

## Planning & Transportation Committee – 24 February 2021

### Addendum for Agenda item 4.

#### Planning application 20/00869/FULEIA: 2-3 FINSBURY AVENUE LONDON EC2M 2PF

#### 1. Letters of Representation

Two consultation letters have been received following the publication of the Officer's Report. The details are summarised in the table below. The letters are attached to this addendum report.

Consultation Response	
London Borough of Islington	<p>LB Islington have provided the following observations:</p> <ul style="list-style-type: none"><li>• While it is appreciated that tall buildings exist to the South and East of Finsbury Square, the proposed development would be visually obtrusive and to the detriment of the setting of the Bunhill Fields and Finsbury Square Conservation Area. Compared to the previously approved building, the proposed development represents an increase in bulk, height and scale. Views 16, 17 and 18 show that the proposed towers would loom over Finsbury Square, harming the character and appearance of the Conservation Area.</li><li>• Should planning permission be granted by the City of London for the proposed development and should adjacent footways and highways (within Islington) be damaged during demolition and construction, appropriate reinstatement will need to be funded by the developer.</li><li>• LB Islington would welcome appropriate public realm improvements to the streets within Islington close to the application site. In addition, given that staff of the proposed development are likely to rely heavily on Finsbury Square as the nearest significant area of public open space to the application site, it would be appropriate for contributions towards public realm improvements in this location to be secured via a Section 106 agreement. Public space priority project 22 – described at appendix 2 of the Finsbury Local Plan – sets out the improvements LB Islington intends to implement in Finsbury Square. It may also be appropriate to direct Section 106 funding towards other projects within Islington (but within the vicinity of the application site) that would improve conditions for pedestrians and cyclists, and would benefit residents, staff and visitors of/to both the City of London and LB Islington. A co-ordinated approach (between LB Islington, the City of London and LB Hackney) to public realm and related improvements would be appropriate, and officers can be available for discussions in the near future.</li></ul>

	<ul style="list-style-type: none"> <li>• Given the likely noise impacts during construction, and the length of the construction period, construction monitoring will be necessary. Given the proximity of the site to noise-sensitive properties in Islington, monitoring fees secured by the City of London (if permission is granted) should be shared with LB Islington to cover officer time.</li> </ul> <p><b>Response to Comments:</b></p> <ul style="list-style-type: none"> <li>• The proposed development represents an increase in the height and massing particularly of the western tower, which is set out in paragraphs 108-116 of the Officer’s Report. These increases are not considered to be significant compared to the consented scheme (ref: 16/00149/FULEIA). The impact on the significance and setting of Bunhill Fields and Finsbury Square Conservation Area is further assessed in paragraphs 186-190.</li> <li>• The cost of making good of any damages to the highway or footway as a result of the development would be covered under highway reparations in the Section 106 agreement, as appropriate.</li> <li>• The Section 278 agreement to be secured for the development would include public realm improvements around and near the site, as appropriate. Improvements to the public realm within the vicinity of the site that fall within the London Boroughs of Hackney and Islington could be explored as part of S278 agreement process.</li> <li>• A scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects is required by condition (condition 5) to be submitted and approved in writing by the Local Planning Authority. The scheme would 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. Officers would liaise with LB Islington, as necessary, regarding the allocation of monitoring contribution, as appropriate.</li> </ul>
Transport for London	<p>Transport for London has requested that following matters are secured as part of the development:</p> <ul style="list-style-type: none"> <li>• New pedestrian route should be publicly accessible at all times, secured via condition or Section 106 agreement.</li> <li>• Cycling Promotion Plan (CPP) to be secured by condition.</li> <li>• Clarification on provision of blue badge parking.</li> <li>• A full Delivery and Servicing Plan and Construction Logistics Plan to be secured by condition.</li> <li>• Short stay cycle parking should be increased and provided in the public realm on the neighbouring Broadgate estate.</li> </ul>

