

Committee:	Date:
Planning and Transportation	21 September 2021
Subject: Snow Hill Police Station 5 Snow Hill London EC1A 2DP External and internal alterations together with demolition and new build and associated change of use of existing building from police station (sui generis) to hotel with ancillary uses (Class C1) including: (i) refurbishment of facade to Snow Hill and the retained facade to Cock Lane; (ii) partial demolition, rebuilding and extension to provide a building ranging from 6 to 8 storeys, plus new plant at roof level; (iii) extension of existing sub-basement; (iv) provision of cycle storage; (v) highway works; (vi) greening and other ancillary works.	Public
Ward: Farringdon Without	For Decision
Registered No: 20/00932/FULMAJ	Registered on: 20 November 2020
Conservation Area: Smithfield	Listed Building: Grade II

Summary

1. The proposed development includes the partial retention and partial demolition of the existing Grade II listed building at 5 Snow Hill, formerly Snow Hill Police Station (Use Class Sui Generis), and to convert and change the use of the building into a hotel (Use Class C1) with ancillary uses. This will include a cultural offer on ground and first floor, including an atrium space and restaurant, all open to the public seven days a week.
2. This includes an application for planning permission (20/00932/FULMAJ) and an application for Listed Building Consent (20/000933/LBC).
3. The proposals will retain the building facing Snow Hill (Block 'A') however would remove the existing mansard roof at fifth floor level and adapt the interior

and rear elevations of this Block. It is proposed to demolish the building facing Cock Lane (Block 'B') with the retention of the façade directly facing Cock Lane, part of an interior staircase and the 'reading room' on the first floor level. In addition, the one storey link building between the two blocks would be demolished. The existing sub-basement would be retained with minor extensions.

4. The proposals include the extension of Block 'A' with a replacement mansard to provide ground floor plus six storeys. Block 'B' would be extended to provide ground plus seven storeys. The area which previously included a link building between the Blocks would be enclosed and covered to create a six storey internal atrium space. In addition, the Block 'B' building would be extended outwards towards the buildings to the east and to the south.

5. The proposal would provide 6,369 sqm of hotel floorspace in the Culture Mile, delivering 219 bedrooms, and would enable public access to a listed building with ancillary uses including exhibition space. The hotel would be operated as a 'hub by Premier Inn' which the Applicant states will offer a high quality, high-tech, compact, and affordable hotel product.

6. The Proposed Development would enable the use of a vacant building to ensure the long-term conservation of this heritage asset, and would deliver heritage-led and high-quality visitor accommodation in the Culture Mile, in close proximity to the new Museum of London Site.

7. Seven objections have been received from third parties relating to a range of issues which include, but not exclusively, concerns regarding: height and massing; daylight and sunlight impact; privacy and overlooking; disruption of the new use; the construction impact including noise; and the proposed development potentially prejudicing future redevelopment of the adjoining site.

8. The servicing is proposed on-street on Snow Hill however there will be no more than two trips per day and the applicant would consolidate servicing with a hotel nearby. The servicing may fall inside peak hours however in this case, minimal peak time servicing is acceptable because there will be no additional trips on the network as a result of the proposed development, the vehicles are already on the network servicing another nearby hotel. In addition, the daily trips of two is considered very low. Therefore, the servicing arrangements are considered acceptable.

9. Provision of long stay and short stay cycle parking is proposed in line with policy requirements. The Applicant would provide additional short stay

spaces, proposed on Snow Hill, in excess of policy requirements.

10. The proposal comprises refurbishment and reuse of a significant part of the existing building and will deliver sustainability benefits including adhering to Circular Economy Principles, delivering BREEAM 'Excellent', and the installation of air source heat pumps, photovoltaic panels, a biodiverse green roof, and SuDs measures through a blue roof. In addition, the proposal would provide a green wall facing Cock Lane.

11. The proposal includes inclusive design with 10% of bedrooms as wheelchair accessible, meeting policy requirements.

12. The proposals would enable the continued use of the building and would in parts better reveal the significance of the building, offering a number of heritage benefits by preserving, refurbishing, and enabling public access including to areas of significance.

13. However, the proposals would result in a level of less than substantial harm to 5 Snow Hill due to the extent of demolition and loss of historic fabric and to some areas of moderate interest. This harm is considered to be at the lower end of less than substantial and is therefore considered to be minimal. Therefore, overall the proposals would comply with Local Plan Policies CS12, DM 12.1, DM 12.2 and DM 12.3(1), draft City Plan 2036 policies S11 and HE1, and London Plan Policy HC1 (A, B, D and E) however elements of the proposals would be contrary to DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).

14. Paragraph 202 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". Therefore an evaluation of the public benefits and the weight afforded to them has been undertaken. It is considered the proposals would result in public benefits, which would outweigh the harm identified.

15. Historic England and the Amenity Societies were consulted and raised no objections.

16. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance and setting of: No 4 Snow Hill (grade II); Church of St Sepulchre with Newgate (grade I) and Old Bailey (grade II*), would not harm the character and appearance or setting of the Smithfield Conservation Area and the nearby Newgate Street Conservation Area, and it

would preserve LVMF views and the setting of St Paul's Cathedral.

17. There are no unacceptable adverse built development or operational impacts anticipated for the proposed development and use, including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, which include the requirement to provide an operational management plan and conditions securing privacy screens and obscured glazing, and relevant environmental health conditions.

18. Negative impacts during construction would be controlled as far as possible by the implementation of robust deconstruction and construction logistics plans and Scheme of Protective Works 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.

19. Whilst there are some adverse impacts to neighbouring occupiers in regards to daylight and sunlight, some of the affected properties already experience low levels of existing daylight or sunlight and the presence of existing overhangs, therefore a modest increase in height is likely to have an impact. Taking account of the scale of the impacts and that the Local Plan and BRE Guidelines acknowledges that ideal daylight and sunlight conditions may not be practicable in densely developed City locations, it is considered that living standards would be acceptable and relevant daylight and sunlight policies, including Local Plan CS10 and Policy DM10.7, and BRE Guidelines would not be breached.

20. The proposal would largely meet the requirements of Local Plan Policy DM11.3 (hotels), however due to impacts to daylight and sunlight, the proposal would be contrary to an element of Local Plan Policy DM11.3 (4) which states that hotels will only be permitted where these do not result in an adverse impacts on the amenity of neighbouring occupiers. Therefore, there is some adverse impact but this is not considered to be unacceptable. Whilst there is conflict with Local Plan Policy DM11.3, given the counteracting benefits which promote other policies, this is not considered to justify refusal. This also applies for draft City Plan Policy CV3 (2).

21. Therefore, it is considered that the proposals would not prejudice the primary business function of the City, would contribute to the balance and mix of uses in the immediate locality, would ensure the continuing beneficial use of the historic building, and would not result in unacceptable adverse impacts on

the amenity of neighbouring occupiers, including cumulative impacts.

22. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the Local Plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

23. In this case, the proposal complies with the majority of development plan policies but is not compliant with elements of the policies regarding harm to listed buildings and for hotels. National Planning Practice Guidance advises that conflicts between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs, as guided by the NPPF. Officers consider that overall, the proposal accords with the development plan as a whole.

24. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

25. For the listed building consent, the proposed change of use to hotel is considered appropriate as an adaptation and would enable a continued viable use of the site securing the long term conservation of the building. However it is acknowledged that the proposals do not preserve the listed building including some features of historic interest, and special regard has been had to the desirability of preservation, but in the context of the proposals and the evaluation in this report it is not considered that this should lead to refusal of the application for listed building consent.

26. Overall, the proposal would comply with Local Plan Policies CS12, DM 12.1 and DM 12.3 (1), draft City Plan 2036 policies S11 and HE1 (2, 3, 4 and 5), and London Plan Policy HC1 (A, B, D and E). However in delivering this new use the proposal would result in some less than substantial harm, at the lower end of the spectrum, failing to preserve the special architectural and historic interest and heritage significance of the listed building. This harm stems from the loss and alteration of historic fabric of some areas of moderate interest including: the cells; staircase and minor alterations to the historic floor plan and this would erode the connection between the site and its former use as a police station.

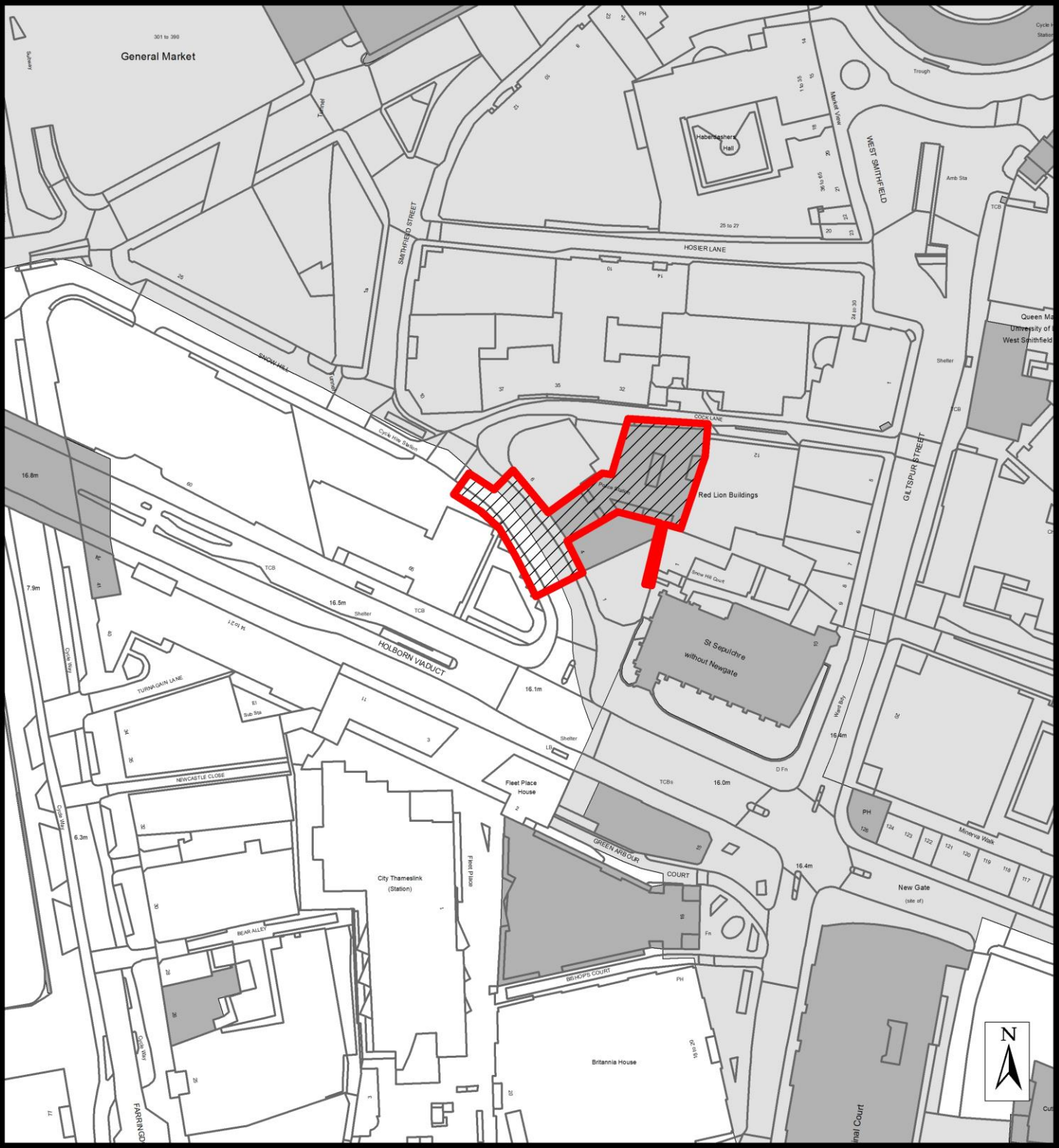
27. The degree of harm is considered to be minimal. Therefore elements of the proposals would be contrary to DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).

28. When taking all matters into consideration, subject to the recommendations of this report, it is recommended that listed building consent be granted

Recommendation

1. That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:
 - (a) 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 the accompanying application for listed building consent is granted (ref. 20/00933/LBC).

Site Location Plan



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ADDRESS:
5 Snow Hill
EC1A 2PD

CASE No.
20/00932/FULMAJ & 20/00933/LBC

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



DEPARTMENT OF THE BUILT ENVIRONMENT



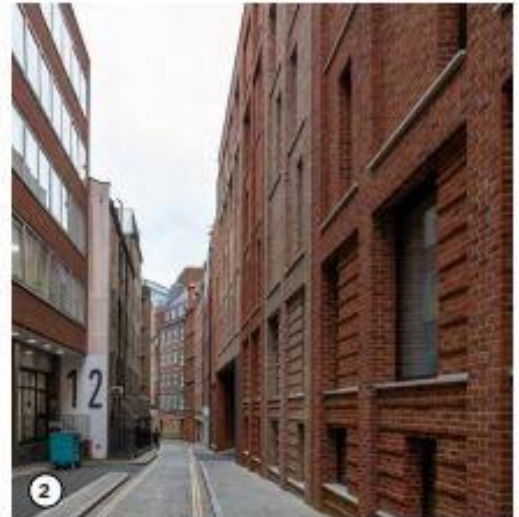
1. View from Snow Hill



2. View of the rear of the Snow Hill block (Block 'A') and view of the link building between the blocks.



View from Snow Hill



1. View facing west down Cock Lane
2. View facing west down Cock Lane
3. View of the Cock Lane Block rear wall that faces no. 6 Snow Hill
4. View facing east down Cock Lane



1. View of the elevation directly facing Cock Lane (Block 'B')
2. View of the west elevation for Block 'B'
3. View of the south elevation for Block 'B'
4. View looking north towards Block B from Snow Hill Court

Main Report

The Site

1. The Site is located to the west of the City of London, in the Farringdon Without ward, and comprises the former Police Station at 5 Snow Hill. The Site is bounded by Snow Hill to the west and Cock Lane to the north.
2. The Site area includes the 5 Snow Hill building, an alley that runs by Snow Hill Court and includes a portion of highway comprised of the pavement immediately outside 5 Snow Hill, and an area of existing police car parking on Snow Hill. The total site area is 1,312 sqm.
3. The building is Grade II listed and was designed by Sydney Perks, City Surveyor, and built in 1926 and incorporates Arts and Crafts and Moderne elements. The Site is within the Smithfield Conservation Area.
4. The existing building comprises two main blocks which extend between Snow Hill and Cock Lane: (i) a block facing Snow Hill ('Block A') at 5 Snow Hill, and (ii) a block facing Cock Lane ('Block B'). The two blocks are linked at basement and at ground floor level through a link building.
5. The existing building layout at the Site is as follows:
 - 'Block A', former main entrance reception and accommodation facing Snow Hill, with neighbouring adjoining buildings on either side (no.4 and no.6 Snow Hill). The existing building comprises basement, ground plus five upper storeys. There is space between Block A and Block B from the first floor and above.
 - 'Block B', formerly a police administration block, facing Cock Lane and comprises basement, ground plus five upper storeys. The Block includes an internal lightwell and there is space between the boundary line and the nearest buildings at no. 4 Snow Hill, no. 12 Cock Lane and Snow Hill Court. This Block is currently built up to the boundary line of no. 6 Snow Hill with a blank flank wall.
6. The existing primary pedestrian access is from Snow Hill on the principal elevation.
7. There is no relevant recent planning history at the Site, with recent applications comprising of proposed external plant and minor internal works.

The Surrounding Area

8. The Site is adjacent to the Newgate Street Conservation Area.
9. The Site is within the St Paul's Heights Policy Area, within London View Management Framework Landmark Viewing Corridors from Kenwood (3A.1) and Parliament Hill (2A.1), Wider Setting Consultation Area from Primrose Hill (4A.1) and Background Wider Setting Consultation Areas from Greenwich Park (5A.2) and Blackheath Point (6A.1).
10. The Site is within the Culture Mile and is near to the proposed Museum of London Site (ref. 19/01343/FULEIA) which received resolution to grant by the Planning and Transportation Committee on 23 June 2020.
11. The Site is within The North of the City Key City Place identified in the adopted Local Plan, and the Smithfield and Barbican Key Area of Change identified within the draft City Plan.
12. An application (ref. 19/01038/FULMAJ) on land opposite the site received planning permission on 1 December 2020 for a ten-storey building comprised of hotel, retail and office uses, known as 'Citicape House'. This permission has not yet been implemented.
13. The Site is within the setting of listed buildings with the No.4 Snow Hill (grade II), and the Church of St Sepulchre (grade I) in close proximity.
14. There is a blue plaque located on the façade at 5 Snow Hill for the Site of the Saracen's Head Inn, demolished in 1868.
15. The Site is near to the identified Smithfield residential area in Figure 'X' of the Local Plan and there are residential properties in close proximity to the Site, with the closest residents on Cock Lane. There are residential properties at: 32, 35, and 37 Cock Lane; The Parvis Flat at St Sepulchre's Church; 10 Hosier Lane (also fronting onto Cock Lane) and 20 Hosier Lane; 8-9 Giltspur Street and 10 Giltspur Street; and 22 West Smithfield.
16. In addition to residential, the surrounding uses comprise of a mix of office, ecclesiastical and hotel uses, and include:
 - The adjoining 4 Snow Hill – office use;
 - The adjoining 6 Snow Hill – office use;
 - The adjoining 12 Cock Lane – office use;
 - The Holborn Viaduct Church of St Sepulchre (Grade I) which includes a designated Open Space;
 - 24-30 West Smithfield - Premier Inn Hotel;
 - Snow Hill Court – Counselling services;
 - In addition, there are retail units located nearby on Holborn Viaduct and Newgate Street;

- The consented Citicape House development (ref. 19/01038/FULMAJ).

The Proposed Development

17. Planning permission is sought for:

“External and internal alterations together with demolition and new build and associated change of use of existing building from police station (sui generis) to hotel with ancillary uses (Class C1) including:

- (i) refurbishment of facade to Snow Hill and the retained facade to Cock Lane;*
- (ii) partial demolition, rebuilding and extension to provide a building ranging from 6 to 8 storeys, plus new plant at roof level;*
- (iii) extension of existing sub-basement;*
- (iv) provision of cycle storage;*
- (v) highway works;*
- (vi) greening; and*
- (vii) other ancillary works.”*

18. Listed building consent is sought for:

“External and internal alterations together with demolition and new build associated with the change of use of a police station to a hotel with ancillary uses including:

- (i) refurbishment of facade to Snow Hill and the retained facade to Cock Lane;*
- (ii) partial demolition, rebuilding and extension to provide a building ranging from 6 to 8 storeys, plus new plant at roof level;*
- (iii) extension of existing sub-basement; and*
- (iv) other ancillary works.”*

19. This report deals with the considerations for both aforementioned applications.

20. The scheme proposes a change of use from a police station (Sui Generis) to provide a hotel development (Use Class C1) delivering 219 bedrooms which would comprise a total of 6,369 sqm (GEA) floorspace which would include 5,262 sqm GEA new build floorspace. This will include uses ancillary to the hotel including publicly accessible entrance spaces curated with relevant cultural and heritage information at ground and first floor, including the refurbished historic reading room and a new restaurant at first floor.

21. In addition to new build floorspace, a significant portion of the building is to be retained due to the heritage significance.

22. The majority of Block ‘A’ is to be retained and refurbished, with the proposed removal of the mansard roof at fifth floor level. The link

building between the two blocks is to be demolished. The Snow Hill façade will be refurbished.

23. The entirety of Block 'B' is to be demolished apart from a retained stair, the historic Reading Room at first floor level, the walls in the sub-basement, and the façade directly facing Cock Lane from basement level to part of the fourth floor level which will be refurbished.
24. The new build parts of Block A include some internal alterations and the replacement mansard roof. The other new build elements would comprise of the majority of Block 'B' including the internal structures and the entire facades to the east, south and west, and part of the façade to the north. The atrium space between the two blocks would also be a new build element and would have a part glazed roof and perforated brickwork design on the elevation.
25. A small extension is proposed to the sub-basement within Block 'B' with lift pits and a stairwell also requiring excavation at the Site.
26. In respect of proposed height of the new building, Block 'A' facing Snow Hill would be 36 metres AOD to the top of the roof. For Block 'B', the top of the parapet facing Cock Lane would be 39.9 metres AOD, with the top of the plant equipment above this at 41.17 metres AOD, which sits slightly below the St Pauls Heights (which is 41.7 metres AOD). The top of the atrium roof would be at 36.5 metres AOD.
27. Urban greening would be introduced to the Site in the form of blue roof and green roof spaces.
28. The proposed plant is concentrated on the new build roof on Block 'B' and would sit alongside photovoltaic (PV) arrays with a total coverage of 76 sqm. There are no accessible roof terrace spaces proposed as part of the development.
29. The servicing of the building is proposed on-street on Snow Hill. The development would provide long stay and short stay cycle parking in accordance with London Plan standards. No car parking is proposed.
30. Highways works comprise the replacement of redundant police parking bays in front of the building, to be replaced with double yellow lines from which hotel servicing will take place (this will be subject to parking orders being made, which will be subject to separate statutory processes which cannot be predetermined).
31. The following amendments to the scheme were submitted during the determination period following comments from Officers and other consultation responses:
 - The rooftop plant has been consolidated to form a more concentrated area;

- Three windows on floors two, three and four on the elevation facing no. 6 Snow Hill have been recessed into the building within a void with the window itself not facing no. 6 Snow Hill;
- The green wall and associated infrastructure has been recessed into the building;
- The provision of short-stay parking spaces internally, in accordance with London Plan standards, and the provision of external short stay cycle parking proposed on Snow Hill;
- A commitment to remove the green wall facing no.6 Snow Hill in the event the adjoining site (no. 6 Snow Hill) were to be redeveloped to the boundary line of no. 5 Snow Hill;
- A commitment to provide privacy screens or obscured glazing on selected windows on all elevations;
- A commitment to provide access to the publicly accessible spaces at ground and first floor level seven days a week, between 10.30am – 7pm;
- A revised Construction Environmental Management Plan to respond to concerns raised by no. 6 Snow Hill;
- Corridor widths on new upper floors and ground floor wheelchair accessible toilet has increased in size. A wheelchair accessible toilet at first floor level, a platform lift to the atrium space on first floor, and accessible cycle parking have been provided.

Consultation Process

Statement of Community Involvement

32. The Applicant submitted a Statement of Community Involvement ('SCI') outlining their engagement with stakeholders. The consultation process prior to the application submission comprised:

- A consultation website;
- Exhibition carried out virtually due to the Covid-19 pandemic with interactive exhibition boards between 27 July - 10 August 2020;
- Feedback forms;
- Phone number and email address – four community members used email address;
- Engagement with local community members and ward councillors.

33. The SCI states that the consultation website was promoted through an invitation sent to 377 addresses in the surrounding area. In addition, posters were placed at the site to publicise the consultation. The SCI states the website received 95 sessions and 161 page views in total, and that following the consultation, feedback centred around potential disruption of the construction phase and daylight and sunlight impact.

34. Prior to submission of the applications, the Applicant states pre-application meetings were undertaken with Historic England and the Twentieth Century Society.

Planning application / Listed Building Consent Consultation Responses

35. Following receipt of the applications these were advertised on site and in the press and have been consulted upon. A site notice was placed at the site on 7 December 2020 and a press notice was published on 15 December 2020.
36. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the tables below.
37. The Applicant has provided a detailed response to matters raised in consultee and third-party responses which are available to view on the public website and are listed in the background papers list at the end of this report.
38. In addition to the original consultation in December 2020, re-consultations took place in:
- March 2021 for 21 days;
 - June 2021 for 14 days;
 - August 2021 for 21 days; and
 - August 2021 for 14 days.
39. The Greater London Authority were not consulted as the application is not a referable scheme.
40. Table 1 includes the consultees and associated responses received from Statutory Consultees for 20/00932/FULMAJ.

Table 1: Consultation responses for application ref. 20/00932/FULMAJ from Statutory Consultees.

