsbury Square. On the skyline in views eastwards and to the south, it would be seen alongside either the permitted cluster of towers in the City Fringe area to the east or the cluster of towers in the City's Eastern Cluster to the south. In this respect, the setting of Finsbury Square as part of the Conservation Area is characterised by an urban layering of consented and completed tall buildings, which the development would relate to satisfactorily.
188. The development would gently step up in height from 1 Crown Place to read as a coherent group of tall buildings. The architecture of the two towers would have a clear vertical emphasis and would be distinctive from the foreground terrace buildings to Finsbury Square. The increased height and massing of the western tower compared to the approved application would be evident in these views from Finsbury Circus. The western tower would have a similar overall width to the consented west tower in views from Finsbury Square. Due to the chamfered plan form and the dynamic roof design, geometric folds and angles as well as the palette of materials the development would be an enriching, high quality and positive addition to the setting of Finsbury Square and the urban skyline. The ability to appreciate the heritage significance of this part of the Conservation Area would be preserved.
189. Similarly, the development would be viewed alongside the permitted and completed towers to the south and east in views from the grounds of the Honourable Artillery Company. The tower would be visible through the mature trees from Bunhill Fields, a Grade 1 Registered Park and Garden alongside the consented towers. From Bunhill Fields in particular, the tower would be virtually concealed when the trees are in leaf and heavily screened by branches at other points in the winter months.
190. Overall, the proposal would result in a major change to the wider backdrop setting of Bunhill Fields and Finsbury Circus Conservation Area and the Registered Historic Park and Garden, but contrary to the GLA conclusion, this would not be in a manner which would undermine that significance which would be preserved.

Sun Street Conservation Area (L.B Hackney)

191. The site is directly to the south of this small Conservation Area in LB Hackney and the development would have an immediate impact on its setting. The Conservation Area is characterised by a domestic scaled enclave of mainly C19th buildings. The scale of development would have a significant impact on the Conservation Area but not in a manner which is considered harmful. In particular in the key views eastwards along Sun Street, the proposed tower would be seen alongside substantially taller buildings including One Crown Place in LB Hackney and 5 Broadgate development in the City. In this respect the backdrop and setting of the Conservation Area is characterised by a juxtaposition of diverse architecture of building heights and different urban grains both e taller buildings. This has transformed the character and appearance of the Conservation Area and its setting by grounding historic buildings – The Flying Horse Pub and 5-15 Sun Street in the context of tall buildings.
192. The base of the development would have a human scale and the palette of materials would create a welcoming pedestrian environment and would redefine and reactivate the street scene and the character of the corner junction introducing a positive outward looking building . The ground floor mediates between the street pedestrian scale emphasised by the canopy and the traditional brick buildings of Sun Street and taller buildings. The different language, light and bright materiality would not dominate the existing masonry buildings which would remain distinctive in the Conservation Area. Sun Street itself would be enhanced though increased permeability, activated edges and improved public realm. The Open Learning Hub would be a destination to providing a cross Borough free public space for all.
193. The height of the development would step down towards Wilson Street and be compatible with the scale of the historic terrace. The eastern and western tower would be set back closer to Crown Place forming a cluster of taller buildings straddling Sun Street.
194. The new development has been designed to respond to the context and the high quality design would enhance the local townscape. Overall, the proposal would result in major change to the setting of the Conservation Area, but not in a manner which would undermine that significance, which would be preserved.

Other Conservation Areas

195. The impact of the proposals on the settings of other Conservation Areas and Historic Registered Parks and Gardens has been assessed in the THVIA within and outside the City of London. These have included South Shoreditch Conservation Area, New Broad Street Conservation Area, Bank Conservation Area, Elder Street Conservation Area, Brick Lane and Fournier Street Conservation Area, Brewery Street Conservation Area and Chiswell Street Conservation Area. The settings and the contribution they make to the significance of the Conservation Areas, would not be adversely affected by the

proposals due to: the relative distance from the proposal where it would not appear unduly prominent; the presence of other tall buildings that characterise the existing emerging settings; and existing built fabric blocking the view of the proposed development in the backdrop. The THVIA assessment that the effect on significance and setting would be neutral or minor is concurred with and the proposed development would not harm the setting or the contribution that the setting makes to the significance of these Conservation Areas or Registered Historic Parks and Gardens.

Non - Designated Heritage Assets

2/3 Finsbury Avenue plan form of public spaces

196. The proposed development would demolish 2/3 Finsbury Avenue and the replacement would be a new high quality development redefining the northern edge to Finsbury Avenue Square. The base of the building would be visually permeable with a new pedestrian route connecting Finsbury Avenue Square and Sun Street. The plan form of public spaces with connecting pedestrian links to the Broadgate Estate is identified by the City as a non-designated Heritage Asset. The proposed north/south permeable route would enhance the nature of existing routes and the quality of the non-designated heritage asset. The proposed new permeable route would follow the existing alignment of Finsbury Avenue. Overall, the public spaces, pedestrian links and visual experience of the Broadgate Campus would be enhanced by the proposed development better revealing the heritage significance of the undesignated heritage asset.
197. The proposed development would not adversely impact on any elements of setting that contribute to significance of the non-designated heritage asset or an ability to appreciate its heritage significance.

5-15 Sun Street

198. The proposed development would be directly opposite the site and these locally listed C19th terrace buildings in LB Hackney. The double height proportions of the ground floor of the development would respond to the scale of these buildings and provide a human context ensuring the development would not be over dominant within the setting of the buildings. The high-quality architecture and public realm would provide a positive setting to their context which is already characterised by tall buildings including 1 Crown Place.
199. The proposed development would not adversely impact on any elements of setting that contribute to significance of the non-designated heritage asset or an ability to appreciate its heritage significance.

Access and Inclusive Design

200. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and

DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy 7.2 of the London Plan and policy D5 of the draft Publication London Plan.

201. The principles of inclusive design have been incorporated into the proposals. The ground floor of the development is highly permeable, with a number of entrances and new routes through the site, all of which have been designed to be step free and at no time the gradient would be steeper than 1:20.
202. All horizontal and vertical access in the building has been designed to the recommendations set out in the Approved Document M and BS8300. Lifts would be the main means of vertical circulation within the building and have been designed to accommodate a variety of users, including wheelchair users.
203. Accessible WC facilities would also be provided in appropriate numbers and locations and the proposed showers at basement would also include accessible shower rooms. A non-gendered shower and WC is also proposed at basement level.
204. The Access Officer welcomes the inclusive access to and within the building which would meet the requirements of Local Plan policy DM10.8 and London Plan policy 7.2. S106 obligations/conditions are recommended to ensure the facilities meet the requirements for the educational/community uses to ensure to ensure full accessibility and provision.

Fire Statement

205. Policy D12 of the draft Publication London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.
206. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. Further details would be required regarding the fire service access and the application of the evacuation lifts and these would be developed as the detailed design of the building progresses in consultation with City District Surveyors and the London Fire Brigade.
207. If planning permission were to be granted, a condition would be recommended requiring the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) with details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority in consultation with the London Fire and Emergency Planning Authority,

Building Control Health and Safety Team prior to construction of the building and the strategy shall remain in place thereafter.

208. Subject to compliance with the condition the proposed development would meet the requirements of Policy D12 of the draft Publication London Plan.

Archaeology

209. The site is in an area of archaeological potential, situated outside the Roman and medieval City Wall. There is potential for remains from all periods to survive in this area. An archaeological assessment has been submitted with the application.
210. There is moderate potential for survival of environmental remains associated with marsh forming in this part of the Walbrook valley, Roman remains including land reclamation and quarrying and high potential for post medieval remains. There is low potential for survival of Roman burials as the site is to the north of a known Roman cemetery, and prehistoric remains.
211. The potential for remains to survive has been affected by the construction of the existing building basements and piled foundations. It is considered that only deep cut features will survive below the basements and between foundations. There is higher potential for archaeological survival outside the basement footprint.
212. The proposed building would have three levels of basement and an area of piled foundations outside the existing basement which would remove all surviving archaeological remains.
213. Archaeological evaluation is required to provide additional information on the type, date and character of potential archaeological survival and to design an appropriate mitigation strategy.
214. The proposals are acceptable in archaeological terms, subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundations and piling design.

Transport, Servicing and Highways

Public Transport

215. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located close to Liverpool Street Station and Moorgate Station. The site is close to several bus routes running close by and can be accessed from Finsbury Square, Norton Folgate, and Liverpool Street Station.

Cycling

216. The Publication London Plan policy T5 requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 requires cycle parking to be designed and laid out in accordance with guidance contained in the London

Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

217. The Publication London Plan requires 1419 long stay cycle parking spaces. The applicant is proposing 1422 long stay cycle parking spaces. This exceeds the Publication London Plan standards. The long stay cycle parking would be accessed via a dedicated cycle ramp from Wilson Street.
218. A minimum of 5% of the cycle parking spaces will be accessible for adapted cycles and this arrangement will be secured by planning condition (in line the Publication London Plan Policy T5 cycling B, with the London Cycling Design Standards 8.2.1, and the emerging City Plan 6.3.24).
219. The cycle facilities offer parking for a broad range of cycles, including double stacked racks, foldable bicycle lockers, Sheffield hoops and spaces for recumbent/outsized cycles. Charging points for electric bikes will also be provided.
220. The proposals include 112 showers, and 1422 lockers, which complement the cycle parking provision. The Publication London Plan policy 10.5.7 recommends a minimum of 2 lockers per 3 long-stay spaces, and at least 1 shower per 10 long-stay spaces. Therefore, the shower proposals do not meet the Publication Plan recommendations. The applicant has demonstrated that the shower number can be increased, however the cycle ramp would need to be removed to facilitate the increase in showers. Therefore, on balance, we agree that the ramp is an excellent facility for people cycling, and in this case the shower provision is acceptable. The locker provision exceeds the Publication London Plan standards.
221. The Publication London Plan requires between 92 and 156 short stay cycle parking spaces, the range is due to the flexible nature of this planning application. The applicant is proposing 100 short stay cycle parking spaces. We have worked with the applicant to increase this from 42 spaces and we believe that this is a reasonable provision of short stay cycle parking, albeit not compliant with the Publication London Plan. The short stay cycle parking comprises 10 spaces and 12 foldable cycle lockers within the cycle lobby accessed off Wilson Street, 20 spaces on Finsbury Avenue Square (east) and 58 spaces on Sun Street Passage. The cycle parking spaces on Sun Street Passage are not immediately outside of the development, but are within the wider Broadgate Estate. Securing these outdoor spaces on the Broadgate Estate is considered a benefit of this scheme. These locations are considered not to impede pedestrian movement. The exact location of the outdoor short stay cycle parking spaces will be secured by planning condition/obligation.
222. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by planning condition to produce a Cycling Promotion Plan which is a cycling focused Travel

Plan. It will be submitted to the City for approval in line with the Publication London Plan policy T4 and 10.4.3.

223. TfL are exploring options to secure Section 106 obligations in relation to a Cycle Hire Docking Station and/or a Cycle Route Quality Criteria assessment.

Vehicular Access

224. Local Plan 2015 Policy DM16.5 – 1 and Draft City Plan 2036 policy VT3 – 1 require development in the City to be car-free except for designated Blue Badge spaces.
225. The development is car free except for one facilities management vehicle space.
226. No blue badge space is proposed within the development. TfL have requested on street blue badge spaces are considered. Therefore this will be included in the Section 278 agreement.

Servicing and Deliveries

227. Policy DM16.5 of the Local Plan and draft City Plan 2036 Policy VT2 – 1 require developments to be designed to allow for on-site servicing. Policy VT2 – 2 requires major commercial development to provide for freight consolidation. Policy VT2 – 4 requires delivery to and servicing of new developments to take place outside peak hours (7am – 10am, 12pm – 2pm and 4pm – 7pm on weekdays) and requires justification where deliveries within peak hours are considered necessary. Publication London Plan policy T7 G requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.
228. The servicing of the building would take place off-street accessed off Wilson Street via two vehicle lifts. The servicing is proposed in the same place as the existing permission on the site. The applicant will have a service level agreement with their lift provider to ensure any breakdowns are fixed in a timely manner. Vehicles would be able to enter and exit the servicing area in forward gear.
229. The servicing area would accommodate 4 vehicles up to 10m in size, but the majority of vehicles are expected to be 8m.
230. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy. Outside of these hours, on average there will be 10 vehicles per hour servicing the site.
231. The development will be required to produce a delivery and servicing plan, and this will be secured in the Section 106 agreement.
232. The applicant is proposing to use a consolidation centre in order to reduce the number of deliveries to the development per day, and a minimum of 90% of deliveries will travel via the consolidation centre. A small number of vehicles will be allowed direct access to site (not via the consolidation centre) and this number will be secured in the delivery and servicing planning obligation.

