Committee:	**Date:**
Planning and Transportation	14 December 2021
Subject: 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT Demolition of existing buildings at 14-21 Holborn Viaduct, 34-35 and 32-33A Farringdon Street, and construction of a new building arranged over 2 basement levels, ground and 10 upper floors to Holborn Viaduct and 12 upper floors to Farringdon Street to provide a new Commercial, Business and Service (Class E) building; new publicly accessible lift to provide step-free access between Holborn Viaduct and Farringdon Street; hard and soft landscaping works and other works incidental to the development.	**Public**
Ward: Farringdon Within	**For Decision**
Registered No: 21/00755/FULMAJ	**Registered on:** 3 September 2021
Conservation Area:	**Listed Building:** NO

Summary

The proposed development includes demolition of three office buildings at 14-21 Holborn Viaduct (known as Kimberley House), 34-35 Farringdon Street (known as Meridian House) and 32-33 Farringdon Street, and construction of a single new building for office use (Class E) comprising two levels of basement, mezzanine, ground plus ten upper floors to Holborn Viaduct and 12 upper floors to Farringdon Street. The proposals also include a new publicly accessible lift between Holborn Viaduct and Farringdon Street, public realm works and enabling works.

The scheme delivers a high quality, office-led development that would provide a minimum of 35,948sq.m (GIA) of new flexible office floorspace (Class E) and associated ancillary space across the above ground floor levels, which would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses. The scheme makes optimal use of the site and provides an uplift of approx. 19,004sq.m (GIA) of floorspace. The development has been designed to accommodate new ways of working reflected in flexible and adaptable floorplates which supports post-Covid recovery as identified in the 'London

Recharged: Our Vision for London in 2025' report. A single-let tenant would be taking over the lease of the building if consented for their London Headquarters. In the event that the single-let tenant does not occupy the whole of the building, the applicant has agreed to an obligation within the S106 agreement which would require the provision of 14 SME desk spaces within the building.

The proposed building would result in a significant aesthetic enhancement to the Farringdon Street and Holborn Viaduct localities, through skilful modelling of the elevations, well considered massing and the use of high-quality, innovative materials. Overall, it is considered that the proposed development would be an appropriate and sympathetic neighbour not only to the buildings immediately adjacent but also to the wider streetscape.

The proposal would involve the total loss of non-designated heritage assets comprising 32 - 33 Farringdon Street, 34 - 35 Farringdon Street and Turnagain Lane.

The proposal would result in a low level of harm to Newcastle Close as a non-designated heritage asset as it would be built over at second floor level diminishing its open aspect and appearance.

The Farringdon Street buildings are considered to have a low level of architectural and historic significance as a well-executed classical design, albeit simple examples of the type. Turnagain Lane and Newcastle Close are considered to have a low level of historic and evidential significance as these routes are low quality in terms of visual amenity, accessibility, and permeability. Their significance has been diminished by past alterations.

Paragraph 203 of the NPPF provides that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the planning application and that 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.

Here the total loss of these non-designated heritage assets and the low level of harm to the significance of Newcastle Close is considered to be outweighed by the provision of a new sustainable development of significant architectural quality that would deliver significant public realm enhancements.

Your officers have concluded that slight low level less than substantial harm would be caused to the setting of the grade II listed southeast Gatehouse. The NPPF, paragraph 202, requires that less than substantial harm to a designated heritage asset be balanced against the public benefits of the development proposal. That balancing exercise is set out in this report. It is the view of officers that giving great weight to the conservation of this heritage asset, that this harm would be outweighed by the public benefits provided by the scheme including the provision of significantly improved circulatory arrangements between Holborn Viaduct and Farringdon Street through the

provision of a new publicly accessible lift to traverse the difference in levels and improvements to south eastern Gatehouse (repairs, lighting, CCTV), the cultural offer in conjunction with the Museum of London and the digitisation of part of their collection, works to enhance the environment along Farringdon Street through the provision of extensive greening and through the applicant's community outreach programme.

The proposed development would result in the loss of 1080m2 of retail floorspace, with none re-provided. The site is not within a Principal Shopping Centre but is within a retail link on Holborn Viaduct. As such the loss of retail space would be contrary to policy DM20.2 (Retail Links) of the Local Plan. The provision of a Class E building for office use would meet the requirements of policy DM1.1 of the Local Plan. Active frontage would be provided through the design of the proposed building and through the proposed cultural offer.

The proposed development would fall within the Landmark Viewing Corridor of two Assessment Points, Protected Vista 2A.1 (Parliament Hill) and Protected Vista 4A.1 (Primrose Hill) but would not breach the threshold planes for either view. The proposed development is also located within the Wider Setting Consultation Area of LVMF Vista 3A.1 from Kenwood, and the Background Wider Setting Consultation Areas of LVMF Vista 5A.2 from Greenwich Park, and LVMF Vista 6A.1 from Blackheath Point. It would breach the threshold plane of the WSCA of Vista 4A.1 by approximately 12.2m, and the threshold plane of the WSCA of Vista 2A.1 by 10.3m.

With regards to River Prospects 1B.1 and 16B.2 (Gabriel's Wharf), from the viewing platform, the river dominates the view whist the mature trees of Temple extend along the Northern embankment towards buildings on the embankment near Blackfriars Bridge. The proposed development would not be visible in these views as it would be obscured by buildings and the tree line. As such, it would preserve the townscape setting of the Cathedral and would preserve the viewer's ability to read the riverside landmarks in the view.

The magnitude of change in these views is considered negligible and the proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.

The scheme would deliver public realm enhancements including to the area around the two mature London Plane trees on Farringdon Street and works from Holborn Viaduct bridge to Ludgate Circus including planters and seating, as part of the S278 agreement with TfL, given that Farringdon Street is part of the TLRN as opposed to City Highway. These works would also include additional short stay cycle parking and cargo bike parking over and above the requirements.

A total of 499 long stay and 34 new short stay cycle parking spaces (in addition to the existing 24 short stay spaces) are proposed. The long stay cycle parking would be provided at basement level 1, ground and mezzanine levels as part of the Wellness Hub accessed from Farringdon Street, along with associated cycling facilities including lockers and showers. Short stay cycle parking would be located outside the building on Farringdon Street and Holborn Viaduct. The provision of cycle parking spaces would exceed the requirements of the London Plan.

Servicing of the building would take place on-site/off-street at ground level (Farringdon Street), accessed from Newcastle Close, and would allow for a forward in-forward out manoeuvre, in accordance with policy DM16.5 and draft policy VT2. The servicing yard would also include two loading bays with EV charging facilities. Deliveries would be undertaken outside of peak hours and make use of an off-site consolidation centre.

The development would require approximately 335.5sq.m. of stopping up of public highway, which includes the total loss of Turnagain Lane. It is for this reason that the application was advertised as a departure from the development plan, as it is considered to be contrary to policy DM16.2 (Pedestrian Movement) of the Local Plan. As above, Turnagain Lane has heritage value, but at present is used as a servicing yard for the existing buildings on site. Some public highway would be re-provided on Farringdon Street, but the proposed 'public realm' on Holborn Viaduct would be designated as Permissive Path. It is argued that its loss is acceptable in transport terms given the public benefits that would arise from the scheme, as well as the consolidation of the three buildings into one level access office of exceptional quality, concordant with the larger urban grain of the locality.

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

The development would achieve an overall Urban Greening Factor (UGF) score of 0.39, or 0.44 based on the City of London methodology, which is in excess of the requirements. The design of the building would also celebrate the two existing London Plane trees adjacent to the Gatehouse on Farringdon Street, providing a pleasant dwell space in the public realm.

The daylight and sunlight assessment submitted demonstrates that the proposal would achieve full (100%) BRE compliance in respect of each methodology for all nearby residential properties, and 97% compliance on the consented City Temple/Morley House redevelopment scheme which incorporates a C1 use.

A Wind and Microclimate assessment was undertaken on four different scenarios - existing, proposed, proposed cumulative and existing cumulative - using both Computational Fluid Dynamics (CFD) and Wind Tunnel Testing. The results show that conditions following the development would remain both safe and acceptable for the intended activities in line with the City of London Comfort Criteria. This is with the exception of the roof terrace whereby mitigation would be required in order to ensure that it suitable for its intended purpose. The proposed development would also provide appropriate thermal comfort for the proposed activities.

Negative impacts during construction would be controlled as far as possible by the implementation of a robust Construction Environmental Management Plan and good site practices embodied therein; it is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment and along a major road on the TLRN. Pre-construction, compliance with planning conditions would minimise any adverse impacts.

Objections have been received to the proposal from the Twentieth Century Society, Historic Buildings and Places, London and Middlesex Archaeological Society, Association for Industrial Archaeology, The Ironbridge Institute, Greater London Industrial Archaeology Society and SAVE Britain's Heritage. The grounds of objection relate to the loss of the Farringdon Street buildings, the impact of the proposals on the City's historic street pattern and the setting of the Gatehouse and the impact of the demolition of the existing buildings from a sustainability perspective. Letters of support have been received from the Museum of London, the Fleet Street Quarter, Central District Alliance, and Hogan Lovells LLP.

It is almost always the case that where major development proposals come forward in the City there is at least some degree of non-compliance with planning policies, and in arriving at a decision it is necessary to assess all the policies and proposals in the 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.

In this case, the proposal complies with the majority of development plan policies including those which relate to the provision of office development in the City, high quality accessible public realm and sustainable development, but is not compliant with elements of the policies regarding pedestrian movement and the loss of routes and spaces that contribute to the character and historic interest of the City, the conservation and enhancement of the City's heritage assets and the provision of retail frontage in retail links. 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.