Consultee	Comments and CoL Response
Historic England	Responded and no comments.
Transport for London	<u>Comments:</u> <i>1. Long stay and short stay cycle parking acceptable in London Plan standards.</i> <i>2. Cycle parking lift to basement does not meet standards in London Cycling Design Standards (LCDS).</i> <i>3. Applicant to identify how basement cycle parking is accessed in event of lift failure.</i>

	<ol style="list-style-type: none"> 4. <i>All cycle parking should be designed and laid out in accordance with the guidance contained in the LCDS and the applicant should demonstrate how a minimum of 5% of cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.</i> 5. <i>Strongly support the removal of existing parking bays on Snow Hill to provide a development which is car-free. No disabled parking proposed and is acceptable in principle to rely on nearby disabled parking bays instead if these are a suitable distance from the site.</i> 6. <i>Deliveries and servicing activity to take place on Snow Hill is acceptable in principle, this is a borough highway and therefore the views of City of London as highway authority ultimately should be sought.</i> 7. <i>Deliveries and waste collection should be outside of peak hours where possible.</i> 8. <i>Note a Construction Environmental Management Plan (CEMP) submitted. A Construction Logistics Plan (CLP) should be provided in accordance with TfL guidance and secured by condition. Diagrams should be provided to demonstrate how construction vehicles will access and egress the area.</i> 9. <i>Encouraged the construction to be aligned with 61-65 Holborn viaduct, if both schemes are delivered simultaneously. All contractor vehicles should include sidebars, blind spot mirrors and detection equipment to reduce the risk and impact of collisions with cyclists and other road users and pedestrians on the roads.</i> 10. <i>The applicant should confirm that they will comply with CLOCS standards. TfL encourages the use of freight operators with FORS silver or gold membership as it is imperative that road safety measures are considered, and preventative measures delivered through the construction and operational phases of the development. All vehicles associated with the works must only park/stop at permitted locations and within the time periods permitted by existing on-street restrictions.</i> 11. <i>The Travel Plan should be secured by condition. Travel surveys will need to be repeated after 3 and 5 years and details should be provided on the number of visitors expected on site and shift patterns. The applicant should consider providing cycle parking provision in excess of London Plan standards to promote cycling.</i>
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	<p><u>Officer Response: (please note TfL confirmed all responses to comments were acceptable)</u></p> <ol style="list-style-type: none"> 1. n/a. 2. The Applicant amended the lift size and TfL subsequently confirmed the change is acceptable. 3. In the event of service lift failure, the cycle parking would be accessed through the guest hotel lifts or the staircases and hotel staff would assist in providing access via either of these routes. 4. The application would provide one space for adapted cycles, meeting the target. 5. There are disabled parking bays near to the Site, including at Giltspur Street (one space) and at Hosier Lane (three spaces). 6. The Transport Planning Team are content with the servicing and delivery proposals. 7. As an exception, up to two deliveries per day will be taking place in peak times as agreed with the Transport Planning Team. These will take place as part of consolidated deliveries with the West Smithfield Premier Inn and would be secured via 106. 8. A Scheme of Protective Works, and Deconstruction and Construction Logistics Plans are proposed to be secured by conditions. 9. It is unknown at this time whether the construction can be coordinated with 61-65 Holborn Viaduct as, at the time of writing, that permission has not been implemented. 10. The requirement to comply with the CLOCS standards is included within the condition securing the submission of a Construction Logistics Plan. 11. A Cycling Promotion Plan is proposed to be secured by obligation, which will address the requirements of a Travel Plan. The Applicant is providing additional short stay cycle parking, in excess of London Plan standards.
Thames Water	<p><u>Comments:</u></p> <ol style="list-style-type: none"> 1. <i>Thames Water has been unable to determine the waste water infrastructure needs of this application, despite contacting developer therefore requested that a condition added to address this.</i> 2. <i>The pump rate for the basement and proposed connection point prior to determination if possible, however should be requested as part of condition if not received.</i>

	<p>3. <i>The development is located within 15 metres of an underground waste water assets and therefore an informative is suggested.</i></p> <p>4. <i>There are public sewers crossing or close to the development, and it is important the risk of damage is minimised. An informative is suggested.</i></p> <p>5. <i>Thames Water requests that the Applicant should incorporate within their proposal, protection to the property by installing a positive pumped devise (or equivalent) on the assumption the sewerage network may surcharge to ground level during storm conditions. Notes potential requirement for a Groundwater Risk Management Permit from Thames Water.</i></p> <p><u>Officer Response:</u></p> <p>1. The condition relating to waste water has been recommended.</p> <p>2. In relation to the foul water, the pump rate was not provided by the Applicant therefore this detail is secured as part of a condition.</p> <p>3. The waste water assets informative has been recommended.</p> <p>4. The public sewer informative has been recommended to respond to this comment.</p> <p>5. In relation to sewerage network comment, an informative has been recommended to address this.</p>
Conservation Area Advisory Committee	<p><u>Comments:</u></p> <p><i>"The Committee had no objections subject to the retention of a pair of blue police lamps on the building façade."</i></p> <p><u>Officer Response:</u></p> <p>The building lamps have been removed and it is understood these are currently in City storage therefore a condition is recommended for these to be reinstated or for details for replica lamps to be approved and reinstated before the Snow Hill façade refurbishment works have begun. This should be completed in consultation with the City of London Police to address any security issues raised through reinstating the lamps.</p>
Lead Local Flood Authority	<p><u>Comments:</u></p> <p><i>Recommended the following conditions:</i></p> <p><i>- Before any construction works hereby permitted are begun the</i></p>

	<p><i>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:</i></p> <p><i>(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue/green roofs, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.8 l/s from a catchment of 468m² with the remainder of the site discharging at an unrestricted rate, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 57m³;</i></p> <p><i>(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.</i></p> <p><i>(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.</i></p> <p><i>- 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:</i></p> <p><i>(a) A Lifetime Maintenance Plan for the SuDS system to include:</i></p> <ul style="list-style-type: none"> <i>- A full description of how the system would work, it's aims and objectives and the flow control arrangements;</i> <i>- A Maintenance Inspection Checklist/Log;</i> <i>- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.</i> <p><u>Officer Response:</u></p> <p>The recommended conditions have been included.</p>
The London and Middlesex Archaeological Society (LAMAS)	<p><u>Comments:</u></p> <ol style="list-style-type: none"> <i>1. No objections to the principle of redeveloping the site and acknowledge the opportunity this brings for improvements to this historic asset.</i> <i>2. Concerns about the complete loss of the historic cells as part of the demolition of the internal floors of the building. Whilst it is acknowledged that the cells have been altered and modified since their original construction, these form</i>

	<p><i>an important element of the unique character of this type of building, with very few examples remaining in London.</i></p> <p>3. <i>Paragraph 189 of the NPPF requires that: In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.</i></p> <p>4. <i>Paragraph 199 of the NPPF requires that: Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.</i></p> <p>5. <i>The City of London Local Plan Policy DM 12.3 Listed buildings paragraph 3.12.16 also requires that: Where alterations are acceptable, the City Corporation may require a standing building record to be made of internal or external structures and features that may be affected or revealed during the course of work. These circumstances would include occasions where a building is likely to be changed as a consequence of major repairs, alteration or extension.</i></p> <p>6. <i>Suggest the requirement for an archaeological building investigation and recording programme to be undertaken during demolition, as outlined in the ClfA guidelines.</i></p> <p><u>Officer Response:</u></p> <p>1. n/a</p> <p>2. The Cells are considered to be of moderate significance however retention is impractical within the proposed rebuilding to deliver the proposed new use which requires single floor level floors. Retention of the cells would result in split floor levels at basement and on the upper floors reducing step free access to a large part of the hotel. The cells are considered to be a recognisable function within</p>
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	<p>the historic floor plan and are intrinsic to the special interest which is unique to this building typology and therefore central to historic and architectural significance. However the quality of the cells is compromised as they have also been substantially altered with new fittings which has diminished their significance and they do not compare to other listed examples of police or holding cells. Alterations include new solid metal doors; the replacement of benches and original sanitary ware; insertion of glass block windows, new flooring and glazed bricks have been over painted and the ceilings have been rebuilt as part of the post war rebuild. When considered in the context of the significance of Snow Hill Police Station which is primarily listed as an example of an interwar police station and of the quality of the external elevation to Snow Hill the cells are considered to be of a lesser quality and would be minimal.</p> <p>The demolition of the cells would cause a degree of less than substantial harm when taking into consideration quality and previous alterations this harm would be at the lower end of the spectrum.</p> <p>3. The Applicant has described the significance within the submitted Historic Building Report. A desk-based Archaeological Assessment has been submitted with the application and conditions for further investigation have been recommended. The full Officer response is detailed within the 'Design' and 'Archaeology' sections of the Report.</p> <p>4. The archaeological impact and the recommended conditions is addressed in full in the 'Archaeology' section of the report.</p>
The Smithfield Trust	No response.
Twentieth Century Society	No response.
Surveyor to the Fabric of St Paul's	No response.

41. Table 2 below provides details of the consultation responses received for the listed building consent application only (ref. 20/00933/LBC); no objections were received for the application.

Table 2: Listed Building Consent Application only (ref. 20/00933/LBC).

Consultees	Comment
Historic England	Responded and no comments. Letter of authorisation received to confirm that the Secretary of State has considered the information and does not intend to require the application concerned to be referred to him.
Twentieth Century Society	No response.
Victorian Society	No response.
Society for the protection of Ancient Buildings	No response.
Council for British Archaeology	No response.
Ancient Monument Society	No response.
Georgian Group	No response.
Victorian Society	No response.

42. A total of 162 residential addresses were consulted as part of the full planning application (ref. 20/00932/FULMAJ). In addition, the Holborn Viaduct Church of St Sepulchre was consulted due to the proximity to the Site.
43. There are seven objections for the application ref. 20/00932/FULMAJ. An additional objection from a resident on Giltspur Street was withdrawn following discussions with the Applicant team. Therefore a total of five objections have been received from residents near to the Site, located on Cock Lane, Hosier Lane, and Giltspur Street. The remaining two objections were received from local businesses associated with no. 6 Snow Hill. The representations are considered in Table 3 below.
44. To summarise, the issues raised in the seven objections were as follows:
- Principle of hotel, and demand for hotel not evidenced including no detail regarding impact of COVID-19;
 - Impact on residential amenity including: daylight and sunlight impact; privacy and overlooking issues; noise; obstruction of views;
 - Impact to amenity of commercial property: daylight and sunlight; outlook; privacy; sense of enclosure; and prejudicing future redevelopment of adjoining Site;
 - Issues with the green wall, including maintenance, oversailing and ability for plants to survive;
 - Harm to heritage assets;
 - Construction impact including noise, dust, road closures and accessibility restrictions;
 - Excessive bulk and massing of the proposed development;
 - Impact to economic value of property;

- Issues with Construction Environmental Management Plan;
- Delivery and servicing arrangements;
- Loss of community use;
- Poor quality rooms due to lack of natural daylight;
- Issues with receiving correct notice to owners as part of application.

Table 3: Representations received for application ref. 20/00932/FULMAJ from residents and commercial occupiers.

#	Representation	Summary
1	Resident at 32 Cock Lane	<p><u>Comments:</u></p> <ol style="list-style-type: none"> 1. <i>Daylight and Sunlight loss to low existing levels.</i> 2. <i>Material adverse impact on economic value of property.</i> 3. <i>The applicant was unable to advise on the potential local disruption from any construction process. There was significant disruption to local residents caused by the previous closure to Cock Lane during the construction of the West Smithfield Premier Inn and it would be unreasonable to have further disruptions in a short time frame.</i> <p><u>Officer Response:</u></p> <ol style="list-style-type: none"> 1. The impact is assessed with the 'Daylight, Sunlight and Overshadowing' section of the report. 2. As stated in the Planning Practice Guidance, in respect of what is considered to be a material planning consideration: in general the courts have taken the view that planning is concerned with land use in the public interest therefore the protection of purely private interests such as the impact of a development on the value of a neighbouring property could not be material considerations. Therefore this is not considered to be a material consideration in this case. 3. The impact is addressed in full in the 'Construction Impacts' section of the Report.
2	Resident at 10 Hosier Lane (flat faces Cock Lane)	<p><u>Comments:</u></p> <ol style="list-style-type: none"> 1. <i>Daylight and Sunlight loss to low existing levels.</i> 2. <i>Material adverse effect on economic value of property.</i> 3. <i>The proposed extensions in the development to between 6 and 8 storeys are excessive and there is no reason to build taller than the existing building.</i> 4. <i>Significant disruption to local residents caused by the previous closure to Cock Lane during the construction of the West Smithfield Premier Inn and it would be unreasonable to have further disruptions within a short time frame.</i>

		<p><u>Officer Response:</u></p> <ol style="list-style-type: none"> 1. The impact is addressed in the 'Daylight, Sunlight and Overshadowing' section of the report. 2. Responded to this comment in representation '#1' above (bullet point '2'). 3. The full Officer response to the design approach, including for height and massing, is provided within the 'Design' section of this Report. 4. The impact is addressed within the 'Construction Impacts' section of the Report.
3	Resident at 8-9 Giltspur Street	<p><u>Comments:</u></p> <ol style="list-style-type: none"> 1. <i>The extension plus plant will obscure the view from the flat.</i> 2. <i>The extension is too large for the surrounding area.</i> 3. <i>Will cause disruption in terms of noise, dust and road closures.</i> 4. <i>Previously informed that there would be no material loss of daylight to 8-9 Giltspur Street however the application includes no analysis of Giltspur Street.</i> <p><u>Officer Response:</u></p> <ol style="list-style-type: none"> 1. The impact on the private views is not a material planning consideration. 2. The full Officer response to the design approach, including for height and massing, is provided within the 'Design' section of this Report. 3. The impact is addressed within the 'Construction Impacts' section of the Report. 4. The impact is assessed with the 'Daylight, Sunlight and Overshadowing' section of the Report.
4	Resident at 32 Cock Lane	<p><u>Comments:</u></p> <ol style="list-style-type: none"> 1. <i>The height of the proposed building will have a direct negative impact on flat which faces the back of the building. The height of the new building will significantly reduce the light coming into flat which only has two windows.</i> 2. <i>The proposed plant on the roof will prevent the opening of windows due to the 24/7 noise from the plant.</i> 3. <i>The noise created as a result of a hotel e.g. staff entrance located on Cock Lane which is a narrow road.</i> 4. <i>Increase of deliveries and waste collection. All will create a neighbourhood nuisance.</i> 5. <i>Loss of privacy as windows will look directly into flat (and Cock Lane is narrow).</i> <p><u>Officer Response:</u></p> <ol style="list-style-type: none"> 1. The impact is assessed with the 'Daylight, Sunlight and Overshadowing' section of the Report.

		<ol style="list-style-type: none"> 2. The proposed plant at roof level will be predominantly located to the south of the roof for Block B, therefore further away the Cock Lane residential properties including 32 Cock Lane. The plant will be subject to recommended conditions from Environmental Health to mitigate the impact of any plant noise to surrounding uses and this is the standard approach in the City. 3. The staff entrance is located on Snow Hill. A condition is recommended for an Operational Management Plan to ensure that the operations minimise disruption to surrounding uses, including staff entry and exit. The hotel is considered to be a noise sensitive use in the evenings, and includes bedrooms directly facing onto Cock Lane, therefore is expected to maintain low noise levels in the evening. 4. Regarding deliveries and servicing, these will be capped at two deliveries per day and these will be consolidated with the operating West Smithfield Premier Inn (to be secured through Section 106) therefore it is considered that no new trips will be introduced to the network. 5. Regarding loss of privacy, the Applicant has amended the proposal to include internal privacy screens to block views towards neighbours for 16 windows facing Cock Lane, which are the windows closest to 32 Cock Lane. These privacy screens are recommended to be secured via a compliance condition, and a condition is recommended for the Applicant to provide details of the privacy screens and/or obscured glazing prior to relevant works.
5	Resident at 10 Hosier Lane (flat facing Cock Lane)	<p><u>Comments:</u></p> <ol style="list-style-type: none"> 1. <i>Too many hotels already in the area. One application pending just across the road from this site. The residents at 10 Hosier Lane experienced many years of disturbance for the current Premier Inn in Barts Square.</i> 2. <i>Construction impact and more demolition in a small area, and residents at 10 Hosier Lane are and will be enclosed by works on all sides, including the construction of the new Museum of London development. In addition, more excavation work and heavy drilling which causes vibration, as was case recently for demolition across the road from 5 Snow Hill.</i> 3. <i>Additional plant at roof level. Noise and disturbance from plant/machinery is experienced from the roof of Tracers Smith Braithwaite (10 Snow Hill) and the Premier Inn (West Smithfield). The noise is constant even with windows closed.</i> 4. <i>More disturbance and safety issues at street level, whilst entering and leaving our residential building.</i> 5. <i>A more appropriate use of the building would be for</i>

		<p><i>offices or residential, utilising the existing structure.</i></p> <p><u>Officer Response:</u></p> <ol style="list-style-type: none"> 1. This is addressed in the 'Principle of Development' section of the Report. Throughout the Report, the cumulative impact of Citicape House is considered (assumed this is the site the resident refers to). 2. The impact is addressed in full in the 'Construction Impacts' section of the Report. 3. Response provided above for representation '#4' (in bullet point '2'). In addition, the plant noise condition takes into account the existing background noise as part of the assessment required. 4. An Operational Management Plan is to be secured by condition to ensure the Applicant mitigates disturbance in the operational phase. For the construction phase, conditions are recommended to mitigate disturbance and safety issues and this is addressed in the 'Construction Impacts' section of the report. 5. This is addressed within the 'Principle of Development' section of the Report.
6	<p>Beaumont Business Centres Limited (related to 6 Snow Hill) – six letters received</p> <p>Collineve Limited (related to 6 Snow Hill) – two letters received</p> <p>Anstey Horne consultants (related to 6 Snow Hill) – two letters received with one on behalf of Beaumont Business Centres Limited</p>	<p><u>Comments:</u></p> <ol style="list-style-type: none"> 1. <i>Loss of amenity, outlook, privacy, daylight and sunlight including cumulative impact with Citicape House, sense of enclosure, including impact from new windows and cross hatched brickwork to atrium. Failure to assess full daylight and sunlight impact for no. 6 Snow Hill.</i> 2. <i>No justification for hotel, no hotel demand study submitted, and no detail about Covid-19 impact.</i> 3. <i>Significant harm to heritage assets and insufficient detail provided assessing impact.</i> 4. <i>Sterilisation of adjoining land at no.6 Snow Hill, prejudicing future redevelopment, including from the green wall, the new proposed windows and the cross-hatched brickwork of the external atrium wall.</i> 5. <i>The green wall:</i> <ul style="list-style-type: none"> - <i>Will oversail the neighbours land;</i> - <i>The management and maintenance is not possible as requires access from neighbours land that will not be granted and the site location plan should be amended to include 6 Snow Hill maintenance access. Accordingly, the green wall should not be included in calculation.</i> - <i>planting will not survive including due to lack of light;</i> - <i>removal of green wall will result in not meeting UGF score.</i> - <i>Error in UGF calculation.</i> 6. <i>Impact of construction. The CEMP is not deliverable and therefore the scheme cannot be constructed. The</i>

		<p>construction requires use of no. 6 Snow Hill land and consent has not been sought and the Applicant has not engaged in meaningful way. The revised CEMP includes alternatives for construction if agreement not reached to access to land in ownership no. 6 Snow Hill however these options are not feasible and would require relevant permissions.</p> <ol style="list-style-type: none"> 7. Notice (Certificate B) was not properly served to no. 6 Snow Hill. 8. Confirmation requested for which windows are to be frosted from the 13 windows facing no. 6 Snow Hill and how this will enforced. 9. Loss of community use due to publicly accessible area of police station. 10. No evidence that police station is no longer required. 11. Adverse effects on amenity of surrounding uses caused by hotel. 12. Servicing arrangements will compete through the same entrance for visitors and servicing and deliveries. This is also proposed on street and there will be associated disturbance. The proposal for shared servicing trips should be discounted as ownership may change in the future. 13. Over 20% of hotel bedrooms would not have access to daylight therefore not suitable for hotel use and not of a high design quality. 14. The Applicant has included the land in front of the Site (on Snow Hill) as part of development and will block the front of the building impacting on safety of employees. 15. This will cause operational and financial harm to the business which contributes £3,000,000 in business rates per annum. 16. The Applicant did not comply with relevant legislation for the development of the nearby West Smithfield Premier Inn including damage to land at no. 6 Snow Hill. 17. Despite issues raised and meetings undertaken, the Applicant has only made minimal changes. 18. The impact to the daylight and sunlight to the office should be assessed as per paragraph 2.2.2 of BRE. Daylight has health and wellbeing benefits for office employees. Local Plan Policy CS10 states that scale of new development should respect amenity of surrounding uses, and the daylight and sunlight policy states that daylight and sunlight is important for mental health of workers and residents. Policy DM11.3 states that new hotels should not be permitted if adverse impacts on amenity of neighbouring occupiers including cumulative impacts. Works are underway to provide new office accommodation at no. 6 Snow Hill and this will involve replacing former tea stations with office
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accommodation at each level. The office use may accommodate a variety of uses (such as creative fields including architecture) which seek office spaces with good daylight provision therefore the quality/amenity of the space is a key objective and Point 2 assigning a 'typical' office use to the property is not appropriate and there are low existing levels.

Officer Response:

1. The neighbouring development would be affected by the proposals and thus the overlooking, privacy and sense of enclosure issues have resulted in amendments which include the inclusion of privacy screens within the windows and this is addressed in the 'Impacts to amenity of surrounding uses' section of the Report. The impact to daylight and sunlight is assessed with the 'Daylight, Sunlight and Overshadowing' section of the report.
2. There is no policy requirement for the preparation of a hotel demand assessment. Nevertheless the principle of a hotel and the evidence of demand is included within 'Principle of Development' section of the Report.
3. The detailed response to harm to heritage assets is provided within the 'Heritage' section of this Report. A further heritage addendum from the Applicant provided a more detailed assessment on the impacts on the setting and significance of surrounding heritage assets including 4 Snow Hill.
Consultees at pre-application stage included Historic England and 20th Century Society. At application stage Historic England, 20th Century Society, Georgian Group, Victorian Society, Ancient Monument Society and SPAB were consulted. No objections have been received from these independent heritage bodies.
The City of London has determined following comprehensive pre-applications meetings, site visits, and amendments, that the proposal would cause harm to areas of moderate significance and this level of harm is less than substantial towards the lower end. Paragraph 202 of the NPPF is therefore applied.
The Design and Heritage section includes an assessment of balancing paragraph 202 and public benefits, and an assessment of massing and bulk in views along Cock Lane.
4. This is addressed in the 'Design considerations for future redevelopment of surrounding sites' section of the report.
5. The Applicant recessed the green wall into the building to ensure this was located entirely within the ownership boundary of the Applicant and does not result in

		<p>overhang to the adjoining land at no. 6 Snow Hill. In addition, maintenance is proposed by abseiling therefore would not require access to land at no. 6 Snow Hill. The details of the type of planting and the irrigation system to ensure the measures are in place to maintain the plants is recommended as a condition. The Applicant has confirmed that the proposal would meet the UGF score if the green wall is removed. A revised UGF calculation was provided following a typographical error.</p> <p>6. An updated CEMP was provided by the Applicant to respond to comments and the application has been reviewed by the Environmental Health team and is considered to be acceptable. This matter is addressed in full in the 'Construction Impacts' section of the report. Conditions are recommended to mitigate construction and demolition impacts before relevant works commence which require details (including arrangements for liaison with neighbours) to be submitted, approved and complied with. The conditions will not be discharged and thus the development will be unable to commence unless the details provided are satisfactory.</p> <p>7. The application form includes Beaumont Business Centres Limited as an owner that was notified of the application. Subsequently, the Agent confirmed that the correct notice (Certificate B) was served to the owner. The red line boundary originally included part of the land owned by no. 6 Snow Hill, however this was subsequently amended and land in no. 6 Snow Hill's ownership was not included.</p> <p>8. See response to point '1' above.</p> <p>9. This is addressed in the 'Principle of Development' section of the report.</p> <p>10. This is addressed in the 'Principle of Development' section of the report.</p> <p>11. Impact of new hotel use on surrounding occupiers is addressed within the 'Impact to amenity of neighbouring uses' section of the report.</p> <p>12. The Transport Planning Team and TfL has no objections to the proposals, and there will be a maximum of two deliveries per day which are to be consolidated with the nearby West Smithfield hotel therefore are not considered to have a detrimental impact to the network or surrounding uses. Regarding securing the shared servicing arrangements in perpetuity, an obligation has been drafted to ensure that peak servicing does not take place in the event that the ownership changes and consequently consolidated delivery and servicing with nearby sites is not proposed.</p>
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		<p>This is addressed in full in the ‘Servicing and Deliveries’ section of the report.</p> <p>13. The provision of windowless rooms is addressed within the ‘Daylight in proposed hotel bedrooms’ section of this report.</p> <p>14. The Applicant will submit a Scheme of Protective Works, a Deconstruction Logistics Plan and a Construction Logistics Plan prior to relevant works. In addition, the Applicant will be required to secure other permissions from other parties during the construction phase.</p> <p>15. This report considers the impacts on the amenity on the surrounding uses, including the construction, daylight and sunlight, noise, and deliveries and servicing. The contribution of business rates is not a material planning consideration.</p> <p>16. As mentioned above, the Applicant will require relevant permissions during the construction process which include agreements with neighbours. These are not required as part of the planning application and therefore is not a material planning consideration.</p> <p>17. The Applicant has made changes in response to comments received, this includes: recessing the green wall, recessing windows and introducing privacy screens to windows to address overlooking, and providing different construction options to avoid use of the adjoining land.</p> <p>18. This is addressed in the ‘Daylight, Sunlight and Overshadowing’ section of the report.</p>
8	Resident at 8-9 Giltspur Street	Objection withdrawn.

Policy Context

45. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
46. The draft City Plan 2036 was approved for consultation by the Court of Common Council in May 2020 and January 2021. The draft City Plan 2036 was published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012 between March and May 2021. As such, it is a material consideration in the determination of applications.
47. Government Guidance is contained in the National Planning Policy Framework (NPPF) July 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.

48. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Social Infrastructure (GLA May 2015), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Central Activities Zone (GLA March 2016), Cultural Strategy (GLA, 2018), Mayoral CIL 2 Charging Schedule (April 2019), Shaping Neighbourhoods: Character and Context (GLA June 2014), Mayor's Transport Strategy (2018), The Square Mile: Future City Report, 2021, City of London Visitor Destination Strategy 2019-2021 and Cultural Strategy 2018 – 2022 (CoL 2020).
49. Relevant City of London Guidance and SPDs comprise: Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018), City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), City of London Thermal Comfort Guidelines (CoL 2020), Planning Obligations SPD (CoL, July 2014), Open Space Strategy (CoL 2016), City Public Realm (CoL 2016), and relevant Conservation Area Summaries.
50. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.

Considerations

Relevant Statutory Duties

51. 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, local finance considerations so far as material to the application, and to any other material considerations.
 - (Section 70 Town & Country Planning Act 1990); and 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).
52. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

53. In determining a planning application for a building or land in the Smithfield Conservation Area, special attention must be paid to the desirability of preserving or enhancing the character or appearance of that area (S.72(1) Planning (Listed Buildings and Conservation Areas) Act 1990).
54. In considering the application for Listed Building Consent special regard must be had to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses (S16(2) Planning (Listed Buildings and Conservation Areas) Act 1990).

National Planning Policy Framework (NPPF, 2021)

55. The NPPF states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
56. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
57. Paragraph 10 states that “at the heart of the Framework is a presumption in favour of sustainable development”. That presumption is set out at paragraph 11. For decision-taking this means:
- approving development proposals that accord with an up-to-date development plan without delay; or
 - where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
58. 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).

59. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 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.”
60. Paragraph 113 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”.
61. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable 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.”
62. Paragraph 130 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.
63. Paragraph 134 sets out that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
64. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 152 identifies that the planning system should support the transition to a low carbon future. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
65. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 195 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.