233. The proposed development will generate fewer daily servicing trips than the consented scheme, which proposed approximately 151 deliveries per day. The applicant has agreed to a cap on the number of deliveries to the development per day of 132, and this will be secured in the Section 106 agreement.
234. The applicant has stated by the opening year of the Proposed Development the vehicle fleet is expected to be electric. As such, electric vehicle charging points are proposed in the servicing area and these will be secured by planning condition. This is in line with Policy VT2 Freight and Servicing point 6.2.38 in the Draft City Plan.
235. The location of the new servicing entrance will require the removal of four pay and display parking bays, which is as agreed in the previous permission on this site. The removal of the pay and display parking bays will be subject to consultation. There is a potential of loss of earnings, should the consultation result in the loss of the spaces. The impact on income will be outweighed by the benefits of the whole of the public realm and Section 278 works; there may be a lost earnings sum agreed within the Section 278 agreement. An application to amend the Traffic Management Order relating to the Pay and Display bays will need to be submitted to the CoL.

Public Realm Security and Hostile Vehicle Mitigation (HVM)

236. Local Plan Policy DM3.2, draft City Plan 2036 Strategic Policy S2 (Safe and Secure City) and Policy SA3 (Designing in Security) sets out how appropriate security and safety provision must be incorporated into all development. Policy D11 of the Publication London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.
237. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing out crime and the counter terrorism security officers within the City of London Police.
238. The majority of the HVM will be within the façade of the building. Where there is a break in the façade line there will be other measures. Vehicle blockers will be used to protect the servicing lift entrance, bollards will be used to protect the routes from Wilson Street and Sun Street into Whitecross Place.
239. There are existing bollards on Sun Street outside the eastern side of the development site. These bollards will be rationalised and partially relocated to meet the corner of the proposed development.
240. Trees are also proposed surrounding the development which serve a dual purpose. They will enhance the environment and provide a visual deterrent to hostile vehicles.

Pedestrian Comfort

241. A pedestrian comfort level (PCL) assessment has been conducted for the site. The pedestrian flows have been thoroughly analysed and the applicant has presented data for three scenarios: the existing situation; the consented development; and the proposed development. Overall, the PCLs are much improved due to the setting back of the building and the new, step free, public pedestrian route through the development.
242. The PCLs at all of the surveyed locations around the site are classed as 'comfortable' in the proposed development scenario, this is a minimum level of B+. The scores range from PCL A to B+. TfL's Pedestrian Comfort Guidance recommends a minimum comfort level of B+ and the City's Transport Strategy aims for all City pavements to have a minimum pedestrian comfort level of B+. There is a small reduction in the useable footway width on Sun Street from 4.5m to 4.2m, this is as a result of the location of tree planting. The footway width measuring 4.2m is sufficient to facilitate comfortable pedestrian conditions with a PCL of A in both the AM and PM peaks.
243. It is predicted that the total number of trips to the development in the AM peak would be 3555. The existing situation is 733 trips in the AM peak, and the consented scheme predicts 2941 trips in the AM peak. Therefore, the proposed trips in the AM are an increase of 614 trips compared to the consented scheme.
244. It is predicted that the total number of trips to the development in the PM peak would be 3303. The existing situation is 743 trips in the PM peak, and the consented scheme predicts 3017 trips in the PM peak. Therefore, the proposed trips in the PM are an increase of 286 trips compared to the consented scheme.
245. The increase in trip generation is considered acceptable due to the PCL assessment predictions, the new proposed route through the site, the widening of the footways, and the commitment to promote cycling at the development.
246. The submitted Transport Assessment indicates that the overall increase in trips across all modes of transport would have a minimal impact and the change will likely not be perceptible.
247. There is no stopping up proposed as part of this development, however there are changes to the existing permissive path. Overall, there will be an extra 163sq.m of permissible path created by the development.

Section 278 Agreement

248. A Section 278 agreement has been secured. The Section 278 agreement will comprise footway works, minor HVM works, the removal of on-street parking bays (subject to consultation), the provision of a public blue badge space in the vicinity of the site (subject to consultation), works to facilitate the new cycle and servicing entrances, and tree planting.

249. The Section 278 works are considered necessary, will be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision, including the potential for footway widening and greening. This would be secured through the Section 106 agreement.

Environmental Sustainability

Energy and CO2 emissions

250. The Energy Statement accompanying the planning application demonstrates that the building has been designed to achieve an overall 47.3% reduction in regulated carbon emissions compared with a Building Regulations compliant building.
251. The proposed energy demand reduction measures include the use of passive design measures in the building envelope, balancing the reduction of heat loss, solar gains and glare, and maximising daylight access. A high efficiency ventilation strategy with heat recovery would be incorporated, along with energy efficient fittings, lighting and appliances. Passive ventilation was excluded due to the height of the building, but the applicants will undertake a further assessment of integrating mix modal ventilation into the detailed design. The savings from energy demand reduction would achieve a 17.3% carbon emissions reduction overall.
252. There are currently no opportunities to connect the development to an existing or planned district heating network. However, drawings demonstrating how the site is to be future-proofed for a potential connection to a district heating network have been provided.
253. A reverse cycle Air Source Heat Pump system, to take full benefit of simultaneous heating and cooling demand, would be incorporated, achieving further carbon emissions savings from low energy and renewable technologies compared to the energy demand reduction stage (be clean) of 36%. The installation of PV panels has been discounted due to their estimated low contribution to the overall carbon emissions savings of approx. 1%. In addition the PV panels would be visually prominent on the west and south facing roof slopes of the towers in long views and would dilute the geometric roof form which is designed to seamlessly integrate with the facades and is intrinsic to the overall design rationale.
254. This energy strategy demonstrates compliance with the London Plan carbon targets. (London Plan Policy 5.2 and Intend to Publish London Plan S12). A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution or appropriate off-site project to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the Intend to Publish London Plan.

BREEAM

255. BREEAM pre-assessments for the offices, the Open Learning Hub and the retail element have been carried out. These demonstrate that the office parts of the development can achieve a score of 90.3% while the Open Learning Hub may achieve 89.1%, both in the excess of 85% threshold required to achieve an “Outstanding” rating. The retail element would achieve a score of 75.8%, exceeding the 55% “Excellent” target, however, this can only be achieved when the credits relating to the fit-out of mechanical systems which at this stage cannot be included, can be accounted for. Additional credits are highlighted for the whole scheme that could protect the anticipated ratings against changes in the detailed design that could affect the ratings. The retail floorspace could potentially amount to approx. 5,000sqm, and therefore separate BREEAM assessment for the offices, the Open Learning Hub and the retail element have been requested by condition. The post construction BREEAM for retail should be submitted after full fit-out and occupation of the retail spaces.
256. The development scores highly on three of the City’s four priority categories of Energy, Water and Pollution. For the fourth priority category, Materials, additional credits relating to the responsible sourcing of materials and the identification of opportunities to reduce environmental impacts of materials will be targeted as part of the detailed design phase and reviewed within the detailed Circular Economy assessment requested by condition. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A condition has been included requiring the submission of post construction BREEAM assessments for all proposed building uses, demonstrating that a target rating of ‘Outstanding’ has been achieved (or a minimum rating of ‘Excellent’ as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an ‘Outstanding’ rating).

Whole Life-Cycle Carbon Emissions

257. Emerging New London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The assessment captures a building’s operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building’s life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility and adaptability of the proposed design on the Whole Life-

Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon city target.

258. A Whole Life-Cycle analysis has been carried out, showing that a significant proportion of the embodied carbon of the base model, approx. 43%, is due to the superstructure. An assessment of low carbon structural solutions results in the following, most significant measures to be considered in the next design stage:
- Maximise the use of demolition materials from the existing building
 - Reduce MEP (Mechanical, Electrical and Plumbing) related embodied carbon
 - Consider low carbon alternatives to typical aluminium frame curtain walling
 - Use 90% recycled steel in reinforcement and concrete with higher GGBS (Granulated Blast-furnace Slag) content cement.
 - Consider the use of a low carbon raised access flooring system.
259. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate emissions well below the Greater London Authority's benchmark emissions target and reach the GLA's aspirational target. A strategy to optimise the results for the proposal's Whole Life-Cycle carbon emissions through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Circular Economy and Waste

260. Emerging New London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.
261. The submitted Draft Circular Economy Statement describes how the building design will incorporate circularity principles and actions according to the 9 circularity principles in the GLA Circular Economy Guidance. A scheme that maintains parts of the base structure was considered but not found technically feasible, given the brief for a tall building development on site in line with the approved planning permission for the site. However, some of the basement structure would be retained.
262. The applicants are committed to achieve a low impact building by employing the following main measures:
- Exploring pre-fabrication of façade and superstructure and utilising bespoke fabrication
 - Optimising thermal fabric specifications and daylight ingress
 - Prioritising green energy supply
 - Including water efficiency measures to achieve at least a 50% reduction in water usage

- Specifying and sourcing materials responsibly by developing a sustainable procurement plan and using a portion of recycled materials or by-products of industrial processes.
- Designing the structure to achieve internal spaces that enable flexibility in use, e.g. with regards to locations of partitions and providing floor slab soft spots
- Designing for disassembly of the superstructure and cores
- Using robust materials fit for purpose and long life
- Develop a Circular Economy fitout guide
- Incorporating easy maintenance and replacement access for plant installations
- Delivering a zero waste to landfill demolition process and exploring the reuse and upcycling of materials, committing to resell equipment and furniture and reuse of façade glass for the existing building
- Managing excavation waste, construction waste and municipal waste responsibly.
- The development aims to be an exemplar of circular design for City office buildings. The applicant commits to:
 - achieve the targets of reusing/recycling/recovering 95 per cent of construction and demolition waste, and putting 95 per cent of excavation waste to beneficial use
 - provide a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility) and a written confirmation that the destination landfill(s) has/ have the capacity to receive waste
 - meet the Mayor's 65 per cent target for Municipal waste recycling
 - demonstrate that all development designs have adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

263. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that these aspirations can be achieved have been requested by conditions. The detailed assessment will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Urban Greening and Biodiversity

264. Local Plan Policy DM19.2, draft City Plan 2036 Policy OS2 and New Publication London Plan Policy G5 requires development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

265. This development proposes some green roof terraces, green walls, trees and planting which would provide biodiversity benefits and visual interest. The external terraces on the western facade of the building (at

Levels 10 and 11) would provide valuable green spaces that contribute to wellbeing and urban greening and provide views to the west of the City. Planted borders would be provided across several levels of the building which would feature green 'fringes' to the external roof terraces. The proposed Winter Garden (between the west and east towers) across Levels 12 and 13, would provide a valuable communal amenity space for occupiers of the building with greening through a mix of planting.

266. The proposed urban greening includes two planters located between 2 Finsbury Avenue and 5 Broadgate which would feature trees, flower-rich perennial planting and public seating. Green walls are proposed around the base of the building to the north, east and south elevations and a two-storey green wall over Levels 3 and 4. The green walls would provide a mix of pollinator friendly species to deliver year-round interest and would assist in improving air quality
267. The UGF for the site has been calculated as 0.1 which would fall short of the target of 0.3 set out in both the draft London Plan and the City's draft Local Plan for commercial development. The applicants have set out details of further greening they intend to carry out across the Broadgate Estate to secure a higher UGF score of 0.3, including a potential green roof on Exchange House or an equivalent financial contribution (£503,000) to be applied by the City Corporation to urban greening within the vicinity of Broadgate.
268. Given the scale and form of the proposed building, opportunities for urban greening and enhancing biodiversity on site would be limited. It has therefore been agreed that further urban greening opportunities across the wider Broadgate Campus, within the ownership of the applicant, would be identified and would be secured as part of the Section 106 agreement.
269. Details of the quality and maintenance of the proposed greening would be required by condition.

Flood Risk, Sustainable Urban Drainage

270. Local Plan 2015 policy CS18 seeks to "reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network". The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2036.
271. The submitted Flood Risk Assessment indicates that this development does not fall within the City Flood Risk Area. The uses proposed are acceptable within the sequential test requirements, so the exceptions test does not apply.
272. The inclusion of SuDS and rainwater harvesting would reduce the risk of sewer surcharge flooding elsewhere in the City by reducing the speed and quantity of rainwater entering the combined drainage

network. This will be especially important as we experience more frequent extreme weather events due to climate change.

- 273. The Lead Local Flood Authority and Thames Water have raised no objections to the proposals and have recommended conditions to be attached.
- 274. The proposed Flood Risk and SuDs strategy would accord with policies CS18 of the Local Plan 2015, CR3 of the draft City Plan 2036, policies 5.12 and 5.13 of the London Plan and policies SI12 and 13 of the draft Publication London Plan.

Climate Resilience

Heat Stress

- 275. The sustainability statement outlines the measures that have been included to prevent overheating including balancing solar gains and daylight access, solar control glazing, openable windows for natural ventilation. These measures will not only reduce the need for carbon intensive air conditioning but will help to make the building resilient to higher temperatures and urban heat island effects.

Water Resources

- 276. The sustainability statement summarises a number of measures to conserve water including rainwater and greywater harvesting and recycling, water metering and leak detection. These measures will enable the development to minimise the use of fresh potable water which will be under increasing pressure as we experience longer periods of drought.

Natural Capital

- 277. Although constrained by its position this development will incorporate some greening on site and elsewhere within the Broadgate Campus or its immediate vicinity. This will help to protect biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winters and more extreme weather events.

Pest & Diseases

- 278. The detailed planting plans will determine how resilient the planting is to pests and diseases that will change as the weather patterns in the City change.
- 279. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and a condition is attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080. These details should demonstrate the resilience of the building and landscaping to hotter drier summers, warmer wetter winters and more frequent extreme weather events for the lifetime of the building.