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

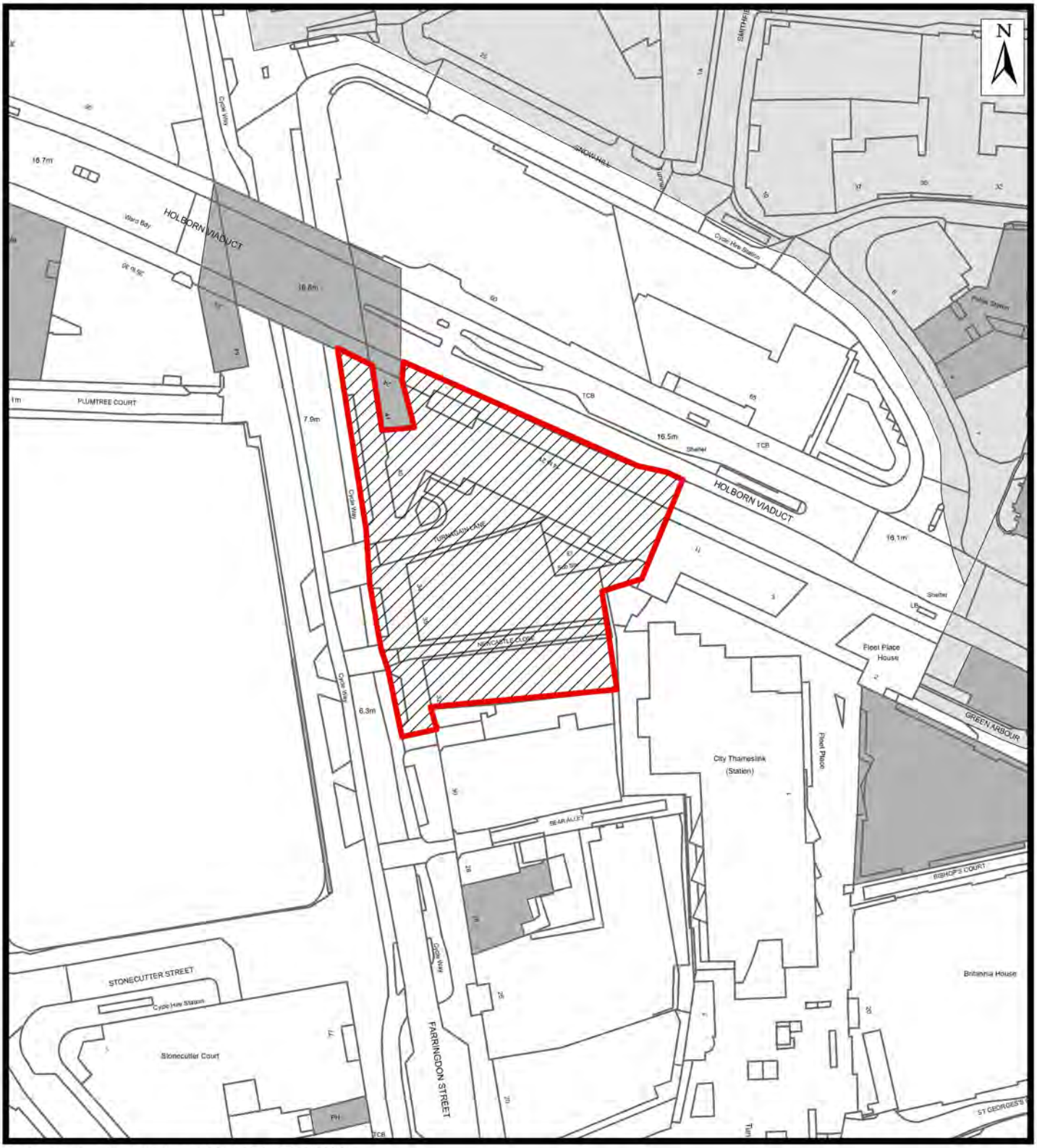
(a) Planning obligations and other agreements being entered into under Section 106 of the Town and Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.

(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) The Mayor of London be given 14 days to decide whether or not to direct the City Corporation to refuse planning permission (under Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008).

(4) That you agree in principle that the land affected by the proposal which is currently public highway and land over which the public have right of access (comprising the entire area of Turnagain Lane) may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and making of a Stopping-up Order for the various areas under the delegation arrangements approved by the Court of Common Council.

Site Location Plan



ADDRESS:
14-21 Holdborn Viaduct

CASE No.
20/00755/FULMAJ

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

Photographs

Image 1: View of existing buildings on Farringdon Street – 34-45 (Meridien House) on left, 32-33A on right.

Image 2: View of site from north of Holborn Viaduct bridge.