	<ul style="list-style-type: none"> <li>• Section 106 contribution of £220,000 for a new Cycle Hire station.</li> <li>• Section 106 contribution towards the proposed TfL Cycleway that will directly serve the site.</li> <li>• Highway works proposed to improve crossing facilities and walking conditions for those visiting the site.</li> </ul> <p><b>Response to Comments:</b></p> <ul style="list-style-type: none"> <li>• The new pedestrian route would be publicly accessible at all times, which would be secured through the S106 agreement.</li> <li>• A Cycling Promotion Plan would be secured through the S106 agreement.</li> <li>• A blue badge parking space would be provided on street, which would be secured through the S278 agreement.</li> <li>• A delivery and servicing plan would be secured through the section 106 agreement. A construction logistic plan would be secured by condition (condition 18).</li> <li>• The applicant has agreed to increase the proposed level of short stay cycle parking provision to 122 (42 on site; 80 off site within the wider Broadgate Estate). Taking account of the restrictions placed on the maximum amount of floorspace allocated to retail and food and beverage uses within the development by conditions 31 and 33, this would exceed a London Plan compliant figure of 120 short stay cycle parking spaces.</li> <li>• The applicant is in negotiations with TfL regarding a Section 106 contribution to a new cycle hire station, which would be informed by the increased provision in short stay cycle parking and the capacity of existing cycle hire docking stations within the vicinity of the site (Finsbury Square, Christopher Street and Pindar Street), which provide a combined 74 cycle docking points.</li> <li>• The applicant is in negotiations with TfL regarding a potential Section 106 contribution for a proposed TfL Cycleway that would serve the site, which would be informed by details of the Cycleway proposal and its relationship to the development, once the details have been developed and costed.</li> <li>• The Section 278 agreement to be secured for the development would include public realm improvements around and near the site, as appropriate. Improvements to footways and pedestrian crossings would be explored as part of S278 agreement process.</li> </ul>
--	--

## **2. Corrections/Amendments to the Officer's Report**

**Paragraph 42** – line 1 should read ‘application’ not ‘applications’

**Paragraph 48** – Line 4 delete ‘adopted’ replace with ‘published’

**Paragraph 50** - delete ‘and will be considered by Court of Common Council in January 2021’ and replace with ‘and was presented to Court of Common Council in January 2021 and approved the draft plan for Regulation 19 pre-submission consultation.’”

**Paragraph 73, Bullet point 8 should read** - The impact of the proposal on non - designated heritage assets and their settings in both the City of London, London Borough of Islington and London Borough of Hackney including amongst others :5-15 Sun Street; and public spaces and pedestrian layout of Broadgate.

**Paragraph 99** – delete reference to ‘Local Plan Policy CS8’ and replace with ‘Local Plan Policy CS5’

**Paragraph 107 – the last sentence should be deleted and replaced with the following two sentences** – ‘In summary, it is considered that as the site does not lie within an area which is considered inappropriate for tall buildings, the assessment should focus on the question of whether the site is suitable having regard to the factors set out in Policy CS14(3) of the Local and policy S12 (2) to (6) of the emerging City Plan. Those Factors are assessed below along with wider provisions of the Development Plan.’

#### **Insert after paragraph 199**

‘The impact of the proposals on the settings of other Non- Designated heritage assets has been assessed in the THVIA within and outside the City of London including: 52A Wilson Street, 8-16 Earl Street, 18-20 Appold Street and City Gate House. Their settings and the contribution to the wider townscape 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 characterize 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 is concurred with and the proposed development would not harm the setting or the contribution that the setting makes to the significance of non-designated heritage assets.’

#### **Paragraph 221 –**

- **Line 1** - delete ‘92’ and replace with ‘94’.
- **Line 3** – delete ‘100’ and replace with ‘122’
- **Line 4** – delete ‘we believe that this is a reasonable provision of short stay cycle parking, albeit not compliant with the Publication London Plan.’ and replace with ‘taking account of restrictions placed on the maximum amount of floorspace allocated to retail and food and beverage uses within the development, by conditions, this would exceed a London Plan compliant figure of 120 short stay cycle parking spaces.’
- **Line 9** – delete ‘58 spaces on Sun Street Passage’ and replace with ‘80 spaces within the wider Broadgate Estate.’
- **Line 10** – delete ‘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.’