Conclusion

280. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.
281. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy overall meets current and new London Plan policies as well as Local Plan policies, and it is on track to achieve an “Outstanding” BREEAM assessment rating. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced and Circular Economy principles can be positively addressed through the forthcoming detailed design development. The building would achieve an appropriate degree of climate change mitigation through providing a connection to a potential new or extended renewable heat network while passive energy saving measures and low energy technologies would be employed to significantly reduce carbon emissions. Furthermore, the development would contribute to the Broadgate Biodiversity Framework to help deliver greening improvement in strategically identified locations.

Environmental Impact of the Proposal on the Surrounding Area

Wind Microclimate

282. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. Computational Fluid Dynamics (CFD) simulation and analysis has also been carried out in accordance with the City of London’s Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.
283. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, building entrances and thoroughfares. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.
284. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
285. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major

adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.

286. Rigorous assessments have been carried out for both the windiest season and the summer season with measurements taken for 36 different wind directions for various scenarios including; the existing site and surrounding buildings, the proposed development and existing surrounding buildings and the proposed development with cumulative surrounding buildings.
287. The wind tunnel and CFD results broadly give the same assessment results. Where there is variance this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

Existing Wind Conditions

Wind Conditions at Street Level

288. In the existing baseline conditions the wind tunnel tests and CFD show that conditions are suitable for frequent sitting to standing in use in most locations around the site at street level, which is suitable for its intended use. At the south eastern corner of Crown Place at the junction with Sun Street, wind conditions are suitable for walking and one location with uncomfortable wind conditions during the windiest season. During the summer Season the wind conditions are one category calmer at ground level with majority of the locations are suitable for frequent sitting to walking use.

Wind Conditions at Thoroughfares

289. The existing wind conditions at the public passageway through the site ranges between frequent sitting use to standing use with two locations at the northern entrance of the passageway along Sun Street being suitable for walking use and one location to the east of the site where it is suitable for walking use during the windiest season. These wind conditions in the thoroughfares are suitable for its intended use.

Wind Conditions at Terrace Level

290. During the summer season the existing wind conditions on the roof level terraces on the northern side of One Crown Place generally ranges from frequent sitting to standing use with one area suitable for walking use in the summer season. At the south eastern side of the terraces at One Crown Place, the conditions range from sitting and walking use with one area being uncomfortable.

291. Early testing of the effects of the development on wind microclimate led to the incorporation of a number of features into the design of the building and landscaping. These include:
- Proposed landscaping scheme in Finsbury Avenue Square
 - Proposed landscaping scheme to the east of the Proposed Development with the inclusion of four 8m high deciduous trees in two planters 0.5m high
 - 2.5m solid downstand on both sides of the passageway underneath the Proposed Development;
 - 1.5m high solid balustrades at the terraces to the west and south-east of the Proposed Development
 - Green wall along the eastern façade of the Proposed Development
 - Four 4m high 50% porous 'umbrellas', 3m by 3m in size at the south-west corner of the Proposed Development
 - Final details to be secured by planning condition.

Proposed Wind Conditions

Wind Conditions at Street Level

292. In considering the completed development with mitigation measures in place, in most locations the wind conditions at street level would remain either in the same categories as existing or become one category windier ranging from occasional sitting and standing use but would continue to fall within a suitable category for the intended use.
293. Two locations in the south-west corner of the site would become one category windier from standing to walking use. This area is a servicing entrance would continue to be suitable for the intended use.
294. Following the completed development, wind conditions are expected to become calmer compared to the existing scenario at the junction of Sun Street and Crown Place. This area would become suitable for occasional sitting and standing use and the one uncomfortable area that has been identified in the existing baseline scenario would become suitable for standing.

Wind Conditions at Thoroughfares

295. Following the completed development, the area immediately east of the Proposed Development and 5 Broadgate would become one category windier at five locations changing from standing to walking use. The wind conditions along the thoroughfare going south (leading to Finsbury Avenue Square) and would broadly remain the same and be suitable for occasional sitting and standing during the windiest season. During the summer season, wind conditions are expected to be one category calmer, suitable for frequent sitting use to walking use.
296. The wind conditions within the public passageway through the site and at the northern side of the passageway along Sun Street, would become one category windier and would change from a mix of frequent sitting and occasional sitting to standing and walking conditions, during the windiest season. During the summer season, wind conditions are

expected to be one category calmer, suitable for frequent sitting use to walking use.

297. The conditions along the thoroughfares would continue to be suitable for the intended use as these are not areas where pedestrians are likely to dwell but are expected to pass through. Notwithstanding, a condition has been recommended to secure further wind mitigations measures (in the form of landscaping) in the passageway to the east, between the Proposed Development and 5 Broadgate.

Wind Conditions at Terrace Level

298. During the summer season, the proposed wind conditions on the roof level terraces on the northern side of One Crown Place would broadly remain the same or become one category calmer than in the existing baseline scenario with wind conditions ranging from frequent sitting and occasional sitting. At the south eastern side of the terraces at One Crown Place, the conditions would continue to range from sitting and walking use (broadly similar as in the existing baseline scenario) with the one uncomfortable location becoming calmer to standing use. The improvement would occur as a result of the proposed development providing shelter from the prevailing southerly and south westerly winds.

Conclusions

299. In conclusion, with the proposed wind mitigation measures in place, all locations at street level, in thoroughfares and at roof level terraces would experience wind conditions appropriate for the intended use and there would not be any safety exceedances resulting in unsafe conditions in the proposed and cumulative scenarios.
300. If planning permission were to be granted, a Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the ES.
301. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with Local Plan Policy 7.6, draft Publication London Plan Policy D8, Local Plan Policy DM10.1, and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

Thermal Comfort Assessment

302. Draft New Publication London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature

conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

303. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site, by comparing the predicted felt temperature values and frequency of occurrence.
304. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location.

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

- 305. Three configurations have been assessed including; the existing site with existing surrounding buildings, the proposed development with the existing surrounding buildings and the proposed development with cumulative surrounding buildings.
- 306. Both the landscaping and the wind mitigation measures considered during the wind microclimate assessments have been included in the study.

Ground Level Amenity Spaces

- 307. Finsbury Avenue Square and the recess along Whitecross Place represent the main amenity spaces adjacent to the Site.
- 308. The baseline existing conditions for Finsbury Avenue Square range from “Seasonal” to “All Season”. With the Proposed Development in place, the thermal comfort conditions remain suitable for the indented pedestrian use ranging from “Seasonal” to “All Season”. All the outdoor dining areas situated along the perimeter of Finsbury Avenue Square are comfortable all year-round.
- 309. The outdoor seating area situated in the recess along Whitecross Place remains comfortable all year-round.
- 310. The conditions at the ground level amenity spaces would be would continue to be suitable for the intended pedestrian use.

Terrace Level Amenity Space

- 311. The thermal comfort conditions on the terrace level amenity spaces of the Proposed Development mainly range from “Seasonal” to “All Season”. A small portion of the lower western terrace is missing by a few percentage points the 70% comfort criteria threshold during wintertime, transitioning into the “Short-Term” category. This zone covers less than 2% of the overall terrace area. Considering that the comfort percentage is predicted to be higher than 90% during all the remaining seasons, when the terraces are more likely to be in use, it is possible to conclude that the thermal comfort conditions on the proposed terraces would be suitable for the intended use.

Onsite thoroughfare locations

- 312. The main onsite thoroughfares are the new ground level passageway being created which will connect Finsbury Avenue Square with Sun Street, the thoroughfare on the east of the Site between the Proposed Development and 5 Broadgate and the area along Whitecross Place immediately to the south of the proposed 2 Finsbury Avenue building.

New ground level passageway

- 313. The thermal comfort conditions along the newly created passageway range from “All-Season” to “Short-Term Seasonal” The areas achieving “Short-Term Seasonal” conditions are mostly located at the northern entrance of the passageway while the covered area is mainly achieving “Seasonal” to “Short-term” conditions. High levels of comfort, above 76%, are still achieved during spring, summer and autumn. The conditions would continue to be suitable for the intended pedestrian use.

Thoroughfare between the Proposed Development and 5 Broadgate

- 314. The baseline existing conditions along the thoroughfare between the Proposed Development and 5 Broadgate range from “Seasonal” to “Short-Term” and are suitable for the intended use.
- 315. With the Proposed Development in place the thermal comfort conditions range from “Seasonal” to “Short-Term Seasonal”. High levels of comfort, above 76%, are still achieved during spring, summer and autumn. The conditions would continue to be suitable for the intended pedestrian use.

Whitecross Place

- 316. The baseline existing conditions along Whitecross Place range from “All Season” to “Seasonal” and is suitable for the intended use.
- 317. With the Proposed Development in place the wind conditions range from “Seasonal” to “Short-Term Seasonal”. The extent of the area achieving “Short-Term Seasonal” conditions is limited and located in the proximity of the southwestern corner of the development while a large portion of Whitecross Place remains comfortable all year-round. High levels of comfort, above 80%, are achieved during spring, summer and autumn. The conditions would continue to be suitable for the intended pedestrian use.

Offsite thoroughfare locations

- 318. The main offsite thoroughfares are Sun Street, to the north of the Site, and Wilson Street, located west of the Site.

Sun Street

- 319. The baseline existing thermal comfort conditions along Sun Street range from “Seasonal” to “Short-Term Seasonal” and are therefore suitable for the intended pedestrian use. High levels of comfort, above 80%, are achieved during spring, summer and autumn. The thermal comfort levels drop during wintertime when the wind speeds are the highest and the temperature the lowest. This is primarily due to a combination of low direct sun access and downdraught effect caused by One Crown Place for the strong south westerly winds, common during winter.
- 320. With the Proposed Development in place, the thermal comfort conditions along Sun Street range from “Seasonal” to “Short-Term Seasonal”. Similar to the existing conditions, high levels of comfort are achieved during spring, summer and autumn. During wintertime, the Proposed Development shelters Sun Street from the south-westerly winds, significantly reducing the wind speeds at pedestrian level. This effect results in a considerable increase of the thermal comfort conditions during wintertime corresponding to a large portion of Sun Street shifting from “Short Term” to “Seasonal”. The Proposed Development is therefore improving the overall thermal comfort conditions along Sun Street both in the context of existing and

cumulative surroundings configurations. The beneficial effect of sheltering from the south-westerly winds extends beyond Sun Street and positively affects Crown Place and Finsbury Square as well. A large portion of Crown Place experiences improved thermal comfort conditions, in particular during wintertime, and transitions from “Short Term” to “Seasonal”. The improved thermal comfort conditions are particularly relevant for the area in front of the retail unit located on the south-eastern corner of Crown Place.

Wilson Street

321. The baseline existing conditions on Wilson Street range from “All-Season” to “Short-Term”. These conditions are suitable for the intended pedestrian use.
322. With the Proposed Development in place the thermal conditions along Wilson Street range from “All-Season” to “Short-Term Seasonal”. The transition of some areas along Wilson Street into more transitory thermal comfort categories is related to a reduction in thermal comfort levels during wintertime. A large portion of the areas ranking as “Short-Term Seasonal” is only a few percentage points away from the 50% comfort threshold during wintertime. High levels of comfort, above 78%, are still achieved during spring, summer and autumn and would be suitable for the intended pedestrian use.

One Crown Place Terraces

323. The baseline existing conditions on the terrace level amenity spaces of One Crown Place range from “All-Season” to “Short-Term Seasonal”. Areas ranking as suitable for long-term activities are mainly located on the lower terraces, while more transitory categories are to be found on the higher terraces, in particular on the upper-south eastern terrace due to the significant wind exposure to the south westerly winds, resulting in a portion of the terrace ranking as “Seasonal” and “Short-Term Seasonal”. (It is worth noting that both the CFD and the wind tunnel wind microclimate assessments highlighted the same area on the terraces as unsuitable for the intended amenity use).
324. The thermal conditions with the proposed developed in place remain largely unaltered for the upper terraces, where a beneficial reduction in wind speed during wintertime is compensated by the overshadowing effect of the Proposed Development. Significant improvements are realised on the lower terraces of the development corresponding to a 20% increase of the available terrace area achieving comfortable conditions all-year round. Marginal improvements are also noticeable on the northern upper terraces. The percentage of terrace area ranking as “Short-Term Seasonal” is increased by a couple of percentage points in the configuration with the Proposed Development in place however the difference is only affecting the portion of the south-eastern terraces already highlighted as unsuitable for the intended use by the wind microclimate study. The thermal comfort percentage in this area is predicted to be higher than 78% during all the remaining seasons, when the terraces are more likely to be in use

325. The proposed development's impact on thermal comfort on the terrace level amenity spaces of One Crown Place is therefore expected to range between beneficial and negligible.