66. Paragraph 197 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."

67. Paragraph 199 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."

68. Paragraph 200 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."

69. Paragraph 202 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.

70. Paragraph 203 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.”

The Square Mile: Future City Report

71. The Square Mile: Future City report aims to “create and sustain a vibrant and engaging City Offer” and target outcomes includes for: “Leisure visitors return and remain in the City, encouraged by the vibrant offer” and for “retail, hospitality, tourism and culture operators to return to and remain in the City, encouraged by City Corporation support”. It is not development plan policy and does not have the weight or statutory status of development plan policy, but may be considered a material consideration.

Considerations in this case

72. In considering this planning application and listing building consent application, account has been taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

73. The principal over-arching issues in considering this application are:

- The extent to which the proposals comply with the relevant policies of the Development Plan.
- The extent to which the proposals comply with Government guidance (NPPF).
- The application of the duty, when considering whether to grant planning permission, to have special regard to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses when determining the planning application and the duty 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 when considering whether to grant listed building consent.
- The application of the duty, when determining a planning application for a building or land in the Smithfield conservation area, to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.
- The acceptability of hotel use.
- Whether the proposal supports the development of the City as a cultural destination for its communities and visitors and the City’s economic development.
- The impact of the proposal on neighbouring amenity.
- The impact of the proposal on daylight and sunlight to dwellings.

- The acceptability of the scheme in design and heritage terms including impact on heritage assets and whether the public benefits outweigh any harm.
- Whether the potential for redevelopment of adjoining sites has been safeguarded.
- The accessibility and inclusivity of the development.
- The impact of the proposal on any archaeology beneath the site.
- Fire safety.
- The impact of the proposal in highway and transportation terms.
- The impact of the proposal in terms of environmental sustainability.
- The impact of the proposal on air quality.
- The results of the Healthy Urban Checklist.
- The requirement for financial contributions.

Economic Development and the Provision of Hotel Accommodation

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 540,000 people.
75. Planning policy supports economic growth. 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.
76. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth in addition to tourist and cultural uses.
77. The Applicant stated there will be approximately 260 guests per day with an estimated total visitor spend of £8.5million per annum of which £3.6million per annum is expected to be spent in the immediate neighbourhood of the hotel.
78. The Applicant states the hotel will provide new employment and

training opportunities during the operational and construction phases. The Applicant estimates 50 full time roles will be created within the hotel and estimates 200 jobs will be required during the construction phase.

79. The submitted Cultural Plan states that the hotel at Snow Hill could provide accommodation for around 55,000 leisure visitors to the City every year.

80. 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.

Principle of Development

Hotel use

81. The London Plan 2021 states (paragraph 2.4.4) that one of the Strategic Functions of the Central Activities Zone (CAZ) is for tourism facilities including hotels. London Plan Policy E10 states that a sufficient supply of serviced accommodation should be maintained, and that this should be provided in the CAZ except in wholly residential streets or predominantly residential neighbourhoods and subject to the impact on office space and other strategic functions. London Plan Policy E10 states that intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses. In addition, Policy E10(H) states that accommodation should provide accessible rooms in line with British Standards.

82. Paragraph 6.10.2 of the London Plan states that it is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041 and paragraph 10.6.22 of the Plan states that hotel and leisure uses should be located in accessible locations to encourage walking, cycling and public transport use.

83. The City of London Visitor Destination Strategy 2019-2021 notes that capacity for growth represents a challenge as: "Demands on land use mean that future growth in hotel supply will be limited – as recognised in the City of London Local Plan policies. Increasing overnight stays will therefore be limited, noting the Culture Mile area is perceived to be particularly short of hotels."

84. The Local Plan Policy CS11 states that hotel development will be allowed where it supports the primary business or cultural role of the City and hotels should be refused where these would compromise the business function or potential for future business growth, and that hotels should not be located where these would create amenity problems for existing residential areas.
85. The Site is located in the CAZ and in a highly accessible area in terms of public transport, and the development would encourage walking and cycling due to its central location in the Culture Mile and proximity to Thameslink and Elizabeth Line stations and provision of short and long stay cycle parking. The Site is surrounded by a mix of uses which includes residential. Although the Site is near to the Smithfield residential area identified in the Local Plan, the locality is a 'vibrant, mixed use area' as identified in the Draft Strategic Policy S23 therefore is not within a wholly residential street or a predominantly residential neighbourhood.
86. The adopted Local Plan (paragraph 3.11.5) states there is capacity for future hotel development in the City to meet the needs of City Businesses and visitors and Local Plan Policy DM11.3 and that proposals for new hotels will only be permitted where they:
- do not prejudice the primary business function of the City;
 - are not contrary to adopted Policy DM 1.1 ('Protection of office accommodation');
 - contribute to the balance and mix of uses in the immediate locality;
 - do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
 - provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
 - are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
 - ensure continuing beneficial use for historic buildings, where appropriate.
87. In addition, Draft City Plan Policy CV3 requires hotels to provide a range of complementary facilities accessible to the public.
88. Paragraph 5.3.16 of draft City Plan 2036 states:
- In 2020, the City had 44 hotels, aparthotels and hostels providing over 6,700 bedrooms;
 - The GLA has forecast the need for an additional 58,146 bedrooms in London between 2015 and 2041;
 - The demand is driven by a projected increase of 42 million visitor nights and a 15 million increase in domestic visitor nights

and that the City's projected share of this increase is 4,341 rooms;

- Based on past trends and hotel sites permitted or under construction, there is a strong likelihood that the City will meet the London Plan requirement. The Policy notes that the GLA forecasts predate the Covid-19 pandemic and states that although there have been short term impacts on the tourism industry, the attractions of the City and London as a visitor destination remain strong.

89. Paragraph 5.3.17 of the draft City Plan states that visitor numbers are projected to increase and the development of the Culture Mile is likely to increase demand for hotel accommodation particularly in the north west of the City.

90. The Local Plan (paragraph 3.11.10) states that hotel development should ensure that it does not result in the loss of suitable and viable office accommodation or sites, or prejudice the primary business function of the City. The Draft City Plan states (paragraph 5.3.19) hotel development should not displace sites that are suitable for office accommodation.

91. The Site is located within the North of the City Key City Place in the Local Plan (Policy CS5) requiring that the City benefits from substantial public transport improvements in the area and realises the potential for rejuvenation and 'eco design'. The Site is located in the Smithfield and Barbican Key Area of Change in draft City Plan Policy S23 which encourages culture-led mixed-use development and complementary uses.

92. There is an existing hotel near to the Site at 24-30 West Smithfield (Premier Inn) and a consented hotel at 61-65 Holborn Viaduct ('Citicape House') opposite the Site. The Applicant is not required to provide a hotel demand study as part of the application, however the Applicant has provided a response to comments objecting to a lack of evidence for demand. In this response, the Applicant has referred to the market research which accompanied the Citicape House application which stated that demand in the City to 2024 is likely to be 1.5 times the current supply representing 1,250 new rooms over this period and identifies the north west area as having the lowest number of rooms in convenient walking distance. The Applicant states that Whitbread's own projection anticipates higher than average occupancy at this proposed hotel and is confident that the additional supply will be met by demand and that this is unaffected by the current COVID-19 circumstances. In addition, the Applicant states that the proposed hotel would provide smaller and more affordable rooms, that the existing West Smithfield hotel provides a different type of accommodation including rooms suitable for families and that Citicape House would provide larger rooms with extensive guest amenities, therefore concluding that the hotels would cater for different groups.

93. The lawful use of the Site is as a police station and classified as a Sui Generis use, and therefore the proposal does not result in a loss of office accommodation. In addition, the Applicant states the complex configuration of the building including level issues and the additional intervention that would be required to the historic fabric for conversion to office use, would result in challenging conditions for potential re-use for modern office requirements. Therefore the Applicant considers that the hotel proposal will provide a viable use of the vacant listed building to ensure it is conserved with key elements preserved.
94. There are a mix of uses in the immediate vicinity of 5 Snow Hill including office premises at the adjoining no. 4 and no. 6 Snow Hill and at the adjacent 12 Cock Lane. In addition, there is office space located at the adjacent 35 Cock Lane and 10 Snow Hill properties. The Proposed Development is near to residential properties predominantly to the north and north-west of the Site, and to the east. Therefore, the Proposed Development will contribute to the balance and mix of the uses in the immediate locality.
95. The proposals would provide a restaurant on the first floor that is accessible to the public and a cultural offer including exhibition spaces, therefore would include a range of complementary facilities accessible to the public.
96. The proposal would secure the continuing beneficial use for a historic building and would include enhanced public access to and interpretation of the heritage, demonstrated through the cultural offer and access to the retained entrance and historic reading room. The proposal would also support the cultural role of the City through the Cultural Plan proposals.
97. Therefore, subject to recommended conditions, the Proposed Development is not considered to prejudice the primary business function of the City, would contribute to the balance and mix of uses in the immediate locality, would not result in unacceptable adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts.
98. Therefore it is considered that the proposals are in accordance with Local and regional policies including elements of Local Plan Policy DM11.3, draft City Plan Policy CV3, and London Plan Policy E10.

Cultural Use and Public Access

99. Policies CS11 and DM11.2 in the Local Plan 2015 and policy S6 in the Draft City Plan 2036 encourage new cultural experiences. The Site is within the Culture Mile and close to the new Museum of London site. Draft City Plan 2036 Strategic Policy S24 supports the development of cultural facilities and uses and the transformation of the north west of

the City into a vibrant strategic cultural area through the Culture Mile initiative.

100. The Applicant has submitted a Cultural Plan in accordance with draft City Plan Policy S6. The Cultural Plan includes spaces which are comprised of four key zones: Threshold and Entrance; Entrance Hall; Main Corridor; Staircase to café and atrium space. These would all be publicly accessible spaces. The Cultural Plan states the spaces will offer a narrative to the building, its use and heritage to be promoted as part of the Culture Mile.
101. The details of the proposals, including how this will successfully cater to the needs of the hotel guests and members of the public to optimise the hotel and cultural experience, and the long-term public access will be agreed through the final Cultural Plan to be secured within the Section 106 Agreement.
102. The cultural offer will enable public access to the historic building through a curated series of spaces and thus this is considered to be a public benefit to the scheme.
103. The intention is that the Premier Hub would offer more affordable hotel accommodation for both businesses and tourist visitors to complement the existing options in the Culture Mile. The enhanced visitor experience would be in key areas of heritage significance within Block A and Block B: the former police station reception areas; through to the new dynamic atrium space to ascend the historical staircase and up to the restored Reading Room. Within these areas there would be a permanent exhibition space celebrating the history of the police building and narratives of the local area referencing the surrounding context such as St Sepulchre Church, Old Bailey, Former Newgate Prison, and the ghost of Cock Lane.
104. This offer will be free and publicly accessible between 10.30am to 7pm for seven days a week and this includes the requirement for booking an appointment via a booking system between 5 - 7pm; no booking will be required from 10.30am – 5pm.
105. The final details of the installation including locations, fixings, lighting, exhibition content and management and monitoring to update and refresh proposals, would be agreed within a Cultural Implementation Plan as part of a Section 106. There will be a requirement to work in partnership with the Culture Mile Team and Museum of London and focus on employing local artists and creatives for the design work. The intention would be to ensure the deliverables are high quality, respect the listed building special architectural and historic interest and are focused on the heritage narrative of the building and locations and support other cultural activity in neighbourhood with some integrated aspects of modest branding. As part of the cultural offer, opportunities for pop-up exhibitions and events

within the atrium spaces and restaurant would also be secured providing an opportunity to showcase a range of creative design work in partnership with the Culture Mile Team.

106. The proposals would enhance and better reveal the history and significance of the listed building, support the vibrancy and aspirations of the Culture Mile including provision of visitor space, as well as support local creatives and design industries and provide culture-led and mixed-use development with complementary uses in the Smithfield and Barbican draft City Plan Key Area of Change. The proposal would also provide visitor information, increasing awareness of the City's cultural and heritage assets.

107. Therefore, the proposal is considered to be in accordance with Local Plan policy CS11 and Draft City Plan policies S6, S23 and CV3 (1 and 3-7).

Loss of Police Station use

108. London Plan Policy S1 supports and protects social infrastructure. The vacant former police station is no longer required for police purposes. As highlighted in the recent application ref. 20/00997/FULEIA ('Fleet Street Estate'), which received resolution to grant on 22 April 2021, the proposed City of London Police headquarters would consolidate the existing workforce within one main building, enabling the release of existing City of London Police stations, including at Snow Hill, for other uses.

109. As detailed within the Committee Report for the Fleet Street Estate, legacy police stations such as Snow Hill were designed for a model of policing appropriate 60 years ago and due to fabric, design and listing status are entirely unsuited to modern policing. Prior to disposal, it had become operationally compromised, inefficient and expensive to run, with significant outstanding backlog maintenance costs. In addition, the building could not be adapted to meet demanding Home Office standards for custody suite design or compliance with structural hardening to meet the threat of bomb blast without significant compromise.

110. The Committee Report for the Fleet Street Estate detailed that the City of London Corporation continually seeks to modernise its policing model in terms of ways-of-working, technology, services, organisation and accommodation, and the Report notes that, key to these changes is the move to a modern, adaptable, efficient, sustainable, secure, compliant and fit-for-purpose new headquarters building.

Loss of overnight accommodation

111. The building previously provided one unit of overnight police accommodation, ancillary to its main function as a police station. There would be no loss of permanent residential accommodation and proposals accord with Local Plan Policy DM21.2 and draft City Plan Policy HS2.

Loss of community use

112. A representation received stated that the former police station had a 'walk-in' element therefore this represented a community use and thus the proposal resulted in a loss of community floorspace. The former police station falls outside of the definition of Local Community use within the Use Classes Order (use class F.2), being a Sui Generis Use and is not considered to be a community use.
113. Therefore, the proposal is not considered to result in a loss of community floorspace and therefore is in accordance with Local Plan Policy DM22.1 and draft City Plan Policy HL5.

Design

Height, bulk and design approach

114. The opportunities to increase height and massing on the site are constrained and informed by the heritage designations. The existing physical layout of the site also restricts development possibilities due to the double aspect nature and narrowness of the building plots, topography, street alignments and the surrounding context of varied architecture and building ages. Overall, the design approach is a contextual response and has been heritage led with insertions being largely contemporary and distinct but complementary and deferential. Objections have been raised in relation to massing and bulk and these are addressed below.

Block A fronting Snow Hill

115. The proposed changes to Block A are limited to replacement of the existing small and much altered mansard extension which is partially concealed by the stone parapet. The proposed mansard would be more prominent following a traditional double pitched form with a large central dormer detailed in materials to match the main facade with discreet rooflights to the rear of the upper shallower pitch.
116. The terrace along this eastern side of Snow Hill together with St Sepulchre Court and Snow Hill Court form a characterful enclave detached from Holborn Viaduct and have a finer urban grain, variety of roof forms and architectural expression. Roof extensions are generally traditional, set back and pitched to reduce visual impact and provide a

degree of deference and are often in more recessive materials such as slate and profiled metal including zinc and lead. The proposed mansard extension would sit comfortably within the immediate townscape in near and longer views from Snow Hill, Farringdon Street and Holborn Viaduct. This very modest extension would reflect the established building heights and townscape character and be a recessive incidental addition to the established roofscape.

117. There would be little change to the Snow Hill facade. Signage would be required through a condition and the approach would be bespoke and restrained to ensure the proposals would not detract from the overall elevation, replica lanterns (to be reinstated) or historic plaques. The hotel use would generate a more active frontage to Snow Hill and the building would be publicly accessible. The reimagining of the buildings would complement the emerging cultural quarter of the Smithfield area and the delivery of the relocated Museum of London.

Block B fronting Cock Lane

118. Block B would be increased in height and volume through upward and rearward extensions behind the retained Cock Lane historic façade with an atrium infill between Block A and Block B. The overall height would be relatively modest increasing from five to eight storeys. The maximum height of the building including plant would be below both the St Pauls Heights Policy Area and LVMF threshold restrictions.
119. The Cock Lane plain historic stock brick elevation would be retained and the existing partial fifth storey completed and then stretched by an additional storey and surmounted by a double height mansard. Both elements would be architecturally contemporary and distinct but well-mannered using contextual materials and proportions to stitch together old and new. The extended masonry levels would be set back with an expressed shadow gap to distinguish between the retained historic elevation and contemporary addition. Window openings would be set within punched and articulated masonry and windows angled to reduce any overlooking. The placement of windows and dormers would have an individual rhythm and the positioning and vertical proportions would complement the retained elevation. The additional double pitched mansard profiled roof with dormers would be set back and deferential as a contemporary reinterpretation of a traditional roof form.
120. Behind the retained historic elevation to Cock Lane the remaining Block B would be almost entirely demolished. The flank west elevation, which is a combination of a stark rendered masonry wall, set back stock brick and modern glazed core facing no. 6 Snow Hill and recessed off street parking area would be rebuilt to full capacity of the site. Climbers would be incorporated to this reformed brick masonry elevation which would soften and add visual interest to the built up context of Cock Lane which has little or no urban greening.

121. The existing gap between the rear elevations of Block A and Block B is glimpsed from Cock Lane and would be infilled in brickwork and roofed over to form an internal circulation atrium space connecting the retained rear elevation of Block A and the rebuilt rear elevation of Block B. The elevation to Cock Lane would be contemporary in design and include a semi perforated brick skin allowing low levels of light in and out but ensuring any light spillage is restrained. This brick patterning would add visual interest and reference similar architectural treatments along Cock Lane. Overall there would be a coherent approach to these new build elements – the stretched façade, the mansard roof, rebuilt elevations and atrium – to reinforce a consistent design integrity to Block B which would be well considered, architecturally quiet and restrained.
122. The increased massing and height to Block B would have a limited and localised visual impact due to the canyon like tight urban nature of Cock Lane. The townscape is characterised by an enclosed narrow street with a back edge of pavement building line, with a warehouse scale and is predominately brick. The visual impact of the remodelled and enlarged Block B would be oblique and in some wider views from Snow Hill Court would be glimpsed between buildings as part of a medley of rear elevations. The increased massing would be most evident in views looking east along Cock Lane and in all these visual experiences the design approach as well as massing and height are considered appropriate and compatible with the scale and character of context and the prevailing massing and height of existing buildings. Overall the contemporary insertions would respect the established urban grain and be reflective of the buildings typologies of Cock Lane which is a mixture of new and historic buildings.
123. Conclusion on design: The design approach to Block A and Block B are appropriate in terms of scale, design approach, materials and intended quality and would add a level of richness and visual interest to the local townscape and would support the emerging vibrancy of Snow Hill and the wider area. Final materials and details would be the subject of conditions. The proposals comply Local Plan Policies CS10 and DM10.1, emerging City Plan Policy S8 and DE2, and London Plan D3 and paragraphs 130 and 132 of the NPPF.

Heritage

124. Through the pre-application and application process the proposals have been assessed against Local Plan Policies CS12, DM 12.1, DM12.2 and DM 12.3, draft City Plan 2036 policies S1 and HE1, and London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. Considerable importance and weight has been attached to and special attention has been paid to the desirability of preserving and enhancing the character or appearance of Smithfield conservation area and surrounding conservation areas, under s.72. There has also been special regard to the desirability of preserving 5 Snow Hill and

surrounding listed buildings including their setting and any features of special architectural or historic interest which it possesses, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.

125. The proposals have been developed and refined to minimise harm to significance with a focus on opportunities for enhancement. Evolution of the scheme includes reduced demolition and preservation of key features of significance such as the reading room and related staircase and areas of the ground floor within Block A. The massing to both block A and Block B has been amended and contemporary interventions refined in design terms. There has also been a focus on better revealing the heritage bedrooms in block A, creation of public access as well as the inclusion of urban greening on the flank wall.
126. Objections are raised that the proposals have not been independently scrutinised by heritage specialists. At application stage Historic England, 20th Century Society, Georgian Group, Victorian Society, Ancient Monument Society and SPAB were consulted. No objections have been received from these independent heritage bodies. The CAAC has recommended the blue lamps should be preserved and these would be reinstated as part of the application. LAMAS has raised concerns in relations to the removal of the cells and this is addressed below.

Direct Impacts on Heritage Assets

5 Snow Hill, Snow Hill Police Station

127. The proposals would have a direct impact as a result of physical demolition, alteration and extensions. The works to the listed building are also subject to a separate application for listed building consent (ref: 20/00933/LBC) which is also for determination in this report.
128. Significance and setting: The current building stands on the site of a purpose-built police station and represents a continuity of policing from 19th to present day. Snow Hill Police Station was designated as grade II listed in 1998 and has historic and architectural values. It is the oldest purpose built police station to survive in the City of London and was the second station on this site. Constructed 1925-1926 and designed by Sydney Perks, Architect and Surveyor to the City of London. It was designed as a civic focal point for the area whilst providing functions for the City Police. The foundation stone at ground floor level remains as a lasting reminder of the buildings original purpose. The original blue lamps noted on the Snow Hill elevation which immediately distinguish the function of the building have been removed.
129. The building is a good example of progressive interwar municipal architecture mixing civic, residential and administrative functions divided between two blocks (A and B) connected by a single storey link block. The original Y shaped plan form has a steel and concrete frame and the

entire structure is built over a large basement. The two parts whilst distinct in character and appearance should be read as a single operational entity to be understood as an historic police station.

130. Block A is of the highest significance and is generally well preserved and comprises a unique and imposing narrow portland stone clad frontage of five storeys and recessed rebuilt mansard. This facade has very high architectural value for its fusion of restrained interwar classicism with the material and form of the Arts and Crafts movement reflected in the bronze framed polygonal bow window across the upper four floors. There are some modern additions at ground floor including signage, cameras and modern light fittings. The rear of Block A is glimpsed from Cock Lane and is much plainer comprising stock brick and window openings of varying sizes and attractive expressed chimney and stack. The lightwell area between Block A and Block B is of low significance as a space and contains plant and ad hoc additions.
131. This block contained the main entrance and reception area with the upper floors providing extended accommodation for married senior officers. The panelled entrance lobby, staircases and residential floor plan to the upper levels all survive. The upper floors which have a more domestic but altered character with remnants of room layouts, evidence of chimneybreasts and fragments of decorative plasterwork and joinery and these spaces are assessed as being of moderate significance. The internal decoration is typical of an early 20th century civic building with a limited palette of materials and simple detailing, the windows are original but include secondary glazing.
132. Block B is a larger 5 storey utilitarian block with a main frontage to Cock Lane which includes a secondary double door access and front lightwell. The Cock Lane facade is also relatively well preserved but plain with no embellishment comprising yellow stock brick and window openings of different sizes with gauged brick arches. All windows have been replaced with UPVC casements, with grilles and there is a cage over the narrow lightwell. The main facade has a functional composition but remains relatively well preserved and is of modest heritage significance. The west elevation is a prominent feature on Cock Lane, the original brick wall has been coated in cement render and there is a full height post war lift enclosure and more historic but partially rebuilt set back masonry elevations and these areas are of low to no heritage significance. The site is land locked to the east. Other elevations of Block B are glimpsed between buildings but are also of low significance having been rebuilt at the upper levels and altered with blocked openings, as well as UPVC replacements. At roof level there is a plain brick coping with a combination of a lean to slate pitched roof which is of modest interest otherwise the roof was remodelled post WW2 flat roof and the flat asphalt roof and various plant additions are of no heritage significance.

133. Block B was purpose built and contemporary with Block A to provide administration functions focused around a central lightwell faced in glazed bricks. The basement contained the canteen, kitchen, mess room and cleaning facilities; the ground floor included offices and the cell block; and the first floor recreation rooms and the upper floors compromised cellular spaces off corridors and contained basic unmarried police officer accommodation and washing facilities. The plan form has been heavily altered following bomb damage and rebuilding and was significantly altered through the 1990s resulting in a very disjointed building with complicated internal layout, many steel columns, multiple mismatched levels and low ceiling heights. However, there are some key areas of high significance including the principal staircase with historic police lantern from ground to first floor and round arched timber window with copperplate glazing and the first floor reading room with decorative interior and chimney piece. The internal decoration has an institutional character and is dominated by glazed bricks. Where these have not been painted over, they are green and cream coloured. The majority of windows have been replaced.
134. The block also contains the police cells, fragments of secondary staircases, and chimney breasts although altered and are of moderate to low significance and indicators of historic floor plan and former functions. The police cells are a defining function of this building typology but have been altered with modern doors and internal fittings and this has diminished their special interest and evidential value. The cells have a modern contemporary appearance and do not reflect the original design and materiality compared to the overall interwar character and are of a lesser quality compared to others for example those in the former Wood Street Police and on balance this are considered to be of moderate heritage value.
135. The setting of the police station is defined by the realignment and development of Snow Hill and the tight knit character of Cock Lane as well rear elevations of surrounding properties. Snow Hill is varied and includes buildings dating from 1870 as well as post war development of the 20th Century, the topography and the strong building lines all reinforce the distinct character of the Snow Hill facade. This setting is attractive as a group which sits alongside St Sepulchre Church and contrasts with the wider urban context of High Holborn. Within the wider setting is the Central Criminal Court and the site of the former Newgate Prison and these local references reinforce the local associations with policing, crime and punishment.
136. Cock Lane is a narrow characterful backstreet dating back to the medieval period and comprises buildings from late 19th, 20th and 21st centuries. The buildings heights are relatively uniform and are enhanced by granite setts, york stone and varieties of brick. The street has a strong sense of enclosure with the building line right on the back edge of a very narrow pavement. The materials, building heights and alley like setting all reinforce the more utilitarian back street secondary character of the

rear block. The setting immediately adjoining the west side of the site on Cock Lane is a small triangular area which is used for car parking and detracts from the significance of the setting and defined building line and character of Cock Lane.