**Paragraph 269 – should read** - Details of the quality and maintenance of the proposed greening would be required by condition and S106 obligation.

**Paragraph 300** – add the wording below at the end of the paragraph:

‘If it is evident after post construction testing that there is a material adverse effect not identified in the ES and are directly attributable to the Development,– the applicants would be required to explore further wind mitigation measures to mitigate any impact to the satisfaction of the local planning authority and to secure implementation of measures as required by the local planning authority

**Paragraph 332**

- **Line 4** – delete ‘13th’
- **Line 6** – delete ‘in this report’

**Paragraph 371** replaced with wording below:

‘On 21<sup>st</sup> June, shadow is cast from the Proposed Development from 06:00 BST in a south westerly direction. Finsbury Square is overshadowed by existing structures at this time, which retract throughout the morning. At 10:00 BST, the majority of Finsbury Square is in sunlight, with a very small portion of shadow cast from the Proposed Development, which clears from the area by 12:00 BST. Crown Place pedestrian amenity area is cast in shadow for the majority of the day, with periods of overshadowing from the Proposed Development between 13:00 BST and 17:00 BST, alongside existing shadows. From 17:00 BST, a small strip of shadow from the East tower of the Proposed Development is cast over Exchange Square, which clears from the area by 19:00 BST when Exchange Square is cast in shadow from existing structures.’

**Add after Paragraph 380 new paragraph 380A-:**

380A ‘Overall Conclusion on Overshadowing’

In summary, the proposed development would have a Major Adverse impact on three roof terraces at One Crown Place as compared to the existing baseline. No additional overshadowing effects are considered likely in the cumulative scenario (ie when considered by reference to the proposals permitted by the March 2018 planning permission and other unimplemented and under construction proposals in the vicinity).

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 One Crown Place nor on surrounding public spaces.

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.’

**Paragraph 384** - viewpoint CAM 3 is missing from the list in the first sentence. It should be ‘(CAM 1, CAM 2B and 2C, CAM 3 and CAM 4)’

**Paragraph 422** add at the end of the second sentence “or to the use of residential properties in the course of construction”

### **3. Corrections and Amendments to Conditions**

#### **Condition 1**

Members will note that, in this case, it is recommended that a condition be imposed allowing development to be begun within 5 years (draft condition 1). The reasons for that recommendation are set out in paragraphs 23 and 24 of the report. Your officers consider that a period of 5 years is appropriate having regard to the provisions of the development plan as set out in the report, in particular the encouragement given to office development and to the material considerations set out in the report, in particular at paragraph 23.

In response to some comments raised by members at previous committees regarding Circular Economy and Whole Life Carbon Assessments the conditions below relating to Whole Life Carbon and Circular Economy have been amended.

#### **Condition 4 – supersede with new wording below**

##### **Whole Life Carbon Assessment – pre-commencement**

Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at [ZeroCarbonPlanning@london.gov.uk](mailto:ZeroCarbonPlanning@london.gov.uk) and 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 GLA and 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.

##### **New condition proposed - Post Construction Circular Economy Statement**

Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner

or proposed occupier) a post-completion report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.

REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.

**New condition proposed – Natural Ventilation**

Prior to commencement submission of details incorporating natural ventilation into the design of the building envelope and the proposed building services system must be submitted to and approved in writing by the Local Planning Authority.

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

**Condition 34** – remove references to “4, 9 and 12”

**Condition 35** – details for retail units - delete part (c)

**Condition 47** – retained architect - delete

**Condition 55** – relocation of statue - delete condition as this is being dealt with via a S106 obligation

# PLANNING DECISION NOTICE



# ISLINGTON

Development Management Service  
Planning and Development Division  
Environment & Regeneration Department  
PO Box 3333  
222 Upper Street  
LONDON N1 1YA

**Case Officer:** Joseph Hennessy  
**T:** 020 7527 3776  
**E:** [planning@islington.gov.uk](mailto:planning@islington.gov.uk)

**Issue Date:** 15 February 2021  
**Application No:** P2020/3402/OBS

*(Please quote in all correspondence)*

Liam Hart  
PO Box 270,  
Guildhall,  
London EC2P 2EJ

Dear Sir or Madam

## TOWN AND COUNTRY PLANNING ACTS

### BOROUGH COUNCIL'S DECISION: Observations to adjoining borough - comments

Notice is hereby given, in respect to the request for observation(s), of the above stated response of Islington Borough Council, the Local Planning Authority, in pursuance of its powers under the above mentioned Acts and Rules, Orders and Regulations made thereunder. The response relates to the application / development referred to below, at the location indicated.