Thermal Comfort Conclusion

326. The Proposed Development's impact on thermal comfort in the existing pedestrian realm is expected to be minor to negligible.
327. All the transitory and standing areas including roads, crossings, thoroughfares, entrances and bus stops are predicted to achieve appropriate thermal comfort conditions post-construction.
328. The thermal comfort conditions for all the ground level amenity spaces remain suitable for the intended use ranging from "Seasonal" to "All Season". All the outdoor dining areas, located along the perimeter of Finsbury Avenue Square and in the recess along Whitecross Place, remain comfortable all year-round.
329. The thermal comfort conditions on the terrace level amenity spaces of the Proposed Development mainly range from "Seasonal" to "All Season" and would be considered to be suitable for intended the intended use.
330. The Proposed Development's impact on thermal comfort on the terrace level amenity spaces of One Crown Place is expected to range between beneficial and negligible.
331. It is considered that the thermal comfort in and around the site, would be acceptable in accordance Publication London Plan Policy D8, Policy D9 and draft City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Daylight, Sunlight, Overshadowing

332. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces is included in the environmental statement (October 2020), supplemented by an Addendum dated 13th January 2021. Chapter 11 of the environmental statement identifies the methodology employed. When referring to the degree of adverse impact in this report (negligible, minor, moderate etc..) in this report, officers have adopted the terminology used in the environmental statement when describing the degree or extent of adverse impacts. The officers agree with the judgements reached in the environmental statement when arriving at the assessment of the degree or extent of adverse impact. The guidelines set out in Building Research Establishment (BRE) Guidelines: Site Layout Planning for Daylight and Sunlight (2011) are used as the basis for the assessment in the environmental statement, and in particular, when describing effects.

333. Policies 7.6 and 7.7 of the London Plan, policy DM10.7 of the Local Plan and policy DE8 of the draft City Plan set out the policy approach. Policy D6(D) of the draft Publication London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.
334. London Plan Policy 2.12 states that the Mayor and boroughs should work to develop sensitive mixed use policies to ensure that housing does not compromise strategic functions (including the increase in office floorspace) within the Central Activities Zone (CAZ). The Mayor's Central Activities Zone Supplementary Planning Guidance (SPG) identifies that it is important to strike a balance when considering areas within the CAZ that are appropriate for mixed use development including residential to ensure that business clusters in the CAZ are not undermined. Table 1.1 within the SPG provides general guidance on the appropriate balance between offices and residential in different parts of the Zone. It states that in the City Fringe Opportunity Area, offices and other CAZ strategic functions are to be given greater weight relative to new residential development.
335. The policy set out in Policy DM10.7 of the Local Plan is to resist development which would reduce noticeably the daylight and sunlight available to nearby residential dwellings and open spaces to unacceptable levels, taking account of the BRE's guidelines. The Local plan states (at paragraph 3.10.41) that the City Corporation will apply the methods in the BRE guidelines consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city-centre locations. The approach indicated by planning policy, in particular London Plan policy 7.6B is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. In applying London Plan policy 7.6B the BRE Guidelines can be used when assessing whether harm is likely to occur, and further judgement made as to whether any such harm is unacceptable. Both the London Plan and Local Plan policies require a judgement to be made as to whether any harm is unacceptable and whether any reduction results in unacceptable levels of daylight and/or sunlight. The draft City Plan policy DE8 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context. Draft publication London Plan policy D6(D) provides that the design of development should provide sufficient daylight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
336. The residential buildings to be considered include those at the new development at One Crown Place, ancillary residential at The Flying Horse Public House and St Mary Moorfields Roman Catholic Church. Impact on three public amenity spaces is also to be considered.

337. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises.
338. The dense urban environment of the City, is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would result in a diminution of daylight and sunlight to surrounding commercial premises, the proposed development provides a degree of separation such that it would not have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10.

Daylight

339. Impact on daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL) and Average Daylight Factor (ADF) these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC or the NSL guidelines are not met.
340. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

St Mary Moorfields RC Church

- 341. This religious building is located south of the Proposed Development. A total of 67 windows serving 30 rooms were assessed for daylight within this building.
- 342. For VSC, 66 of the 67 (98.5%) windows assessed would meet BRE's criteria and are therefore considered to experience a negligible effect.
- 343. The one affected window would experience an alteration in VSC between 20-29.9% which is considered a Minor Adverse effect. This window has a low existing VSC of 6.2% and as such the change is 1.6%.
- 344. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a negligible effect.

Flying Horse Public House

- 345. This building is located north of the Proposed Development. A total of eight windows serving seven rooms were assessed for daylight within this building.
- 346. For VSC, six of the eight (75%) windows assessed would meet BRE's criteria and are therefore considered to experience a negligible effect.
- 347. Of the two impacted windows, both would experience an alteration in VSC slightly greater than 40% (41% and 41.5% respectively) which is considered a major adverse effect.
- 348. For NSL, all rooms assessed would meet BRE's criteria and so are considered to experience a negligible effect.

One Crown Place

- 349. This building is located opposite the proposed development and is currently under construction.
- 350. The impact on this building is considered above, when responding to AMTD's objection.
- 351. For VSC, 1052 of the 1548 (68%) windows assessed would meet BRE's criteria and are therefore considered to experience a Negligible effect.
- 352. Of the 496 remaining affected windows, 51 would experience an alteration in VSC between 20-29.9%, which is considered a minor adverse effect, and 94 would experience an alteration between 30-39.9%, which is considered a moderate adverse effect. The remaining 351 windows would experience an alteration in excess of 40%, which is considered a major adverse effect.
- 353. For NSL, 563 of the 620 (90.8%) rooms assessed would meet BRE's criteria and are therefore considered to experience a negligible effect.
- 354. Of the 57 remaining affected rooms, four would experience an alteration in NSL between 20-29.9%, which is considered a minor

adverse effect, and four would experience an alteration between 30-39.9%, which is considered a moderate adverse effect. The remaining 49 rooms would experience an alteration in excess of 40%, which is considered a major adverse effect.

355. Overall, considering the VSC and NSL methods of assessment, the Proposed Development gives rise to a number of effects on One Crown Place which are described as 'major adverse' (significant).
356. An assessment of ADF has also been undertaken. In the baseline scenario 580 (93.5%) out of 620 rooms would retain ADF levels in line with those recommended within the BRE Guidelines and would result in well daylighted spaces. Should 1.5% ADF be considered acceptable for combined Living/Dining/Kitchen areas (L/K/Ds), this would increase to 97.1%.
357. In the Proposed Development Scenario, 499 (80.5%) out of all 620 rooms would retain ADF levels in line with those recommended within the BRE Guidelines and would result in well daylighted spaces. Should 1.5% ADF be considered acceptable for combined Living/Dining/Kitchen areas (L/K/Ds), this would increase to 84.5%.

Sunlight

St Mary Moorfields RC Church & Flying Horse Public House

358. All 18 rooms within St Mary Moorfields RC Church and The Flying Horse Public House assessed for Annual Probable Sun Hours and Winter Probable Sun Hours would meet the BRE Guidelines criteria (alterations below 20%) and are therefore considered to experience a negligible effect.

One Crown Place

359. A total of 176 rooms were assessed for sunlight within One Crown Place, of which 123 (69.9%) would meet the BRE's criteria for both Annual and Winter PSH.
360. For Annual PSH, 146 of the 176 (82.9%) rooms assessed would meet BRE's criteria and are therefore considered to experience a negligible effect.
361. Of the 30 remaining rooms affected annually, four would experience an alteration in Annual PSH between 30-39.9%, which is considered a moderate adverse effect, whilst 26 would experience an alteration in excess of 40%, which is considered a major adverse effect.
362. For Winter PSH, 130 of the 176 (73.8%) rooms assessed would meet BRE's criteria and are therefore considered to experience a negligible effect. The remaining 46 see losses greater than 40%, which is considered a major adverse effect.
363. Overall, the Proposed Development will give rise to a number of effects on One Crown Place which when compared with the Baseline Scenario, are described as 'major adverse'.

Conclusion on Daylight & Sunlight

364. In summary, the proposed development would have a Major Adverse impact on the daylight and sunlight to a number of rooms within the soon to be completed development at One Crown Place. There will be some harm to the living conditions within this building as compared to the baseline, with losses of daylight and sunlight noticeable. However, the adopted and emerging Local Plans indicate that impacts on daylight and sunlight have to be considered within the context of what is appropriate given the City Centre location and the fact that ideal daylight and sunlight conditions may not be practicable in densely developed city- centre locations,. It is not considered that the proposal would result in an unacceptable impact on the residential use of the property. As such the extent of harm is not considered to be such that it would conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft Local Plan. It is also the view of officers that the proposals would not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, and that London Plan policy 7.6B is complied with. Officers also consider that surrounding housing will enjoy sufficient daylight and sunlight which is appropriate for its context, and that draft Publication London Plan policy D6D is complied with.
365. In the environmental statement the impact of the scheme consented by the planning permission granted in March 2018 is considered. Your officers, in performing their assessment, have considered the impact of the proposed development when compared to existing circumstances (the baseline) without taking account of the effects on sunlight and daylight that would occur were the scheme authorised by the extant planning permission to be built. The view taken by officers is, based upon comparing the proposed development with existing circumstances, the scheme is acceptable.

Overshadowing

366. BRE Guidelines recommend that for an external space to appear well lit, at least 50% of the area should receive at least 2 hours of sunlight on March 21st. If as a result of development an amenity area does not meet the above and the area which receives two hours of direct sunlight is reduced to less than 0.8 times its former value (i.e. more than 20% reduction) then the loss of sunlight is likely to be noticeable.

Public Open spaces:

367. The potential overshadowing impacts of the proposed development has been assessed on 3 surrounding public amenity areas:
- Finsbury Square;
 - Exchange Square;
 - Crown Place pedestrian amenity area;

Finsbury Square & Exchange Square

Transient Overshadowing

21st March – Spring Equinox

368. In assessing transient overshadowing, on 21st March, shadow is cast from the Proposed Development from 08:00 GMT in a north westerly direction until 17:00 GMT. All three amenity areas are cast in shadow from existing structures at this time.
369. Between 09:00 GMT and 10:00 GMT, shadows encroach on Finsbury Square. The shadow clears by 11:00 GMT, by which time the area experiences a period of direct sunlight throughout the afternoon.
370. At 13:00 GMT, a small strip of shadow is cast onto the Crown Place pedestrian amenity area, alongside shadowing from existing structures which remain present for the remainder of the day. This small strip moves across the area and clears completely by 15:00 GMT. Exchange Square is not affected by the Proposed Development at any point during the day.

21st June – Summer Solstice

371. On 21st June, shadow is cast from the Proposed Development in a north westerly direction from 09:00 GMT. Owing to the developed nature of the surrounding area, the majority of overshadowing is a function of existing structures. As such, Finsbury Square and Exchange Square are not affected by overshadowing from the Proposed Development, with Crown Place pedestrian amenity area experiencing only a short period of overshadowing between 13:00 GMT and 14:00 BST.

21st December – Winter Solstice

372. On 21st December, shadow is cast from the Proposed Development in a north westerly direction from 09:00 GMT. Owing to the developed nature of the surrounding area, the majority of overshadowing is a function of existing structures. As such, Finsbury Square and Exchange Square are not affected by overshadowing from the Proposed Development, with Crown Place pedestrian amenity area experiencing only a short period of overshadowing between 13:00 GMT and 14:00 BST.

Sun Hours on Ground (SHOG)

373. In assessing sun hours on the ground, when comparing the Baseline scenario with the Proposed Development scenario, all three amenity areas assessed see little to no alteration (0-1%) from the percentage of total area which receives at least two hours of direct sunlight on March 21st. Therefore, all three amenity areas are considered to experience a negligible effect from the shadow cast from the Proposed Development.

One Crown Place

374. SHOG assessments have been undertaken for all the private and communal areas within One Crown Place. When compared with the Existing Baseline Scenario, the effects of the Proposed Development are considered major adverse on three terraces and minor adverse on one open space. The remaining eight areas are considered negligible.
375. Overall, the effect of the of the Proposed Development Scenario would be major adverse (significant) on three roof terraces against Baseline conditions.

Cumulative Impact

376. For daylight in the cumulative scenario, St Mary Moorfields RC Church and Flying Horse Public House were assessed given their proximity to the emerging cumulative scheme at 1&2 Broadgate.
377. In terms of daylight, St Mary Moorfields Church is considered to experience a significant (moderate) adverse effect with the Proposed Development and 1&2 Broadgate in situ. The impact to the Flying Horse Pub does not change from the Proposed Development scenario and therefore the effect remains not significant.
378. In terms of sunlight, St Mary Moorfields building is considered to experience a significant (moderate) adverse effect with the Proposed Development and 1-2 Broadgate in situ. Given that no effects occur in the Proposed Development scenario, the adverse effect is a function of the 1-2 Broadgate development. The impact to the Flying Horse Pub does not change from the Proposed Development scenario and therefore the effect remains not significant.
379. No additional overshadowing effects are considered likely in the cumulative scenario and therefore the effect remains not significant for all three amenity areas.
380. As such the proposal is considered to comply with Policies 7.6 and 7.7 of the London Plan, policy DM10.7 of the Local Plan, policy DE8 of the draft City Plan and Policy D6(D) of the draft Publication London Plan in that the development would not have an unacceptable impact on the overshadowing of surrounding public spaces.