Impact of the proposals on significance of 5 Snow Hill

137. Change of use: The building is vacant having been declared surplus to the needs of the City of London Police who have demonstrated the building no longer meets requirements and therefore a new use is essential to secure the future of the building and reduce risk of it remaining empty which could have a detrimental impact on the future of the building.
138. This change of use from a purpose-built police station to hotel would have an impact on historic significance eroding the long established link with active policing on this site and wider setting. Externally the Snow Hill elevation which is of high heritage significance would largely remain unaltered and so externally would still reflect its former use. The main impacts stemming from delivery of the hotel use would be expressed through demolition and extensions. A degree of continuity of the former use would be expressed through the heritage interpretation exhibition areas, reinstatement of external replica lamps to the Snow Hill elevation and the preservation of the key areas of high heritage significance.
139. City Plan Policy CS12 requires the safeguarding of listed buildings while allowing for appropriate adaptation and new uses. Emerging policy S11 encourages the beneficial continued use of heritage assets consistent with their conservation and enhancement. It is recognised that any change of use of the Police Building would require significant alteration particularly of Block B given the low quality of the much altered internal layout and fit out.
140. Overall the change of use and adaptation to a hotel would erode but not delete the historic references to the former use and would seek to largely preserve and repurpose the areas of high heritage significance. Parts of the required alterations and demolition to deliver the new use would however result in a degree of harm which is considered to be less than substantial harm and at the lower end of the spectrum and this is evaluated further below. This harm is considered to be minimal. The new use would also significantly revitalise and in parts enhance the existing buildings and secure its long term use.
141. Extent of and justification for demolition: The areas proposed to change such as partial demolition of Cock Lane, including the cells and part of the main staircase and lesser secondary staircases are required to achieve a better relationship of level floor to ceiling heights; improve circulation and level access. The approach has been to retain areas of high to moderate heritage significance and to focus demolition on areas

of low to no significance within Block B which is less well preserved and utilitarian. This demolition would retain the Cock Lane façade and parts of the basement wall as well as the basement to first floor ornate main staircase and wider setting and the reading room which are all areas identified as of primary importance. The majority of the proposed demolition would cause no harm to the significance of the listed building as a single entity as the significance of these areas has already been eroded through the significant internal remodelling, alterations and bomb damage.

142. The cells are within a split floor arrangement and therefore would be impractical to retain within the proposed rebuilding to deliver the proposed new use which requires single floor levels. The cells are a recognisable function within the historic floor plan and are intrinsic to the special interest which is unique to this building typology and therefore central to historic and architectural significance and have evidential and historic value. However the quality of the cells is compromised as they have also been substantially altered with new fittings which has diminished their significance and they do not compare to other listed examples of police or holding cells. When considered in the context of the overall significance of Snow Hill police station which is primarily listed as an example of an interwar police station and compared to the quality of the external elevation to Snow Hill the cells are clearly of a lesser quality.

143. The main decorative and historic staircase in Block B from basement to first floor would be preserved and then the utilitarian parts demolished from first to fifth floor. Other utilitarian secondary staircases would also be removed. These circulation routes again do not align and create split mismatched floors and are within areas which are altered and are utilitarian in terms of detailed design.

144. Taking into consideration significance and the quality of these elements, demolition of the cells and the partial loss of the secondary parts of the main staircase and other minor staircases, the resulting impact would cause a low level of less than substantial harm. The degree of harm is considered to be minimal given the extent of later alterations.

145. Conditions are attached to fully record the existing buildings internally and externally prior to demolition.

Extensions and adaptation:

146. Block A: The Snow Hill frontage would be preserved, and the existing non original mansard roof rebuilt after WW2 would be removed and replaced with a full width traditional double pitched mansard. The proposed design has been informed by archival information and original historic drawings and it is proposed to reconstruct the new mansard as close to the original dimensions and detail as far as a possible with

central dormer including timber framed architrave and leaded light casements. The roof profile would be a double pitch as it is proposed to provide additional hotel accommodation. The mansard would complement the overall design and proportions of the listed building and would increase the height of the building to better reflect the originally intended scale of the building in the street scene. The proposed cleaning of the stone work to remove staining and reinstatement of replica lanterns would be welcomed enhancements to the front elevation and would reinforce significance and historic integrity. These aspects would require further detail as conditions.

147. Externally the rear elevation of Block A would be restored removing UPVC windows and replacing these with timber sash windows which were the original window types based on evidence. This would better reveal and enhance the historic significance of the existing retained elevation.
148. Block B: The proposed Cock Lane contemporary masonry and double height mansard extensions would be compatible additions to the retained historic façade and the areas to be demolished are of low to no heritage significance and the extent of this demolition is not considered to cause harm. Effectively Block B would be almost entirely remodelled but in doing so would retain a functional institutional and pared down appearance consistent with the existing building and would be a worthy reimagined partner building to Block A with a clear secondary character which would not diminish the identified heritage significance and the sense of two distinctive blocks linked on a single site would be maintained. The replacement and restoration of the windows, removal of grilles, the cage and rendered elements on the retained historic elevation are welcomed.
149. Internal alterations: The interior of Block A is proposed to be retained and restored including the original layout and circulation route where possible including the entrance hall and flanking staircases. The restored entrance hall would link to a reinstated corridor route into Block B. In these spaces a public exhibition is proposed related to the history of the building as a police station as well as other cultural aspects to be agreed as part of a S106. This exhibition would extend into a new internal atrium space between the blocks and the journey would continue up through the retained historic staircase to the reading room.
150. On the upper floors of Block A the proposed alterations would involve some subdivision of relatively plain historic rooms to create ensuite hotel rooms but the level of harm would be low given the modest quality of the spaces. The approach is to create heritage rooms for an enhanced visitor experience as opposed to modular rooms. Where they exist, historic features would be revealed and replicated including cornices and architraves. The services have been considered at this stage and the intention is to upgrade and reuse the existing service runs as far as possible. Where new services are required for the bedrooms

these would be installed in a reversible manner and historic fabric will remain in situ. A new service lift would be relocated outside of the areas of high significance in an area of low significance between block A and Block B.

151. The existing lightwell between the rear elevations of Block A and B is visually unattractive and includes plant. The space would be cleared out and the rear elevation of Block A retained, restored and adapted. As part of the Block B rebuild a full height internal space would be created with glazed rooflights, external green roof and perforated brick infill elevation to Cock Lane to enclose the north elevation. This internal void would become a dramatic space which would include bridge links on the upper floors connecting the Block A and B. This new dynamic circulation space would preserve the historic distinction of two separate blocks and the rear elevation of Block A with historic brickwork and retained chimneybreast would form an attractive backdrop. There would be a minor loss of historic fabric of significance to deliver this new space including changes to the original layout of Block A, but this would be in areas of low significance. This atrium would be a central part of the proposed exhibition space and a key transition zone connecting Block A to Block B.

152. The rebuilding of Block B behind the Cock Lane facade would enable new level floors and lifts to facilitate step free access and insertion of new floor plates focused around a central lightwell with corridors and insertion of modular hotel rooms. The main historic staircase to the first floor and the Reading Room would be preserved and would become a key historic feature of the hotel experience to be fully restored and converted to a publicly accessible restaurant, bar and lounge.

Conclusion on impacts to 5 Snow Hill

153. The proposals seek to rationalise, revitalise and in parts better reveal the significance of the listed building through comprehensive reconfiguration and adaptation. It is a heritage led approach with significance as the starting point to the development. The proposals would offer a number of benefits to the listed building and it would preserve, refurbish and make publicly accessible the key areas of significance: the front elevation; the historic interiors; and associations with the police function would be retained through the replica lamps and heritage interpretation. The overall investment in the built fabric of the building would prolong and enhance its life and introduce a vibrant new use.

154. The extensive demolition of Block B would largely be areas of no heritage significance. There would be also be a loss of areas of moderate heritage significance including: demolition of cells; and demolition of lesser significant secondary staircases to improve circulation as well as modest changes to historic floor plans. The new

extensions including the roof extensions and atrium area are sensitively designed to limit impacts on the significance of the listed building. The larger rear extensions are in areas of lesser significance and the replacement extensions are of a scale and materiality that would be compatible with the retained Block B historic elevation.

155. Objectors have identified substantial harm to the listed building. However despite the extensive demolition key areas of heritage significance and the overall historic and architectural interest would be preserved and therefore the impact is not evaluated as substantial harm. The adaption has been based on a thorough understanding of significance and as far as possible efforts have been made to reduce and mitigate harm where it arises. However the proposals are impactful and would result in harm and a clear and convincing justification has been set out for this harm. The harm is evaluated as less than substantial and this is assessed to be at the lower end of the spectrum. Primarily this harm is due to the loss of the cells and other internal features of low to moderate interest and thereby the erosion of the historic association with law and order. Given the extent of later alterations the degree of harm is considered minimal. These elements of the proposals would therefore be contrary to DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).

Smithfield Conservation Area

156. Objections have been raised in relation to impact on the Conservation Area and this is addressed below.
157. The character and appearance and heritage significance of Smithfield Conservation Area is summarised in the Character Summary and Management Strategy SPD (2016), which is a material consideration of the application.
158. The area lies to the north of Holborn Viaduct and Newgate Street and comprises 5 character areas. The site is within Area 4 and this is bounded by Smithfield Street, West Smithfield, Giltspur Street and Snow Hill. The sub area is defined by a historic street pattern, building lines and a prevailing building height and change of in topography Cock Lane is identified as having relatively uniform building heights, York stone paving and varied palette of brick types. The change in levels and gentle curve of the street provide interest to local views. Snow Hill has a varied and attractive architectural grouping alongside the contrasting stone St Sepulchre Church and includes attractive streets trees at both junctions and the urban greening around the churchyard. Snow Hill is an original thoroughfare to link Farringdon Street and Holborn Viaduct.
159. Snow Hill Police Station is one of the few inter-war buildings on Snow Hill and its progressive architectural style makes a valuable contribution to the historic and communal values of the Conservation

Area. The conservation area has evolved incrementally and has a diversity of built forms and development of specialised institutions and activities. The police station once bustled with activity with a large number of officers working and living in the station and the building had recognisable importance within the conservation area and the district of the City. The Snow Hill elevation enhances the Conservation Areas status and whilst the Cock Lane elevation is less refined it contributes to the character and appearance of the Conservation Area with traces of the working life of Smithfield and the typical pared back stock brick elevation representative of Cock Lane and other alleyways and streets within the Conservation Area. The view along Cock Lane is identified as a Local View within the Conservation Area Appraisal.

160. The areas of the Cock Lane building which detract from the character and appearance of the conservation area are of limited interest and include the flank elevations. The proposed extension to Cock Lane would remain subservient to the main building and the overall massing and bulk would be compatible with wider context of established heights and massing and would reinforce the enclosed warehouse feel of Cock Lane. The external appearance of the extensions, green wall and the contrasting contemporary extensions would integrate with the varied character of Cock Lane which is a combination of historic and newer buildings. The enhancements to the retained elevation would be beneficial to the street scene. The mansard extensions to the Snow Hill elevation would result in a massing and bulk and roof form which would complement the wider townscape context and would be an incidental addition.

161. Conclusion on impacts: The scheme would be of a scale, structure, urban grain, disposition, form and appearance consistent with the character and appearance of the Smithfield Street Conservation Area. Although the change of use to a hotel would erode historic associations with policing the exterior of the Snow Hill elevation would be preserved reflecting this former use and the reinstatement of replica lamps would further evidence this function. On balance the proposals would not harm the character and appearance or significance of the Smithfield Conservation Area. This part of the Conservation Area is dynamic and within the Culture Mile and the proposed new use which would be more outward facing to the public would contribute to the evolution of the conservation area as a centre of cultural activity.

Indirect impacts on the setting of designated heritage assets

No 4 Snow Hill (grade II)

162. Objections have been raised in relation to the impact on this listed building. No 4 Snow Hill adjoins the application site and dates from 1875 and is 5 storeys of a plain red brick and Portland stone with tiled roof and is an office building but former furniture warehouse. The building has architectural and historic significance derived from the front elevation, the building has been remodelled and extended at the rear and the

interior has been comprehensively modernised. The buildings central alignment within the terrace and prominent roofline is defined by the pinnacle of its brick gable end and is a distinct feature. The setting is defined by the mid terrace location alignment of Snow Hill and the rich variety of buildings that surrounding Holborn viaduct and Farringdon Street which reflect the former uses of the area and St Sepulchre's Church. This dense, architecturally varied urban character and rich variety of former uses as well as the finer urban grain of neighbouring buildings reinforces the historic and architectural values overall visual interest of the front elevation. 5 Snow Hill immediately adjoins the property and the proposed mansard roof extension to 4 Snow Hill would be a comfortable addition to the existing setting and would reinforce the overall character of building within the setting comprising set back more recessive roof forms and would maintain the overall uniform scale of Snow Hill.

163. Overall the proposal would preserve the special architectural and historic interest and heritage significance of 4 Snow Hill, including the contribution made by setting. There is not considered to be any harm to the significance of this heritage asset.

Nos 19-20 Cock Lane

164. There is a listed building entry for these buildings but the site has been redeveloped and there is no heritage significance designated or non designated. There would be no impact on this building.

Church of St Sepulchre without Newgate (grade I) and Railings and dwarf wall to the Church of St Sepulchre (grade II)

165. The church dates from mid C15th – late C17th with later alterations and has architectural, historic, archaeological and artistic values. The Church occupies a prominent corner location. The railings and wall date from the early C19th and enclose the churchyard and have historic and architectural value. The setting is defined by the churchyard, prominent location fronting the interchange of Giltspur Street, Newgate Street, Snow Hill Court, Old Bailey, Cock Lane and Holborn Viaduct as well as the radiating curve of Snow Hill. The church tower is set back and is a visual marker enclosed by the churchyard and the vegetation which have a sense of serenity separating the building and its context from the busy commercial and congested High Holborn. The rear of the churchyard is accessed via Snow Hill Court via a gate on Giltspur Street. The courtyard contains the former vestry/school house and is a peaceful and characterful contributor to the setting of the church and tranquil qualities of reflection associated with the church. The wider setting is low quality dominated by the rear elevations of Snow Hill including the police station buildings and Cock Lane which have been rebuilt and these aspects do not contribute to setting. The proposed remodelling and extension would be within the setting of the churchyard but the increased massing and bulk, materials

and detailed design would not detract from the wider existing setting and would blend into the existing dense urban layers. Overall the proposal would preserve the special architectural and historic interest and heritage significance of Church of St Sepulchre and the railings, and it's setting therefore is not considered to be any harm to the significance of this heritage asset.

Other designated heritage assets

166. The impact of the proposals on the settings of the other listed buildings and their significance, identified have been fully assessed and taken into consideration. These include: Old Bailey Central Criminal Court (Grade II*), Holborn Viaduct Bridge (grade II), 126 Newgate Street (grade II), 15 Old Bailey (grade II), 16-17 Old Bailey (grade II), West Smithfield St Bartholomew's Hospital Medical School (grade II); The Golden Boy of Pye Giltspur Street (grade II). The setting of these designated heritage assets have been assessed and due to their distance from the site and lack of visibility between them there would be no harm the setting or the contribution that the setting makes to their significance.

Impacts on Other Conservation Areas

167. Newgate Conservation Area adjoins the site and is essentially the crossroads of Newgate Street, Holborn Viaduct, Old Bailey and Giltspur Street and is dominated by the Central Criminal Court and other monumental and often classical in spirit buildings. St Sepulchre Church and Snow Hill Court are within Newgate Conservation Area. St Sepulchre Church and The Central Criminal Court are distinct skyline buildings. The existing Snow Hill Block A and Block B are visible in the context of the Newgate Conservation Area. The mansard roof extension would be incidental and would have no impact on the setting of Newgate Conservation Area. The extensions and rebuilding of Block B would be glimpsed from St Sepulchre Church Churchyard and from the gateway next to St Sepulchres Church on Giltspur Street. The existing police buildings are visible in these glimpse views and the setting of this part of the Conservation Area is defined by rear elevations many of which are modern.
168. Whilst the hotel use would erode the link of crime and punishment with Newgate Conservation Area including connections with the Central Criminal Court and former Newgate prison site the appearance of the Snow Hill block would outwardly be preserved as a police station. The reinstatement of the police lanterns would further reinforce the historic connection. The new development particularly of Block B would result in some minor change to the wider backdrop setting of Newgate Conservation Area but the height, massing and design which would be reflective of the existing context and would not undermine or harm that significance, which would be preserved. The proposed development would not harm setting or significance.

Indirect impacts on non-designated heritage assets

169. Giltspur Street: No 5 Giltspur Street is a 1930s domestic neo-Georgian style building with a red brick and stone facade which attractively turns the corner to Cock Lane. No 6 Giltspur Street is also from a similar period in red brick and Portland stone with a well-ordered classical hierarchy of features and extensive metal windows. Nos 8-9 are of red brick and sandstone with attractive stained glass in an Edwardian Baroque Style and are central to the setting of St Sepulchre Church. Individually and collectively these buildings have considerable townscape value and have historic and architectural value with similar materials, high quality detailing and a consistent scale and urban grain which reflects the local context. The proposed extensions and rebuilding of the application site would only be glimpsed in the context of this group of buildings and there would be no harm to their significance or setting.
170. Cock Lane: No 37 Cock Lane has a striking terracotta frontage to the ground floor with the wording "Saracens Head Buildings, John Royle of Manchester" the elevation above is largely rebuilt. No 36 Cock Lane has an attractive facade and is redbrick and terracotta, a narrow plot with and six storeys with gable roof. Both buildings have architectural and historic value which contribute positively to the townscape of Cock Lane. The application site would not be seen in the context of these non-designated heritage assets and there would be no impact on significance or setting.
171. Snow Hill: No 1 Snow Hill is a late 19th century brick and stone building exuberant and florid in detail including animal motifs and occupies a prominent corner adjacent to the Church of St Sepulchre. The building has architectural and historic interest and positively contributes to the attractive and eclectic grouping of the buildings along the northern side of Snow Hill and positively contributes to the setting and significance of surrounding listed buildings stone church. The proposed development would not harm setting or significance.
172. No 10 Snow Hill occupies the junction of Snow Hill and Cock Lane and is defined by a curved appropriately proportioned 1980s building with deep window reveals in high quality materials and deeply recessed windows and is a positive contextual building. The proposed extensions to Snow Hill Police Station would not harm the values these non-designated heritage assets which contribute to the Snow Hill townscape. There would be no harm to significance or setting
173. Snow Hill Court: No 1 Snow Hill Court dating from 1859 is tucked behind the Church of Sepulchre and stands within the churchyard with its own secluded garden. The white rendered gabled single storey building served as a parish school house/vestry and has historic and architectural values and its setting is defined by St Sepulchre's Church, its peaceful setting and the surrounding rear

elevations of Cock Lane and Snow Hill. The development would change the setting of the non-designated heritage assets but due the massing, height and materials which reflect the locality the impact would not be adverse and setting and significance would not be harmed.

Heritage Conclusion

174. The proposals have been assessed against Local Plan Policies CS12, DM 12.1, DM 12.2 and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. Considerable importance and weight has been attached to and special attention has been paid to the desirability of preserving or enhancing the character or appearance of Smithfield conservation area and surrounding conservation areas, under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended. There has also been special regard to the desirability of preserving 5 Snow Hill and surrounding listed buildings including their setting and any features of special architectural or historic interest which it possesses, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
175. The proposed heritage led change of use of 5 Snow Hill Police Station to hotel is considered appropriate as an adaptation and would enable a continued viable use on the site securing the long term conservation of the buildings. The proposals would preserve key areas of high heritage significance and make these publicly accessible for the first time. There would be a number of physical enhancements including replacement of windows; sensitive refurbishment and cleaning of all historic elevations; and removal of redundant services and structure to better reveal internal features.
176. However the delivery of the use would result in a level of less than substantial harm to 5 Snow Hill Police Station due to loss of historic fabric to some areas of moderate heritage significance and this would erode the connection with the history of policing on the site. This harm is considered be less than substantial and is considered to be minimal. It is acknowledged that elements of the proposals do not preserve the listed building at 5 Snow Hill including some features of historic interest, and special regard has been had to the desirability of preservation, but in the context of the proposals and the evaluation of this report it is not considered that this should lead to a refusal of planning permission.
177. There would be no harm to the significance of Smithfield Conservation Area and its character and appearance would be preserved.
178. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance and setting

of: No 4 Snow Hill (grade II) and Church of St Sepulchre with Newgate (grade I).

179. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance and setting of: Old Bailey Central Criminal Court (Grade II*), Holborn Viaduct Bridge (grade II), 126 Newgate Street (grade II), 15 Old Bailey (grade II), 16-17 Old Bailey (grade II), West Smithfield, St Bartholomew's Hospital Medical School (grade II); and The Golden Boy of Pye Giltspur Street (grade II).
180. There would be no harm to the setting and significance of Newgate Street Conservation Area and its character and appearance would be preserved.
181. It is considered there would be no harm to the significance of identified non designated heritage assets in Snow Hill, Snow Hill Court, Giltspur Street or Cock Lane.
182. Overall the proposals would comply with Local Plan Policies CS12, DM 12.1, DM 12.2 and DM 12.3(1) draft City Plan 2036 policies S11 and, HE1 London Plan Policy HC1 (A, B, D and E).
183. Elements of the proposals would be contrary to DM 12.3(2), emerging policy HE1(1) and London Plan Policy HC1(C).

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184. The proposals have been assessed against Local Plan Policies CS12, DM 12.1, and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There has also been special regard to the desirability of preserving 5 Snow Hill and surrounding listed buildings including their setting and any features of special architectural or historic interest which it possesses, under s.16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
185. The proposed change of use to hotel is considered appropriate as an adaptation and would enable a continued viable use of the site securing the buildings long term conservation.
186. It is acknowledged that the proposals do not preserve the listed building at 5 Snow Hill including some features of historic interest, and special regard has been had to the desirability of preservation, but in the context of the proposals and the evaluation in this report it is not considered that this should lead to refusal of the application for listed building consent.

187. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1 and DM 12.3 (1), draft City Plan 2036 policies S11 and, HE1 (2, 3, 4 and 5) London Plan Policy HC1 (A, B, D and E). However in delivering this new use the proposal would result in some less than substantial harm, at the lower end of the spectrum, failing to preserve the special architectural and historic interest and heritage significance of the listed building. This harm stems from the loss and alteration of historic fabric of some areas of moderate interest including: the cells; staircase and minor alterations to the historic floor plan and this would erode the connection between the site and its former use as a police station. The degree of harm is considered to be minimal. Therefore elements of the proposals would be contrary to DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).
188. Otherwise the substantive remodelling and new build element would preserve special interest and heritage significance, subject to detail reserved for condition.

Heritage assessment against paragraph 202

189. Paragraph 202 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". An evaluation of the public benefits and the weight afforded to them in the evaluation carried out for the purposes of paragraph 202 is set out in the 'Assessment of the Public Benefits for the purposes of paragraph 202 of the NPPF' section of the report.

Strategic Views, London wide and Local

London View Management Framework (LVMF)

190. The site is within a number of Strategic Viewing Corridor including: Landmark Viewing Corridors for: View 2A Parliament Hill and View 3A Kenwood; Wider Setting Consultation Area for view 4A.1 Primrose Hill; and Background Wider Setting Consultation Area View 5A.2 Greenwich Park and View 6A.1 Blackheath Point. In all cases the proposed maximum height would be below the corridor thresholds.
191. The proposed development would therefore not impact on strategic views of St Paul's Cathedral and would accord with Local Plan Policy CS13, the draft City Plan 2036 Policy S13 and London Plan Policies HC3 and HC4.

Other Protected Views

192. The City of London Protected Views SPD provides guidance on the St Pauls Heights code, relevant (LVMF) Strategic Views, views from and to the Monument, views to and from the Tower of London

World Heritage Site and views of historic City landmarks and skyline features. The site is located within St Pauls Heights Policy Area, The SPD identifies Historic City Landmarks and Skyline Features which includes St Sepulchres as a “City Church with a Skyline Presence” and Old Bailey are recognisable landmarks. The SPD is supported by Local Plan Policy CS 13(1), draft City Plan 2036 Policy S13 and London Plan Policy HC3 and guidance contained in the LMVF SPG.

193. The site is within the St Pauls Heights policy area. The maximum height of the proposed extensions to Block A and B including the plant would be below the St Paul’s Heights threshold height.
194. There would be no impact on St Sepulchres Church or Old Bailey as important historic city landmarks and skyline features due to the modest increase in height and topography of Cock Lane and Snow Hill.

Daylight in proposed hotel bedrooms

195. Policy DM10.7 requires that “the design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.” The proposed scheme is for hotel rooms, not residential dwellings, therefore the same requirements for light are not applied however it is important the development would provide a high-quality environment for visitors. In addition, it is relevant to consider that hotel occupants are likely to be transitory and occupy rooms for a short period of time. Local Plan Policies CS10 and DM10.1 require that all new developments are of a high standard of design.
196. A representation received has stated concerns about the quality of the development in respect of the provision of windowless rooms. The proposals include 18% of bedrooms without windows.
197. It is pertinent to consider that the scheme proposes to retain significant parts of the listed building which result in constraints to the layout of the Site. Overall it is considered that the development is of a high-quality design and would provide adequate daylight in line with its use as a hotel which is not required to provide natural daylight to all bedrooms. In addition, it is understood that these smaller bedrooms form part of the business model for the Premier Inn ‘Hub’ rooms operating elsewhere.
198. The proposals are considered to be of a high quality design appropriate to the proposed use and therefore in compliance with Local Plan Policies.

Archaeology

199. The site is in an area of archaeological potential, outside the Roman and medieval walled City and on the edge of the Roman

Western cemetery. An Archaeological Desk-Based Assessment and Addendum have been submitted with the application.