Image 3: View of site from south on Farringdon Street

Image 4: View of site from south on Farringdon Street

Image 5: View of site from west side of Farringdon Street

Image 6: View of site looking east from Holborn Viaduct bridge

Image 7: View of site looking west on Holborn Viaduct

Image 8: View of site looking west from St Sepulchre

Image 9: View of Kimberley House (14-21 Holborn Viaduct) behind Gatehouse

Images 10 and 11: Entrance to Newcastle Close

Image 12: View looking down Newcastle Close toward Farringdon Street

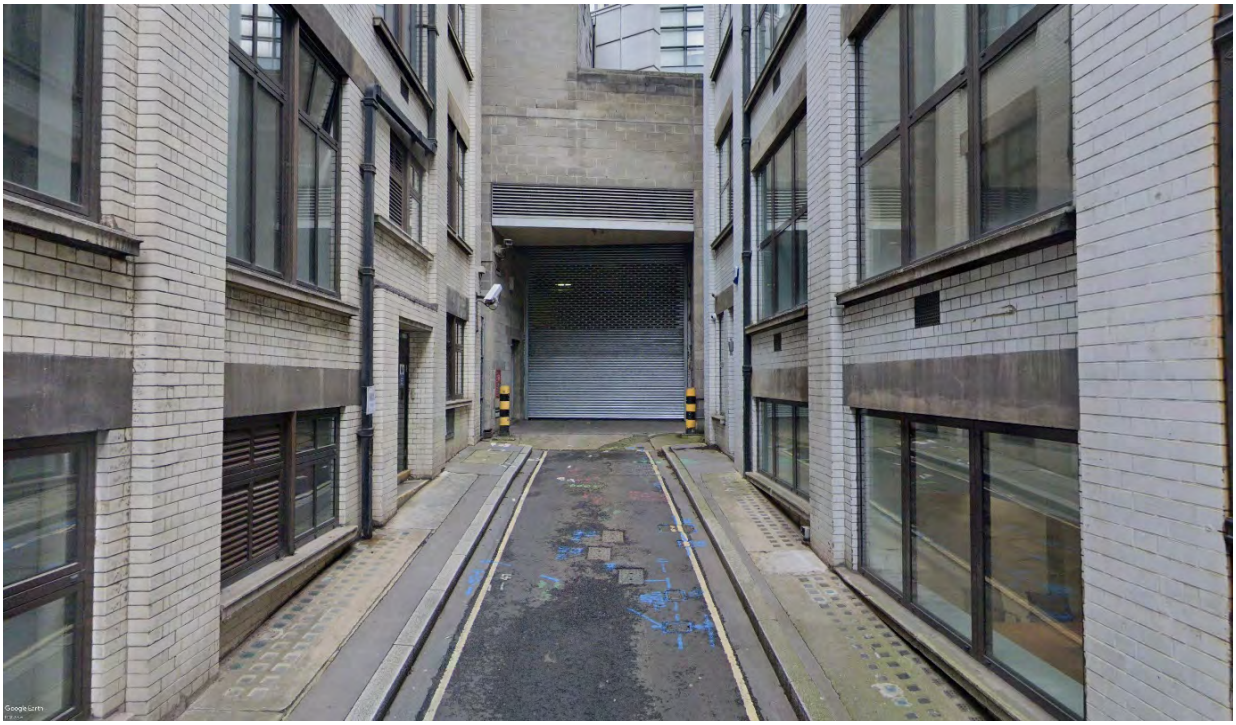


Image 13: Servicing Bay at end of Newcastle Close

Image 14: Turnagain Lane

Image 15: Turnagain Lane looking toward Farringdon Street

Image 16: Turnagain Lane

Image 17: Corner of Turnagain Lane

Image 18: Rear of Turnagain Lane

Image 19: London Plane trees on Farringdon Street to be retained

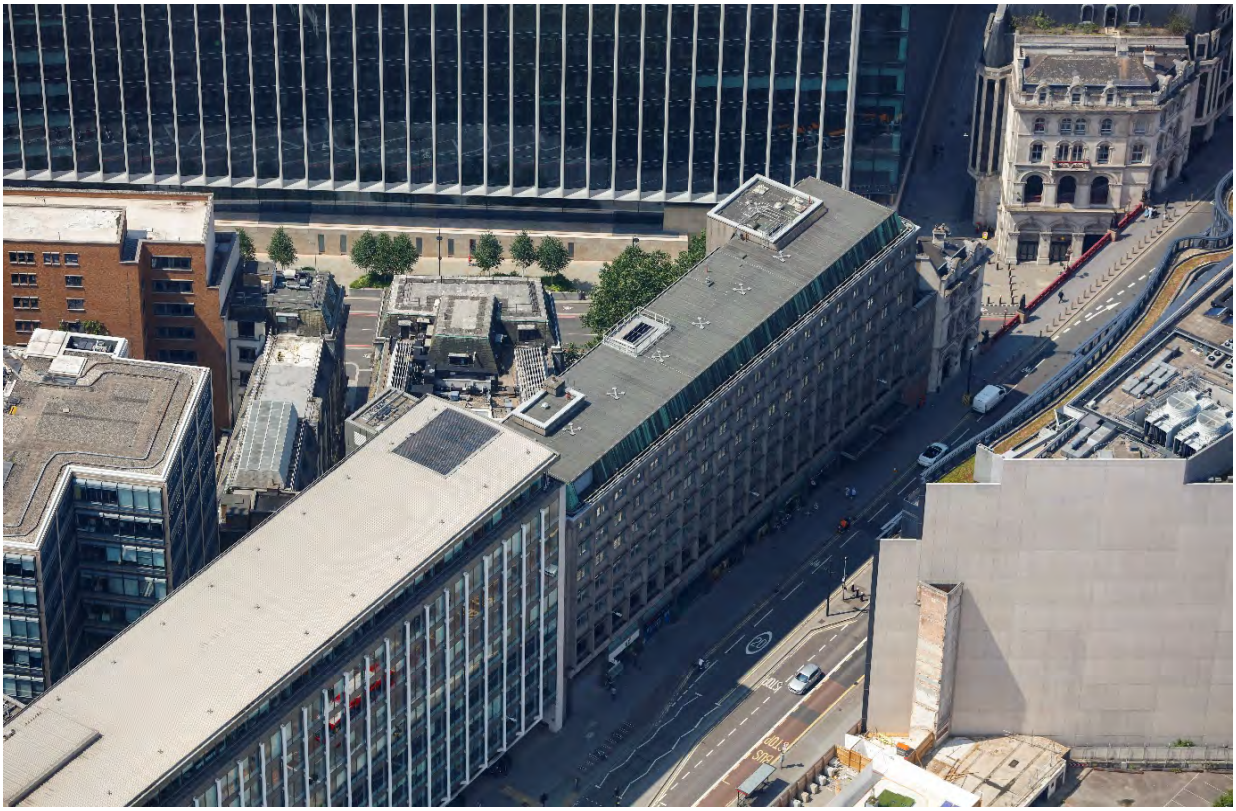


Image 20: Aerial view of site looking west along Holborn Viaduct

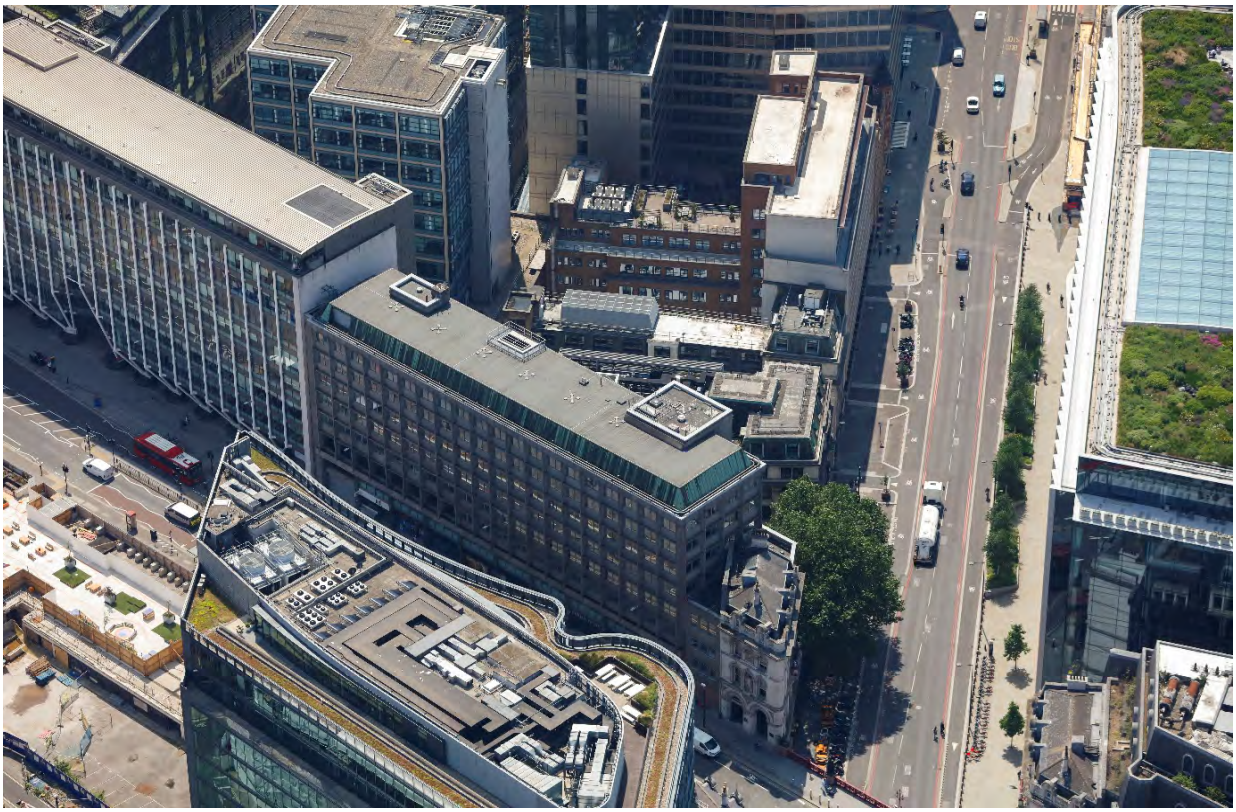


Image 21: Aerial view looking south

Image 22: Aerial view looking north-east

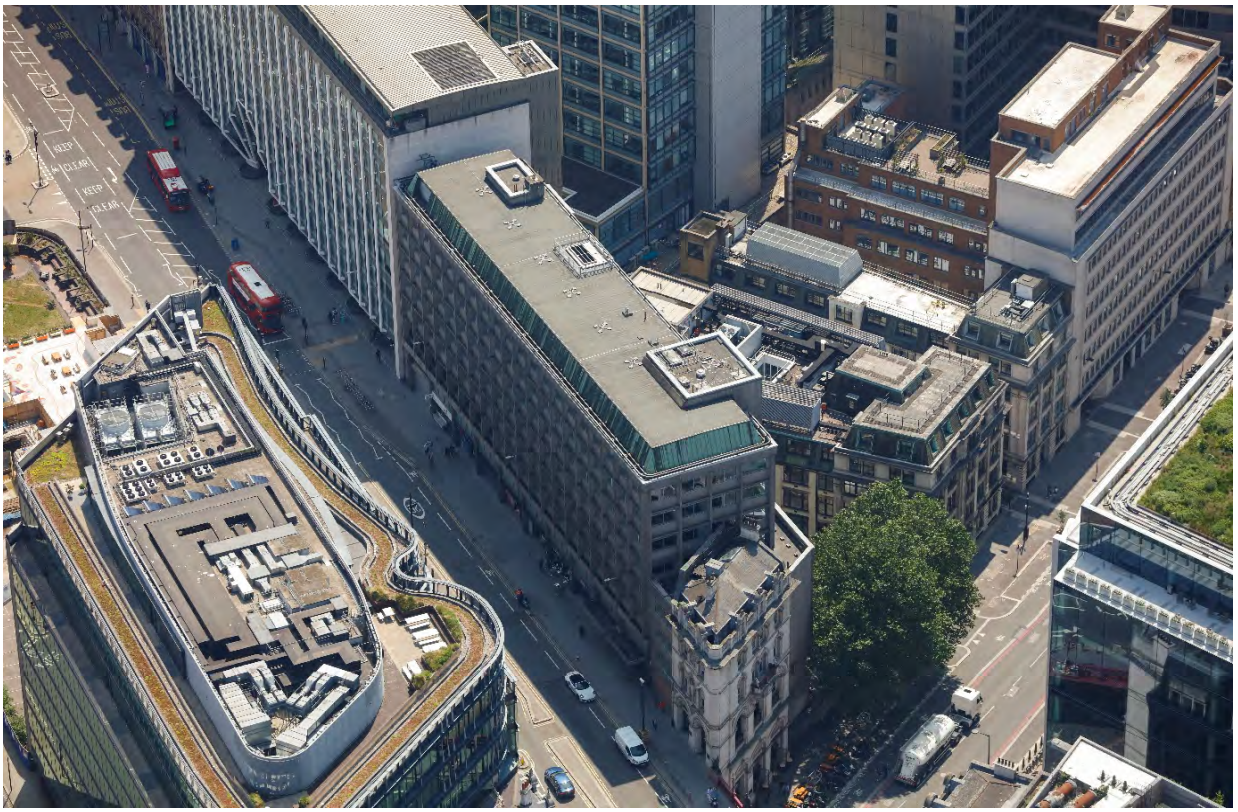


Image 23: Aerial view looking east

Image 24: Aerial view looking south-east

Image 25: Aerial view looking west

Main Report

Site and Surroundings

1. The application site sits across two levels on Holborn Viaduct and Farringdon Street. The site encompasses three existing buildings, namely; 14-21 Holborn Viaduct, known as Kimberley House, 34 -35 Farringdon Street known as Meridian house, and 32-33 Farringdon Street. The site area is approximately 0.4 hectares.

2. The existing buildings comprise 15,863sq.m (GIA) of office floorspace, and 1080sq.m (GIA) of retail floorspace on Holborn Viaduct, with a mix of cafes and shops. The total existing GEA for the site is 18,343sq.m.

3. The site is situated around the south-eastern Gatehouse, which forms part of a quad that frame the Holborn Viaduct bridge.

4. The site is not statutorily listed nor within a conservation area. However, the south-eastern and south-western Gatehouses are Grade II listed and the Holborn Viaduct bridge is Grade II listed. Newgate Street Conservation Area is a short distance to the east, and Smithfield Conservation Area is a short distance to the north. The Farringdon Street buildings are of heritage significance and are considered to be non-designated heritage assets.

5. There is an approximate 9 metre (29ft.) difference in levels across Holborn Viaduct and Farringdon Street, and at present the only publicly accessible vertical movement between the two is via the steps within the Gatehouses.

6. The site also encompasses two streets that lead to the rear of the Fleet Place development; Turnagain Lane and Newcastle Close.

7. Turnagain Lane and Newcastle Close are of heritage significance and considered to be non-designated heritage assets. Turnagain Lane in particular has Medieval roots and was also mentioned by John Stow within his Survey of London. Both streets would have led down to the banks of the Fleet River before this was enclosed under Farringdon Street in the Victorian era.