Solar Glare

381. Four locations have been identified in the ES as sensitive to solar glare within 600m around the site in all different directions. There are located west of Chiswell Street looking east; at the southern end of Finsbury Square looking east; on Wilson Street north of Sun Street looking south; and on Wilson Street at the junction with Lackington Street looking north. The potential effect of the impact of solar glare on road users has been assessed at the most sensitive traffic junctions around the site.
382. The assessment considers the potential occurrence, proximity and duration of solar reflections from the Proposed Development owing to

its size and large areas of glazed façade visible at these road traffic junctions. At the locations where there is more than one road traffic signal from which the Proposed Development is visible, several viewpoints have been tested.

- 383. Of the four locations assessed, the assessment concludes that at one of the junctions assessed (CAM 2A), the proposed development would have a negligible effect. Solar reflections would occur at 25o to 26o of a road user's line of sight between 16:00 GMT and 17:00 GMT from mid-April and mid-May and mid-July to mid-August for a very short period of time on very limited portions of the façade.
- 384. At the three remaining locations (CAM 1, CAM 2B and 2C and CAM 4), based on a combination of criteria including angle of the solar reflection (ranging from 19o to 30o) in relation to the road users' line of sight, the ability to deploy a visor, the duration of the solar glare and the existence of alternative traffic signals at junctions enabling the road user to use different options, the effects of solar glare as a result of the proposed development are assessed as being 'minor adverse'.
- 385. The assessment in the environmental assessment concludes that no additional measures are required to mitigate the impact of solar glare.
- 386. 26. If planning permission were to be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion but prior to occupation which would include details of any mitigation measures (if considered necessary). The development would comply with the London Plan, policy D9 of the draft Publication London Plan, Local Plan policy DM10.1 and draft City Plan 2036 policy DE8 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.

Light Pollution

- 387. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
- 388. In terms of light pollution (i.e. the brightening of the night sky caused by artificial lighting) two surrounding sensitive buildings, One Crown Place and the Flying Horse Pub, have been assessed for potential light trespass. The assessment showed that there would be a negligible effect at One Crown Place and the Flying Horse Pub, for light intrusion pre-curfew (before 11pm). The assessment showed that there would be a negligible effect at the Flying Horse Pub for light intrusion post-curfew (after 11pm), and whilst some impact was identified at One Crown Place, it is considered that a condition requiring a detailed lighting strategy would adequately mitigate this impact. The condition would require the submission and approval of the strategy prior to the occupation of the building demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity,

uniformity, colour, a controlled passive infra-red system and associated management measures to reduce the impact on light pollution and residential amenity.

389. The development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 and has been designed as to avoid light spill.

Air Quality

390. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy 7.14 of the London Plan and policy SI of the draft Publication London Plan.
391. The Environmental Statement includes an assessment of the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.
392. The assessment states that during demolition and construction the effects from dust will be mitigated in accordance with the measures set out in the Greater London Authority's Supplementary Planning Guidance. Mitigation measures shall be written into a dust management plan which would be secured by condition. With regards to demolition and construction traffic, the site is located within London's Ultra Low Emission Zone and therefore all construction vehicles will need to meet these stringent emissions standards. In addition, a Construction Environmental Management Plan and a Construction Logistics Plan will be implemented to minimise the road traffic and environmental impacts
393. The assessment has identified that the proposal will not cause significant air quality impacts once completed and in use. Additionally, the development will be air quality neutral, as required for all new developments in London.
394. The City's Air Quality Officer has no objection and has commented that the development will be car free and heating will be through an electric system utilising air source heat pumps which is welcomed and that the emissions associated with the vehicle trips have been assessed and should have negligible impact on the local air quality. They also state that the development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment and recommend that a condition is attached requiring the submission and approval of an Air Quality Report to detail how the finished development will minimise emissions and exposure to air polluting during its operational phase

and will comply with the City of London Air Quality Supplementary Planning Document and the submitted Air Quality Assessment.

395. Subject to compliance with conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, policy 7.14 of the London Plan and policy SLI of draft Publication London Plan which all seek to improve air quality.

Noise and Vibration

396. Local Plan 2015 policy DM15.7, London Plan policy 7.15 and draft Publication London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
397. The Environmental Statement assesses the impact from noise and vibration on the surrounding area, including noise and vibration from demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.
398. In most City redevelopment schemes the main noise and vibration issues occur during demolition and early construction phases. The Assessment identifies significant adverse effects (without mitigation) on One Crown Place (major adverse for all activities), the Flying Horse Pub / St Christopher's Inn (major adverse all activities except superstructure) and 33 Finsbury Square (moderate adverse during demolition and bulk dig). All other receptors are predicted to result in a Minor Adverse or Negligible effect (not significant).
399. The Assessment concludes that with the mitigation measures adopted, the likely residual effects from demolition construction activities are expected to reduce, but would not remove significant adverse effects, although they should reduce their prevalence and therefore are welcomed.
400. The assessment also identified the potential for significant adverse vibration effects. Mitigation measures such as vibration limits and monitoring will be implemented, however it is anticipated that some significant adverse effects are likely to remain. There is expected to be a temporary significant adverse effect in relation to vibration at One Crown Place and Flying Horse Pub / St Christopher's Inn due to their close proximity to the site.
401. Noise and vibration mitigation, including control over working hours and types of equipment to be used would be included in a Construction Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics

Plan Guidance. Environmental Health Officers have requested the conditions be attached in order to mitigate the construction impacts. It is therefore considered that the temporary residual impacts would be acceptable.

402. During the operational phase of the development, the Assessment concludes that there would be a negligible impact on noise levels from road traffic compared with the existing.
403. Noise levels from mechanical plant in the completed development would need to comply with the City of London's standard requirements that noise output should be 10dB below background noise levels and would be approved under planning conditions to ensure that there would not be an adverse effect on the surrounding area.
404. The submitted noise assessment indicated that the requirements of these conditions can be satisfactorily met and consequently the proposals would comply with London Plan policy 7.15, draft London Plan policy D13, Local Plan policy DM15.7 and draft City Plan 2036 policy HL3.

Health Impact Assessment

405. The applicants have submitted a Health Impact Assessment which has been based on the Healthy Urban Development Unit (HUDU) to develop a comprehensive assessment outlining how the proposed development could impact on health, identifying relevant pathways towards health outcomes drawing on the wider determinants of health. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:
406. Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment, as well as the creation of job opportunities during construction;
 - Provision of a flexible community learning hub (the 'Open Learning Hub') providing a space dedicated to a range of learning and training facilities;
 - A new north-south pedestrian passageway will be created between Finsbury Avenue and Sun Street which will improve pedestrian access and permeability to the existing civic space at Finsbury Avenue Square and alleviating demand on pedestrian routes;
 - Provision of high-quality public realm at the ground floor improving the physical environment and contributing to social cohesion;
 - Two large terraces (the 'Western Terraces') at Levels 10 and 11 which will have extensive green planting and a winter garden at Levels 12 and 13 which will provide a climate-variable green space for office tenants to access;
 - A car-free development minimising vehicles travelling to the site;
 - Building design considering the context of the site and maximising benefits including employing system to reduce energy usage;
 - Consideration to sustainability and inclusive design; and

- Provision of long and short stay cycle parking spaces and associated facilities to promote cycling and other active travel options
407. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:
- Implementation of a Construction Environmental Management Plan to minimise any environmental effects including dust (via Dust Management), noise and vibration;
 - Implementation of a Construction Logistics Plan to minimise the environmental and road traffic related impacts of the demolition and construction works;
 - Implementation of a Delivery and Servicing Management Plan setting out access, delivery times and booking system; and
 - Implementation of a Cycling Promotion Plan to encourage cycling.
 - A Sustainable Urban Drainage Strategy
 - A Waste Management Strategy
 - Local Training Skills and Job Brokerage Strategy
 - Landscaping Management Plan
408. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations. The development seeks to improve the health and addresses health inequalities, the residual impact would be acceptable, and the proposals would comply with London Plan policy 3.2 and draft London Plan policy GG3 and draft City Plan 2036 policy S1.

Planning Obligations and Community Infrastructure Levy

409. 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.
410. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
411. From 1st 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 Mayors 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).
412. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (Excl. Indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£15,343,236	£14,729,507	£613,729

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (Excl. Indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£6,311,400	£5,995,830	£315,570
City Planning Obligations			
Affordable Housing	£1,683,040	£1,666,210	£16,830
Local, Training, Skills and Job Brokerage	£252,456	£249,931	£2,525
Carbon Reduction Shortfall (<i>as designed</i>) - <i>Not Indexed</i>	£to be calculated on completion	£to be calculated on completion	£to be calculated on completion
Section 278 Design and Evaluation <i>Not Indexed</i>	£50,000	£50,000	£0
S106 Monitoring Charge	£4,500	£0	£4,500
Total liability in accordance with the City of London's policies	£8,301,396	£7,961,971	£339,425

City's Planning Obligations

413. 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
- Wind Audit
- Solar Glare Assessment
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (Demolition and Construction)
- Delivery and Servicing Management Plan (including Consolidation)
- Cycling Promotion Plan
- Legible London Contribution (£20,000)
- Cycle Hire Contribution (£220,000)
- TfL Cycleway Contribution (TBC)
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement
- Public Route Access (Provision and Management Plan for pedestrian arcade running through the site between Finsbury Avenue Square and Sun Street)
- Public Art Relocation (Chromorama sculpture)
- Open Learning Hub (Provision and Management Plan)
- SME / Incubator Space (Provision and Plan for 33 desk spaces)
- Urban Greening / Tree Planting

414. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

415. The scope of the s278 agreement may include, but is not limited to, Hostile Vehicle Mitigation measures, a new vehicle crossover, cycle parking, tree planting, , highway and footway works to Sun Street and Wilson Street, and any other works necessary to make the Development acceptable.

Monitoring and Administrative Costs

416. 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.

417. 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

418. 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.

The Public Sector Equality Duty (section 149 of the Equality Act 2010)

419. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:
- a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
420. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. It is the view of officers that a decision to grant permission in this case would remove or minimise disadvantages suffered by persons who suffer from a disability and in particular mobility impairment by providing enhanced and accessible public realm. It is also the view of officers that the provision of accessible floorspace together with the proposed 'open learning hub' would advance equality of opportunity.

Human Rights Act 1998

421. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR")).
422. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of the properties. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace and contributing to the City's primary business and professional services function, together with the proposed 'open learning hub', outweighs the Minor Adverse impact and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.
423. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising though impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference is in the public interest and proportionate.

Conclusions

- 424. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Publication London Plan and the draft Local Plan and considering all other material considerations.
- 425. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorspace to meet the demands of different types of business occupiers, including incubators, start-ups and other small and medium sized companies. The office space would be complemented by an exemplar 'Open Learning Hub' (Class F1) at ground, first and second floor levels at the north west corner, facing onto Wilson Street and Sun Street. The vision for the Open Learning Hub is to create a shared resource and an accessible and inclusive route into the knowledge and expertise of the City for use by local communities and networks.
- 426. The Proposed Development comprises the demolition of two 1980s retail and office buildings and the replacement proposed delivers a high quality, office-led development in, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses.
- 427. The proposed development would deliver the highest architectural quality through two dynamic towers coherently connected by a podium which would deliver an engaging, distinctive and vibrant building designed to be responsive at a macro and local context. The development would be a positive and lasting addition to the skyline and the streetscapes and represents a responsive approach to bulk, height, scale, massing, quality of materials and detailed design. The proposals would comply with NPPF design policies para 124, 127 draft London Plan policy paras 7.4 and 7.6, draft Publication London Plan policy D1, D3, Local Plan Policies CS10 and DM10.1, S8 and emerging City Plan Policy DE2.
- 428. The building would be designed to high sustainability standards, incorporating integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles.
- 429. Dedicated areas of planting and greening would be incorporated into the development through a combination of external terraces with perimeter planting; green walls; and new tree planting at ground level within the surrounding public realm.
- 430. The scheme delivers significant public realm enhancements, including a generously proportioned north-south passageway through the site, connecting Sun Street and Finsbury Avenue Square with a minimum of 732 sqm of active ground floor commercial units (suitable for drinking establishments and restaurants).