200. The Assessment confirms that there is high potential for Roman remains to survive, including 3rd–4th century burials and evidence of earlier 1st–2nd century Roman occupation, such as quarrying and building activity, rubbish pits and features such as wells, which have been recorded in the vicinity.
201. There is low or moderate potential for later medieval remains and structures as the site has been occupied since the 12th century, and this would include buildings, courtyards and gardens next to St Sepulchre Church. There is potential for survival of foundations of an early 19th Century Baptist Chapel which was on the northern part of the site.
202. The building has a basement covering the entire site and a smaller sub-basement to the rear. It is considered that remains would not survive below the sub-basement due to its depth and that there is high potential for remains to survive below the single basement area.
203. The proposed extension of the sub-basement and stair access would have an impact on archaeological remains. Other groundworks which would have an archaeological impact include temporary works, underpinning, new piled foundations, façade support works, lift pits and services.
204. There is potential for features of the building and construction to be revealed during the course of work, which it would be appropriate to record.
205. The proposals are acceptable subject to conditions which are recommended to cover a programme of archaeological work, building recording, and details of foundations and piling design.
206. Therefore the development is in accordance with Local Plan Policy DM 12.4 and London Plan Policy 7.8 and the Archaeology and Development Guidance SPD.

Access and Inclusive Design

207. 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 HL1, S1 and S8 of the draft City Plan 2036 and Policy D5 of the London Plan. In addition, Policy E10 of the London Plan requires Visitor Infrastructure to be accessible.
208. The Proposed Development would provide:
- 10% wheelchair accessible bedrooms;

- Step-free ramped access at the main entrance;
- 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;
- A cycle parking space to accommodate larger adapted bicycles, meeting policy requirement;
- Accessible toilet facilities on the ground and first floor areas.

209. Following comments from the Access Officer, the Applicant amended the scheme including to: increase of the widths of and to introduce passing points for corridors in Block B, introduce a platform lift to enable step-free access to the first floor atrium, and to provide an accessible toilet at first floor level.

210. The areas open to the public are level (aside from the atrium space which will be served by a platform lift) and the main lifts would bring wheelchair users up to the first floor where the reception and the restaurant space is level with the reading room.

211. The Proposed Development would not provide a disabled car parking space. There are disabled parking bays located near to the Site at Giltspur Street (one space) and at Hosier Lane (three spaces). People with mobility issues will be able to access the site by taxi, which would be able to drop off outside the front door of the hotel, and by national rail or bus, which are located at the top of Snow Hill on Holborn Viaduct. City Thameslink, the national rail service on Holborn Viaduct, has step free access to all platforms, and there are drop kerbs at all crossings between the station to the development.

212. Conditions are recommended to ensure the facilities meet the requirements for accessibility. This includes a requirement for the Applicant to submit an Accessibility Management Plan. In addition, a condition is recommended (Operational Management Plan) which requires details of the management strategy for arrangements for disabled car parking for guests.

213. The Access Officer welcomes the inclusive access to and within the building which would meet the requirements of Local Plan and London Plan.

Structural issues

214. The Applicant has provided a Structural Planning Report with the submission detailing the proposed works. The details assess the impact of the works on the listed building and neighbouring structures. Conditions are recommended requiring details regarding structural stability and monitoring while works are in progress and structural issues will be addressed under Building Regulations.

Design considerations for future redevelopment of surrounding sites

215. Local Plan Policy CS11 and Policy DM11.3 supports development where it this would support, and not compromise, the primary business or cultural role of the City or potential for future business growth. The Policy states that hotels should not be located where they would create amenity issues for neighbouring occupiers.
216. Local Plan Policy DM1.2 requires the promotion of the assembly and development of sites for large office schemes in appropriate locations and this includes resisting development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period. It is considered that listed building constraints mean there are no opportunities for development for large office schemes nor potential large sites in the vicinity that would be jeopardised by development on the application site. Policy DM1.2 is not therefore, considered to apply. Nevertheless, the impacts of the proposals for the development potential of neighbouring sites has been considered.
217. The proposed development seeks to extend the existing building line for the east and south sides of Block 'B'. In addition, the development seeks to introduce new windows on the flank wall facing 6 Snow Hill.
218. The Site adjoins a triangle of paved area which is owned by no. 6 Snow Hill and is currently used for parking purposes. An objection was received from no. 6 Snow Hill stating that the provision of a green wall and windows on the boundary line of their site could prejudice future redevelopment of their site.
219. Therefore, the green wall has been amended to be recessed into the building of 5 Snow Hill and the Applicant has confirmed that this will utilise an integrated irrigation system, with maintenance to take place from the highway and through abseiling, neither of which will require access via the land owned by no. 6 Snow Hill.
220. In addition, a condition is recommended that in the event that the parking area of no.6 Snow Hill is to be redeveloped, the green wall must be removed from the flank wall at no. 5 Snow Hill. This would remove the potential for the future protection of the green wall and allow no. 6 Snow Hill to build up to the boundary line without limitations.
221. Following concerns raised by the adjoining commercial neighbours, the Applicant has recessed three proposed windows on the boundary line with no. 6 Snow Hill and stated that they understand these windows may be blocked in the future in the event that the neighbour builds to the boundary line, the three recessed windows will

be covered and served through an artificial circadian light source instead of the daylight it would receive if approved.

222. The three windows from floors two to four are directly on the boundary line with no. 6 Snow Hill. However, the other 11 windows facing this neighbour are slightly recessed and seven of these are part of a mansard roof element. Therefore, because these windows are not located on the boundary line, these are not considered to jeopardise future redevelopment of the Site. In any event, the Applicant has agreed to provide privacy screens for the rooms on this elevation to address overlooking and hence would not be significantly affected in the event of re-development of the adjoining site.
223. The Applicant has addressed the proximity of windows to the adjoining sites for the east and south elevations, where no objections have been received specifically, and has amended the development to move the locations of some windows to ensure the maximum distance from the adjoining sites. The Applicant has also provided confirmation that in the event of the neighbouring properties being redeveloped to the boundary line of no. 5 Snow Hill, the glazing to the windows on the south and east elevation will be removed and replaced with frosted or obscured glass. A condition to secure this in the event of redevelopment of these sites is proposed. This would ensure that the future redevelopment of the adjoining site up to the boundary line was not compromised.
224. In addition, a commercial neighbour raised the issue of the cross-hatched brickwork on the external atrium wall as prejudicing future redevelopment of the Site. However the design of the brickwork itself is not considered to prejudice future redevelopment of the Site as if the neighbour were to build to the boundary line, and thus the external atrium wall, this would not block the only light source to the atrium space, which serves as open publicly accessible space. The atrium is also served by a rooflight which would allow light into the space, and this could be supplemented by artificial lighting if required.
225. Therefore it is considered that the proposed changes to the scheme adequately overcome the objections raised, and that the proposed development will protect the amenity of the surrounding uses, and would not prejudice any future re-development of the adjoining sites in accordance with Local Plan policies DM1.2, CS11, and DM11.3.

Impacts to amenity of surrounding uses

226. Local Plan Policies CS10, CS11, DM11.3, DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3, S23, S24, and SB1, and London Plan Policies D3, D6, D13, D14 seek to protect the amenity of neighbouring uses, including residential, from adverse impacts of uses including hotel and culture from noise, light pollution, daylight and

sunlight and other amenity impacts.

227. Whilst there are likely to be impacts to the amenity of surrounding occupiers as part of the development (and the draft City Plan states these could be, for example, through noise nuisance or traffic and servicing impacts) it is not considered there would be unacceptable adverse impacts on amenity, including as a result of cumulative impacts.

Privacy, Overlooking and sense of enclosure

228. The Proposed Development is in close proximity to its neighbours, which comprise a mix of residential and commercial uses which reflects the tight knit urban grain of this part of the City. Following objections raised on the grounds of the impact of overlooking, the Applicant has amended the drawings to demonstrate that internal privacy screens will be fitted within specific windows to prevent views towards the surrounding properties. This includes:

- For the elevation facing no. 6 Snow Hill: Four windows on the fifth floor level and four windows on sixth floor level would have privacy screens. The three windows on the seventh floor level would not have privacy screens but would serve plant rooms and a stairwell only therefore there are no concerns with overlooking or privacy associated with these rooms. The windows on the second to fourth floors have also been amended to be recessed into the wall and the direction of the recessed window will not face no. 6 Snow Hill and would be at a right angle to this neighbour; these windows would have no views of neighbouring windows.
- For the elevation facing 12 Cock Lane (to the east) and rear elevation facing Snow Hill (south): the Applicant has confirmed that in the event of the neighbouring properties being redeveloped, these windows would be reviewed and internal screens or frosted glass added to avoid privacy issues.
- For the north elevation directly facing Cock Lane, a total of 16 windows are proposed to be fitted with privacy screens to block views towards neighbours.

229. A condition is recommended to agree the details of the privacy screens and any obscured glazing prior to the relevant works for windows, and to require their installation prior to occupation of the relevant redeveloped neighbouring sites.

230. The commercial neighbour at no. 6 Snow Hill has stated concerns regarding increased sense of enclosure. There is an existing flank wall on the boundary line of no. 5 Snow Hill and the proposed development will increase the massing facing no. 6 Snow Hill on the boundary line with the main west elevation and the new infill atrium. However, there remains space in the form of the existing hard

landscaping of no.6 Snow Hill between the two buildings and both sites are located in an urban context of dense development which is evidenced by the other nearby sites. Therefore it is not considered that the proposals would result in a sense of enclosure that would have a significant adverse effect on the amenity of the commercial building and therefore is in accordance with DM 11.3.

Cross-hatched brickwork to atrium

231. A neighbour has stated that the cross-hatched brickwork for the external wall to the atrium affects the amenity of no. 6 Snow Hill. The atrium would have internal glazing on the other side of the brickwork thus there would be no noise transfer, although there could be limited transfer of light via the modest perforations although it is not considered that this would have a significant detrimental impact. A lighting strategy is recommended as a condition, which would seek to address light trespass to surrounding properties. In addition, overlooking is not considered to be an issue in this instance as there are no windows proposed in the atrium elevation.

Entrances, Servicing and Deliveries impact

232. There will be up to two servicing trips per day as a result of the development. The S.106 Agreement would limit servicing trips to a maximum of two and prohibit these trips from being at peak hours, other than in consolidation with existing servicing trips to the West Smithfield hotel for so long as they are owned/operated by the same operator. In terms of cumulative impact with Citicape House, there will be no additional new trips on the network as two servicing trips will be consolidated with the existing hotel at West Smithfield. For all trips, the Transport Statement states there will be a net increase however there will be a decrease in the number of vehicle trips (taxis for the proposed use) from the existing use. This assessment is considered acceptable.
233. In the Transport Assessment submitted with the application, the consultant conducted a high level review of the Citicape House proposals to understand the cumulative impact and determined there would not be any conflicting issues from a transport perspective and that the number of daily vehicle trips would be less than the existing use at the site.
234. The location of the main entrance on Snow Hill is considered acceptable, including as a drop off point for guests and for delivery and servicing. For cumulative impact for servicing entrances, the loading bay entrance for the West Smithfield Premier Inn is via Cock Lane. Citicape House would be serviced through an internal loading bay accessed via Snow Hill. The servicing and delivery for the proposed development will take place on Snow Hill outside the main entrance. For Citicape House, the internal loading bay is located to the west of the Site therefore a significant distance away from the 5 Snow Hill

entrance. Due to the constraints of the listed building, an internal loading bay could not be accommodated, although a maximum of two deliveries per day will be permitted in any event. The main entrance on Snow Hill will be accessed by guests, public space and restaurant visitors, staff, and for waste collection; this is considered appropriate as this was the main entrance for the former police station therefore the proposed development would not be introducing a new primary entrance on Snow Hill.

235. No car parking, taxi or coach parking facilities are proposed as part of the application. The Applicant has confirmed that a Section 106 obligation prohibiting coach parties would be acceptable.
236. The Transport Statement estimates that there would be 707 additional two-way trips which would comprise trips via vehicles (taxis), public transport and walking compared with the lawful use of police station, with the majority of the trips via public transport and walking. However, the Transport Statement states there is likely to be a reduction in vehicular traffic over the day, compared to the existing use. This assessment is considered acceptable.
237. The Cleansing Team, the Transport Planning Team and Transport for London had no objections to the proposals. Therefore, considering a large proportion of the building is being retained, it is considered the hotel will provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles, waste storage and taxis appropriate to the size and nature of the development. Transport considerations are discussed further in the Transport section.

Daylight, Sunlight and Overshadowing

Assessment Context

238. An assessment of the impact of the proposed development on the daylight and sunlight received by surrounding residential buildings has been submitted in support of the application. The effects of the development have been assessed having regard to the recommendations in Building Research Establishment ('BRE') Report 209, Site Layout Planning for Daylight and Sunlight: A Guide to Good Practice (second edition, 2011). No overshadowing of open spaces was assessed as there are no open spaces relevant to the proposal.
239. London Plan Policy D6 states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context. Local Plan Policy CS10 seeks to ensure that the bulk, height, scale, massing, quality of materials and detailed design of buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces.

240. Policy DM10.7 of the Local Plan seeks 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 BRE guidelines. 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 and provides acceptable living standards, taking account of the BRE guidelines.
241. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. Paragraph 3.10.41 of the Local Plan states that “The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations”.
242. The BRE guidelines state that “bedrooms should be analysed although they are less important” and are therefore considered less sensitive than other uses.
243. Paragraph 3.10.41 of the Local plan further states that when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals on the amenity of existing residents. Local Plan Policy DM 11.3 requires that hotels do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts.
244. The assessment submitted in support of the application has assessed the impact of the proposed development on the daylight and sunlight received by the residential properties at: 32 Cock Lane; 35 Cock Lane; 37 Cock Lane (also referred to as ‘35-37’ Cock Lane); and 8-9 Giltspur Street. In addition, for the closest residential at 32 Cock Lane, and at 35 Cock Lane, supplementary radiance assessments have been submitted. For the addresses 32 and 35 Cock Lane, referred to below, some of these properties are accessed via 10 Hosier Lane.
245. The Applicant has undertaken a daylight and sunlight assessment for two scenarios. These include:
- Existing baseline vs. Proposed Development (referred to as ‘existing vs. proposed’ scenario), with the proposed hotel only; and
 - Existing baseline vs Proposed Development and consented development (referred to as ‘existing vs. cumulative’ scenario), with the proposed hotel and the consented Citicape House development.

246. The impacts on daylight and sunlight levels were also considered if the existing overhangs were removed, where relevant.
247. There is residential accommodation at the Watch House (10 Giltspur Street) and The Parvis (Holborn Viaduct) at the Holy Sepulchre Church and the consultant has confirmed that a VSC study has been undertaken to confirm that these properties would not experience any material reduction in daylight and are thus outside the scope of further detailed commentary.
248. The BRE Guidelines state in paragraph in 2.2.2 that the Guidelines “may also be applied to any existing non-domestic building where occupants have a reasonable expectation of daylight; this would normally include... hotels and hostels, small workshops and some offices.”
249. Following objections received, a supplementary letter addressing the daylight impact to the commercial property at no. 6 Snow Hill was submitted including a radiance assessment. In addition, the Daylight and Sunlight Assessment states it is aware of surrounding commercial properties, including the existing nearby hotel at 24 - 30 West Smithfield, however the Consultant did not consider this to require special need for daylight or have a high expectation of daylight or sunlight that would warrant consideration. The Assessment further states that the impact to the hotel is modest and due to the transient nature of the property, the relative alterations were not considered and states that most of the rooms maintain a similar level of retained daylight appropriate for the location. This response is considered acceptable.

Daylight impact

250. Regarding daylighting for residential properties, the vertical sky component ('VSC') and daylight distribution tests (No Sky Line) have been applied to 32 Cock Lane, 35 Cock Lane, 37 Cock Lane, and 8-9 Giltspur Street.
251. The VSC test measures the amount of skylight available at the centre of a window on the external plane of the window wall. The BRE guidelines state that a window which achieves a VSC of 27% or more is considered to provide good levels of light. If with the proposed development in place the figure is both less than 27% and reduced by 20% (0.8 times its former value) or more than the existing level, the loss would be noticeable.
252. As the VSC calculation does not account for the size of the window being tested, the size of the room that it lights or whether there are multiple windows serving a room, the BRE guidelines recommend that the results should be read in conjunction with those of a second test: daylight distribution.

253. The BRE Guidelines state that “If a room has two or more windows of equal size, the mean of their VSCs may be taken”.
254. The daylight distribution test, also referred to as the No Sky Line test ('NSL'), calculates the areas of a working plane inside a room (usually 0.85m above the finished floor level) that would or would not have a direct view of the sky. The BRE guidelines state that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% (0.8 times its former value) or more, the loss would be noticeable.
255. In making assessments a judgement is made as to the level of impact on affected windows. Where there is a less than 20% change in VSC the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on site conditions. The judgements that arise from these percentages do not form part of the BRE Guide and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable. This will depend on a whole number of circumstances.
256. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:
- Percentage change (10% reduced to 8% = 20% reduction); and
 - Actual/Absolute change (10% reduced to 8% = 2% change).
257. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). Similar to measuring the ADF of a room, this method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.
258. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the BRE guidelines ADF formula or Radiance methodology, the radiance based assessments can draw upon the BRE's recommended ADF target values. Radiance assessment results are presented as floor plans colour rendered to illustrate the individual daylight factors within

room, which range between 0% and 5%. The average value of the individual daylight factors within a room can be expressed as an ADF percentage for the room as a whole.

259. The application is supported by a Radiance Assessment, and there is no separate ADF Assessment.

32 Cock Lane – Existing vs Proposed

260. Located to the north of the site, this building contains the nearest residential properties to the development and is arranged over six floors and a basement. The assessment considers the windows on the façade facing the site. Windows at ground and basement level are located below an existing overhang as the building steps out from the first floor to fifth floor level. A total of 36 windows serving 14 rooms (six bedrooms and eight living/kitchen/dining rooms) have been assessed for daylight from floorplans obtained by the consultant.

261. The consultant confirmed that there are windows within a lightwell behind the assessed façade which include residential properties which were not included in the Assessment because a VSC façade study has been undertaken to confirm these properties do not experience any material reduction in daylight and thus are outside the scope of further detailed commentary.

262. For VSC assessment, 22 of 36 windows (six of 14 rooms) tested would meet the BRE criteria (i.e. experience no more than 20% reduction in existing VSC) therefore impacts are considered not to be noticeable. For the VSC for the remaining 14 windows (associated with eight rooms):

- Six windows would experience minor adverse impacts (reductions of 22%, 22%, 22%, 23%, 26% and 28%);
- Four would experience moderate adverse impacts (33%, 33%, 33% and 35%);
- Four would experience major adverse impacts (43%, 43%, 63% and 69%).

263. All the major adverse reductions relate to windows that form a multi-pane window for one room located at ground floor beneath an existing overhang. However the highest level of existing daylight to these windows is 1.6% against a recommended 27%. The absolute percentage reduction would range from 0.2% to 0.7% and such small alterations are likely to be imperceptible to the occupants.

264. For the four moderate adverse impacts, these relate to four rooms located at basement, ground, third and fourth floors. Two of these rooms are also served by another window which experiences a reduction of 22% (slightly above the BRE criteria of 20% for a noticeable impact) and the mean impact to windows serving these

rooms would be considered minor adverse overall. The other two rooms are underneath an existing overhang experiencing very low existing daylight.

265. Of the six minor adverse impacts, these relate to five rooms located at first, third, fourth, and fifth floors. The majority (four) of these impacts are at 22% (slightly above BRE criteria of 20% for a noticeable reduction). Two of these rooms are served by another window that meets BRE for VSC.
266. Therefore overall, over 60% of windows meet BRE guidelines for VSC. For the all windows experiencing reductions, the majority are minor or moderate adverse, with all major impacts relating to a room at ground floor with very low existing light levels. In addition, for the all VSC reductions, half of these have absolute percentage changes of less than 2% and such small alterations are likely to be imperceptible to the occupants.
267. The BRE Guidelines recommends an additional VSC calculation ('no balcony' assessment) without the obstruction or overhang to ascertain whether this is the primary factor in the loss of light. This assessment demonstrates that without the obstruction, eight of 36 windows would experience noticeable reductions. Six of these reductions are minor adverse, and two are moderate adverse. Therefore the existing overhang is considered to have a significant role in the VSC reductions as six windows would become BRE compliant when removing the obstruction.
268. The daylight distribution results ('NSL' assessment) demonstrate that five of 14 rooms would experience reductions in daylight distribution which are within the BRE guidelines criteria. Nine rooms would experience noticeable reductions of over 20% and the majority (eight rooms) would experience minor adverse impacts. One room (located at ground floor underneath the existing overhang) would experience a major adverse impact of 45% reduction. The large majority of the impacts are minor adverse; therefore this is considered acceptable in the dense urban environment.

32 Cock Lane – Existing vs. Cumulative

269. For the cumulative daylight impact (VSC), the assessment demonstrates that 20 of 36 windows tested would be BRE compliant. Of the remaining 16 windows that experience noticeable reductions:
- Seven would experience minor adverse impact (20%, 22%, 22%, 23%, 25%, 28%, and 29%);
 - Five would experience moderate adverse impacts (31%, 33%, 34%, 35%, and 37%);

- Four would experience major adverse impacts (43%, 43%, 63%, and 69%).

270. All the major adverse reductions relate to windows that form a multi-pane window for one room located at ground floor beneath an existing overhang. The highest level of existing daylight to these windows is 1.6% against a recommended 27%. The absolute percentage reduction would range from 0.2% to 0.7% and such small alterations are likely to be imperceptible to the occupants.
271. For the five moderate adverse impacts, these relate to five rooms located at basement, ground, third, fourth and fifth floors. Three of these rooms are also served by another window which experiences a minor adverse reduction (between 23% - 29%); two of these rooms become minor adverse when taking the mean for the windows for room. The other two rooms are at basement and ground floor underneath an existing overhang experiencing very low existing daylight and would experience an absolute percentage reduction of 0.1% - 0.4% and such small alterations are likely to be imperceptible to the occupants.
272. Of the seven minor adverse impacts, these relate to six rooms located at first to fifth floors. The majority (four) of these impacts range between 20% - 23% (slightly above BRE criteria of 20% for a noticeable reduction). Half of the six rooms are served by other BRE compliant windows for VSC and one of these rooms becomes BRE compliant when taking the mean for the windows for room.
273. Therefore overall, over 55% of windows meet BRE guidelines for VSC. For the windows experiencing reductions, the majority are minor or moderate adverse, with all major impacts relating to a room at ground floor with very low existing light levels of between 0.4 – 1.6% (against a target of 27%). In addition, for the VSC reductions, half of these have absolute percentage changes of no more than 2% and such small alterations are likely to be imperceptible to the occupants. The absolute percentage changes range from 0.1 – 9.5%.
274. For cumulative 'no balcony' VSC calculation without the obstruction, 10 of 36 windows would experience noticeable reductions. Seven of these reductions are minor adverse, and three are moderate adverse. Therefore the existing overhang is considered to have a significant role in the noticeable VSC reductions as six windows would become compliant when removing the obstruction.
275. The daylight distribution test (NSL) for the cumulative scenario demonstrates that one additional room would experience a noticeable reduction of a 21% therefore considered to be minor adverse and slightly above the 20% which BRE states will be noticeable. There are increases to the reductions that the nine rooms which experience

noticeable reductions in the non-cumulative proposed scenario however these remain as eight minor adverse impacts and one major adverse impact. The large majority of the impacts are minor adverse; therefore this is considered acceptable in the dense urban environment.

35 Cock Lane – existing vs proposed

276. Located to the north of the site and adjoining 32 Cock Lane, this building contains residential properties and is arranged over eight floors and a basement. The assessment considers the windows on the façade facing the site. The ground floor and basement windows are located below an overhang from the first floor. The consultant has assumed that 36 windows serve 32 rooms for the assessment.

277. For VSC assessment, one of 36 windows would experience a noticeable reduction of over 20%. Therefore, 35 windows are BRE compliant. The one window that would experience a reduction of 26% is a ground floor window below an existing overhang, the reduction is considered to minor adverse and the room has low existing daylight of 2.2%. The absolute percentage reduction would be 0.6%

278. For the 'no balcony' VSC assessment, the non-compliant window becomes compliant. Therefore all windows would be BRE compliant in this scenario therefore the overhang is considered to be a primary factor in the reduction.

279. For the NSL assessment, three of 32 rooms experience reductions beyond 20%, which BRE state would be noticeable. These rooms are located at the ground, first and second floors. Two of these reductions are between 22 – 24% therefore considered minor adverse. One room experiences a moderate adverse reduction of 33% however this is recessed room at ground floor.

35 Cock Lane – Existing vs. Cumulative

280. For the cumulative daylight impact (VSC), the assessment demonstrates that 33 of 36 windows remain BRE compliant; therefore two additional windows would experience noticeable reductions from the non-cumulative proposed scenario. One of these windows would receive 80% reduction therefore considered to be major adverse, however this window would be BRE compliant with the 5 Snow Hill proposal only, without Citicape House, and would experience only a 6.3% reduction (20% is considered noticeable) in the proposed scenario therefore this represents a very small proportion of the loss in the cumulative scenario. The other two windows would experience reductions of 39% (major adverse) at ground floor, and 23% (minor adverse) at first floor level.

281. In the cumulative 'no balcony' VSC scenario, one of the three windows in the cumulative scenario would become BRE compliant and the other two windows would experience minor adverse reductions. In addition, one additional window experiences minor adverse reduction at basement level.

282. For the cumulative daylight distribution assessment (NSL), six of the 32 rooms experience noticeable reductions. These reductions include two minor adverse impacts at first floor and second floor level with reductions between 21% - 29%. One room at first floor would experience a moderate impact of 33%. There are two major adverse impacts of 49% and 78% for rooms recessed at ground floor. For the room experiencing a reduction of 49%, this experiences a moderate adverse reduction in the proposed scenario without Citicape House with a reduction of 33%. The room experiencing a reduction of 78% is BRE compliant in the proposed scenario without Citicape House with a reduction of only 15%.

Daylight Radiance Assessment for 32 Cock Lane and 35 Cock Lane

283. The radiance assessment results demonstrate that there would be reductions in daylight to the affected rooms. However in the existing scenario, all rooms experience less than 2% daylight (ADF) to the majority of the room area, therefore suggesting electrical lighting would be required as per BRE Guidelines. For the proposed scenario, where there are reductions in daylight, the absolute reductions in ADF do not exceed 0.33%. The rooms will continue to experience less than 2% daylight (ADF) throughout a majority of the room area. It is considered there will be no material difference between the proposed scenario and the cumulative scenario.