8. Both streets have in the past been truncated, albeit remaining in their original positions, and in the case of Newcastle Close, been renamed. Turnagain Lane is also currently used as a servicing yard for the existing building on site. Newcastle Close leads to the servicing yard for One Fleet Place. As such, both streets are now dead ends in comparison to their previous historic through routes.

9. To the rear and east of the site are a number of existing office buildings including 11 Holborn Viaduct, Fleet Place House, Fleet Place, as well as City Thameslink station, and Lexis House located to the south on Farringdon Street. Opposite the site on Farringdon Street is the Plumtree

Court development, and opposite on Holborn Viaduct is the Bath House development.

10. The site has an excellent PTAL rating of 6b, given its proximity to City Thameslink, bus routes on Farringdon Street and Holborn Viaduct, and proximity to Farringdon Station which has National Rail, Circle, Metropolitan, and Hammersmith and City line trains, and the Central line at St Paul's station.

11. Farringdon Street is part of the Transport for London TLRN. Holborn Viaduct is part of the City of London highway network.

12. Running parallel to the site on Farringdon Street is TfL Cycleway 6, as well as other cycle lanes along Holborn Viaduct.

13. The site also encompasses two mature London Plane trees on Farringdon Street. These are situated between the south-eastern Gatehouse and Meridien house.

14. The site is just outside the boundary of the Culture Mile, which is known for cultural activities and institutions such as the Museum of London, Barbican Centre, and Barbican Exhibition Halls.

15. The site is within the North of the City Key Place Area as defined in the Local Plan 2015 and is on the periphery of the Smithfield and Barbican Key Area of Change as defined by the Draft City Plan 2036.

16. The site lays underneath a number of LVMF views. This includes being in the Landmark Viewing Corridors for Protected Vistas 4A.1 from Primrose Hill and 2A.1 from Parliament Hill. The site is also within the Wider Setting Consultation Area for views 3A.1 from Kenwood, and the Background Wider Setting Consultation Areas of view 5A.2 from Greenwich Park and 6A.1 from Blackheath Point.

17. The existing site has an AOD of +46m at Kimberley House, and +27.2m at Meridien House and 32-33 Farringdon Street. The threshold plane in this location is approximately +55m AOD.

18. The existing ground level AOD is between 6.3m and 7.9m on Farringdon Street, and 16.5m on Holborn Viaduct.

Proposals

19. Planning permission is sought for the demolition of all existing buildings on site and the erection of a single new building of two basement and mezzanine levels, ground plus 10 upper storeys on Holborn viaduct and 12 upper storeys on Farringdon Street, for office (Class E) use. Part of the existing basement structure would be retained and extended.

20. The development would provide 35,948sq.m (GIA) of office (Class E) floorspace, and associated office ancillary uses.

21. The proposals would provide extensive improvements to the public realm, including the creation of two new areas of public realm one on Holborn Viaduct, and one on Farringdon Street situated around the two retained London Plane street trees and the provision of greening along Farringdon Street down to Ludgate Circus.

22. A new publicly accessible lift would be provided to traverse between the different levels on Farringdon Street and Holborn Viaduct. Additionally, in order to improve the pedestrian experience between these two levels, enhancements would be secured through the S.106 agreement to the south-eastern Gatehouse including repairs, stonework, cleaning, CCTV and lighting.

23. The proposals would involve the loss of Turnagain Lane through stopping up, an area of approximately 332.61sq.m of City of London Highway, and 2.89sq.m of Transport for London Highway.

24. The height of the proposed development would measure between 52.2m and 65.95m AOD.

25. Amenity roof terraces would be provided at levels 6 and 11 for use by the office tenants.

26. The building design incorporates appropriate balustrades around external terraces and roof area, exceeding the required 1100mm design standard in Building Regulations. The balustrade heights would be at 1250mm, which is the maximum that could be achieved without impacting upon the protected viewing corridors of St. Paul's. The roof terraces would incorporate significant greening and other landscaping features for users to dwell.

27. The building design would incorporate nine digital screens on both Holborn Viaduct and Farringdon Street facades, which would incorporate artwork as part of the cultural plan.

28. The south of the development, roughly in the position of where 32-33 Farringdon Street currently is, would be the Wellness Wing, including cycle parking and associated end of trip facilities, a gym, and staff restaurant.

29. The building would feature two basement levels with mezzanine, and would house plant machinery/equipment (with additional plant located at the top of the building), cycle parking and associated facilities and other ancillary storage. The basement of the existing building would also be partially retained and extended.

30. All servicing for the development is proposed within the confines of the site. The servicing bay is located to the north off Newcastle Close at ground floor level, with one blue badge parking space and sufficient room for forward in, forward out manoeuvres.

31. Dedicated areas of planting and greening would be incorporated in the development through a combination of green walls, green landscaping, public realm works, and vertical greening.

32. A local community outreach programme is proposed in conjunction with the proposed office space. The program would include: engaging with schools within the City and neighbouring London Boroughs for access to career insight sessions; educational workshops and employability skills sessions, and access to the roof terrace for biodiversity learning at least six times a year with a focus on Green Skills which would seek to forge links with organisations and initiatives promoting the growth of this sector; hosting sustainability education programmes for local/neighbouring Borough schools at least four times a year; providing Culture Mile partners/charities with access to meeting facilities (i.e. auditorium and roof terrace) at least twelve times a year; and hosting employability workshops with jobseekers from the City and neighbouring Boroughs at least twice a year.

33. A single-let tenant is intended to take up the whole of the building if consented. In the event that the single-let tenant does not occupy the whole of the building, the applicant has agreed to an obligation within the S106 agreement which would require the provision of 14 SME desk spaces within the building.

Background to the Proposal

34. The design of the proposed scheme has been influenced by the requirements of the prospective single-let tenant.

35. This is a site where a highly regarded City tenant has been secured by the applicant. This tenant currently occupies multiple buildings in the locality totalling 320,000sq.ft., namely Atlantic House and Kimberley House (which is one of the buildings proposed to be demolished) where their leases are due to expire in 2026 and are seeking to consolidate their activities into a headquarter building which functions to accommodate their 1000 staff.

36. The tenant has written a letter supporting the application and have been involved in the design of the building throughout; in the letter they explain that the proposed location and their floorspace requirement of a minimum 265,000sq.ft,has been derived from meeting their business needs and their desire to remain both in the City, and the local area in which they were founded in 1899. The reduction in their required floorspace from their current 320,000sq.ft. to 265,000sq.ft. has been driven by a post-Covid

occupancy review, based on a 15% reduction in demand for office space with the increased take-up in working flexibly.

Consultation

37. The applicants have submitted a Statement of Community Involvement which outlines their engagement with stakeholders. Prior to the application being submitted the applicant dispatched a briefing newsletter to 439 homes and businesses, set up a contact centre with dedicated telephone number and email for enquiries, launched a public consultation website (visited by 248 stakeholders) and held meetings with local businesses, local organisations (including Fleet Street Quarter, Midtown BID and Hatton Garden BID) and Members.

38. The response to the pre-application consultation can be summarised as: the scheme represents a missed opportunity to repurpose the currently abandoned vaults, deliveries should be managed to prevent unnecessary congestion on the local road network, the existing Farringdon Street facades are attractive and have some historic value, the scheme should incorporate sufficient space for cyclists and local stakeholders should be consulted during the development of the construction logistics plan. Consultees were supportive of the proposed commercial use, some of the sustainability credentials of the scheme, the improvements to the wider public realm, the proposed design, the improvements to accessibility and the introduction of cultural elements.

39. Following receipt of the application it has been advertised on site and in the press. The application was advertised as a departure from the Local Plan on the basis of the proposed highway alterations.

40. 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 table below.

41. The views of other City of London departments have been taken into account in the preparation of this redevelopment scheme and some detailed matters remain to be dealt with under conditions and the Section 106 agreement.

Consultation Response	
Network Rail	Due to the close proximity of the proposed works to Network Rail's land and the railway tunnel which supports operational railway, Network Rail requests the applicant/developer to engage with Network Rail's Asset Protection and Optimisation team. This will allow the team to ensure that works could be carried out without risk to the operational railway.

Officer Response to Comments	No further action required.
Historic England	No comments
Twentieth Century Society	Objection to the demolition of 32 – 35 Farringdon Street which is a non-designated heritage asset. Designs by the noted architect Victor Wilkins and served as the offices of engineers Babcock and Wilcox. The building relates to a tradition of stone clad, steel framed offices erected in the early 20th century. It makes a positive contribution to the local streetscape and adds to the historic interest of the area. Paragraph 189 of the NPPF states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. The NPPF advises that "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 current application would result in the total loss of a non-designated asset and no justification has been provided for its demolition, with no evidence submitted that the building could not be retained and repurposed. The DAS acknowledges that it could accommodate one or two additional storeys. Construction and material procurement represents approximately 40% of global greenhouse gas emissions. Reusing and retrofitting an existing building can result in a 70%-85% reduction in embodied carbon emissions compared to new construction. The City of London is committed to reducing its carbon emissions and should therefore encourage the reuse and retrofit of the existing buildings. This consideration combined with the heritage impact of demolition, makes a strong case for retaining 32 – 35 Farringdon Street.

Officer Response to Comments	See officer response section at the end of this table. The applicant has responded to these comments. Noting that the application documentation states that the Farringdon Street buildings have modest historic and architectural interest. They are typical office development of the early 20th century and are neither innovative nor of a particularly high architectural quality. The townscape analysis considers that the wider townscape context of Farringdon Street is extremely varied in scale, age and quality and that the Farringdon Street buildings are isolated pre-war survivals that do not contribute to a single coherent townscape character along Farringdon Street. The applicant considers that because the buildings are not designated assets and do not contribute to a designated conservation area, their loss would not result in 'harm' in NPPF terms. In applying paragraph 203 of the NPPF they consider that the benefits of the proposed development would outweigh the loss of the Farringdon Street buildings as non-designated heritage assets. The applicant concludes that a comprehensive redevelopment represents the most suitable and sustainable approach to achieving a viable and transformative development that offers substantial public benefits. The new development would be fit for purpose and designed for circularity. Portland Stone from the existing buildings would be salvaged and reworked into the new office facades.
Historic Buildings and Places (formerly Ancient Monuments Society)	Objection to the loss of two non-designated heritage assets and the historic street pattern. 34 – 35 and 32 – 33 Farringdon Street are a matching pair of Portland Stone buildings dating from 1921 – 22. This part of the City was heavily damaged during the war and much of the surrounding area redeveloped. These two buildings are some of the last surviving examples of such buildings.
Officer Response to Comments	See officer response section at the end of this table.
London Borough of Richmond Upon Thames	No objection.
London Borough Tower Hamlets	No objection.