431. The increase in floorspace and occupation places extra pressure on the comfort and safety of the City's streets. The overall width of the existing pavements around the site would be enlarged to increase their capacity and improve pedestrian comfort levels. Overall, the PCLs are much improved due to the setting back of the building and the new, step free, public pedestrian route through the development.
432. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel.
433. Objections have been received from neighbouring occupiers at One Crown Place (OCP) relating to the design, massing and the impact on townscape views of the development, its impact on designated and non-designated heritage assets and the impact on the environment and amenity of the immediately surrounding area and the building at One Crown place. This report has considered these impacts, and conditions have been recommended to mitigate the impacts including the implementation of wind mitigation measures.
434. The site does not lie in an area which is considered to be inappropriate for a tall building. The site is considered suitable for tall buildings having regard to the criteria set out in policy CS14(3) of the Local Plan. The proposed height is considered acceptable in the context of an existing and emerging cluster of tall buildings on the City Fringe. The proposal complies with Local Plan Policy CS14, draft City Plan Policy S12, London Plan Policy 7.7 and draft Publication London Plan D9. The proposal would not harm and would protect pan-London LVMF and local strategic views in accordance with Local Plan Policy CS13(1), London Plan Policies 7.11 and 7.12, draft City Plan 2036 Policy S13 and draft Publication London Plan Policy HC4 and associated guidance in the LVMF SPG and Protected Views SPD. Following rigorous assessment, it is concluded that the proposal would preserve the setting and significance of St Paul's Cathedral and comply with LVMF SPG and Protected Views SPD.
435. The proposal would preserve the special interest/significance and setting of 1 Finsbury Avenue, Park House and Garden House, Britannic House, Salisbury House, 25 London Wall, Lutyens House, The Flying Horse Public House St Botolph without Bishopsgate Church St Botolph Church Hall, Bishopsgate Parish Memorial and drinking fountains and over throws. The proposal would preserve the special interest/significance and setting of the Finsbury Circus, Bunhill Fields and Finsbury Square, Bishopsgate and Sun Street Conservation Areas. In relation to other designated and non-designated heritage assets, it is considered that the proposed development would not harm their significance or setting.
436. The application proposals accord with London Plan policy 7.8, Local Plan policies CS12, DM12.1, DM12.3 and DM12.4, draft Publication London Plan policy HC1 and with the emerging City Plan policy HE1. The objective set out in section 66(1) of the Planning (Listed Buildings

and Conservation Areas) Act 1990, in particular that of preserving the settings of listed buildings is achieved.

- 437. The proposals comply with strategic objective 1 in the Local Plan and with the policies relating to offices and to economic growth.
- 438. The environmental impact of the development on the neighbouring buildings and spaces has been assessed.
- 439. The proposed development would have a Major Adverse impact on the daylight and sunlight to a number of rooms within the soon to be completed development at One Crown Place. Despite failure to comply with BRE criteria, it is not considered that the proposal would result in an unacceptable impact on residential amenity in the context of the location of the site in a densely developed City Centre location, and will not reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels. As such, the extent of harm is not considered to be such as to cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036. It is also the view of officers that the proposals would not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, and that London Plan policy 7.6B is complied with. Officers also consider that surrounding housing will enjoy sufficient daylight and sunlight which is appropriate for its context, and that draft Publication London Plan policy D6D is complied with. In any event, it is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace and contributing to the City's primary business and professional services function, outweighs the identified Major Adverse impact.
- 440. Negative impacts during construction would be controlled as far as possible by implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
- 441. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.
- 442. The development would regenerate the Liverpool Street area through improved public realm connectivity and activation and represents good growth. This development would be an exemplary in its progressive approach to sustainable, circular, accessible and behavioural design addressing many of the key issues facing the City, London and the UK

by providing a state of the art workplace that contributes to the local environment, City workers and local communities.

443. It is the view of officers that the proposal complies with the development plan when considered as a whole and that other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached.

Background Papers

Internal

Memo, DBE Transport, 03 December 2020
Memo, Stephanie Hughes (Air Quality), 15 December 2020
Memo, Lead Local Flood Authority, 17 December 2020
Memo, Archaeology, 07 January 2021
Memo, Access Team, 08 January 2021
Memo, Department of Markets and Consumer Protection, 11 January 2021
Memo, Planning Obligations, 11 January 2021
Memo, City Public Realm, 15 January 2021
Email, Patrick Hegarty (Open Spaces), 05 February 2021
Memo, Department of the Built Environment, 09 February 2021

External

E-mail, NATS Safeguarding, 25 November 2020
E-mail, Crossrail Safeguarding, 27 November 2020
Letter, London City Airport, 02 December 2020
E-mail, Heathrow Airport Limited (Airport Safeguarding), 02 December 2020
Letter, City of Westminster, 02 December 2020
Letter, Natural England, 08 December 2020
Letter, Royal Borough of Kensington and Chelsea, 11 December 2020
Letter, London Borough of Tower Hamlets, 14 December 2020
Letter, Twentieth Century Society, 15 December 2020
Letter, London Borough of Southwark, 15 December 2020
E-mail, Thames Water, 17 December 2020
Letter, London Borough of Hammersmith and Fulham, 18 December 2020
Letter, London Borough of Richmond, 04 January 2021
Letter, Forsters LLP, 11 January 2021
Letter, London Borough of Hackney, 14 January 2021
Letter, Greater London Authority, 25 January 2021
Planning report GLA/2020/6825/S1/01, Greater London Authority, 25 January 2021
Letter, Royal Borough of Kensington and Chelsea, 28 January 2021
E-mail, Crossrail Safeguarding, 29 January 2021
Online Comment, Mr Alessio Sancetta, 31 January 2021
E-mail, NATS Safeguarding, 04 February 2021
Letter, Historic England, 05 February 2021
Letter, London Borough of Tower Hamlets, 05 February 2021
E-mail, Natural England, 09 February 2021
Letter, London Borough of Southwark, 10 February 2021

Application Documents

BRUKL Output Document, 22 September 2020
Fire Statement, OFR, 30 September 2020
Design and Access Statement, 3XN, October 2020
Planning Statement, DP9, October 2020
Statement of Community Involvement (SCI), BECG, October 2020
Transport Assessment, Velocity, October 2020

Cycle Promotion Plan, Velocity, October 2020
 Delivery and Servicing Plan, Velocity, October 2020
 Energy Assessment, Ramboll, October 2020
 Sustainability Statement, Ramboll/Atelier Ten/GXN, October 2020
 Sustainable Urban Drainage Strategy, Ramboll, October 2020
 Flood Risk Assessment, Ramboll, October 2020
 Environmental Statement Volume 1: Main Report, Trium, October 2020
 Environmental Statement Volume 2: Townscape, Heritage and Visual Impact
 Assessment, Trium/Tavernor Consultancy/Miller Hare, October 2020
 Environmental Statement Volume 3: Technical Appendices, Trium, October
 2020
 Environmental Statement Non-technical summary, Trium, October 2020
 Draft Circular Economy Statement, GXN, 28 October 2020
 Cover Letter, DP9 Ltd, 30 October 2020
 Environmental Statement Addendum: Non-Technical Summary Memorandum,
 Trium, January 2021
 Environmental Statement Addendum Volume 1: Environmental Statement
 Addendum Main Report, Trium / GIA, January 2021
 Environmental Statement Addendum Volume 3: Environmental Statement
 Addendum Technical Appendices, Trium / GIA, January 2021
 Letter: Response to Objection of LB of Hackney, Tavernor Consultancy, 20
 January 2021
 Letter: Submission of Additional Environmental Information, DP9, 22 January
 2021
 Letter: Response to Objection of AMTD London Development Co Limited,
 DP9, 22 January 2021
 Urban Greening Factor Assessment, Greengage, 08 February 2021
 Outdoor Thermal Comfort Assessment, Ramboll, 09 February 2021

Appendix A

REASONED CONCLUSIONS ON SIGNIFICANT EFFECTS

Reasoned Conclusions

Following examination of the environmental information a reasoned conclusion on the significant effects of the proposed development on the environment has been reached and is set out in the report.

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report, and in particular, as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted. An objection received states that the Environmental Statement refers to uses defined under the categories of the Town and Country Planning (Use Classes) Order 1987. The description of development refers to the same types of uses but as defined under the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which would potentially allow for a significantly different range of uses. Therefore, it is stated that the City of London need to determine that the Environmental Statement and all other documents adequately assess the proposed development.

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, socio-economics, health, highways & transport, noise & vibration, air quality, wind microclimate, daylight/sunlight, overshadowing, light pollution & solar glare, townscape, built heritage & visual, climate change, greenhouse gas emissions, waste and cumulative effects. The ES Addendum submitted under Regulation 25 of the EIA Regulations addresses the proposed amendments contained within the submission and sets out additional assessment of daylight, sunlight and overshadowing, light pollution and solar glare. It is considered that the likely significant effects of the proposed development on the environment are as described in the ES, ES Addendum and further and other information, and as, where relevant, referred to in the report.

Should planning permission be granted, it would authorise a range of uses. The assessment contained in the ES is based on the uses proposed, namely office, flexible retail space and public terrace uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the ES. The application does not state that the development seeks unrestricted Class E business and commercial uses. Conditions are recommended that requires the development to implemented only in accordance with the specific floor areas and uses as set out and assessed in the application, removing the ability, without consent, to subsequently change to other uses specified within Class E.

The following conditions are recommended:

1. The development shall provide:

- 89,406 sq.m. (GEA) of office floorspace (Class E);
- 1,097 sq.m. (GEA) flexible retail use (Class E, drinking establishment (sui generis), hot food takeaway (sui generis.)); and
- 2,239 sq.m (GEA) of learning and non-residential institutional (Class F1)

REASON: To ensure the development is carried out in accordance with the approved plans

2. No more than 1,960sqm (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business and Service/Drinking Establishment (Class E/Sui

Generis) floorspace hereby approved to be provided at Ground to Level 01 shall be used for purposes falling within Class E (a), (b), (c) or sui generis under Schedule 2 to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.

REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2.

3. Not less than 732 sq m (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business and Service/Drinking Establishment (Class E/Sui Generis) floorspace hereby approved to be provided at Ground Floor to Level 01 shall be used for purposes within Class E (a), (b), (c) or sui generis under Schedule 2 to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning(Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.'

REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2

4. Unless otherwise approved in writing by the Local Planning Authority, no more than 50% of the areas marked as flexible Commercial, Business and Service/Drinking Establishment (Class E/Sui Generis) on the floorplans hereby approved shall be occupied as Food and Beverage uses.

REASON: To ensure that a varied mix of retail types is provided within the development in accordance with the following policies of the Local Plan: CS20 and of the emerging policies of the City Local Plan: S5, RE2.

5. The areas shown on the approved drawings above ground floor as offices including internal amenity green space, internal winter garden and external terraces (levels 3,4,9,10,11 and 12) and as set out in Condition xx of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

6. The areas shown on the approved drawings as offices (Class E), flexible retail use (Class E), drinking establishment (sui generis) and hot food takeaway (sui generis) and learning and non-residential institution (Class F1), and as set out in Condition xx of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Class F1 as appropriate) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.

REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure compliance with the Construction Environmental Management Plan, the cap on servicing trips and other elements of the Delivery and Servicing Management Plan, a Service Vehicle Lift Maintenance Strategy, a Cycling Promotion Plan. Mitigation measures should be secured including additional wind mitigation measures at the ground floor level. These, as well as other measures to ensure the scheme is acceptable, would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreements. Any remedial action necessary can be taken by enforcing those agreements or conditions. The duration of the monitoring will depend upon the particular provision in the relevant agreement or in conditions.

Appendix B

London Plan Policies

The following policies from the London Plan (2016) are considered relevant:

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

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

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

Policy 3.1 Protect and enhance facilities and services that meet the needs of particular groups and communities.

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 4.3 Within the Central Activities Zone increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan.

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 4.8 Support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need and the broader objectives of the spatial structure of this Plan, especially town centres.

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

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

Policy 5.5 (Decentralised Energy Networks) Development proposals should prioritise connections to existing or planned decentralised energy networks where feasible.

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

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

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

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

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

Policy 5.12 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 5.18 Encourage development waste management facilities and removal by water or rail transport.

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

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

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

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

provide parking for disabled people in line with Table 6.2

meet the minimum cycle parking standards set out in Table 6.3

provide for the needs of businesses for delivery and servicing.

Policy 7.1 Development should be designed so that the layout, tenure, mix of uses interface with surrounding land will improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops, employment opportunities, commercial services and public transport.

Policy 7.2 All new development in London to achieve the highest standards of

accessible and inclusive design.

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

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

Policy 7.5 London's public spaces should be secure, accessible, inclusive, connected, easy to understand and maintain, relate to local context, and incorporate the highest quality design, landscaping, planting, street furniture and surfaces.

Policy 7.6 Buildings and structures should:

- a be of the highest architectural quality
- b be of a proportion, composition, scale and orientation that enhances, activates and appropriately defines the public realm
- c comprise details and materials that complement, not necessarily replicate, the local architectural character
- d not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, overshadowing, wind and microclimate. This is particularly important for tall buildings
- e incorporate best practice in resource management and climate change mitigation and adaptation
- f provide high quality indoor and outdoor spaces and integrate well with the surrounding streets and open spaces
- g be adaptable to different activities and land uses, particularly at ground level
- h meet the principles of inclusive design
- i optimise the potential of sites.

Policy 7.7 Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings. Applications for tall or large buildings should include an urban design analysis that demonstrates the proposal is part of a strategy that will meet the criteria set out in this policy.

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

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

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.

Policy 7.21 Trees should be protected, maintained, and enhanced. Existing trees of value should be retained and any loss as the result of development should be replaced.

Relevant draft Publication London Plan Policies.