37 Cock Lane – existing vs proposed

284. The consultant prepared a supplementary report to address the daylight impacts at this property. The report states that the building is comprised of office use at ground and basement levels, with residential use from first to sixth floor. The consultant has assessed 39 windows serving 25 habitable rooms.

285. All windows and rooms experience alterations of daylight (VSC and NSL) of less than 20%, which BRE states will be unnoticeable. The greatest alteration of VSC is 3%.

37 Cock Lane – existing vs cumulative

286. For the cumulative scenario, 13 of 39 windows experience noticeable reductions of VSC with the impacts between 21 – 29% therefore considered to be minor adverse, which can be attributed to the Citicape House development.

287. For cumulative NSL, 12 of 25 rooms experience noticeable reductions with four of these as moderate adverse (up to 39%) and in the proposed scenario without Citicape House, these reductions range from 0% - 5.6% and therefore would be BRE compliant and considered a negligible impact; and two of these rooms are bedrooms which are considered less important in BRE guidelines. Eight rooms experience minor adverse impacts however in the proposed scenario without Citicape House, six of these rooms experience 0% reduction and the remaining two experience reductions of only 1.2% and 1.4% therefore would be BRE compliant and considered a negligible impact.
288. Overall the cumulative impact is considered acceptable.

8-9 Giltspur Street

289. The rear elevation of the property is located to the south-east of the site and overlooks the proposed development. The consultant has assumed room layouts and room depths from external observation. Nine windows servicing five habitable rooms have been assessed.
290. All windows and rooms assessed are fully BRE compliant for VSC and for NSL. The greatest VSC impact is 3% and BRE states that reductions below 20% will not be noticeable. In the cumulative scenario, the windows and rooms remain BRE compliant for daylight.

Non-domestic properties – 6 Snow Hill

291. 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.
292. Following representations received from no. 6 Snow Hill (office use), a radiance assessment was carried out to measure the daylight impacts to the property. The assessment includes rooms served by windows facing the development and facing north. The property is comprised ground and five upper storeys.
293. The radiance results demonstrate that all rooms on all floors currently experience an ADF of less than 5% (defined by BRE as a “well daylight space”), and that the ground to fourth floors (except one room) currently experience less than 2% ADF. Below 2% a room will look dull and electric lighting is likely to be required. The radiance diagrams indicate that there will be small changes to the daylight pooling however this is not considered to be significant. In the

cumulative scenario, it is considered that there is no material difference to the impact.

294. Whilst there will be some loss of daylight as a result of the proposed development, BRE Guidance and Local Plan policy does not expect losses of light to standard commercial premises to be taken into account when assessing the proposal except in special circumstances. In addition, the existing low light levels and use of electric lighting and the computer-based operations at no. 6 Snow Hill, do not indicate that the continued office use of the building would be adversely affected.

Sunlight Impact for Annual Probable Sunlight Hours

295. Regarding sunlight, the BRE guidance recommends that all main living rooms of dwellings should be checked if they have a window facing within 90 degrees of due south. The available sunlight is measured in terms of the percentage of annual probable sunlight hours (APSH) at the centre point of the window. Probable sunlight hours is defined as “the long-term average of the total number of hours during a year in which direct sunlight reaches the unobstructed ground (when clouds are taken into account)”. Sunlighting of a dwelling may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours, or less than 5% of annual probable sunlight hours between 21 September and 21 March and
- Receives less than 0.8 times its former sunlight hours during either period and
- Has a reduction in sunlight received over the whole year greater than 4% of annual probable sunlight hours.

296. To clarify, all three of the above criteria need to be met for there to be an adverse impact in sunlight terms.

32 Cock Lane

297. A total of 13 of 14 rooms are BRE compliant for APSH. The one affected room would retain 19% annual sunlight against a target of 25% and the absolute reduction is 7% and the room is served by another BRE compliant window. The impact is considered minor adverse. There are no material differences in the cumulative scenario.

35 Cock Lane

298. A total of 31 of 32 rooms experience fully BRE compliant reductions for APSH. However the room adversely affected would retain 24% of annual sunlight against a BRE target of 25%. The absolute reduction to the room is 5%.
299. For the cumulative scenario, five of 32 rooms experience reductions that is considered may be adverse for APSH. Four of the

rooms would experience between 22-23% APSH against a 25% target in the cumulative scenario. The remaining room is recessed and located at ground level and experiences low existing annual sunlight levels (9% against target of 25%) with an absolute percentage reduction of 7%.

37 Cock Lane

300. All rooms assessed experience fully BRE compliant APSH in the existing vs. proposed scenario. For the cumulative scenario, five of 25 rooms would not meet BRE however four of these would retain annual sunlight of between 21% - 24% against a target of 25%.

8-9 Giltspur Street

301. There is one room material for assessment, and the room is fully BRE compliant with the proposed development in place. In the cumulative scenario, the room remains BRE compliant for sunlight.

Overall Conclusion on Daylight and Sunlight impacts

302. The assessments have been reviewed and the methodology and conclusions are considered to be reliable.

Daylight

303. Overall, the assessments submitted in support of the application demonstrate that there would be noticeable loss of daylight in a number of rooms within 32 Cock Lane and 35 Cock Lane in the proposed scenario (without Citicape House), however the majority of these are considered to be minor adverse. In the cumulative scenario (including Citicape House), there are additional reductions however the majority of impacts are minor adverse. The only major impact relates to a recessed single room at ground floor with low existing light levels.

304. For 35 Cock Lane, the large majority of windows and rooms are BRE compliant for daylight in the proposed and cumulative scenarios.

305. In addition, there are existing site circumstances to consider including existing overhangs above the ground and basement windows, and existing low daylight levels. The results demonstrate that the overhangs have a significant role in the amount of daylight received as seven windows would become BRE compliant across 32 and 35 Cock Lane when removing this obstruction in the existing vs. proposed scenario.

306. The radiance results for 32 Cock Lane, and 35 Cock Lane demonstrate that all rooms currently experience less than 2% daylight

(ADF) to the majority of the room area, therefore electrical lighting would be required as per BRE Guidelines. For the proposed scenario, where there are reductions in daylight, these do not exceed 0.33%. The rooms will continue to experience less than 2% daylight (ADF) throughout a majority of the room area. The images suggest the daylight experienced in the rooms will be of a similar level with 5 Snow Hill in place and in the cumulative scenario which is reflected in the limited reduction in ADF levels for the four ground floor rooms (two in No.32 and two in No. 35) which range between 0.01 to 0.06 reduction from existing levels which is considered to be negligible. This radiance analysis demonstrates that whilst these rooms would experience reductions in VSC and NSL, the change in daylight experienced would be minimal.

307. For 8-9 Giltspur Street and 37 Cock Lane, all rooms are BRE compliant with the proposed development at 5 Snow Hill in place. In the cumulative scenario, 37 Cock Lane experiences noticeable reductions due to the proximity to the Citicape House scheme however the majority of impacts are considered to be minor adverse.

308. For the impact to the commercial property at 6 Snow Hill, the radiance assessment demonstrates that all rooms on all floors currently experience an ADF of less than 5% (defined by BRE as a “well daylight space”), with all rooms except on the ground to fourth floors currently experiencing less than 2% ADF. Below 2% a room will look dull and electric lighting is likely to be required. The radiance diagrams indicate that there will be small changes to the daylight pooling however this is not considered to be significant. In the cumulative scenario, it is considered that there is no material difference to the impact.

Sunlight

309. For sunlight, one room at 32 Cock Lane and one room at 35 Cock Lane would not meet BRE criteria; with the majority of rooms meeting BRE guidelines; and these rooms would retain 19% and 24% respectively (against a target of 25%). In the cumulative scenario, there would be additional reductions although the majority of rooms would continue to meet BRE guidelines.

310. The windows at 37 Cock Lane would be BRE compliant in the proposed scenario however there would be noticeable reductions in the cumulative scenario, due to the proximity of the Citicape House development, although the majority of the rooms would retain annual sunlight of between 21% - 24% against a target of 25%.

311. There are no adverse reductions for 8-9 Giltspur Street in the proposed or the cumulative scenario.

Conclusion

312. Whilst there are some adverse impacts, some of these have existing circumstances which need to be considered, including low levels of existing daylight or sunlight or existing overhangs above the window restricting the level of light received. In addition, it is important to consider that Cock Lane is a narrow street and therefore a modest increase in height is likely to have daylight and sunlight impacts.
313. Taking account of the scale of the impacts, including cumulative impacts, and that the Local Plan acknowledges that ideal daylight and sunlight conditions may not be practicable in densely developed City locations, it is considered that living standards would be acceptable and relevant daylight policies would not be breached.
314. Therefore, overall, the daylight and sunlight impacts are considered acceptable in this dense urban location.
315. As such, for daylight and sunlight impact, the proposal is not considered to conflict with London Plan Policy D6, Local Plan Policies CS10 and DM10.7, and draft City Plan 2036 Policy DE8. However due to the adverse impacts, which are considered to be acceptable in line with Local Plan Policy DM10.7, the proposal is contrary to an element of Policy DM11.3 (4) for hotels which requires there are no adverse impacts to neighbouring occupiers. This conflict also applies for draft City Plan Policy CV3 (2).

Environmental Considerations

Air quality

316. 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 developments 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 SI1 of the London Plan.
317. Policy DM15.6 requires developers to consider the impact of their proposals on air quality and encourages the installation of non-combustion low and zero carbon energy technology.
318. The submitted Air Quality Assessment concludes that there should be no significant impacts on air quality due to the development. The application predicts the development will reduce vehicle trips to the building by 96 two way vehicle movements (Annual Average Daily

Traffic) which would benefit the local air quality. The proposed development will utilise an electric heat pump system which is welcomed in regards to air quality. The development meets both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

319. The development would be car free. Vehicle trips would be generated from servicing and delivery vehicles however this would represent up to two trips per day.
320. The City's Air Quality Officer have reviewed the assessment, which is considered acceptable, and has no objections to the proposal and recommends that relevant conditions are applied.
321. During demolition and construction dust emissions would increase and would need to be controlled in order to avoid significant impacts. Mitigation measures and dust control measures would need to be put in place on the construction site. Details of the dust control measures would be required by condition prior to the commencement of development as part of a scheme of protective works.
322. A condition is recommended for an Air Quality Report to be submitted and approved in writing prior to any plant being commissioned or installed on the building to ensure the proposed development does not have a detrimental impact on air quality and reduces exposure to poor air quality.
323. Subject to the compliance with conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, and Policy SI1 of the London Plan which all seek to improve air quality.

Noise and vibration

324. Policy DM15.7 of the Local Plan states that 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. The Policy also requires the consideration of the impact of operational use on neighbours and any conflict between uses should be minimised.
325. Generally, in City redevelopment schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Scheme of Protective Works to be approved by condition which has been recommended in this case.
326. The Applicant has submitted a Noise Impact Assessment for the proposed new plant. The development would include new mechanical

plant which would be located at seventh floor, roof and basement levels, and would include extract fans, heat pumps and condenser units. The plant areas at roof level will be surrounded by a combination of solid mansard roof and acoustic louvre screens which will provide attenuation in addition to air flow required by the heat pumps. To ensure that noise from plant is adequately controlled and minimised conditions are required related to plant noise and vibration.

327. All deliveries would take place on street with these potentially taking place at peak times. However the development would not result in more than two deliveries per day therefore this is considered to have a negligible impact in terms of noise associated with unloading.
328. In addition, the hotel entrance and servicing activities are proposed to take place from Snow Hill which is located further away from the Cock Lane residential properties therefore this minimises the impact of these arrivals.
329. The hotel use will require low noise levels at night to provide high-quality visitor accommodation. The Cultural Uses are not anticipated to have a detrimental impact to the surrounding as these areas are all internal and public access will cease by 7pm. There are no accessible roof terrace spaces proposed as part of the development therefore no terrace-related noise as a result of the development. The development would be subject to an Operational Management Plan, to be approved by condition, to minimise disruption.
330. No unacceptable adverse noise issues are anticipated from the operation of the hotel which will not have accessible roof terraces, no night-time uses (restaurant open until 10pm), and the proposed plant will be subject to the standard plant conditions requiring that noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Furthermore, noise would need to be limited as the hotel represents a noise-sensitive use.
331. Therefore, subject to recommended conditions, the development is in accordance with Local Plan Policies DM11.3, DM 15.7 and DM21.3.

Light Pollution

332. 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. Policy DE9 states that external lighting of heritage assets must be sympathetic to the building and wider context.

333. Light pollution is not considered to be a pertinent issue for this development due to the low prevalence of glazed façade however the requirement for the applicant to provide a lighting strategy to be agreed as part of condition discharge has been recommended in accordance with the adopted Lighting strategy.
334. For the façade directly facing Cock Lane, this is partially retained therefore retains the same window openings at ground to third floors. There are additional windows at floors four to seven. For the façade facing no. 6 Snow Hill, 14 new windows are proposed however three of these will be recessed. In addition, an atrium wall is proposed at the rear of the site with cross-hatched brickwork and no windows. There is no large area of glazing proposed.
335. Therefore, due to the size of the windows and nature of the use where lights are expected to be turned off during the night, no significant lighting pollution effects or light trespass are anticipated as part of the proposals.
336. No external lighting is proposed as part of the application however the condition recommended for a full Lighting Strategy will require these details, including or the replica lamps on Snow Hill.
337. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

Construction impacts

338. The Applicant submitted a Construction Environment Management Plan ('CEMP') with the application which sets out measures to mitigate construction impact for surrounding uses.
339. Concerns have been raised by neighbours for the impact of construction activities, in particular following recent disruption from a nearby hotel site at West Smithfield. The neighbour at no. 6 Snow Hill objected to the CEMP on various grounds including stating it would cause harm to the occupiers, that the relevant permissions including access via, and oversailing of, land in no. 6 Snow Hill's ownership would not be granted for the works set out in the CEMP, and to the vehicle access proposals.
340. The Applicant subsequently amended the CEMP in response to the concerns of representations from no. 6 Snow Hill to include options for rebuilding the wall facing no. 6 Snow Hill within the boundary of no. 5 Snow Hill, to be utilised if use of the hardscaped area in the ownership of no. 6 Snow Hill is not agreed between the parties. The revised CEMP also includes a commitment for further iterations of the

CEMP to be finalised with the City and the neighbouring occupiers to the Site.

341. The Environmental Team have reviewed the revised CEMP and raised no objections and have recommended two conditions for a Scheme of Protective works to limit the impacts of the construction of the development in terms of noise, dust and vibration; this is required prior to demolition and prior to construction.

342. In addition, a Deconstruction Logistics Plan, a Construction Logistics Plan, would be secured through conditions.

343. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Scheme of Protective Works and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Details for cumulative impacts have not been provided to include Citicape House however this represents a temporary impact to amenity and it not possible to ascertain whether the developments will be constructed at similar times. The Transport Assessment Addendum states that it is understood construction will be choreographed with any construction at Citicape House, providing both schemes are delivered simultaneously, and that this is encouraged. In any event, robust conditions are proposed to mitigate deconstruction and construction impacts of no. 5 Snow Hill.

344. Representations have been received from no.6 Snow Hill stating that it is not possible to build the development as proposed without relevant permission, for example crane oversailing. Although this is not specifically a material planning consideration, the recommended conditions requiring a Scheme of Protective Works, and Deconstruction and Construction Logistics Plans require the Applicant to engage with the neighbouring occupiers in the preparation of the information.

345. The construction of the proposed development would have an impact on the surrounding uses however the conditions proposed are considered to be adequate to mitigate this impact and to address concerns raised by residents. Therefore, subject to recommended conditions, the proposals are in accordance with Local Plan Policies CS16 and DM16.1.

Contaminated Land

346. A Contaminated Land assessment has been provided which suggests recommendations for site surveys required at the site. Therefore, a pre-commencement condition has been recommended to ensure a detailed site investigation is carried out to establish if the Site is contaminated and to determine the potential for pollution of the water

environment. This is in accordance with Policy DM15.8 of the Local Plan.

Conclusion for overall impact to amenity of neighbouring uses

347. Therefore for the overall impact to the amenity of neighbouring occupiers, including cumulative impacts, it is considered the proposed development complies with London Plan Policies D13 and D14, Local Plan Policies CS10, CS11, DM15.7, DM21.3 and draft City Plan Policies, HL3, HS3, S23, S24, and SB1.
348. As outlined above, for daylight and sunlight impact, the proposal is not considered to conflict with London Plan Policy D6, Local Plan Policies CS10 and DM10.7, and draft City Plan 2036 Policy DE8. However due to the adverse impacts, which are considered to be acceptable in line with Local Plan Policy DM10.7, the proposal is contrary to an element of Policy DM11.3 (4) for hotels which requires there are no adverse impacts to neighbouring occupiers; in addition, this applies to CV3 (2).

Sustainability Considerations

349. 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.

Energy and Carbon Emissions

350. The Energy Strategy is based on an all-electric system utilising air source heat pumps. The Energy Statement accompanying the application demonstrates that the Proposed Development has been designed to achieve regulated CO₂ savings of 68% when measured against a Part L baseline which comprises a 66% reduction for new build aspects and 69% for refurbished aspects. In addition, Air Source Heat Pumps and photovoltaic (PV) arrays with a roof coverage of 76 sqm are proposed. The carbon emissions savings due to the incorporation of renewable technologies amount to 51% reduction over the baseline case.

351. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 17% compared to a Building Regulations compliant building.
352. The new elements of building fabric have been specified to exceed the minimum standards set out within the Building Regulations, whilst the retained and historic elements have been upgraded to meet the minimum requirements of Part L1B.
353. The proposed energy demand reduction measures include:
- Energy efficient light fittings and controls;
 - Installation of high efficiency centralised mechanical ventilation system and individual heat recovery units;
 - Efficient building services and control systems; and
 - A Building Management System with submetering will be installed to allow for the metering of 100% of energy consumption on Site.
354. There are currently no proposals to connect the development to an existing or planned district heating network. A future extension is proposed to the Citigen Heat Network running through Snow Hill. Provision has been made for future connection to the network through additional plant and riser space to be included to accommodate required equipment and soft points in walls to allow for easy adaptation.
355. Natural ventilation is not proposed due to operational, safety and security concerns of the applicants. The lack of incorporating natural ventilation is a disappointing element to the scheme however overall, this is mitigated by the high carbon savings, including incorporating heat recovery from the mechanical ventilation system.
356. The energy strategy demonstrates compliance with the London Plan carbon targets. A Section 106 obligation is recommended requiring reconfirmation of this energy strategy approach at completion stage and a carbon offsetting contribution 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 the GLA's zero carbon target in the London Plan.

BREEAM Assessment

357. BREEAM (new construction) 2018 pre-assessment has been carried out, demonstrating that the building will achieve an "Excellent" rating. The Applicant considers an "Excellent" rating to be the highest

feasible and viable rating based on the constraints of the existing listed building.

358. The assessment indicates acceptable scores in the City's priority categories and particularly high scores in the energy category where only few credits cannot be targeted due to the constraints of the site, including the partial retention of the existing structure and façade, limiting the ability to implement energy efficient measures and free cooling measures.

359. A condition has been included requiring the submission of a post-construction BREEAM assessment demonstrating the target rating of "Excellent" as a minimum has been achieved.

Circular Economy and Waste

360. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles for development proposals to follow and Circular Economy Statements are required for referable schemes; the Applicant has provided this despite not being a development referable to the Mayor. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles, and the emerging Plan would require all major development to submit a Circular Economy Statement.

361. The Proposed Development would be predominantly new-build, however due to the historic importance of the building, the Applicant estimates that 30 – 35% of the existing building is to be retained, including:

Block A

- Retention of the existing building from ground level to fourth floor level (with removal of existing mansard roof at fifth floor level);
- At basement level to fourth floor, retention of the majority of internal structures in the Block including two staircases.

Block B

- Retention of façade directly facing Cock Lane from basement level to third level and part of fourth floor level;
- Walls retained at sub-basement level in Block 'B';
- Retention of Reading Room in the Block and a staircase.

362. The mansard roof of Block 'A' at fifth floor level and the link building between the two blocks are to be demolished.

363. The extent of demolition of Block 'B' is due to the multiple level changes within the Site which would restrict hotel servicing, mechanical services, and step-free access in large parts of the building.

364. The Applicant states that the level of retention is considered optimal as it retains a proportion of the existing structure and fabric and claims that any greater degree of retention would encounter a high degree of complexity and structural engineering together with design compromise due to the multiple level changes across the site and constraints imposed by the structure.
365. An initial Demolition Recovery Assessment has been carried out to provide an estimate of the quantity of materials as well as their suitability for reuse or recycling. A pre-refurbishment and demolition audit will be carried out to determine capacity for materials to be retained, reused and recycled and a condition has been recommended to ensure this.
366. The Applicant states that the approach will be for minimal excavation waste to be created. The excavation is limited to the extension to the existing sub-basement, the stairwell access and lift pits. Where excavation occurs, waste will be reused as much as possible on site. The London Plan target for excavation waste/material to be used for beneficial use is 95%; the Applicant has confirmed they will seek to meet the target.
367. The Applicant has set a target for 70% by volume of the construction waste to be reused, recycled or backfilled as per BREEAM. The London Plan target is 95%. The Applicant states they undertook the circular economy workshop and strategy from March to September 2020 with the new London Plan being adopted in March 2021 and therefore targets set as part of our input were agreed prior to the formal adoption of the 95% target. However, a condition is recommended requiring the Applicant to meet the current targets set by the GLA.
368. London Plan Policy SI7 requires the design to provide adequate, flexible, and easily accessible storage space and collection systems that support the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food. The development provides storage for this area.
369. The submitted Circular Economy Statement demonstrates the strategic approach of the Proposed Development including design for longevity, modularity, a high degree of standardisation and to ensure that material use is responsible and of low carbon impact.
370. The London Plan requires circular economy performance to be monitored and reported. The Applicant has confirmed that targets for reduction, reuse, and recycling will be integrated into the specification for the main contractor Employers Requirements and performance against these targets will be aligned with the commercial agreement with the main contractor.

371. In addition, the Applicant proposes to produce a Construction Waste Management Plan (CWMP) to monitor waste generated on site; set targets for minimising the amount of waste generated on site; and sorting, reuse and recycling of construction waste.
372. The Applicant (Whitbread Group PLC) have created an approach with goals including the elimination of unnecessary single-use plastic by 2025, 50% reduction in food waste by 2030, and not sending any routine operational waste to landfill.
373. Overall, the partial retention of existing structure and the intentions stated for: the new build elements; the minimising and reuse or recycling of construction waste; and managing operational waste, are positive elements of the Proposed Development.
374. A pre-commencement Circular Economy Assessment update and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm full details and achievement of the planning stage intentions have been requested by conditions. These assessments will be expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Whole Life-Cycle (WLC) carbon emissions

375. London Plan Policy SI 2 (Minimising greenhouse gas emissions) encourages applicants for 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 target.
376. The submitted Whole Life-Cycle carbon assessment results confirm that the greatest savings in embodied carbon emissions derive from the retention of the existing façades and structures, and the use of a cement replacement for elements of the frame as well as up to 50% cement replacement for the piles to reduce embodied carbon over the life cycle.

377. The whole life-cycle carbon emissions for the proposed development are in line with the GLA's aspirational WLC benchmarks.
378. Confirmation of the strategy including further improvements from the detailed design stage, and confirmation of the post-construction results have been requested through conditions.

Overheating

379. Draft Local Plan policies S15 and CR1 states that developers will be required to demonstrate their developments have been designed to reduce the risk of overheating.
380. An Overheating Assessment has been undertaken. The design of the building does not include significant glazed facades and incorporates urban greening to improve evaporative cooling. Mechanical ventilation is proposed to prevent overheating of the hotel including bedrooms.

Flood Risk and Sustainable Drainage

381. London Plan Policy SI12 and Local Plan Policy CS18 require that development ensure flood risk is mitigated and minimised. The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policies CS18 and DM18.2, Policy CR3 of the draft City Plan, and London Plan Policy SI13.
382. The Site is not within the City Flood Risk Area and is within the Environment Agency's (EA) Flood Map for Planning in Flood Zone 1, an area with a low probability of flooding.
383. The existing site discharges via a sewer towards the combined sewer in Snow Hill. The internal network below ground is combined, with gullies and rainwater pipes running into foul water runs at basement level. All gullies are shown as trapped and interceptor trap is provided at the outfall manhole.
384. The Flood Risk Assessment states that the risk from flooding from all sources is considered low risk. A combined blue and green roof is proposed on Block B with a catchment for the blue roof of 468 sqm. The water will be collected within the blue roof, which is a shallow water holding layer below the roof surface. This is then drained with pipework for a controlled discharge to the sewer. No attenuation tank is proposed in the basement.

385. The Drainage Strategy states that the blue roof equates to a total of 57 sqm of storage, reducing runoff by 0.8l/s whilst collecting water for irrigation of the green roof. The existing site currently achieves a run-off rate of 33.5l/s for a 1-in-100 year event, and the proposed development will achieve a total saving of up to 80.9% over the existing site.

386. The Applicant is exploring options for rainwater harvesting from the blue roof for the irrigation for the green wall and a condition is recommended to secure this.

387. 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.

388. The Lead Flood Authority reviewed the application and have raised no objections, subject to recommended conditions.

389. Final details of the SuDS and associated components are reserved by condition. The use of SuDS is supported by London Plan, adopted Local Plan and draft City Plan.

Urban Greening and Biodiversity

390. London Plan Policy G5 and G6, and Local Plan policies DM10.3 and DM19.2 promote urban greening and biodiversity.

391. A preliminary ecological appraisal has been undertaken for the development which concluded the Site is deemed to be of low ecological value. The Proposed Development would provide:

- 357 sqm of biodiverse combined blue and green roof;
- 40 sqm green wall facing Cock Lane;
- Bird boxes;
- Bat boxes.

392. The Proposed development would have an Urban Greening Factor (UGF) of 0.35 which exceeds the London Plan target of 0.3. However, to address objections from the neighbouring site, a condition is proposed for the removal of the green wall in the event that the neighbouring site is redeveloped to the boundary line where the green wall is proposed. The UGF for the Site without the green wall would remain above 0.3 and therefore would meet the London Plan standard.