The observations (if any) of the Borough Council are noted below.

<b>Location:</b>	<b>2-3 Finsbury Avenue , London , EC2M 2PF</b>
------------------	--

<b>Application Type:</b>	<b>Observations to Adjoining Borough</b>		
<b>Date of Application:</b>	24 November 2020	<b>Application Received:</b>	24 November 2020
<b>Application Valid:</b>	24 November 2020	<b>Application Target:</b>	15 December 2020

### DEVELOPMENT:

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 nonresidential 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.

(The development would provide 85,009sq.m GEA 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); 2,239 sq.m GEA of learning and non-residential institutions uses (Class F1); and 16,058sq.m of ancillary plant, back of house and storage; total floorspace 108,800sq.m GEA; overall height 170.290m AOD).



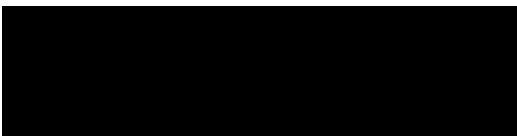
## **OBSERVATIONS:**

- While it is appreciated that tall buildings exist to the South and East of Finsbury Square, the proposed development is considered to be visually obtrusive and to the detriment of the setting of the Bunhill Fields and Finsbury Square Conservation Area. Compared to the previously approved building, the proposed development represents an increase in bulk, height and scale. Views 16, 17 and 18 show that the proposed towers would loom over Finsbury Square, harming the character and appearance of the conservation area.
- Should planning permission be granted by the City of London for the proposed development, and should adjacent footways and highways (within Islington) be damaged during demolition and construction, appropriate reinstatement will need to be funded by the developer.
- LB Islington would welcome appropriate public realm improvements to the streets within Islington close to the application site. In addition, given that staff of the proposed development are likely to rely heavily on Finsbury Square as the nearest significant area of public open space to the application site, it would be appropriate for contributions towards public realm improvements in this location to be secured via a Section 106 agreement. Public space priority project 22 – described at appendix 2 of the Finsbury Local Plan – sets out the improvements LB Islington intends to implement in Finsbury Square. It may also be appropriate to direct Section 106 funding towards other projects within Islington (but within the vicinity of the application site) that would improve conditions for pedestrians and cyclists, and would benefit residents, staff and visitors of/to both the City of London and LB Islington. A co-ordinated approach (between LB Islington, the City of London and LB Hackney) to public realm and related improvements would be appropriate, and officers can be available for discussions in the near future.
- Given the likely noise impacts during construction, and the length of the construction period, construction monitoring will be necessary. Given the proximity of the site to noise-sensitive properties in Islington, monitoring fees secured by the City of London (if permission is granted) should be shared with LB Islington to cover officer time.

The proposed development is unlikely to affect LB Islington in other respects relevant to planning.

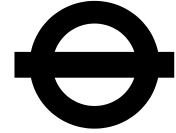
Certified that this document contains a true record of a decision of the Council

Yours faithfully



**KAREN SULLIVAN  
SERVICE DIRECTOR - PLANNING AND DEVELOPMENT  
AND PROPER OFFICER**

# Transport for London



**To:** Liam Hart  
**From:** Emily Hindle – TfL Spatial Planning  
**Your ref:** 20/00869/FULEIA  
**Our ref:** CITY/20/45  
**Date:** 18.2.2021

## **RE: 2-3 Finsbury Avenue- TfL comments**

The comments below summarise Transport for London's (TfL) views on the proposed development. Please note that these comments represent the views of TfL officers and are made entirely on a "without prejudice" basis.