London Borough of Hammersmith and Fulham	No objection.
Westminster City Council	No comment.
Royal Borough of Kensington and Chelsea	No comment.
Lead Local Flood Authority	No objection, recommendation of two conditions relating to SUDS.
Officer response to comments	Recommended conditions included within the conditions schedule.
Transport for London – London Underground	No objection, recommendation of a condition relating to further details (loading, construction, asset survey etc.) of the development.
Officer response to comments	Recommended condition included within the conditions schedule.
Thames Water	No objection recommendation of conditions and informatives relating to groundwater discharge, surface water drainage, water mains and water pressure. The applicant is advised to refer to Thames Water guidance in respect of surface water drainage and proximity of the site to sewers.
Officer response to comments	Recommended conditions and informatives included.
Greater London Authority	The Mayor considers that the application does not yet comply with the London Plan for the reasons set out below, all be it remedies set out in the stage 1 report could address these deficiencies. A summary of the key issues is follows: - The scheme does not provide any flexible office space suitable for SMEs. - Further information/clarification is required in relation to the public realm and layout. - Streetscape improvements should be secured through S.106 and section 278 agreements. Further clarification is required in relation to the public realm impacts and Road Safety Audit. A full DSP and CLP should be secured by condition. - An updated view should be provided for LVMF View 4A.1 Primrose Hill. - Further information is required in relation to Energy Strategy, Whole Life Carbon and Circular Economy Statements. Information should be provided in relation to digital connectivity.

	- Further information is required in relation to air quality.
Officer response to comments	The applicant has provided additional information and a response to the matters raised by the GLA. The applicant's response is appended to this report. - The scheme does not allocate floorspace specifically for SME use, given there is a single let tenant signed up to lease the building should planning permission be granted. Notwithstanding, the scheme provides flexible and adaptable floorplates that could be used by SME's should the prospective tenant depart in the future. Furthermore, in the event that a single tenant does not occupy the building the provision of 14 affordable desk spaces would be secured through the S.106 agreement. - The applicant has provided further details of the public realm and layout directly to the GLA. - Full details of the S.106 and section 278 agreements are set out in the financial contributions section of this report. A Road Safety Audit would be secured through the S.106 agreement A construction logistics plan would be secured by condition and a delivery and servicing plan would be secured through the S.106 agreement. - The required updated view has been provided by the applicants. - Additional sustainability information has been submitted to the GLA in order to address the matters raised relating to circular economy, WLC and the energy strategy. - An updated Air Quality Strategy has been provided which includes the required additional detail in respect of backup generators, exhaust locations and revised benchmarks.
City of London Department of Markets and Consumer Protection	No objection, recommendation of conditions relating to schemes of protective works, noise and amenity.
Officer response to comments	The recommended conditions have been incorporated into the conditions schedule.
City of London Access Officer	The application has been assessed to ensure that the proposal meets the highest standards of accessibility. In respect of the proposal a summary of the detailed design matters is set out below: - The proposed revolving doors are inaccessible to people with ambulant mobility impairments, people who are blind or partially sited and many others. It is

	recommended that alternative inclusive door styles should be considered such as automated curved sliding doors. If alternative doors are unfeasible then pass doors should be clearly signposted and should be evident on approach. They should be unlocked during the times that the revolving doors are open. - Doors to the bridge links and rooms adjacent to the atrium lack the required minimum unobstructed space on the pull side of the door. - Transfer handling of the wheelchair accessible WC's should alternate between most floors. At present they do not at Basement 1 and 2 and L02. - Consideration should be given to the privacy of users of the level 00 wheelchair accessible facility as it opens directly into an office. - A universal lift symbol should be included adjacent to the proposed lift. Ensure the right footway material is used adjacent to the lift to ensure that it appears as accessible to all. - There is concern that the digital artwork could be problematic for some people due to bold colours, patterns and flickering lights. - Lighting should be positioned so as to avoid glare. - Give careful consideration to the placing of seating in respect of desire lines and access to entrances. - Ensure that a variety of seating is proposed. - It needs to be ensured that the cycle parking area would be adequate for tricycles, handcycles and recumbent cycles. - The loss of the blue bade parking space on Farringdon Street is unsatisfactory.
Officer response to comments	Further details of certain matters would be required by condition for example, WCs, lighting, seating, cycle parking and signage. The design of the proposed entrance door is evaluated in the Access and Inclusivity section of this report. It is understood that there are issues with the thermal efficiency and security with an alternative style of door, and instead pass doors are proposed adjacent to the revolving ones. As long as these are suitably manned by staff in reception and appropriate height entry buttons/powered opening, the entrance door configuration is acceptable in this instance. As the glazed entrance doors would be situated immediately adjacent to the revolving doors, they are seen to be of equal importance as entrances to the building. All pass doors would be clearly sign-posted with appropriate manifestations.

	The loss of the blue badge space is covered in the transportation section of the report. TfL consider that while the loss of the space would be regrettable, its loss would be offset by the merits of the scheme including the enhancement to the public realm

Representations(Objection)	
London and Middlesex Archaeological Society	The proposed development would be harmful to the historic environments of Farringdon Street and Holborn Viaduct. Consent should therefore be refused. The demolition of 34 – 35 Farringdon Street and 32-33 Farringdon Street is of the greatest concern. The submitted Built Heritage Assessment adjudges them to be 'non-designated heritage assets of low local value'. This underplays the contributions that the buildings make as non-designated assets. The application documents do not acknowledge that either side of the main entrance to 34-35 Farringdon Street are original relief sculptures by George Alexander. The contribution of the sculptures are mirrored by the positive contributions of the two buildings to this section of Farringdon Street. The interplay of the Portland Stone faced buildings and the entrances to Turnagain Lane and Newcastle Close is pleasing when viewed from the north. This is in marked contrast to the bland Farringdon Street elevation of the proposed building. The Built Heritage Assessment states that these buildings "do not contribute to the contemporary townscape of Holborn Viaduct or its bridge and Gatehouses". This is misleading. The situation of the Farringdon Street buildings makes it impossible for them to contribute to the townscape of Holborn Viaduct, they are at a different level. They do contribute to the setting of the listed viaduct and Gatehouses when viewed from further south of Farringdon Street. The Design and Access Statement notes that both buildings "could accommodate one or two extra storeys with moderate structural interventions and enhancements", indicating that a viable alternative exists for the buildings.

	The committee does not support the proposed erasure of Turnagain Lane and the transformation of Newcastle Close into a service road. Turnagain Lane has medieval roots and Newcastle Close is of several centuries. The Built Heritage Assessment describes them as 'rather murky service access roads' and downplays their significance. The proposal does not take the opportunity to reactivate these streets through sensitive and re-imaginative development. The existing building on Holborn Viaduct (Kimberley House), while of limited architectural merit does have some texture to its street frontage and provides some visual interest in comparison to the glass dominated façades of the proposal. The application documentation claims that the proposal would deliver an improved interface with the listed southeast Gatehouse, when compared to the existing building. In reality the old and new would be separated by nothing more than a thin slither of greenery. Visually the proposal would dominate its neighbour and would not respect or enhance it. In summary, the proposal would dimmish the appearance of Holborn Viaduct and Farringdon Street. The historic buildings and fine urban grain of the City are among its greatest assets, the proposed development would erase these within the site. The Farringdon Street buildings are 100 years old which underscores their design quality. Development should respect context and celebrate the heritage assets. The proposal also jars with sustainable development and working trends. Replacing three buildings with one large building would be counter to these by failing to reduce contribution to climate change and respond to flexible working patterns which mean a reduced need for office space.
Officer response to comments	See officer response section at the end of this table. The applicant has also responded to the matters raised in this letter of objection. They acknowledge that the 32-35 Farringdon Street have modest architectural interest, but are neither innovative nor of particularly high architectural quality. They have a known architect and their historic associations with architect Victor Wilkins and sculptor George Alexander contribute some minor historic interest. They state that 'The fact that 32-35 Farringdon Street are outside a conservation area is pertinent in that, they are non-designated structures

	themselves, and neither do they contribute to the character and appearance of a designated heritage asset.' The applicant states that there is an awkward resolution of the different geometries of Holborn Viaduct and Kimberley House and Farringdon Street appears to turn its back on the south east Gatehouse which has removed the coherent streetscape of Farringdon Street. This fragmented streetscape has eroded the quality of the setting of the south-east Gatehouse. The applicant acknowledges the historic and evidential interest of the two streets as a remnant of the pre-existing historic urban development of the area. They state that the routes do not contribute to the urban layout of a designated conservation area or to the setting of any listed structure or Scheduled Monument. They are much altered, truncated, lack building frontages and used purely for service access. They state that they have some minor evidential or archaeological interest, neither currently contribute to the legible historic character of the City.
Association for Industrial Archaeology The Ironbridge Institute	Objection to the demolition of the non-designated heritage assets, supporting the objection comments made by the Twentieth Century Society and the Historic Buildings and Palaces. These buildings have important historical connections as they served as the offices of the engineering firm of Babcock and Wilcox. The connection would be lost by the proposed replacement buildings.
Officer response to comments	See officer response section at the end of this table.
Greater London Industrial Archaeology Society	Objection to the demolition of number 32 – 35 Farringdon Street. These two buildings were completed in 1923 as the head offices of Babcock and Wilcox, leaders in the manufacture of steam boilers for power generation and marine propulsion. The firm's operations throughout the British Empire and Europe were directed from here. The location reflected the desire for leading companies at that time to be based in the City of London. The offices have well composed facades, and they make a positive contribution to the streetscape and add to the areas historic interest. Above the main entrance at 34-35 there are two putti by the sculptor George Alexander (1881 – 1942). If your committee decides to approve the application, we would ask that the two sculptures are offered to