393. The Proposed Development will provide a biodiversity net gain of 0.17 units which is a positive impact of the proposals considering the limited site area and constraints of existing listed building.
394. A condition is recommended to ensure the green roof and green wall design demonstrates high quality specifications and substrate depths to provide appropriate environmental benefits of biodiversity and rainwater attenuation. In addition, a condition is recommended to secure rainwater collection for the irrigation of the green wall.

Summary for Sustainability of the Scheme

395. The proposed development, by way of its central location within London, its opportunities for providing a positive contribution to Cultural Mile and enhanced visitor experience, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London.
396. The scheme achieves 68% carbon savings against Part L baseline, which significantly exceeds the London Plan target of 35%. The air source heat pumps and PV panels account for 51% (total 68%) of the carbon savings over the notional building.
397. The proposed sustainability strategy overall meets current London Plan policies as well as Local Plan policies. The development is on track to achieve an “Excellent” BREEAM rating. A BREEAM “Outstanding” rating is not considered to be achievable due to the heritage constraints of the existing building. The partial retention of the existing building, the proposed robust detailing, the optimised structural solutions and the application of design principles for longevity and adaptability positively address Circular Economy principles and significantly reduce Whole Life-Cycle carbon emissions.
398. Overall, this development includes measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.
399. The Proposed Development includes a range of measures that are considered to achieve an appropriate degree of climate change resilience and mitigation.

Transport, Servicing and impact on Public Highways

Public Transport

400. 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 City Thameslink Station, and Chancery Lane and St Pauls underground stations. The site is close to several bus routes running close by on Holborn Viaduct and Farringdon Street.

Cycling

401. The 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.
402. The London Plan requires 11 long stay cycle parking and 5 short stay cycle parking spaces which are proposed as part of the scheme thereby meeting the standards.
403. The cycle parking would be accessed through the servicing entrance on Snow Hill. The short stay would be in the lobby area at ground floor and the long stay would be in the basement accessed via the goods lift. The long stay cycle parking is sized in accordance with the London Cycling Design Standards, the short stay cycle parking uses semi-vertical stands, due to space constraints.
404. 5% of the long stay cycle parking spaces are accessible for adapted cycles and this arrangement will be secured by planning condition (in line with the London Plan Policy T5 cycling B, with the London Cycling Design Standards 8.2.1, and the emerging City Plan 6.3.24).
405. The 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. The proposals include 1 shower, and at least 11 lockers, which complement the cycle parking provision and are in line with the London Plan standards.
406. 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 London Plan policy T4 and 10.4.3.

Car Parking

407. The development is car free, 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. No blue badge space has been proposed due to the constraints of the site. People with mobility issues will be able to access the site by taxi, which are able to drop off outside the front door of the hotel, and by national rail or bus, which are located at the top of Snow Hill on Holborn Viaduct. City Thameslink, the national rail service on Holborn Viaduct, has step free access to all platforms, and there are drop kerbs at all crossings between the station to the development.
408. It has been predicted there would be a maximum of 32 taxi trips per day. No taxi facility will be provided, taxis and private hire vehicles will be able to drop off passengers in line with the on-street restrictions.
409. No coach facility will be provided, the applicant has agreed to a maximum group size booking clause to be added into the Section 106, which will reduce the likelihood of coaches accessing the site.
410. The proposed development is car free and it is expected the proposed hotel use would produce significantly fewer vehicle trips than the existing Police Station use. It has been estimated that currently there can be up to 161 vehicle movements on a typical weekday to the police station, with most of these being police car trips. It has been estimated that there will be a maximum of 65 vehicle movements on a typical weekday to the proposed hotel. Therefore, the proposed development is considered to have a positive impact on the number of trips to the development.

Servicing and deliveries

411. Policy DM16.5 of the Local Plan states developments states on-site servicing should be designed to allow vehicles likely to service at the same time to be conveniently unloaded and loaded at the same time. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 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.
412. Options for the servicing of the building have been considered. An on-site loading facility has been discounted due to the size and layout of the development, the level changes on the site, and the listed facades on Snow Hill and Cock Lane. Therefore, the servicing would take place on-street on Snow Hill. Servicing from other streets surrounding the development has been discounted due to the proximity to residents and narrow streets.

413. Draft City Plan 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. The applicant has provided justification to show why servicing cannot be achieved at off-peak times only. The applicant will be consolidating servicing of this development with other nearby developments, and due to the schedule of other near-by developments the servicing for this development may fall inside peak hours. In this case, minimal peak time servicing is acceptable because there will be no additional vehicles on the network as a result of this development – the vehicles are already on the network servicing a nearby hotel. The number of trips per day is also 2 vehicles, which is very low.
414. Policy VT2– 2 requires major commercial development to provide for freight consolidation. The applicant is proposing to use a consolidation strategy with other hotels in their ownership in order to reduce the number of deliveries to the development per day. As such the servicing of this hotel will not add an additional vehicle onto the network – it will be serviced (by no more than two trips per day) by a vehicle already servicing another nearby hotel, which is the Premier Inn Hotel at West Smithfield, for so long as they are owned/operated by the same operator. Should that cease to be the case the prohibition on peak time servicing will apply.
415. The applicant has estimated that there would be 14 deliveries per week – approximately 2 deliveries per day, which includes approximately 3 waste collections per week. This is a low number of deliveries due to the applicants experience in the industry and also the ability to consolidate deliveries with existing hotels nearby in their ownership. A cap of two servicing vehicle trips per day will be included in the Section 106 agreement.
416. Policy DM 11.3 of the Local Plan states new hotels will only be permitted when they ‘do not result in adverse impacts on the amenity of neighbouring occupiers’ and ‘provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches’. The proposals for this development reduce the number of vehicles to the site per day due to the new consolidated delivery arrangement. The proposals restrict coach travel to the site, and are funding the removal of the redundant police bays on Snow Hill, to facilitate an area for loading on Snow Hill, which is appropriate to the size and nature of the hotel.
417. The development will be required to produce a delivery and servicing plan (DSP), and this will be secured by planning obligation. The DSP will require servicing to be off peak, unless agreed by the City of London Corporation. In the case of the current developer, it will be acceptable for some deliveries (limited to two per day) to be at peak

times, however if the owner changes, the new owner will be required to service at off-peak times only. An obligation to this end will be in the Section 106 agreement.

Pedestrian Comfort

418. A PCL assessment has not been conducted due to the size and location of the development.

419. It is predicted that the total number of daily trips to the development would be 1448, and the peak hour trips to the hotel will have a negligible impact on the surrounding streets. For example, it has been estimated that there would be 63 trips during the AM peak hour and 91 trips during the PM peak hour.

420. It is not known what the current daily trips are to the police station as the Covid-19 pandemic has affected the number of people visiting the station – meaning surveys may not be representative of ‘normal’ conditions. However, it has been estimated that over a day there will be an increase in 707 trips (increasing to 1448). 1448 trips to the development per day is considered acceptable due to wide footways, low level of existing footfall, the significant predicted reduction in vehicle trips, and the likelihood of trips occurring at off peak times.

421. The submitted Transport Assessment indicates that the overall increase in trips across all modes would have a minimal impact on the surrounding highway and public transport network capacities, and during the conventional peak hours, there would be a reduction in public transport use compared to the previous use, which actually represents a reduced impact on the surrounding transport services and infrastructure.

Section 278 Agreement

422. A Section 278 agreement has been secured to comprise works to amend the current kerbside activity (removal and replacement of bays and lines – subject to parking orders being made), public consultation, repaving of the footway, any requirements for tactile paving that are needed, and to retain any existing cycle markings on Snow Hill. The applicant has also agreed to extend the existing public cycle parking at the top of Snow Hill – this is over and above the London Plan 2021 compliant level of cycle parking, and we welcome this provision.

423. The Section 278 works are considered necessary in planning terms and 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.

Waste collection

424. Refuse collection would be undertaken from the kerb at Snow Hill and the Applicant has confirmed that the bins will be available at ground floor level for collection crew with a maximum 10m trundle distance to the collection vehicle. The bin store is located a basement level and will comply with BS5906 specifications and could be accessed via a goods lift. The Applicant has confirmed that this will be overseen by facilities management and not left on the footway. A Condition to secure an Operational management Plan has been recommended.
425. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.
426. Local Plan Policy DM11.3 requires hotels to provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel. The proposed arrangements for the transport aspects of this scheme are appropriate for this small scale hotel, and a S278 agreement has been agreed to secure changes on street, therefore the proposals are considered acceptable and in compliance with DM11.3 (5).

Security and Safety

427. The Applicant has provided a Security Statement which details the security measures for the development. The City Police have reviewed the application and have raised no objections subject to a recommended condition to provide an updated Security Statement to be reviewed in Consultation with City Police. Therefore the proposal is in accordance with London Plan Policy D11, Local Plan Policies CS3 and D3.2, and draft City Plan S2.

Fire Safety

428. Policy D12 of the 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. Policy D5.B.5 of the London Plan requires development proposal to be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity

assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.

429. A Fire Statement has been provided by the Applicant which demonstrates how the development would achieve the standards of fire safety. The District Surveyors Office has confirmed that this meets the requirements of the London Plan and the City's Fire Safety Team has provided input.

430. There are no in principle issues with the fire safety measures proposed. Further detail is required prior to the construction of the green wall and the green roof to ensure a maintenance strategy for these elements to mitigate fire risk and to approve plants with a high moisture content for the green wall; therefore a condition is recommended for these details to be submitted and approved in consultation with the Fire Safety Team and the District Surveyors prior to relevant works.

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

Health Impacts

432. Policy HL9 of the draft City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicant has submitted a Healthy Urban Checklist, based on the NHS Healthy Urban Development Unit's criteria and toolkit to assess the possible impacts on the health and well-being of the City's communities.

433. The Checklist is considered acceptable, and the proposed development will provide public access to spaces.

Equality Impacts

434. When considering the proposed development, the Public Sector Equality Duty (PSED) requires City of London to consider how the determination of the application will affect people who are protected under the Equality Act 2010, including having due regard to the effects of the proposed development and any potential disadvantages suffered by people because of their protected characteristics.

435. Under the Act, a public authority must, in the exercise of its functions, have due regard to the need to:-

- eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it

436. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

437. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.

438. This application has been assessed against the Equality Act 2010 and any equality impacts identified.

439. The proposed development would provide significant employment opportunities during the construction and operations phases of the development, which could benefit all groups with protected characteristics. A planning obligation for contributions towards employment and training initiatives will be secured through the Section 106 Agreement. This would provide further opportunities for priority groups.

440. The Proposed Development would offer step free access throughout and around the Site. Significant consideration has been given in the design of the scheme to ensure it is accessible. All floors of the building will be served by wheelchair accessible lifts, accessible toilets and wide circulation space.

441. The Applicant has submitted a Security Statement which includes design and management measures to increase security.

442. Potential impacts of the proposed development on the nearby occupiers identified above, have been assessed. Officers do not consider that they would be detrimentally impacted in so far as the spaces within the development become unusable nor would it be considered that there would be disadvantages to any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

Assessment of the Public Benefits for the purposes of paragraph 202 of the NPPF

443. Paragraph 202 of the NPPF states “where a development proposal will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”. The National Planning Practice Guidance states that “public benefits...could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to the genuine public benefits”. Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). Paragraph 200 states that 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. As the statutory duty imposed by section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 is engaged, considerable importance and weight must be given to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise.

444. In this case, the less than substantial harm is modest to a single designated heritage asset (5 Snow Hill). Great weight is attached to the significance of this asset of national importance and to the level of harm. Such levels of harm require clear and convincing justification and should only be accepted if there is such justification and that the harm would be outweighed by the public benefits which the proposals would secure.

445. The key public benefits of the proposal are considered to be as follows:

- Contribution to vibrant City offer to include evening and weekends in the Culture Mile – afforded moderate weight;
- Contribution to jobs and visitor spend in the Culture Mile – afforded moderate weight;
- Public access into the listed building including areas of high heritage significance and to exhibition spaces – afforded substantial weight;
- Sensitive reuse of the listed building securing its long-term conservation including heritage enhancements of repair and refurbishment – afforded low weight;
- Short stay cycling parking provision proposed on Snow Hill, in excess of policy requirements – afforded low weight.

446. It is the view of officers that after applying the relevant tests, the public benefits outweigh the less than substantial harm to the significance of 5 Snow Hill. The proposals would achieve a successful and sensitive change of use to provide a proposed viable reuse. It is considered that the public benefits of the proposals outweigh the less than substantial harm and that there is clear and convincing justification for that harm.
447. The NPPF heritage policies are an important material consideration and it is considered the benefits of the scheme would outweigh the low level of less than substantial harm to the designated heritage asset. This conclusion is reached even when giving great weight to heritage significance as required under statutory duties.
448. On the basis of the above, the proposal accords with the heritage policies set out in the NPPF. The central aims of the planning system in achieving sustainable development are achieved by this high quality proposal and by the public benefits that will flow from the scheme.

CIL and Planning Obligations

449. 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.
450. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
451. 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).
452. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£355,460	£341,242	£14,218

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution	Available for allocation	Retained for administration and monitoring
City CIL	£190,425	£180,904	£9,521
<i>City Planning Obligations</i>			
Affordable Housing	£50,780	£50,272	£508
Local, Training, Skills and Job Brokerage	£7,617	£7,541	£76
Carbon Reduction Shortfall (as designed)	£204,345	£204,345	£0
Section 278 Design and Evaluation	£25,000	£25,000	£0
S106 Monitoring Charge	£3,000	£0	£3,000
Total liability in accordance with the City of London's policies	£480,667	£468,062	£13,105

City's Planning Obligations

453. 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;
- Local Procurement Strategy;
- Local Training, Skills and Job Brokerage Strategy (Demolition & Construction);
- Local Training, Skills and Job Brokerage Strategy (Operational Phase);
- Delivery and Servicing Management Plan (including Consolidation);
- Cycling Promotion Plan;
- Carbon Offsetting;
- Utility Connections;
- Section 278 Agreement;
- Cultural Plan (including historical exhibition within public areas);
- Visitor Access and Management Plan (including public access seven days a week from 10.30am – 7pm with no booking required between 10.30am – 5pm, and with an appointment if between 5 – 7pm at no charge);
- Construction Monitoring Costs; and
- Prohibition of Coach Parties/ maximum group bookings of 6.

454. The proposed obligations 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. Any planning permission would therefore be subject to the completion of a S106 agreement to secure the obligations set out above, together with the payment of the local planning authority's legal and planning administration fees of this legal agreement.

455. In addition, your approval is sought to continue to negotiate and enter into the S278 agreement.

456. The scope of the s278 agreement may include, but is not limited to, works to amend the current kerbside activity (removal and replacement of bays and lines), public consultation, repaving of the footway, any requirements for tactile paving that are needed, retain any existing cycle markings on Snow Hill, and the provision of public cycle parking within an appropriate location close to the site.

Monitoring and Administrative Costs

457. 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.
458. 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

459. 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.

Human Rights Act

460. 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")).
461. Insofar at 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 or the amenity of neighbouring 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.
462. Insofar at 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 would meet the objective of the Development Plan and the emerging City Plan, and outweighs the impact and such impact is necessary in the interests of the economic well-being of the country and is proportionate.
463. 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.

Conclusion

Conclusion for 20/00932/FULMAJ

464. 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, and the emerging Local Plan and considering all other material considerations.
465. The proposal would provide 6,369 sqm hotel floorspace in the Culture Mile. The visitor accommodation would provide a more affordable offer in the City and public access to a listed building with ancillary uses including exhibition space. The principle of development is considered acceptable.
466. The Proposed Development is not considered to prejudice the primary business function of the City, would contribute to the balance and mix of uses in the immediate locality, provides satisfactory servicing arrangements, provides 10% wheelchair accessible hotel rooms, would ensure the continuing beneficial use of the historic building and would not result in unacceptable adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts.
467. The servicing is proposed on-street on Snow Hill however there will be no more than two trips per day and the applicant will be consolidating servicing with a hotel nearby. The servicing may fall inside peak hours however in this case, minimal peak time servicing is acceptable because there will be no additional trips on the network as a result of the proposed development, the vehicles are already on the network servicing another nearby hotel. In addition, the daily trips of two is considered very low. Therefore, the servicing arrangements are considered acceptable.
468. Provision of long stay and short stay cycle parking in line with policy requirements. The Applicant will provide additional short stay spaces, proposed on Snow Hill, in excess of policy requirements.
469. The proposal comprises refurbishment and reuse of a significant part of the existing building and will deliver sustainability benefits including adhering to Circular Economy Principles, delivering BREEAM 'Excellent', the installation of air source heat pumps, photovoltaic panels, a biodiverse green roof, and SuDs measures through a blue roof.
470. It is considered that the proposal would preserve the special

architectural and historic interest and heritage significance and setting of: No 4 Snow Hill (grade II); Church of St Sepulchre with Newgate (grade I) and Old Bailey (grade II*), would not harm the character and appearance or setting of the Smithfield Conservation Area and the nearby Newgate Street Conservation Area, and it would preserve LVMF views and the setting of St Paul's Cathedral.

471. The proposals would enable the continued use of the building and would in parts better reveal the significance of the building, offering a number of heritage benefits by preserving, refurbishing, and enabling public access including to areas of significance. The overall investment in the built fabric of the building would prolong and enhance its life and introduce a vibrant new use.

472. However, the proposals would result in a level of less than substantial harm to 5 Snow Hill due to the extent of demolition and loss of historic fabric and to some areas of moderate interest. This harm is considered to be at the lower end of less than substantial and is therefore considered to be minimal. Therefore, overall the proposals would comply with Local Plan Policies CS12, DM 12.1, DM 12.2 and DM 12.3(1), draft City Plan 2036 policies S11 and HE1 London Plan Policy HC1 (A, B, D and E), however elements of the proposals would be contrary to DM 12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).

473. Historic England and the Amenity Societies were consulted and raised no objections.

474. Paragraph 202 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". Therefore an evaluation of the public benefits and the weight afforded to them has been undertaken. It is considered the proposals would result in the following public benefits, which would outweigh the harm identified:

- Contribution to vibrant City offer to include evening and weekends in the Culture Mile;
- Contribution to jobs and visitor spend in the Culture Mile;
- Public access into the listed building including areas of high heritage significance and to exhibition spaces;
- Sensitive reuse of the listed building securing its long-term conservation including heritage enhancements of repair and refurbishment;
- Short stay cycling parking provision proposed on Snow Hill, in excess of policy requirements.

475. There are no unacceptable adverse built development or operational impacts anticipated for the proposed development and use,

including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, which include the requirement to provide an operational management plan and conditions securing privacy screens and obscured glazing, and relevant environmental health conditions. Therefore it is considered the proposed development complies with London Plan Policies D13 and D14, Local Plan Policies CS10, CS11, DM11.3 (other than explained in paragraphs 477- 478), DM15.7, DM21.3 and draft City Plan Policies HL3, HS3, CV3 (other than explained in paragraphs 477- 478), S23, S24, and SB1 regarding impact on amenity.

476. Negative impacts during construction would be controlled as far as possible by the implementation of a robust Scheme of Protective Works 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.

477. Whilst there are some adverse impacts to neighbouring occupiers in regards to daylight and sunlight, some of the affected properties already experience low levels of existing daylight or sunlight and the presence of existing overhangs, therefore a modest increase in height is likely to have an impact. Taking account of the scale of the impacts and that the Local Plan and BRE Guidelines acknowledges that ideal daylight and sunlight conditions may not be practicable in densely developed City locations, it is considered that living standards would be acceptable and relevant daylight and sunlight policies, including London Plan Policy D6, Local Plan Policies CS10 and DM10.7, draft City Plan Policy DE8, and BRE Guidelines would not be breached.

478. Therefore, the proposal would largely meet the requirements of Local Plan Policy DM11.3 (hotels), however due to impacts to daylight and sunlight, the proposal would be contrary to an element of Local Plan Policy DM11.3 (4) which states that hotels will only be permitted where these do not result in an adverse impacts on the amenity of neighbouring occupiers. Therefore, there is some adverse impact but this is not considered to be unacceptable. Whilst there is conflict with Local Plan Policy DM11.3, given the counteracting benefits which promote other policies, this is not considered to justify refusal. This also applies for draft City Plan Policy CV3 (2).

479. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the Local Plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.

480. In this case, the proposal complies with the majority of development plan policies but is not compliant with elements of the policies regarding harm to listed buildings and for hotels. National Planning Practice Guidance advises that conflicts between development plan policies adopted at the same time must be considered in the light of all material considerations including local priorities and needs, as guided by the NPPF.
481. Officers consider that overall, the proposal accords with the development plan as a whole.
482. When taking all matters into consideration, subject to the recommendations of this report it is recommended that planning permission be granted.

Conclusion on Listed Building Consent 20/00933/LBC:

483. The proposals have been assessed against Local Plan Policies CS 12, DM 12.1, and DM 12.3, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There has also been special regard to the desirability of preserving 5 Snow Hill and surrounding listed buildings including their setting and any features of special architectural or historic interest which it possesses, under s.16 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
484. The proposed change of use to hotel is considered appropriate as an adaptation and would enable a continued viable use of the site securing the buildings long term conservation.
485. It is acknowledged that the proposals do not preserve the listed building at 5 Snow Hill including some features of historic interest, and special regard has been had to the desirability of preservation, but in the context of the proposals and the evaluation in this report it is not considered that this should lead to refusal of the application for listed building consent.
486. Overall, the proposal would comply with Local Plan Policies CS12, DM 12.1 and DM 12.3 (1), draft City Plan 2036 policies S11 and HE1 (2, 3, 4 and 5), and London Plan Policy HC1 (A, B, D and E). However in delivering this new use the proposal would result in some less than substantial harm, at the lower end of the spectrum, failing to preserve the special architectural and historic interest and heritage significance of the listed building. This harm stems from the loss and alteration of historic fabric of some areas of moderate interest including: the cells; staircase and minor alterations to the historic floor plan and this would erode the connection between the site and its former use as a police station. The degree of harm is considered to be minimal. Therefore elements of the proposals would be contrary to DM

12.3 (2), emerging policy HE1 (1) and London Plan Policy HC1 (C).

487. When taking all matters into consideration, subject to the recommendations of this report it is recommended that listed building consent is granted permission be granted.