### **Summary**

- S106 contribution of £220,000 for a new Cycle Hire station.
- New pedestrian route should be publicly accessible at all times, secured via condition or S106 agreement.
- Highway works proposed to improve crossing facilities and walking conditions for those visiting the site.
- S106 contribution towards the proposed TfL Cycleway that will directly serve the site.
- Cycling Promotion Plan (CPP) to be secured by condition.
- Short stay cycle parking should be increased and provided in the public realm on the neighbouring Broadgate estate.
- Clarification on provision of blue badge parking.
- A full Delivery and Servicing Plan and Construction Logistics Plan to be secured by condition.

### **Site description and Location**

The site is bounded by Finsbury Avenue Square and Whitecross Place to the south, Wilson Street to the west and Sun Street to the north. The A10 Bishopsgate is the nearest section of the Transport for London Road Network (TLRN), approximately 500 metres east of the site. The nearest part of the Strategic Road Network (SRN) is A501 Moorgate/Finsbury Pavement, 100 metres east.

Liverpool Street Station is within 200 metres of the site and is served by Central, Circle, Hammersmith & City and Metropolitan lines, TfL Rail and national rail services. Moorgate station is also within 400 metres of the site and provides access to the underground and national rail services. Docklands Light Railway and Waterloo & City line services are within walking distance at Bank station. Liverpool Street will be served by Crossrail, with an additional entrance at Moorgate.

There are bus stops on Liverpool Street, Bishopsgate, Finsbury Pavement, Appold Street, Moorgate, Eldon Street and Finsbury Square, providing access to a wide range of bus services. The site therefore achieves a Public Transport Access Level (PTAL) of 6b, where 6b represents the highest level of connectivity.

There is a Cycle Hire docking station opposite the site at the junction of Sun Street and Crowne Place, where Cycle Superhighway 1 terminates and joins a local east – west cycle route.

### **Trip Generation and Public Transport impacts**

In line with London Plan policy T4 (Assessing and mitigating transport impacts), the applicant has undertaken a trip generation assessment to evaluate the impacts of the proposed development on public transport capacity. The assessment demonstrates that the proposed scheme is expected to create a minor increase in trips when compared to the

existing building and previously consented scheme. In terms of impact on the underground network, TfL would usually expect an assessment on station capacity and further advice will be set out in the detailed response.

Overall, TfL expects that the increase in demand can be absorbed via active travel and public transport in line with policy T4 of the Publication London Plan.

### **Healthy Streets**

The pedestrianised area of the neighbouring Broadgate Campus will be extended by the proposed development which is welcome. Footway widening is also proposed along Sun Street, along with a new 8m wide, covered, publicly accessible pedestrian route through the site between Finsbury Avenue Square and Sun Street. This would provide additional pedestrian capacity in accordance with Publication London Plan policies D8 (Public realm), T1 (Strategic approach to transport), T2 (Healthy streets) and T3 (Transport capacity, connectivity and safeguarding) which is strongly supported. Clarification is required on the new pedestrian route proposed, which should be publicly accessible at all times of day in perpetuity. This should be secured by condition or in the S106 agreement.

Pedestrian Comfort Levels (PCLs) have been assessed on the surrounding footways using a growth assumption of 18% more pedestrian activity which the TA states can be expected in the City of London by 2036. The applicant should provide further justification on this and further explanation of how exactly it has been used within the PCLs calculation prior to determination. Similar recent applications in the City of London have extrapolated to the expected year of initial occupation using an expected 25.6% increase in the number of people walking by 2044. Notwithstanding that, the PCL analysis submitted shows all scores at least B+ expected on local footways in the future baseline 'with proposed development' scenario, which is welcome.

The ATZ Assessment includes key walking routes from the site to local transport stops and stations. However, the routes assessed do not include the junction of South Place, Eldon Street and Wilson Street, 200m south of the site, which would be crossed by pedestrians in order to walk south to bus stops on Eldon Street or to reach the new Broadgate ticket hall entrance of the Liverpool Street Crossrail station by an alternative less direct but more legible and obvious route coming south down Wilson Street then turning left along Eldon Street.