	an industrial heritage museum site which formerly made use of Babcock and Wilcox boilers, for preservation.
Officer response to comments	See officer response section at the end of this table.
SAVE Britain's Heritage	Objection to the proposal on the basis that it would involve the demolition of two non-designated heritage assets which would result in substantial unjustified harm to the character of this part of the City and would be unacceptable in terms of embodied carbon cost. The application fails to comply with national and local policy for preserving the City of London's historic environment and sustainable planning goals. The Farringdon Street buildings, considered to be non-designated heritage assets, were built in 1921 as a pair of offices for Babcock and Wilcox. Designed by Victor Wilkins, the buildings are constructed in a grand manner with steel frames clad in Portland stone reflecting established practice for the construction of office buildings in the early 20th century. Either side of the doorway of 34 – 35 Farringdon Street are unusual relief sculptures that are of high historic and artistic significance. These buildings are an attractive pair, refined and sophisticated examples of their period which survived the substantial redevelopment of the area in the 1990s. They contribute positively to the historic character of Farringdon Street and provide an appropriate setting to Holborn Viaduct and the Gatehouses. They should be considered non-designated heritage assets of considerable local historic and architectural significance when undertaking the balancing exercise required under paragraph 203 of the NPPF. Their demolition is unjustified and the scale of harm inherent to their total loss to be extreme and disproportionate. The Holborn Viaduct building, while of no significance in heritage terms, it represents a substantial amount of embodied carbon. Demolition of all three buildings would have a highly negative carbon cost contradicting paragraph 152 of the NPPF which sets out a core principle of the planning system is to "support the transition to a low carbon future in a changing climate…[and] encourage the reuse of existing resources including the conversion of existing buildings". Retaining and

	converting historic buildings and the embodied carbon that they contain is of paramount importance if the City is to meet local and national policy commitments. The City has pledged to reduce its carbon emissions and refusal of the demolition of these buildings would show that it is serious about these commitments.
Officer response to comments	See officer response section at the end of this table.

Officer Response to Objections

The objections primarily raise concern over the following issues:

- The loss of the Farringdon Street buildings as non-designated heritage assets and the implications of this in terms of the balancing exercise required by paragraph 203 of the NPPF.
- The loss of the relief sculptures either side of the entrance at 34 – 35 Farringdon Street.
- The loss of Turnagain Lane and impact of the proposal on Newcastle Close leading to the subsequent erosion of the City's historic fine grain and street pattern.
- Impact of the proposed new building on the setting of the listed Gatehouse.
- There is a lack of justification as to why the buildings could not be retained and re-purposed. The demolition of the three buildings would have a big impact on carbon emissions.
- The proposal does not respond to flexible working patterns and reduced demand for office space.

Taking each comment in turn:

Loss of the Farringdon Street Buildings as non-designated heritage assets

The loss of the Farringdon Street buildings is covered from a heritage perspective in the Heritage section of this report under the 'Non-designated heritage assets' heading. The appraisal includes the balancing judgement as required by paragraph 203 of the NPPF.

The Farringdon Street buildings are considered to have a low level of architectural and historic significance as a well-executed classical design, albeit simple examples of the type.

With regard to the NPPF paragraph 203 balancing exercise the total loss of these non-designated heritage assets and their significance is considered to be outweighed by the provision of a new sustainable development of significant architectural quality that would deliver significant public realm enhancements.

Loss of the relief sculptures at 34 – 35 Farringdon Street

Details pertaining to the sculptures are covered in the Heritage section of this report under the 'Non-designated heritage assets' heading.

The two carved stone relief panels at the entrance of Meridian House have artistic, historic and evidential interest and it would be appropriate to reinstate the panels in a similar location on the new building. A condition is recommended to cover their careful removal, secure storage and reinstatement on the building, and an information plaque, to retain their historic association with this site. It is not considered appropriate to offer the relief panels to an industrial heritage museum site as suggested by the Greater London Industrial Archaeology Society, as the historic interest and connection with Farringdon Street and the City, and contribution to the townscape would be lost.

Loss of Turnagain Lane and impact on Newcastle Close

The impact of the proposal on Turnagain Lane and Newcastle Close is covered in the design, non-designated heritage assets and transportation sections of this report.

This report assesses Turnagain Lane and Newcastle Close as non-designated heritage assets. Turnagain Lane dates from the 13th century and is a remnant of the street pattern which was altered with the construction of Holborn Viaduct and the Fleet Valley improvements. The eastern section of the road was built over at this time and it later became a service access road on the development of Kimberley House and Meridian House. The road would be built over, representing a loss of public realm and erosion of historic street pattern, contrary to policy DM12.1.3, CS10.5 and DM16.2.3 of the adopted Local Plan. However, the existing dead-end road is of low quality in terms of visual amenity, accessibility and permeability and there are no building frontages to the street. It is used principally as access for service vehicles and does not provide opportunities to dwell.

The existing Newcastle Close is a narrow road between 32-33 Farringdon Street and Meridian House, 34-35 Farringdon Street and provides access to the service entrance of 1 Fleet Place at the east end of the street. It may date from the medieval period and is a remnant of the street pattern which was altered with the construction of Holborn Viaduct and the Fleet Valley improvements. The eastern section of the road was built over at that time. The road and access to the service entrance of 1 Fleet Place would be retained as a two-storey height route and its highway use would be unchanged. There would be a new service entrance for the development on the north side of the route. This would represent a loss of public realm and erosion of the historic street pattern contrary to policy DM12.1.3 and CS10.5 of the adopted Local Plan. However, the existing dead-end road is of low quality in terms of visual and public amenity, accessibility and permeability It is used principally as access for service vehicles and does not provide opportunities to dwell.

In respect of the NPPF paragraph 203 balancing exercise Turnagain Lane and Newcastle Close are considered to have a low level of historic and evidential significance as these routes are low quality in terms of visual amenity,

accessibility, and permeability. Their significance has been diminished by past alterations. Here the total loss of Turnagain Lane and the low level of harm to the significance of Newcastle Close is considered to be outweighed by the merits of the proposal which include the provision of a new sustainable development of significant architectural quality that would deliver significant public realm enhancements.

The proposed public realm would be attractive, welcoming, accessible, permeable, greened and inclusive. It would incorporate artistic, cultural, and educational digital art displays which would enliven the space and provide a greater understanding of the historical development of the area and its historic street pattern. The new route through the site and public lift bridging the 9m level change between Holborn Viaduct and Farringdon with step free access is a significant benefit offered by the development. As such the loss of Turnagain Lane and Newcastle Close public realm is considered to be compensated for and justified by the gain of a new, attractive and inclusive accessible route through the site.

Impact on the setting of the grade II listed adjoining Gatehouse

The impact of Kimberley House as existing and the proposal on the setting of the Gatehouse is covered in the Heritage section of the report under the heading 'Impact on significance and setting of listed buildings'. The increased height of the proposed building, its appearance and materiality are not considered to adversely affect the setting of the adjoining listed Gatehouse. It is acknowledged that the projection of the building along Holborn Viaduct would partially obstruct the visibility of the Gatehouse in some fleeting local views as a result this would result in a low level of less than substantial harm to the setting of the listed building. Officers consider that in applying the NPPF paragraph 202 balancing exercise this harm would be outweighed by the public benefits of the proposal as set out in the Public Benefits section of this report.

Justification for demolition and impact on carbon emissions

An appraisal of the demolition of the existing buildings from a sustainability perspective is set out in the 'Sustainability' section of this report. The submitted Draft Circular Economy Statement assess various retention scheme scenarios compared to a redevelopment option. It evaluates the Whole Life Cycle carbon impacts of the different scenarios against the feasibility of constructing them and against the opportunities of a new build option including the provision of high quality floorspace, flexibility, future adaptability, urban greening/biodiversity, and accessibility.

The existing buildings have been found to be unsuitable to be transformed into an attractive and sustainable development for a 60+ year period. Significant operational carbon savings can be achieved over the lifetime of the proposed building. The applicants intend to reuse as much as practicable of the existing buildings and recycle the remaining materials. Passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Flexible working patterns and reduced demand for office space

The City of London is one of the world's leading international financial and business centres as is set out in the Economic Issues section of this report. This section of the report notes that "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."