Appendix A

Background Papers – 20/00932/FULMAJ

Application documents

Existing plans: 5177-P-100, 5177-P-101, 5177-P-102, 5177-P-103, 5177-P-104, 5177-P-105, 5177-P-106, 5177-P-107, 5177-P-108, 5177-P-109, 5177-P-110, 5177-P-111, 5177-P-112, 5177-P-113, 2019-4988-002 P1,

Design and Access Statement, Axiom Architects, November 2020

Covering Letter, Daniel Watney, 13/11/2020

Phase I Preliminary Risk Assessment ref. 'CRM.1483.043.GE.R.001.A',
Enzygo Geoenvironmental Ltd, September 2020

Urban Greening Assessment, Greengage, 06/11/2020

BREEAM Ecology Credit Report, Greengage, November 2020

CIL Form, Daniel Watney, 13/11/2020

Cultural Plan, becrg, November 2020

Daylight and Sunlight Report, Point 2 Surveyors, November 2020

BREEAM Pre-Assessment, Greengage, 06/08/2020

Delivery and Servicing Management Plan, RGP, November 2020

Transport Assessment, RGP, November 2020

Travel Plan, RGP, November 2020

Flood Risk and Drainage Strategy Report, Heyne Tillett Steel, 28/10/2020

Planning Statement, Daniel Watney, November 2020

Statement of Community Involvement, becrg, October 2020

Structural Report, Heyne Tillett Steel, 28/10/2020

Archaeological Desk-based assessment, MOLA, October 2020

Circular Economy Statement, Greengage, 06/11/2020

Historic Building Report, Donald Insall Associates, November 2020

Energy Statement, Greengage, 13/11/2020

Air Quality Assessment, Entran Limited, 10/11/2020

Noise Impact Assessment, Scotch Partners, 12/11/2020

Life Cycle Assessment, Greengage, 13/11/2020

Statement of Significance, Donald Insall Associated, November 2020

Overheating Assessment, Greengage, October 2020

Letter, Scotch Partners 11/01/2021

Daylight and Sunlight Addendum, Point 2 Surveyors, 11/01/2021

Healthy Urban Planning Checklist, Daniel Watney, 11/01/2021

Transport Statement Addendum, RGP, January 2021

Addendum Historic Building Report, Donald Insall Associates, February 2021

Views from Giltspur Street, Point 2 Surveyors, 01/02/2021

Sustainability Addendum. Greengage, March 2021

Archaeological Desk Based Assessment – Addendum, MOLA, February 2021

Q-ton, Mitsubishi Heavy Industries Air-conditioning Europe, Ltd, May 2021

Fire Strategy, C.S. Todd, May 2021

Sustainability Statement, Greengage, March 2021 PV02

Axonometric Roof Plan, 5177-P-310 Rev A

IFC Engineering Assessment Report, International Fire Consultants Limited, February 2020

Construction Environmental Management Plan, Gilbert Ash, August 2021

General Detailing for blue roofs for SuDS, 01/06/2021

Impacts to 6 Snow Hill Letter, Anstey Horne, 18/06/2021

Security Policy Statement, Whitbread PLC, August 2021

Daylight and Sunlight Report, Point 2 Surveyors, August 2021

Daylight and Sunlight Letter for 6 Snow Hill, Point 2 Surveyors, 13/08/2021

Daylight and Sunlight Addendum, Point 2 Surveyors, 26/08/2021

Representations

Mr Thomas Boden 17/12/2020

Marcello Leonardi 20/12/2020

Mr Alan Buxton 21/12/2020

Beaumont Business Centre Limited (sent from CMS LLP) 06/01/2021

Mr Richard Leyland 06/01/2021

Beaumont Business Centres Limited (sent from CMS LLP) 18/01/2021

Collineve Limited 27/04/2021

Beaumont Business Centres Limited 20/04/2021

Collineve Limited 28/06/2021

Beaumont Business Centres Limited 28/06/2021

Anstey Horne (on behalf of Beaumont Business Centres Limited 14/07/2021

John James 22/08/2021

Mrs Carol Bernstein 23/08/2021

Beaumont Business Centres Limited 31/08/2021

Anstey Horne 02/09/2021

External

Letter Historic England (pre-application advice) 24/08/2020

Letter Historic England 21/12/2020

Email Thames Water 29/12/2020

Email ANS Global, 01/04/2020

Email Twentieth Century Society (pre-application advice to Applicant)
28/10/2020

Email Transport for London 11/01/2021

Letter Conservation Area Advisory Committee 21/01/2021

Email Whitbread PLC 01/02/2021

Email Daniel Watney 03/02/2021

Email Thames Water 09/02/2021

Email Daniel Watney 11/02/2021

Marcello Leonardi 05/02/2021

Letter, Greengage, 15/02/2021

Letter Daniel Watney 19/02/2021

Letter Daniel Watney 03/03/2021
Email Daniel Watney 03/03/2021
Letter LAMAS Historic Buildings 08/03/2021
Email Air Quality Officer 24/03/2021
Letter Whitbread Group PLC, 29/03/2021
Email Transport for London 29/03/2021
Email Transport for London 31/03/2021
Letter ANS Global 01/04/2021
Email Daniel Watney 08/04/2021
Email Daniel Watney 27/04/2021
Letter BRCS Building Control 15/04/2021
Email Thames Water 11/05/2021
Email Daniel Watney 25/05/2021
Email Tower Eight, 07/06/2021
Email Tower Eight, 11/06/2021
Email Daniel Watney 23/06/2021
Email Daniel Watney 24/06/2021
Email Daniel Watney 18/06/2021
Email Daniel Watney 11/08/2021
Email Daniel Watney 03/09/2021
Email Thames Water 06/09/2021

Internal

Email Transport Planning Team 11/12/2020
Memo Department of Markets and Consumer Protection 18/12/2020
Memo Lead Flood Authority 18/12/2020
Memo Lead Flood Authority 26/03/2020
Memo Air Quality Officer 15/01/2021
Memo Access Team 15/01/2021
Email Department of Markets and Consumer Protection 22/01/2021
Email Department of Markets and Consumer Protection 17/03/2021
Email Culture Mile Manager 01/02/2021

Email District Surveyors Office 02/06/2021

Memo District Surveyors Office 18/05/2021

Email District Surveyors Office 27/04/2021 (09:45)

Email District Surveyors Office 11/06/2021 (09:45)

Email District Surveyors Office 11/06/2021 (13:46)

Email District Surveyors Office 22/06/2021 (11:01)

Email District Surveyors Office 22/06/2021 (11:39)

Email Fire Safety Department, 08/11/2020

Email Fire Safety Department, 09/03/2021

Email Fire Safety Department, 27/01/2021

Email Fire Safety Department, 08/04/2021

Email City of London Police 21/06/2021

Email City of London Police 01/07/2021

Email Access Team 25/06/2021

Memo Transport Planning Team 01/06/2021

Memo Planning Obligations Team 25/06/2021

Email Department of Markets and Consumer Protection 13/08/2020

Email Cleansing Team 12/04/2021

Other

The Square Mile: Future City Report, 2021

City of London Visitor Destination Strategy 2019-2021

Cultural Strategy 2018 – 2022 (CoL 2020)

Appendix B

Relevant 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

Policy 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 D6 Housing Quality and Standards

Policy D11 Safety, security and resilience to emergency

Policy D13 Agent of Change

Policy D12 Fire Safety

Policy D14 Noise

Policy E10 Visitor infrastructure

Policy E11 Skills and Opportunities for All

Policy HC1 Heritage conservation and growth

Policy HC3 Strategic and Local Views

Policy HC4 London View Management Framework

Policy HC5 Supporting London's culture and creative industries

Policy G1 Green infrastructure

Policy G5 Urban Greening

Policy G6 Biodiversity and access to nature

Policy S1 Developing London's social infrastructure

Policy SI1 Improving air quality

Policy SI2 Minimising greenhouse gas emissions

Policy SI3 Energy Infrastructure

Policy SI4 Managing heat risk

Policy SI5 Water Infrastructure

Policy SI7 Reducing waste and supporting the circular economy

Policy SI8 Waste capacity and net waste self-sufficiency

Policy SI 12 Flood Risk Management

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 T6.4 Hotel and leisure uses parking

Policy T7 Deliveries, servicing and construction

Policy T9 Funding transport infrastructure through planning

Policy DF1 Delivery of the Plan and Planning Obligations

Relevant GLA Supplementary Planning Guidance (SPG):

Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014)

Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014)

Sustainable Design and Construction (GLA, September 2014)

Social Infrastructure (GLA May 2015)

London Environment Strategy (GLA, May 2018)

London View Management Framework SPG (GLA, March 2012)

Cultural Strategy (GLA, 2018)

Mayoral CIL 2 Charging Schedule (April 2019)

Central Activities Zone (GLA March 2016)

Shaping Neighbourhoods: Character and Context (GLA June 2014)

Town Centres SPG (July 2014)

Mayor's Transport Strategy (2018)

Culture and Night-time Economy SPG (2017)

Relevant Draft City Plan 2036 Policies

AT1 Pedestrian movement

AT2 Active travel including cycling

AT3 Cycle parking

CE1 Zero Waste City

CR1 Overheating and Urban Heat Island effect
CR2 Flood Risk
CR3 Sustainable drainage systems (SuDS)
CR4 Flood protection and flood defences
CV2 Provision of Visitor Facilities
CV3 Hotels
DE1 Sustainability requirements
DE2 New development
DE7 Advertisements
DE8 Daylight and sunlight
DE9 Lighting
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HL1 Inclusive buildings and spaces
HL2 Air quality
HL3 Noise and light pollution
HL4 Contaminated land and water quality
HL9 Health Impact Assessments
HS3 Residential environment
IN1 Infrastructure provision and connection
IN2 Infrastructure Capacity
OS2 City greening
OS3 Biodiversity
S1 Healthy and inclusive city
S2 Safe and Secure City
S3 Housing
S6 Culture, Visitors and the Night -time Economy
S7 Smart Infrastructure and Utilities
S8 Design
S9 Vehicular transport and servicing
S10 Active travel and healthy streets
S11 Historic environment
S13 Protected Views
S14 Open spaces and green infrastructure
S15 Climate resilience and flood risk

S16 Circular economy and waste
S23 Smithfield and Barbican
S24 Culture Mile Implementation
S25 Smithfield
S27 Planning contributions
SA2: Dispersal Routes
SA3 Designing in security
SB1 Culture Mile Impacts
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (CoL, July 2017)
Archaeology and Development Guidance SPD (CoL, July 2017)
City Lighting Strategy (CoL, October 2018)
City Transport Strategy (CoL, May 2019)
City Waste Strategy 2013-2020 (CoL, January 2014)
Protected Views SPD (CoL, January 2012)
City of London's Wind Microclimate Guidelines (CoL, 2019)
City of London Thermal Comfort Guidelines (CoL 2020)
Planning Obligations SPD (CoL, July 2014)
Open Space Strategy (COL 2016)
City Public Realm (CoL 2016)
Relevant Conservation Area Summaries

Relevant Local Plan Policies

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.

DM1.2 Protection of large office sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

- a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
- b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
- c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
- d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

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.

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.

CS3 Ensure security from crime/terrorism

To ensure that the City is secure from crime, disorder and terrorism, has safety systems of transport and is designed and managed to satisfactorily accommodate large numbers of people, thereby increasing public and corporate confidence in the City's role as the world's leading international financial and business centre.

DM3.2 Security measures

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

- a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;
- b) measures to be integrated with those of adjacent buildings and the public realm;

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

DM3.3 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.

CS4 Seek planning contributions

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

CS5 Meet challenges facing North of City

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

CS10 Promote high quality environment

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

DM10.1 New development

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

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

l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.4 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.

DM10.6 Advertisements

- 1) To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.

- 2) To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

DM10.7 Daylight and sunlight

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

DM10.8 Access and inclusive design

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

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

CS11 Encourage art, heritage and culture

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

DM11.3 Hotels

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

- a) do not prejudice the primary business function of the City;
- b) are not contrary to policy DM1.1;
- c) contribute to the balance and mix of uses in the immediate locality;
- d) do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;

- e) provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
- f) are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
- g) ensure continuing beneficial use for historic buildings, where appropriate.

CS12 Conserve or enhance heritage assets

To conserve or enhance the significance of the City's heritage assets and their settings, and provide an attractive environment for the City's communities and visitors.

DM12.1 Change affecting heritage assets

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

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.
2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.
3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.3 Listed buildings

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

DM12.4 Archaeology

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

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.1 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 (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact

assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.

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

DM15.7 Noise and light pollution

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.

2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.

3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.

4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

5. Internal and external lighting should be designed to reduce energy consumption, avoid spillage of light beyond where it is needed and protect the amenity of light-sensitive uses such as housing, hospitals and areas of importance for nature conservation.

DM15.8 Contaminated land

Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential

adverse impacts of the development on human and non-human receptors, land or water quality.

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.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
 - a) road dangers;
 - b) pedestrian environment and movement;
 - c) cycling infrastructure provision;
 - d) public transport;
 - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.3 Cycle parking

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

DM16.4 Encouraging active travel

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

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.
3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

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).

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

DM17.3 New waste management sites

When new facilities for waste management, handling and transfer are proposed developers will be required to demonstrate through design and sustainability statements that the benefits of the proposed development outweigh any adverse impacts and particularly that:

- a) the development will handle waste which has been generated locally;
- b) access arrangements, mode of transport and transport routes will minimise the potential for congestion and environmental impacts, including local air quality impacts and carbon emissions. Use of the river for transport of waste and recyclables will be encouraged;
- c) the carbon impact of the development will be minimised. New waste facilities should comply with the Mayor's Carbon Intensity Floor (CIF);
- d) the development is designed with resilience to natural and man-made safety and security challenges.

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

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

DM18.3 Flood protection and climate

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

DM19.2 Biodiversity and urban greening

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

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

CS21 Protect and provide housing

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

DM21.3 Residential environment

1. The amenity of existing residents within identified residential areas will be protected by:

- a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
- b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.

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

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

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

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

SCHEDULE

APPLICATION: 20/00932/FULMAJ

Snow Hill Police Station 5 Snow Hill London

External and internal alterations together with demolition and new build and associated change of use of existing building from police station (sui generis) to hotel with ancillary uses (Class C1) including: (i) refurbishment of facade to Snow Hill and the retained facade to Cock Lane; (ii) partial demolition, rebuilding and extension to provide a building ranging from 6 to 8 storeys, plus new plant at roof level; (iii) extension of existing sub-basement; (iv) provision of cycle storage; (v) highway works; (vi) greening and other ancillary works.

(Please note that additional information has been submitted in support of the application including: additional Daylight and Sunlight information, and a revised Construction Environmental Management Plan)

CONDITIONS

- 1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
- 2 Prior to the commencement of the development an update to the approved Circular Economy Strategy shall be submitted to and approved in writing by the Local Planning Authority, to reaffirm the proposed strategy or demonstrate improvements, and that demonstrates that the development is designed 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 and operated & managed in accordance with the approved details throughout the lifecycle of the development.
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 Plans: 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.
- 3 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: 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.

- 4 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.
- 5 Prior to the commencement of development, an updated Energy Assessment demonstrating the improvements in carbon emission

savings from the building is required to be submitted to and approved by the Local Planning Authority.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2. and of the London Plan: SI2.

- 6 No works 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.
- 7 No works shall take place until the developer has secured the implementation of a programme of building recording 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, 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.
- 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 Before any development hereby permitted is begun an air quality assessment shall be submitted to and approved in writing by the Local Planning Authority and the measures identified shall be installed, maintained and retained for the life of the building in accordance with the approved assessment.
REASON: To improve or maintain local air quality, particularly nitrogen dioxide and particulates PM10 in accordance with the City of London Air Quality Strategy 2011 in accordance with the following policies of the Local Plan: DM15.1, DM15.6. These details are required prior to commencement in order to create a record of the conditions prior to changes caused by the development.
- 10 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.
REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 11 Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.
REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.
- 12 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 reused 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, CEW1. 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.

- 13 No piling or construction of basements using penetrative methods shall take place until it has been demonstrated that there would be no unacceptable risk to below ground utilities infrastructure, details of which shall be approved in writing by the Local Planning Authority in liaison with Thames Water before such works commence and the development shall be carried out in accordance with the approved details.

REASON: To ensure that below ground utilities infrastructure is protected in accordance with the following policy of the Local Plan: DM2.1.

- 14 No works except demolition to basement slab level shall take place before details of the foundation design and piling configuration, to include a detailed method statement, have been submitted to and approved in writing by the Local Planning Authority.

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

- 15 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/green roofs, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 0.8 l/s from a catchment of 468m² with the remainder of the site discharging at an unrestricted rate, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 57m³;
- (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.

- 16 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
- 17 Demolition 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.
- 18 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 of demolition (including management of works, control over working hours and types of equipment to be used, and including prior consultation with neighbours and interested parties) has been submitted to and approved in writing by the Local Planning

Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

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

- 19 There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction (including management of works, control over working hours and types of equipment to be used, and including prior consultation with neighbours and interested parties) 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 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 construction of the development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

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

- 20 Before any construction works hereby permitted are begun details of rainwater harvesting including for the irrigation for the green wall as agreed shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to

satisfy this condition are incorporated into the development before the design is too advanced to make changes.

21. 21. 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 and so retained thereafter:
- (i) particulars and samples of the materials to be used on all external faces of Block A and Block B and the atrium including external ground and upper level surfaces including brick samples panels to be inspected on site ;
 - (ii) details of the shadow gap for block B at the junction between retained structure and extension
 - (iii) details of the proposed new facades to Block B including typical details of new fenestration and entrances and mansard extension including dormers;
 - (iv) details of a typical bay of the development for new internal and external facades to Block B;
 - (v) typical details of brickwork including for the new external walls for atrium Block B ;
 - (vi) details of ground floor elevations;
 - (vii) details of all ground floor entrance(s);
 - (viii) details of window schedule including retained and upgraded, refurbished and replaced including full joinery details to the Block A and retained Block B;
 - (ix) details of the mansard and new dormer windows and rooflights to Block A;
 - (x) details of soffits, hand rails and balustrades;
 - (xi) details of all alterations to the existing facades;
 - (xii) details of junctions with adjoining premises;
 - (xii) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
 - (xiv) details of plant and ductwork to serve the development
 - (xv) details of ventilation and air-conditioning for the development;
 - (xvi) details of all ground level surfaces including materials to be used;
 - (xvii) details of external surfaces within the site boundary including hard and soft landscaping;
 - (xx) obscured glazing and internal privacy screen details; to all relevant windows to external elevations including a management plan for securing use of privacy screens;
 - (xxi) circadian light source details for the flank wall facing Cock Lane.

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.

- 22 Prior to the commencement of the relevant works a full Signage strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of design, location, fixing and lighting .
The Applicant should note that separate advertising consent may be required.
REASON: To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City in accordance with Policy DM 10.6 of the Local Plan and to ensure the publicly accessible areas and Cultural Offer are visible and legible for visitors.
- 23 Prior to the commencement of the relevant works, details of the proposed construction hoarding including cultural content shall be submitted to and approved in writing by the Local Planning Authority and no construction hoardings shall be erected other than in compliance with the approved details.
REASON: To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City in accordance with Policy DM 10.6 of the Local Plan and to ensure the publicly accessible areas and Cultural Offer are visible and legible for visitors.
- 24 Details of the position and size of the green roof(s), the type of planting, the maintenance regime including fire strategy and the contribution of the green roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2, and to ensure that the safety of future visitors to the development and surrounding uses through mitigating the risk of fire from the green roof in accordance with draft City Plan Policy S2 and London Plan Policy D12.
- 25 Details of the position and size of the green walls(s), the type of planting, the maintenance regime including a fire strategy 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 maintenance regime must ensure the maintenance of the green wall does not require access from 6 Snow Hill 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, and to protect use of neighbouring site in accordance with DM11.3 and to ensure that the safety of future visitors to the development and surrounding uses through mitigating the risk of fire from the green wall and green roof in accordance with draft City Plan Policy S2 and London Plan Policy D12.

26 Prior to the commencement of the relevant works,

(a) 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. This should include details of the replica police lanterns. Post installation (b) Details of final lux levels for all external lighting, including a test light glare assessment on site attended by the Local Planning Authority officers with adjustments to be agreed in writing. All works and management measures pursuant to this consent shall be carried out, put in place 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.

27 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 and so retained thereafter:

a. The details for the reinstatement of the police lamps previously located on the Snow Hill façade. If it is not possible to reinstate the original lamps, details for an appropriate replica or replacement must be submitted. The plans and details for the reinstatement or replacement of these lamps must be completed in consultation with City Police prior to relevant works commencing.

b. the above works shall be completed in full and inspected by the Local Planning Authority prior to occupation.

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, DM15.7 and CS3, and emerging policy DE2 of the Draft City Plan 2036.

- 28 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking, including adaptable 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.
- 29 (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.
- 30 All residential premises in the development shall be designed and constructed to attain the following internal noise levels:
Bedrooms- 30dB LAeq,T* and 45dB LAmax
Living rooms- 30dB LAeq, T*
*T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00.
A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building.
REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.
- 31 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 prior to any mechanical plant being installed .
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

- 32 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 Class E use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class E use takes place.

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

- 33 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.

- 34 A post construction BREEAM assessment demonstrating that a target rating of 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.

REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2

- 35 Details of a Hotel Security Management Plan to ensure the security and safety of visitors and staff at the development shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The Management Plan must include details for the security arrangements for the publicly accessible spaces. The building facilities shall thereafter be operated in

accordance with the approved Security Management Plan (or any amended Security Management Plan that may be approved from time to time by the Local Planning Authority) for the duration of the hotel use.

REASON: To ensure that the development is secure from crime, disorder and terrorism in accordance with the following policy of the Local Plan: CS3."

- 36 Prior to first occupation of the hotel an Accessibility Management Plan shall be submitted to and approved by the Local Planning Authority and this should include accessibility details for the publicly accessible spaces. The hotel shall only be operated in accordance with the approved management plan.

REASON: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8

- 37 Details of an Operational Management Plan demonstrating the arrangements for management of the building, including the arrangements for guests that require blue badge car parking spaces and the arrangements for waste collection, shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Operational Management Plan (or any amended Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.

REASON: To ensure that the development does not have an adverse impact on the amenity of the surrounding uses in accordance with the following policy of the Local Plan: DM11.3.

- 38 No development shall be occupied until confirmation has been provided that either:-

1. 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 sewage 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.

- 39 No development shall be occupied until confirmation has been provided that either:

- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or
- a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

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

- 40 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 . 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 London Plan.

- 41 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 London Plan.

- 42 Prior to the occupation of any part of the building all exposed flank or party walls must be faced or treated in accordance with details to be approved by the Local Planning Authority in writing before any such works are commenced and all development pursuant to this permission shall be carried out in accordance with the approved details.

REASON: In the interests of visual amenity in accordance with the following policy of the Local Plan: DM10.1.

- 43 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the Climate Change resilience 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
- 44 No live or recorded music shall be played that it can be heard outside the premises or within any residential or other premises in the building.

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.
- 45 Privacy screens or obscured glazing must be installed on the windows to obstruct the internal views from the hotel bedrooms to the neighbouring properties on Cock Lane as shown in the approved drawings.
REASON: To ensure the amenity of surrounding uses is protected in accordance with Policy DM11.3.
- 46 There shall be no use of or access to any part of the roof areas hereby approved, 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.
- 47 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time between 23:00 and 07:00 by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.
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.
- 48 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside 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: DM15.7, DM16.2, DM21.3.

- 49 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.

- 50 The proposed development sharing a party element with non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the proposed premises due to noise from the neighbouring premises and shall be permanently maintained thereafter.

A test shall be carried out after completion but prior to occupation to show the criterion above have been met and the results shall be submitted to and approved in writing by the Local Planning Authority.

REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.

- 51 A minimum of 10% of the hotel bedrooms shall be wheelchair accessible as set out in the details provided.

REASON: To ensure the hotel provides a fully accessible and inclusive facility in accordance with Policy DM10.8

- 52 Provision shall be made for disabled people to obtain access to the building via the principal entrance without the need to negotiate steps and shall be maintained for the life of the building.

REASON: To ensure that disabled people are able to use the building in accordance with the following policy of the Local Plan: DM10.8.

- 53 In the event that the neighbouring owner at 6 Snow Hill is to redevelop their Site and proposes to build to the boundary line at 5 Snow Hill, the green wall located on the flank wall is to be removed before works on the neighbouring site commence and such removal shall not be deemed to be in breach of Condition 25.

REASON: To ensure does not prejudice future redevelopment or prejudice the primary business function of the City in accordance with policies DM1.2 and DM11.3.

- 54 In the event that the neighbouring owners facing the east and south elevations of no. 5 Snow Hill redevelop their sites (12 Cock Lane and 4 Cock Lane) the glazing to the windows in the east and south elevations of 5 Snow Hill must replace by frosted glass or obscured glazing and the proposed specifications are required to provide sufficient privacy, which must be installed no later than first occupation of the first redeveloped neighbouring site and thereafter retained for the life of the building .
REASON: To ensure does not prejudice future redevelopment or prejudice the primary business function of the City in accordance with policies DM1.2 and DM11.3.
- 55 In the event that the neighbouring owner at 6 Snow Hill is to redevelop their Site and proposes to build to the boundary line at 5 Snow Hill, and the natural light for the three windows on the boundary is obstructed, the rooms will instead be served through artificial circadian light source as shown on approved plans.

REASON: To ensure does not prejudice future redevelopment or prejudice the primary business function of the City in accordance with policies DM1.2 and DM11.3.
- 56 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.
- 57 All new work and work in making good shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this permission.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 58 The plant enclosures shown in the drawings hereby approved shall be constructed and completed within a period of three months from the date of the plant equipment being installed on the roof and shall be retained thereafter as approved for the life of the plant it encloses.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 59 No flues, ductwork, soil stacks, soil vent pipes or any other pipe-work other than rainwater pipes shall be fixed to the elevations of the building unless shown on the drawings hereby approved.
REASON: To ensure that the external appearance of the building is satisfactory in accordance with the following policy of the Local Plan: DM10.1.

- 60 All commemorative plaques on the existing building shall be retained for the life of the building and not removed during refurbishment.
REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM12.1.
- 61 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.
- 62 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety.
- 63 No part of the proposed development including plant structures to which this permission relates shall infringe or exceed the heights specified on the St. Paul's Heights code.
REASON: To ensure compliance with St. Paul's Heights restrictions and to ensure protection of the view of St. Paul's Cathedral in accordance with the following policy of Local Plan: CS14, DM10.1, DM12.1.
- 64 Unless otherwise approved by the LPA there must be no building, roof structures or plant above the top storey, including any building, structures or plant permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure protection of the view of St Paul's Cathedral and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: CS14, DM10.1 DM12.1.
- 65 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 66 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 and so retained thereafter:
(i) Lighting strategy external elevations

(ii) Post installation review on site with the Local Planning Authority to adjust and agree final lux levels

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, DM15.7 and CS3, and emerging policy DE2 of the Draft City Plan 2036.

- 67 Notwithstanding the details shown on the approved plans, 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 works pursuant to this consent shall be carried out in accordance with the approved details:

a. A methodology and monitoring strategy to ensure the stability of the retained structures of the historic building including in relation to Block B the main staircase; reading room and Cock Lane facade.

REASON: to ensure that the Local Planning Authority may be satisfied with detail of the proposed development in accordance with the following policies DM12.2 and DM12.3

- 68 The stability of the structure to remain must, throughout the period of demolition and reconstruction, be assured before any works of demolition begin, taking into account any rapid release of stress, weather protection, controlled shoring, strutting, stitching, reinforcement, ties or grouting as may occur to be necessary.

REASON: To ensure the stability of the structure to be retained in accordance with the following policies of the Local Plan: DM12.2 and DM12.3

- 69 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:

5177-P-010-A; 5177-011-A; 5177-P-114; 5177-P-115; 5177-P-116; 5177-P-117; 5177-P-118; 5177-P-119; 5177-P-120; 5177-P-121; 5177-P-122; 5177-P-123; 5177-P-198-B; 5177-P-199-B; 5177-P-200-C; 5177-P-201-C; 5177-P-202-C; 5177-P-203-C; 5177-P-204-C; 5177-P-205-C; 5177-P-206-B; 5177-P-207-B; 5177-P-208-B; 5177-P-209-A; 5177-P-210-A; 5177-P-211-B; 5177-P-300-A; 5177-P-301; 5177-P-302-A; 5177-P-303-D; 5177-P-304-B; 5177-P-305; 5177-P-306; 5177-P-307; 5177-P-308; 5177-P-309; 5177-P-310; 5177-P1-401; 5177-P1-402; 5177-P1-403; 5177-P1-404; 5177-P1-405; 5177-P1-406; 5177-P1-407; Email from Daniel Watney dated 17.06.2021 regarding the site area; Email from Daniel Watney regarding public access timings dated 24/06/2021; Email from Daniel Watney regarding public access to atrium space dated 24/06/2021; Email from Daniel Watney regarding short stay cycle parking dated 03/09/2021.

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

INFORMATIVES

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

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

a full pre application advice service has been offered;

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

- 2 The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read the guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.
- 3 There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. Thames Water will need to check that your development doesn't limit repair or maintenance activities, or inhibit the services they provide in any other way. The applicant is advised to read the guide working near or diverting Thames Water pipes.
- 4 As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. 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 will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management.

- 5 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.

- 6 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.
- 7 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as ground landlords; and the work must not be instituted until the consent of the City of London Corporation as freeholders has been obtained by the Head Lessee.
- 8 This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London

Corporation or Transport for London as Highway Authority; and work must not be commenced until the consent of the Highway Authority has been obtained.

- 9 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.