The junction, and adjacent area has been identified as in need of public realm and safety improvements by the Crossrail Liverpool Street Urban Integration Design Study 2011. The quality of the public realm along South Place is poor due to a large central reservation, with police box, with carriageway alignment and surfacing, and private motor vehicle dominance due to narrow footways. Informal crossing already occurs at this location, which experienced a collision causing a serious injury between 2016 and 2018, as also highlighted in the application TA. As a result, crossing facilities and general walking conditions at the junction should be improved in order to support the proposed development, and footways should be widened if possible.

These highway works would be on local highway rather than the TLRN. The City Corporation is therefore recommended to secure them through section 278 or 106 as appropriate.

These highway works would enable the development to support the MTS and Mayor's Vision Zero Action Plan, by designing and helping to deliver a safe, pleasant local walking environment, specifically by improving key pedestrian routes between the site and local bus stops and stations, which will clearly be used daily by many people commuting to and from the new development proposed.

## **Vision Zero**

A Stage 1 Road Safety Audit (RSA) has been undertaken of the proposed vehicle access off Wilson Street, which is welcome. This recommends removal of four pay and display parking bays on Wilson Street to improve visibility and safety. Removal of the parking bays should be secured by condition or in the section 278 agreement between the applicant and the City Corporation, to support Publication London Plan policies T2 and T7 (Deliveries, servicing and construction) part F, which requires new development to reduce road danger from freight trips.

All highway works proposed, secured and eventually delivered should also follow the design guidance in the TfL Streets toolkit and the new TfL Cycle route quality criteria.

## **Cycle Hire**

The proposed development will increase demand for TfL Cycle Hire in the local area. The area already suffers from significant docking station capacity pressure as referred to in the Crossrail Liverpool Street Urban Integration Design Study 2011 and made clear by TfL recently at the City of London Liverpool Street Working Group. At present there are no docking stations in close vicinity of the site. The closest is Moorfield docking station in Moorgate, which spends over 15% of the time completely empty or full. Therefore, TfL is frequently required to service the station. This occurs so frequent in the City of London that the contractor is unable to fulfil all the jobs, and the station remains empty or full.

Consequently, customers wishing to hire, or dock are unable to. This is occurring under the current demand. Any increase in demand in this area will increase pressure on capacity. Given the proposed shortfall in short-stay cycle parking for this development and the wider shortfall in visitor parking across the Broadgate area, there is even greater need for the applicant to address demand for cycling. TfL therefore requests a s106 contribution of £220,000 for a new Cycle Hire station to cater for the new demand likely to be generated by this development.

## **Cycling**

As noted in the TA, a future TfL Cycleway is proposed to directly serve the site. This route will eventually connect the junction between Finsbury Square, Sun Street and Wilson Street to the junction between Gresham Street and King Street via Liverpool Street station. The proposed development should make a S106 contribution to help timely delivery of this new TfL Cycleway, as it would directly benefit new employees and visitors at the site, enabling safe and pleasant cycling including for onward travel southwards across Southwark Bridge. This would ensure compliance with Publication London Plan policy T5 part A, sub-section 1 which requires new development to support the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.

## **Cycle Parking**

The long stay cycle parking proposed would meet the minimum standards of the Publication London Plan, which is welcome. 156 short stay cycle parking spaces are required to meet the minimum standards set out in policy T5 (Cycling). However, only 42 short stay cycle spaces are proposed, only 20 of which would be in the public realm in accordance with the London Cycling Design Standards (LCDS).

In line with policy T5, part D of the Publication London Plan, where it is not possible to provide suitable short-stay cycle parking on-site, the applicant should work with the City Corporation to identify suitable alternative on-street locations. In this case, more short stay cycle parking could be provided across the adjacent Broadgate estate. This should be resolved prior to determination and secured as appropriate.

As stated in policy T5, part B of the Publication London Plan, all cycle parking should be designed and laid out in accordance with the LCDS. 80% of long stay cycle spaces are

proposed as two-tier racks, which is acceptable. Where two-tier racks are provided, they should have a machinal or pneumatically assisted system for accessing the upper level and the rack itself must allow for double locking.

Access to cycle parking is proposed from Wilson Street via a dedicated cycle ramp or lift. The lift will be able to accommodate larger cycles. This should include adapted cycles for disabled people and reflect the size requirements laid out in the LCDS.