Representations (Support)	
Fleet Street Quarter	Support the proposal, noting that the development team have maintained constant and strong communication with the Partnership during the consultation phase for the proposal. The current buildings on the site have outdated facades, narrow and constrained floorplates, and a lack of permeability. The proposal would provide improvements to the public realm, animation of the streets through the provision of active frontages and increased permeability. The new step free link between Holborn Viaduct is welcomed and would provide inclusive access. The new streetscapes would provide greening that would enhance the quality and usability of the public realm, creating a better micro-climate and reducing the urban heat island effect. A thorough and attentive cultural audit has been undertaken, offering a cultural strategy that would broaden the use of the building and would invite a broader demographic to use and visit the space. The work with the Museum of London would create an organic link between the Fleet Street Quarter and the Culture Mile. Whilst the scheme would primarily appeal to building occupiers, there is consideration for the building responding to a wider audience that can be interacted with and used beyond 'working' hours.
Museum of London	The Museum of London welcomes the opportunity that this scheme would provide to partner with Royal London Asset Management regarding Cultural Plans for this site. The partnership would enable key new digitalisation work to take place, which would not otherwise be possible, unlocking the academic,

	creative, and educational potential of these collections for the largest possible audience. The new artistic commissions would bring vibrancy to this historic part of the City and there is support for the proposed cultural plan.
Hogan Lovells	They are excited to be involved in the application scheme. The location, size and sustainable design are reflective of the needs of the business. They are support of the cultural investment in the scheme and would continue to invest in outreach programmes for the City and neighbouring boroughs, including commitments to diversity and inclusion, environment and sustainability, pro bono and fundraising. Hogan Lovells has a long history in the City. The business currently occupies two buildings where the leases are due to expire in 2026. New premises are needed in order to meet the future demands of the business. Other sites have been explored, but a location in the west of the Square Mile is preferred. The proposed scheme would maintain access to the courts, clients, transportation and future access to amenities and culture that will be offered by the Culture Mile initiative.
Central District Alliance	We endorse the significant sustainability improvements embedded in the proposed development. We feel the ambition to deliver a net zero carbon emissions development (including offsetting) combined with a Circular Economy approach enables waste reduction in the present and makes for a more adaptable building in the future. High-quality public space is hugely important to our members, and we are delighted this proposed development proposes major public realm improvements. We are encouraged by the proposed biodiversity uplift, with proposals for planting along Farringdon Street, which should enhance the quality and usability of the public realm as well as support to people's wellbeing. We are also supportive of a development that is ambitiously setting an example for achieving the Mayor of London's Urban Greening Factor. We welcome the scheme's vision to create flexible office space accommodating modern and future ways of working, accessible for all types of businesses,

	which we feel will be an important long-term need for the post-Covid-19 recovery.

Policy Context

42. 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.

43. 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 has been published for consultation under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. As such, the draft City Plan is a material consideration in the determination of applications.

44. 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.

45. 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), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), 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); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

46. Relevant City Corporation Guidance and SPDs comprises 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's Thermal Comfort Guidelines (CoL, 2020), Planning Obligations SPD (CoL, May 2021), Open Space Strategy (CoL, 2016), Office Use (CoL, 2015), City Public Realm (CoL, 2016), Cultural Strategy 2018 – 2022 (CoL, 2018) and relevant Conservation Area Summaries.

Considerations

47. 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);
    - 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).

48. 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). This duty must be given considerable weight and importance when weighing any harm to the setting of a listed building in the balance with other material considerations.

49. The National Planning Policy Framework (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".

50. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social, and environmental.

51. Paragraph 10 of the NPPF 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:
    (a) approving development proposals that accord with an up-to-date development plan without delay; or
    (b) 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.

52. 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).

53. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand, and adapt. 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.

54. Chapter 8 of the NPPF seeks to promote healthy, inclusive, and safe places.

55. Paragraph 92 states that planning decisions should aim to achieve healthy, inclusive, and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

56. 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”.

57. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

58. 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”.

59. 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.”

60. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.

61. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. 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 conversion of existing buildings.

62. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

63. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment.

64. 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.

65. 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."

66. 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.

67. 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. Substantial harm to or loss of:
    (a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
    (b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

68. Paragraph 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.

69. Paragraph 203 of the NPPF 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".

Considerations in this case

70. In considering this planning application account has to be taken of the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees.

71. The principal issues in considering this application are:
    - The extent to which the proposals comply with the development plan
    - The extent to which the proposals comply with the NPPF
    - The appropriateness of the proposed Class E use and loss of retail use

- The impact of the development in design and heritage terms including impact on designated and non-designated heritage assets
- The impact of the proposal on Strategic Views and Protected Views
- The impact of the proposal on any archaeology beneath the site
- The accessibility and inclusivity of the development
- Transport, servicing, cycle parking provision and impact on highways
- The proposed public realm and cultural offer
- The impact of the proposal in terms of energy and sustainability
- The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight, and light pollution.
- The environmental impacts of the proposal including wind microclimate, thermal comfort, flood risk, and air quality.
- The requirement for financial contributions and other planning obligations.

Economic Development and Use

Economic Issues

72. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 520,000 people.

73. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.

74. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting

this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

75. 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. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing population will create the demand for more employment and for the space required to accommodate it.

77. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.

78. The London Plan projects future employment growth across London, projecting an increase in City employment. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.

79. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.

80. Strategic Objective 1 in the City of London Local Plan 2015 is to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan

recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

81. The draft City Plan 2036 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 2,000,000sqm during the period 2016-2036. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.

82. 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.

83. Policy CS5 of the Local Plan, referring to the North of the City 'Key City Place' of which the development site forms part, states that the City will; implement proposals for the rejuvenation of … Holborn… for intensification; require improvements to pedestrian and cycle routes; and ensure the improvement of pedestrian permeability and connectivity. As such, an office is a suitable use for the intensification of the site to complement the objectives in the North of the City, and as discussed below, the public realm proposals would help to enhance the two key pedestrian routes along Farringdon Street and Holborn Viaduct.

Office provision

84. Policy E1 of the London Plan (2021) explicitly supports increases in the current office stock. Likewise, Core Strategic Policy CS1 of the Local Plan 2015 and Strategic Policy S4 of the draft City Plan 2036 seek to ensure that the City provides additional office accommodation to meet demand from long term employment growth.

85. The existing site provides a total of 15,863sq.m GIA of office floorspace across three buildings.

86. This application proposes an uplift of 18,210sqm GIA of Class E office, which results in a building of 34,073sqm GIA of commercial floorspace. The increase in office floorspace is welcomed in accordance with Core Strategic Policy CS1 to increase the City's stock and S4 of draft submission City Plan 2036.

87. Local Plan 2015 Policy DM1.3 encourages office designs that are flexible and adaptable and meet the needs of small and medium sized

businesses. Policy OF1 of Draft City Plan 2036 seeks offices of outstanding design and exemplars of sustainability, designed for future flexibility, which provide office floorspace suitable for a range of occupiers and provide a proportion of flexible workspace suitable for micro, small and medium sized enterprises where appropriate.

88. The proposed development would accord with policy through the provision of flexible workspace in the sense that the floorplates are fully open and adaptable, which could be used as a headquarters or space for multiple tenants in the future.

89. There is a single-let tenant signed up to the lease of the building as their headquarters should planning permission be granted, but the adaptable floorplates could still provide smaller let spaces for SMEs in the future, should the tenant depart. In the event that the single-let tenant does not occupy the whole of the building, the applicant has agreed to an obligation within the S106 agreement which would require the provision of 14 SME desk spaces within the building.

90. The building would provide high standards of sustainability and wellbeing through greening, a gym and cycling facilities. This would enhance the proposal's sustainability and future adaptability, and the attractiveness to potential tenants for future uptake. The proposed Local Community Outreach Program is a valuable community offer alongside the office space and would secure some public access to the building.

Retail

91. The existing site contains five retail units across 1080sq.m of floorspace including a vacant unit. All of the units are located on Holborn Viaduct. Policy DM1.5 aims to encourage a mix of commercial uses within office developments which contribute to the City's economy and character.

92. The application site is not located within a designated Principal Shopping Centre (PSC) as set out in the current and emerging Local Plans; however, Holborn Viaduct is designated as a Retail Link in both. Policy DM20.2 of the Local Plan and Policy RE2 in the emerging Local Plan encourages the provision of retail development as it contributes to vitality and provides services for local residents, visitors and workers. The loss of active frontages, retail frontage and floorspace within the Retail Links is resisted.

93. As part of the proposal no replacement retail use would be provided. The development would be contrary to policy in terms of loss of retail frontage and floorspace, which is acknowledged in the submitted Planning Statement. The Planning Statement argues that the location of the office frontages and the integration of digital public art screens would provide a greater level of activation to Holborn Viaduct than currently exists, as well as an enhanced public offering through the public realm improvements. In addition, the planning permission would provide flexibility under Class E

to enable retail uses to come forward in the future should the market dictate.

94. It is acknowledged that the proposed loss of retail would represent a loss of services to visitors, workers, and residents. Regarding the impact that this loss would have on the vitality of the area, careful consideration has been given to the design of the proposal to ensure that the proposed ground floor(s), through the landscaping design and cultural elements, should ensure visual interest and activation for pedestrians, by enhancing the City's cultural offer and avoiding a sterile environment through:
    - Cultural activities or displays in ground floor spaces
    - Providing exhibition/interpretation boards in relation to matters of historic interest
    - Incorporating public art either within the design of the building or as freestanding structures.

95. The double height atria/lobby spaces, particularly on Holborn Viaduct, would evoke the feeling of increased activation. The proposed development and neighbouring consented developments, including, 15 Old Bailey, City Temple (Morley House), and Citicape House, would change the dynamic of the area, as well as significantly increasing footfall. Retail uses opposite and adjacent to the site would continue to function and add vibrancy to this retail link.

96. It is also expected that this part of the City will attract more pedestrian footfall travelling to and from the proposed new Museum of London at Smithfield and other cultural activities in the nearby Culture Mile area. Furthermore, the Draft City Plan 2036, in relation to the Smithfield and Barbican Key Area of Change, recognises Farringdon Street and Holborn Viaduct as key pedestrian routes and therefore the increased activation of the area around the site, albeit not through retail uses, would contribute positively.

97. Overall, the proposal is contrary to Policies DM 20.2 of the adopted Local Plan and RE2 of the Draft City Plan 2036 with regard to the loss of the retail space. It is accepted that the level of harm created by this conflict with policy is relatively modest as the site is not in a PSC and the proposal has been designed to ensure activation at ground floor level through public realm enhancement and a cultural offer which is of relevance in this context given the site's proximity to Culture Mile. Accordingly, a judgement should be made as to whether the modest harm created by this conflict with policy is outweighed by the merits of the proposed development. In this instance, taking into account the considerations set out above, on balance it is considered that the loss of retail space is considered acceptable.