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D9 Tall buildings
- Policy D11 Safety, security and resilience to emergency
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy G7 Trees and woodlands
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

Relevant GLA Supplementary Planning Guidance (SPG):

- Accessible London: Achieving an Inclusive Environment SPG (October 2014);
- Control of Dust and Emissions during Construction and Demolition SPG (September 2014);
- Sustainable Design and Construction (September 2014);
- Social Infrastructure (May 2015);
- Culture and Night-Time Economy SPG (November 2017);
- London Environment Strategy (May 2018);
- London View Management Framework SPG (March 2012);
- Cultural Strategy (2018);
- Mayoral CIL 2 Charging Schedule (April 2019);
- Central Activities Zone (March 2016).
- Mayor's Transport Strategy (2018)

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city
HL1 Inclusive buildings and spaces
HL2 Air quality
HL3 Noise and light pollution
HL4 Contaminated land and water quality
HL6 Public toilets
HL9 Health Impact Assessments
S2 Safe and Secure City
SA1 Crowded Places
SA3 Designing in security
HS3 Residential environment
S4 Offices
OF1 Office development
S5 Retailing
RE3 Ground floor retail provision elsewhere in the city
S6 Culture, Visitors and the Night -time Economy
CV2 Provision of Visitor Facilities
CV5 Public Art
S7 Smart Infrastructure and Utilities
S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking
S10 Active travel and healthy streets

AT1 Pedestrian movement
 AT2 Active travel including cycling
 AT3 Cycle parking
 S11 Historic environment
 HE2 Ancient monuments and archaeology
 S12 Tall Buildings
 S13 Protected Views
 S14 Open spaces and green infrastructure
 OS1 Protection and Provision of Open Spaces
 OS2 City greening
 OS3 Biodiversity
 OS4 Trees
 S15 Climate resilience and flood risk
 CR1 Overheating and Urban Heat Island effect
 CR3 Sustainable drainage systems (SuDS)
 S16 Circular economy and waste
 CE1 Zero Waste City
 S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

- Air Quality SPD (July 2017);
- Archaeology and Development Guidance SPD (July 2017);
- City Lighting Strategy (October 2018);
- City Transport Strategy (May 2019);
- City Waste Strategy 2013-2020 (January 2014);
- Protected Views SPD (January 2012);
- City of London's Wind Microclimate Guidelines (2019);
- Planning Obligations SPD (July 2014);
- Open Space Strategy (2016);
- Office Use SPD (2015);
- City Public Realm (2016);
- Cultural Strategy 2018 – 2022 (2018).

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.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

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.

CS4 Seek planning contributions

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

CS10 Promote high quality environment

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

CS11 Encourage art, heritage and culture

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

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.

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.

CS14 Tall buildings in suitable places

To allow tall buildings of world class architecture and sustainable design in suitable locations and to ensure that they take full account of the character of their surroundings, enhance the skyline and provide a high quality public realm at ground level.

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.

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

CS18 Minimise flood risk

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

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.

CS20 Improve retail facilities

To improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them.

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

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.

DM2.1 Infrastructure provision

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
 - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply (TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
 - b) reasonable gas and water supply considering the need to conserve natural resources;
 - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;

d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;

e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

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.

DM3.3 Crowded places

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

- a) consulting the City Corporation on all matters relating to servicing;
- b) restricting motor vehicle access, where required;
- c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
- d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

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.

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;

- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

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.

DM11.2 Public Art

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;

- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

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.

DM12.4 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.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

- a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.
4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
- a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
 - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
 - d) anticipated residual power loads and routes for supply.

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 (NO_x).
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.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.
2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:
 - a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
 - b) the shortest practicable routes between relevant points.
3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

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.

DM17.1 Provision for waste

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

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;
- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

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.

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.

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

DM20.4 Retail unit sizes

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:
 - a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
 - b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or

c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

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

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

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

SCHEDULE

APPLICATION: 20/00869/FULEIA

2-3 Finsbury Avenue London EC2M 2PF

Demolition of the existing buildings and construction of a new building arranged over three basement levels, ground and 37 upper floors to provide an office-led, mixed use development comprising commercial, business and service uses (Class E), flexible commercial, business and service uses /drinking establishment uses (Class E/Sui Generis); and learning and non-residential institutions uses (Class F1); creation of a new pedestrian route through the site at ground floor level; hard and soft landscaping works; outdoor seating associated with ground level uses and other works incidental to the development.

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of five years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Prior to any stripping-out or demolition of the existing building, a material audit of the building should be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.
REASON : To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plan: London Plan ; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.
- 3 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, providing final details on how the building would adhere to circular economy principles: build in layers, design out waste, design for longevity, design for flexibility and adaptability, design for disassembly and using systems, elements or

materials that can be re-used and recycled, to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plan: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

- 4 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: Publication London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

- 5 There shall be no demolition 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 and construction 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.

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.

- 6 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.

- 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 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 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.
REASON: To prevent pollution of the water environment in accordance with the following policy of 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.
- 9 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.

- 10 Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken 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 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.
- 12 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.
- 13 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. Piling has the potential to impact on local underground water utility infrastructure. Please read the Thames Water guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near Thames Water pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

- 14 Prior to the commencement of the development a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation

- 15 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.

- 16 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. The development shall not be carried out otherwise than in accordance with the approved details.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.
- 17 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work. The development shall not be carried out otherwise than in accordance with the approved details.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.
- 18 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.
- 19 Prior to construction details shall be submitted 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, must be 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. Please read the Thames Water guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near Thames Water pipes or other structures.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

Should you require further information please contact Thames Water.
Email: developer.services@thameswater.co.uk.

- 20 No cranes or scaffolding shall be erected on the site unless and until construction methodology and diagrams clearly presenting the location, maximum operating height, radius and start/finish dates for the use of cranes during the Development has been submitted to and approved by the Local Planning Authority, the Local Planning Authority having consulted London City Airport. The development shall not be carried out other than in accordance with the approved details.
REASON: To ensure that construction work and construction equipment does not endanger the safe movement of aircraft or the operation of London City Airport through interference with communication, navigational aids and surveillance equipment.
- 21 No development other than demolition shall take place until the detailed design of all wind mitigation measures (including the exploration of further wind mitigation measures in the passageway between the proposed development and 5 Broadgate) has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 22 Except as may otherwise be approved in writing by the Local Planning Authority, no development shall be carried out in advance of the building lines as shown on the deposited plans.
REASON: To ensure compliance with the proposed building lines and site boundaries in accordance with the following policies of the Local Plan: DM16.1, DM16.2.

- 23 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 including blue roofs, rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 litres per second from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 390m³;
 - (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.
 - (c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
- 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 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 24 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 and emerging policies CR2, CR3 and CR4 of the Draft City Plan 2036.
- 25 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 development shall not be carried out other than in accordance with the approved details. 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.

REASON: 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.

- 26 Prior to construction the submission of details of a Fire and Emergency Escape Strategy for all building users (including people with disabilities) with details of the means of escape, areas of refuge and fire evacuation lifts and stairs and fire service access shall be submitted to and approved in writing by the Local Planning Authority (after consultation with the London Fire Brigade, Building Control Health and Safety Team) and the strategy shall remain in place thereafter. The development shall be carried out in accordance with the approved Fire and Emergency Escape Strategy details.
REASON: In the interests of the safety of occupants of the buildings in the event of a fire or emergency in accordance with City of London Local Plan policy CS3.
- 27 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.
Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the Publication London Plan.
- 28 A post construction BREEAM assessment for the retail element of the development, demonstrating that a target rating of 'Outstanding' has been achieved (or, if first agreed by the local planning authority a minimum rating of 'Excellent' has been achieved) shall be submitted after full fit-out and occupation of the retail spaces. In the event that the local planning authority is asked to agree a minimum rating of "Excellent" it must be first demonstrated to the satisfaction of the local planning authority that all reasonable endeavours have been used to achieve an "Outstanding" rating. The details shall thereafter be retained.

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.

- 29 A post construction BREEAM assessment demonstrating that a target rating of 'Outstanding' has been achieved (or, if first agreed by the local planning authority a minimum rating of 'Excellent' has been achieved) shall be submitted as soon as practicable after practical completion. In the event that the local planning authority is asked to agree a minimum rating of "Excellent" it must be first demonstrated to the satisfaction of the local planning authority that all reasonable endeavours have been used to achieve an "Outstanding' rating. The details shall thereafter be retained.

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.

- 30 No development shall be occupied until details have been submitted and approved confirmation has been provided that either:-
1. Water Capacity exists off site to serve the development or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water.

Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development 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 flooding and/or potential pollution incidents. (The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning).

- 31 No more than 1,960sqm (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business and Service/Drinking Establishment (Class E/Sui Generis) floorspace hereby approved to be provided at Ground to Level 01 shall be used

for purposes falling within Class E (a), (b), (c) or sui generis under Schedule 2 to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.

REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2

- 32 Not less than 732 sq m (GIA) of the Commercial, Business and Service (Class E) and the flexible Commercial, Business and Service/Drinking Establishment (Class E/Sui Generis) floorspace hereby approved to be provided at Ground Floor to Level 01 shall be used for purposes within Class E (a), (b), (c) or sui generis under Schedule 2 to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England)Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.'
REASON: To ensure that active uses are retained on the lower floors in accordance with Local Plan Policy DM20.2
- 33 Unless otherwise approved in writing by the Local Planning Authority, no more than 50% of the areas marked as flexible Commercial, Business and Service/Drinking Establishment (Class E/Sui Generis) on the floorplans hereby approved shall be occupied as Food and Beverage uses.
REASON: To ensure that a varied mix of retail types is provided within the development in accordance with the following policies of the Local Plan: CS20 and of the emerging policies of the City Local Plan: S5, RE2
- 34 The areas shown on the approved drawings above ground floor as offices including internal amenity green space, internal winter garden and external terraces (levels 3,4,9,10,11 and 12) and as set out in Condition 76 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).
REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.
- 35 Before any retail units are occupied 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) Detailed design of shopfronts
 - (b) A signage strategy for the retail units within the development shall be submitted;
 - (c) The signage relating to the public viewing gallery and winter garden shall also be included within the overall 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: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

- 36 No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 37 Self-closing mechanisms must be fitted on the doors at Drinking Establishment before the Class (Sui Generis) use commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 38 The roof terraces on hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 07:00 on the following day and not at any time on Sundays or 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.
- 39 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.
- 40 No live or recorded music that can be heard outside the premises shall be played.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.
- 41 (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.

- 42 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.

- 43 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the retail uses (Class E and sui generis) and any Class E (office) kitchens. Flues must terminate at roof level or an agreed high-level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the said use takes place and retained for the life of the building.

REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

- 44 No cooking shall take place within any Class E or sui generis use 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.

- 45 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

- 46 Unless otherwise approved in writing by the Local Planning Authority, 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.

- 47 3XN Architects shall be retained as the project architects for the duration of the development for completion of RIBA Stages 4-7.
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.

- 48 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 and semi-external faces of the building and surface treatments in areas where the public would have access, including external ground and upper level surfaces, including details of compliance with approved Circular Economy Strategy;
 - (b) details of the proposed new facades and roofs including details of typical bays of the development for each facade and fenestration;
 - (c) details of canopies including soffits, jointing and integrated drainage and lighting;
 - (d) details of key junction types and junctions across the building including: thermal sawtooth facade; public space interfaces ; roof and facade interfaces; ground level façade interfaces to include any expansion/movement joints
 - (e) details of ground and first floor elevations including all entrances, integrated seating, vitrines and information boards;
 - (f) details of all semi-internal elevations fronting the ground floor public routes;
 - (g) details of the Open Learning Hub external and internal level ground to 2nd floor including: all elevations: entrances: fenestration; internal circulation and fit out; planters; fixed seating; fixed lighting; signage; and any infrastructure required to deliver the F1 use;
 - (h) full details of the Cycling Hub entrance and lobby external and internal design including; all elevations; entrances, fenestration; lighting; signage; and any infrastructure required to deliver the proposed use;

- (i)) full details of the Social Lobby entrance and lobby external and internal design including; all elevations; entrances; circulation fenestration; planters; seating; lighting; signage; and any infrastructure required to deliver the proposed use;
- (g) full details of the internal winter garden and external terraces including all enclosures, elevations, entrances, fenestration, planters, seating, lighting, soffit, drainage, irrigation and any infrastructure required to deliver programming and varied uses;
- (h) details of soffits, hand rails and balustrades;
- (i) detailed design of the public realm route including; elevations; soffits and associated jointing and lighting; signage and any art installation
- (k) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room;
- (l) details of all drainage and irrigation;
- (m) details of the integration of M&E in all external and semi-external public elevations in the podium from ground to garden level;
- (n) details of the legible London wayfinding sign
- (o) details of the improvement works to the public realm to Sun Street, Wilson Street, Finsbury Avenue Square and Whitecross Place
- (p) details of all ground floor service entrances

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.

- 49 Before the works thereby affected are begun, sample panels of agreed sections of the glazing and metal structural facades shall be built, agreed on-site 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.

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.

- 50 Details of the construction, including detailed drawings, growing media, 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.

- 51 Details of the position and size of any green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 52 Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity 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
- 53 Details of the planting for the internal amenity green spaces, internal winter garden and external terraces (levels 3,4,9,10,11 and 12) shall be submitted to and be 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.
- 54 All unbuilt surfaces, including the podium, terraces, balconies, roof terrace, tenant garden, under croft, new public route and trees and approved for wind mitigation, shall be treated in accordance with a landscaping scheme, including details of:
- a) Irrigation
 - b) provision for harvesting rainwater run-off from road to supplement irrigation
 - c) spot heights for ground levels around planting pit
 - d) Soil
 - e) planting pit size and construction
 - f) tree guards

g) species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development

h) containers or planters

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 and prior to occupation. 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 the lifetime of the development shall be replaced with trees and shrubs of the same 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.