Cyclist access controls are proposed in the basement, preventing any need for cyclists to dismount before entering the cycle store area. This will support those who use cycles as mobility aids, removing barriers to cycling for disabled persons. Cycling welfare facilities including showers and lockers will be provided, supporting compliance with Publication London Plan policies T1 and T5.

### **Cycling Promotion Plan**

A Cycling Promotion Plan has been provided in place of a Travel Plan, which is supported. This should be secured by condition and discharged in consultation with TfL.

### **Car Parking**

In line with policy T6 (Car parking) of the Publication London Plan, the development will be car free, with no general car parking provided.

The application lacks information on Blue Badge parking for disabled people. Where sites are car free, appropriate disabled persons parking for blue badge holders should still be provided as set out in policy T6.5 (Non-residential disabled persons parking) of the Publication London Plan. This should therefore also be addressed, and further clarification is required prior to determination.

### **Deliveries and Servicing**

A Framework Delivery and Servicing Plan (DSP) has been submitted. To comply with policy T7 of the Publication London Plan, a detailed DSP is required. This should be secured by condition. The full DSP should follow the latest TfL guidance and genuinely reflect the scale and complexity of the development.

Delivery and servicing vehicles will access and egress the site in a forward gear from Wilson Street, where two lorry lifts are proposed to provide access to the basement for vehicles up to 8m. TfL is satisfied this will provide adequate space for servicing activities to be made off-street in line with policy T7.

The DSP focuses on the use of an off-site consolidation centre. This is strongly encouraged and should be used wherever possible. This underpins key aspirations within policy T7 of the ItP London Plan which aims to minimise freight trips on the road network and facilitate efficient servicing and deliveries.

An online delivery booking system will also be employed, ensuring deliveries occur outside peak pedestrian/cyclist times. This should be implemented from the outset. In line with policy T7 of the Publication London Plan, the applicant will also manage deliveries so they can be received overnight.

The development proposal should facilitate clean and sustainable servicing and deliveries to align with the Mayor's Transport Strategy (MTS). This will be supported by provision of electric vehicle charging points and cargo cycle spaces within the servicing area, both of which are very welcome.

### **Construction**

An outline Construction Logistics Plan (CLP) has been provided alongside this application. A full CLP should be submitted in line with TfL guidance and secured by condition.

During construction, the applicant proposes closure of the southern footway on Sun Street, the eastern footway on Wilson Street and the narrowing of Whitecross Place to 2.5m in width. The site is in a busy part of the CAZ. Therefore, the proposed temporary zebra crossing between Wilson Street and Whitecross Place is welcomed and, safe routes for walking, fully accessible for people of all ages and abilities, should be provided around the site throughout construction.

The applicant should ensure all construction vehicle movements are safe and support the Mayor's Vision Zero approach. All construction vehicles should meet the Direct Vision Standard and HGV safety permit for HGVs as part of the Mayor of London's Vision Zero plan to eliminate all deaths and serious injuries on London's transport network by 2041 (see TfL Direct Vision Standards here: <https://tfl.gov.uk/info-for/deliveries-in-london/delivering-safely/direct-vision-in-heavy-goods-vehicles>). The full CLP should also commit to all construction vehicles serving the site being part TfL's Freight Operator Recognition Scheme (FORS).

The Outline CLP includes a proposal for the A10 Bishopsgate to act as an access route to the site for construction traffic. As the A10 forms part of the TLRN, this may require further discussion and consultation with TfL prior to approval of the full CLP, especially given that timed traffic restrictions are temporarily in force along the A10 as part of the Streetspace for London programme, meaning that from 7am to 7pm it is currently accessible to buses and cycles only.

Use of a tower crane is proposed. TfL should be consulted on the planned access routes and timing. The proposed delivery booking system should also manage deliveries so that they occur outside of peak hours, reducing the risk of congestion on the strategic highway network.

A Staff Travel Plan will be prepared, which is welcomed and should be consulted on by TfL. The absence of staff car parking and provision of cycle parking facilities is strongly supported.