- 55 The existing sculpture at the North-East corner of the site shall be removed, safely stored, reinstalled and retained for the life of the building as part of the public realm scheme for the building in accordance with detailed specifications including safe storage, location, position and fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby. The approved scheme must be implemented prior to the occupation of the building unless otherwise approved in writing by the Local Planning Authority and any changes thereto thereafter shall be submitted to and approved in writing by the Local Planning Authority.

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: DM10.1; DM10.5; DM10.8; DM11.2.

- 56 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.

- 57 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated

infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting 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: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036

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

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

- 59 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.

REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.

- 60 The dividing wall between the F1 use and Cycling Hub functions shall be retained as transparent wall to enable visibility between the uses. Details of this wall shall be submitted and be approved 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 ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory activation at ground floor in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 61 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.
- 62 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 1419 long stay pedal cycle spaces, and a minimum of 42 short stay pedal cycle spaces. 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.
- 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.
- 63 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 112 showers and 1422 lockers shall be provided adjacent to the cycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
- REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.
- 64 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
- REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.
- 65 No servicing of the premises shall be carried out between the hours of 0700-1000, 1200-1400 and 1600-1900 from Monday to Sunday including Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
- 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, DM21.3.
- 66 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in

the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.

REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance

with the following policy of the Local Plan: DM16.3 and Intend to Publish London Plan policy: T5

- 67 A minimum of 2 electric charging points within the delivery and servicing area must be provided.
REASON: to further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS 16 and draft Local Plan 2036 Policy VT2.
- 68 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.
- 69 The threshold of all vehicular and pedestrian access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.
- 70 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.
REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.
- 71 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety.
- 72 A clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.
REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.

- 73 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation
- 74 The development shall provide:
 - 83,301 sq.m. (GIA) of Office floorspace (Class E);
 - 4,309 sq.m. (GIA) of Commercial, Business and Service Use floorspace (Class E);
 - 1,075 sq.m. (GIA) of flexible Commercial, Business and Service Use / Drinking Establishment, Wine Bar , Public House floorspace (Class E / Sui Generis); and
 - 2,194 sq.m (GIA) of Learning and Non-Residential Institutional floorspace (Class F1).
 REASON: To ensure the development is carried out in accordance with the approved plans.
- 75 The areas shown on the approved drawings as offices (Class E), commercial, business and service uses (Class E), drinking establishment (sui generis) and learning and non-residential institution (Class F1), and as set out in Conditions 31 and 32 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E and Class F1, as appropriate) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020) or in any provision equivalent to that Class in any statutory instrument amending or revoking and re-enacting that Order with or without modification.
- 76 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: 2FA-3XN-XX-XX-DR-AX-0010 Site Location Plan, 2FA-3XN-XX-XX-DR-AX-0030 Site Plan - Proposed, 2FA-3XN-XX-B3-DR-AX-1200 Basement 03 Pit Access Plan - Proposed, 2FA-3XN-XX-B3-DR-AX-1201 Basement 03 Plan - Proposed, 2FA-3XN-XX-B2-DR-AX-1202 Basement 02 Plan - Proposed, 2FA-3XN-XX-BM2-DR-AX-1203 Basement 02 Mezzanine Plan - Proposed, 2FA-3XN-XX-B1-DR-AX-1204 Basement 01 Plan - Proposed, 2FA-3XN-XX-00-DR-AX-1205 Ground Floor Plan - Proposed, 2FA-3XN-XX-M0-DR-AX-1206 Ground Floor Mezzanine Plan - Proposed, 2FA-3XN-XX-01-DR-AX-1207 Level 01 Floor Plan - Proposed, 2FA-3XN-XX-02-DR-AX-1208 Level 02 Floor Plan - Proposed, 2FA-3XN-XX-03-DR-AX-1209 Level 03 Floor Plan - Proposed, 2FA-3XN-XX-04-DR-AX-1210 Level 04 Floor Plan - Proposed, 2FA-3XN-XX-05-DR-AX-1211 Level 05 Floor Plan -

Proposed, 2FA-3XN-XX-06-DR-AX-1212 Level 06 Floor Plan -
 Proposed, 2FA-3XN-XX-07-DR-AX-1213 Level 07 Floor Plan -
 Proposed, 2FA-3XN-XX-08-DR-AX-1214 Level 08 Floor Plan -
 Proposed, 2FA-3XN-XX-09-DR-AX-1215 Level 09 Floor Plan -
 Proposed, 2FA-3XN-XX-10-DR-AX-1216 Level 10 Floor Plan -
 Proposed, 2FA-3XN-XX-11-DR-AX-1217 Level 11 Floor Plan -
 Proposed, 2FA-3XN-XX-12-DR-AX-1218 Level 12 Floor Plan -
 Proposed, 2FA-3XN-XX-13-DR-AX-1219 Level 13 Floor Plan -
 Proposed, 2FA-3XN-XX-14-DR-AX-1220 Level 14 Floor Plan -
 Proposed, 2FA-3XN-XX-15-DR-AX-1221 Level 15 Floor Plan -
 Proposed, 2FA-3XN-XX-16-DR-AX-1222 Level 16 Floor Plan -
 Proposed, 2FA-3XN-XX-17-DR-AX-1223 Level 17 Floor Plan -
 Proposed, 2FA-3XN-XX-18-DR-AX-1224 Level 18 Floor Plan -
 Proposed, 2FA-3XN-XX-19-DR-AX-1225 Level 19 Floor Plan -
 Proposed, 2FA-3XN-XX-20-DR-AX-1226 Level 20 Floor Plan -
 Proposed, 2FA-3XN-XX-21-DR-AX-1227 Level 21 Floor Plan -
 Proposed, 2FA-3XN-XX-22-DR-AX-1228 Level 22 Floor Plan -
 Proposed, 2FA-3XN-XX-23-DR-AX-1229 Level 23 Floor Plan -
 Proposed, 2FA-3XN-XX-24-DR-AX-1230 Level 24 Floor Plan -
 Proposed, 2FA-3XN-XX-25-DR-AX-1231 Level 25 Floor Plan -
 Proposed, 2FA-3XN-XX-26-DR-AX-1232 Level 26 Floor Plan -
 Proposed, 2FA-3XN-XX-27-DR-AX-1233 Level 27 Floor Plan -
 Proposed, 2FA-3XN-XX-28-DR-AX-1234 Level 28 Floor Plan -
 Proposed, 2FA-3XN-XX-29-DR-AX-1235 Level 29 Floor Plan -
 Proposed, 2FA-3XN-XX-30-DR-AX-1236 Level 30 Floor Plan -
 Proposed, 2FA-3XN-XX-31-DR-AX-1237 Level 31 Floor Plan -
 Proposed, 2FA-3XN-XX-32-DR-AX-1238 Level 32 Floor Plan -
 Proposed, 2FA-3XN-XX-33-DR-AX-1239 Level 33 Floor Plan -
 Proposed, 2FA-3XN-XX-34-DR-AX-1240 Level 34 Floor Plan -
 Proposed, 2FA-3XN-XX-35-DR-AX-1241 Level 35 Floor Plan -
 Proposed, 2FA-3XN-XX-36-DR-AX-1242 Level 36 Floor Plan -
 Proposed, 2FA-3XN-XX-37-DR-AX-1243 Level 37 Floor Plan -
 Proposed, 2FA-3XN-XX-38-DR-AX-1244 Roof Plan - Proposed, 2FA-
 3XN-XX-XX-DR-AX-2100 North Elevation - Proposed, 2FA-3XN-XX-
 XX-DR-AX-2101 East Elevation - Proposed, 2FA-3XN-XX-XX-DR-AX-
 2102 South Elevation - Proposed, 2FA-3XN-XX-XX-DR-AX-2103 West
 Elevation - Proposed, 2FA-3XN-XX-XX-DR-AX-2104 North Elevation
 Illustrative - Proposed, 2FA-3XN-XX-XX-DR-AX-2105 East Elevation
 Illustrative - Proposed, 2FA-3XN-XX-XX-DR-AX-2106 South Elevation
 Illustrative - Proposed, 2FA-3XN-XX-XX-DR-AX-2107 West Elevation
 Illustrative - Proposed, 2FA-3XN-XX-XX-DR-AX-3100 Section A-A -
 Long section - Proposed, 2FA-3XN-XX-XX-DR-AX-3101 Section B-B -
 Long section - Proposed, 2FA-3XN-XX-XX-DR-AX-3102 Section C-C -
 Cross Section West Tower - Proposed, 2FA-3XN-XX-XX-DR-AX-3103
 Section D-D - Cross Section East Tower - Proposed, 2FA-3XN-XX-00-
 DR-AX-4001 Tree Planting Plan - Proposed.

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

INFORMATIVES

- 1 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 £185 sq.m

Retail £165 sq.m

Hotel £140 sq.m

All other uses £80 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 £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 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.

- 2 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.

- 3 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.
- 4 There are water mains crossing or close to the development. Thames Water do NOT permit the building over or construction within 3m of water mains. If you're planning significant works near Thames Water mains (within 3m) they will need to check that the development does not reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read the Thames Water guide working near or diverting our pipes.
<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipe>
- 5 The proposed development is located within 15m of Thames Water's underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read the Thames Water guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you are considering working above or near Thames Water pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk
- 6 During the construction phase of the development, the City of London Corporation encourages all owners/developers to commit to the principles outlined in the City of London Corporation's Local Procurement Charter, i.e.

- to identify opportunities for local small to medium sized businesses to bid/tender for the provision of goods and services;

- aim to achieve the procurement of goods and services, relating to the development, from small to medium sized businesses based in the City and the surrounding boroughs, towards a target of 10% of the total procurement spend;

- or where the procurement of goods and services is contracted out

- ensure the above two principles are met by inserting local procurement clauses in the tender documentation issued to contractors or subcontractors (further information can be found in our 'Guidance note for developers').

For additional details please refer to the City of London's 'Local Procurement Charter' and 'Local Procurement - Guidance Note for City Developers'. These documents can be found at

http://www.cityoflondon.gov.uk/Corporation/LGNL_Services/Environment_and_planning/Planning

Further guidance can be obtained by contacting the 'City Procurement Project' which provides free advice to City based businesses and City developers. They can signpost you to local supplier databases, give one to one advice and provide written guidance via the City of London Corporation's Local Purchasing Toolkit and other resources.

To access free support in procuring locally please call 020 7332 1532 or email city.procurement@cityoflondon.gov.uk

- 7 This permission must in no way be deemed to be an approval for the display of advertisement matter indicated on the drawing(s) which must form the subject of a separate application under the Advertisement Regulations.
- 8 This permission must in no way be deemed to prejudice any rights of light which may be enjoyed by the adjoining owners or occupiers under Common Law.
- 9 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.
- 10 Improvement or other works to the public highway shown on the submitted drawings require separate approval from the local highway authority and the planning permission hereby granted does not authorise these works.

- 11 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) Connections to the local sewerage and surface water system.
 - (g) Carriageway crossovers.
 - (h) 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".

- 12 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:
- (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.
 - (b) Installation of engine generators using fuel oil.
 - (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
 - (d) Alterations to the drainage and sanitary arrangements.
 - (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:
 - the identification, encapsulation and removal of asbestos in accordance with a planned programme;
 - provision for window cleaning (internal and external) to be carried out safely.
 - (f) The use of premises for the storage, handling, preparation or sale of food.
 - (g) Use of the premises for public entertainment.
 - (h) Approvals relating to the storage and collection of wastes.
 - (i) The detailed layout of public conveniences.
 - (j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.
 - (k) The control of noise from plant and equipment;
 - (l) Methods of odour control.

- 13 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.

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.

- 14 The investigation and risk assessment referred to in conditions 8, 9 and 10 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;
- 15 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.
- 16 The Crime Prevention Design Advisor for the City of London Police should be consulted with regard to guidance on all aspects of security, means of crime prevention in new development and on current crime trends.
- 17 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.

- 18 The Directorate of the Built Environment (District Surveyor) should be consulted on means of escape and constructional details under the Building Regulations and London Building Acts.
- 19 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 20 All reasonable endeavours are to be used to achieve a BREEAM 'Outstanding' rating and The City of London Corporation as Planning Authority requests early discussion with the Applicant should it appear that the rating is likely to fall below outstanding.
- 21 The grant of approval under the Town and Country Planning Acts does not overcome the need to also obtain any licences and consents which may be required by other legislation. The following list is not exhaustive:

(a) Fire precautions and certification:
London Fire Brigade, Fire Prevention Branch
5-6 City Forum
City Road
London EC1N 2NY

(b) Public houses, wine bars, etc.
City of London Corporation
Trading Standards and Veterinary Service
PO Box 270
Guildhall
London EC2P 2EJ

(c) Inflammable materials (e.g., petroleum)
London Fire Brigade, Petroleum Department
5-6 City Forum
City Road
London EC1N 2NY

(d) Works affecting Transport for London operational land and structures:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL

(e) Works affecting a GLA road:

Borough Integration and Partnerships
Transport for London
Windsor House
42-50 Victoria Street
London, SW1H 0TL