Design

Principle of demolition of the existing non listed buildings and spaces from a design perspective

98. There are three existing buildings on the site proposed to be demolished. At the higher level, along Holborn Viaduct, is Kimberley House at 14-21 Holborn Viaduct, constructed as offices and retail between c.1973-5. It was designed by TP Bennet & Son as a pair of concrete office blocks, with the now demolished Bath House on the north side of the street.

99. The main building frontage onto Holborn Viaduct is unremarkable, with awkward geometrical forms abutting the adjacent Gatehouse. The south elevation fronts Turnagain Lane and there is a short return elevation which abuts the south side of the Gatehouse in Farringdon Street. The building forms a poor architectural setting to the listed Gatehouse.

100. The concrete office building rises to 12 storeys over a basement at a height of 46.14m AOD. The building is considered a nondescript example of its type and date and the principle of its demolition is acceptable in design terms.

101. To the rear of Kimberley House and flanking the north side of Meridian House is Turnagain Lane, which would be built over by the proposed development.

102. Although it would appear that Turnagain Lane is named as such because it is a dead-end, it was named this when it was a through route from Snow Hill down to the River Fleet. The 'turn again' was to warn pedestrians that there was no bridge crossing the river at the bottom of the lane, so they should turn around.

103. The loss of this altered and now dead-end lane, which dates back to the 13th century would result in a low-level loss of heritage significance. This is discussed further in the public realm and heritage sections of the report.

104. 32-33 Farringdon Street and Meridian House, 34-35 Farringdon Street, are two Portland Stone and glazed brick clad steel framed office buildings, constructed in the 1920's. They have attractive classical detailing and are considered to be non-designated heritage assets of a low level of architectural significance. Their proposed demolition would result in the total loss of these assets. This impact is discussed in greater detail in the 'Heritage Assets' section of this report.

Design Evolution

105. The massing and façade treatment of the proposals has evolved considerably over a series of pre- application meetings to achieve an appropriate massing and complementary architectural backdrop to the historic Gatehouse. Previous iterations of the design, including those

which did not retain the two plane trees on Farringdon Street, would have provided an inappropriate backdrop to the Gatehouse by way of a fragmented and overbearing massing, incoherent façade treatment, overly assertive geometry and inadequate greening.

106. The current scheme addresses these issues with a lowering of the scale of development, sculpting and refining the articulation of the massing and the materiality to simplify and soften its visual impact on the backdrop setting of the listed Gatehouse. The stone façade on Farringdon Street to the same height as the Gatehouse would provide a more contextual and coherent street scape, in turn re-integrating the Gatehouse.

107. The development has a soft, curvilinear form, providing visual continuity between the Farringdon Street and Holborn Viaduct elevations as well as complimenting the form of the Gatehouse. The introduction of new public realm would enhance the street scene and amenity of the area through greening, the integration of art and culture and new accessible routes and connections through the site. A more detailed analysis of the design specifics is set out in the following sections of this report.

Height and bulk

108. The site is located towards the west of the City. The building embraces the existing character of the area, typified by a clear juxtaposition of historical Gatehouses with larger contemporary developments in the backdrop. Although slightly taller, the height and bulk would be comparable to the scale of recent large floorplate commercial developments nearby which characterise this part of the City, including Plumtree Court and 60 Holborn Viaduct. The height of the shoulder of the development would be equivalent to the scale of 60 Holborn Viaduct, opposite to the north. The additional height of the rooftop pavilion would be set back and greened to form a softer and more recessive crown.

109. The building would occupy almost the entire site including Turnagain Lane and would over sail Newcastle Close. However, the building line would include a concave set back around the existing trees on Farringdon Street to create a new public space.

110. The proposed building would rise to a height of 65.95m AOD. It would comprise thirteen floor levels and a plant room over a double basement. From the 11th floor (52.2m AOD) up, the building would step back on the southern part of the site and on the northeast corner, reducing the visual bulk of the top three floors and avoiding intrusion into the LVMF protected vista viewing corridors from Primrose Hill and Parliament Hill which over sail the site. Above the 13th floor, the plant enclosure would be further set back, to minimise its visual prominence.

Design approach

Architecture

111. The proposed development would respond to the scale of the context of both the historic listed Gatehouses and the surrounding large commercial developments with a tripartite expression of its base, middle backdrop volume and articulated pavilion core. The treatment of the base on Farringdon Street would be in stone, whilst the recessed double height base along Holborn Viaduct would be predominantly glazed and incorporate public art visuals.

112. The stone base along Farringdon Street would be four storeys high and a similar height to the adjacent listed Gatehouse. The stone facade would be richly articulated with new and reclaimed Portland stone (from Meridian House). It would be arranged in three layers to form asymmetrical portals, with modelled stone reveals, creating shadow and depth to animate the facade. Set within the portals would be powder coated bronze aluminium frames and spandrels, providing contrast and further layering. To accommodate the canopy of the existing trees, the façade on Farringdon Street would be curved. The stone base would display a pleasing rhythm and ordered hierarchy which would complement the classical character and scale of the adjacent listed Victorian Gatehouse and respond positively to the site's townscape settings: lower-rise historic buildings and mid-rise, taller modern buildings.

113. At ground level, immediately adjacent to the Gatehouse on both frontages, would be a new public lift, providing level access between Farringdon Street and Holborn Viaduct. Living green walls on the junctions with the Gatehouse would provide a soft and attractive transition between the new development and historic building, as well as enhancing biodiversity.

114. At ground floor on the Holborn Viaduct frontage, the elevations would be dramatically cut away to create a triangular entrance with a chamfered building line, expanding the public realm and creating a dynamic focal point in townscape views. The double-height ground floor elevations would be glazed active frontages, interspersed with public art display panels to provide cultural and visual interest. Greening would be integrated into the public space to form the junction with the Gatehouse.

115. Along Holborn Viaduct, above the recessed double height ground floor, the building line would project out beyond the existing building line by 2.4m and would over sail the footway. As such it would protrude out beyond the line of the Gatehouse frontage at upper levels.

116. Above the base, a curvilinear façade of glass and vertical metal fins, would wrap continuously around both Farringdon Street and Holborn Viaduct frontages. The curved corners and concave sweep around the retained trees provide a coherent, yet soft, organic form to the main facades. The rounded, raised corner would echo that of the Gatehouse.

117. Externally, the main volume of the proposed development has a light, filigree texture, comprised of a glass envelope with glazed shadow box spandrels, giving the impression of continuous vertical glass strips interspaced with projecting metallic fins. The light silver-coloured fins would be set in darker silver vertical framing. Perforations to the sides of the fins would enable a passive ventilation system as well as create a textured finish. The size of the fins would increase progressively up the facades, providing solar shading and wind mitigation, as well as a sense of hierarchy.

118. Architecturally, the façade would appear as a refined, calm and coherent backdrop, quite distinct from the Gatehouse, but with a strong dynamic presence. The proposed development would vary in scale, height, form and would bring a richness of materiality and high architectural quality to this part of the City.

119. The south facing, flank elevation is characterised by a continuation of the filigree backdrop that transitions to reflect specific site conditions on this elevation. The main core of the building would be located on the eastern edge of the site and would be clad in silver-coloured panels.

120. At the top of the main facade would be a setback, smaller, three storey element comprising the core, an upper plant room and lower pavilion providing access to the southerly roof terrace. The pavilion would feature dark silver metalwork frames, with vertical strips of greening in an alternating pattern, relating to the architectural language of the main facades. As such it would appear as a coherent part of the overall composition, but not overly assertive due to the setback massing and softening effect of the greening. There would be extensive greening to the roof terrace. The upper plant room is further set back and would be clad with photo voltaic panels on the south elevation, vertical louvres, and green climbing plants to the west and north. The plant enclosure would be screened from above with architectural louvres.

121. The retained Newcastle Close would be built over as a double-height route through the site leading to the existing loading bay of the adjacent property at 1 Fleet Place. The service yard for the proposed development would be accessed on the north side of Newcastle Close via operable gates within the façade. Architecturally, the frontages would be treated as a continuation of the stone and bronze coloured metal base along Farringdon Street. Stone portals at regular intervals would be enhanced through feature lighting. There would be glazed, active frontages to the entrance lobby, office, and the Wellness Wing. The remainder of the solid cladding would be carefully articulated in solid bronze coloured metalwork in front of the proposed Service Yard and mechanical spaces. Louvres and doors sit within the bronze metalwork where required.

122. The final details of the development including greening, public art, public

realm, lighting, soffits, fins, entrances, and materials, would be secured via condition to ensure a satisfactory appearance and finish.

123. The building design is considered to be of high quality, sustainable design which would enhance the townscape and public realm.

Public Realm and existing street pattern

124. The proposals would transform the public realm around the site. Currently, the existing building offers no form of accessible public space at ground floor level on Farringdon Street and has limited active frontages on Holborn Viaduct, albeit there are some retail units. Contrastingly, the proposed development would create new publicly accessible space at ground floor level. A new step free public route across the site, linking Holborn Viaduct and Farringdon Street via an accessible lift would be provided. This route would significantly enhance the locality's permeability, accessibility, and amenity. High quality materials, seasonal planting, green walls, as well as bench seating for people to dwell would feature in the new public route. The legibility of the lift entrances would be enhanced by living green walls with integrated way finding graphics and public art.

125. The public art would be in the form of digital screens incorporating historical references and educational content relating to the history and transformation of the area over the centuries. Details of the junctions with the listed Gatehouse and the new route would be secured via condition.

126. The proposed development would offer further gains of public realm to the north of the site along Holborn Viaduct, where the proposed chamfered, set back entrance would release more of the footway, and at the western edge on Farringdon Street, where the west frontage would be set back to create a curved space to dwell, featuring the existing mature trees as the focal points, surrounded by low level seasonal planting and bench seating. As well as these spatial improvements, the Holborn Viaduct frontage would incorporate public art referencing the history of the locality. Details would be secured via condition.

127. The level of proposed greening is extensive and would include the provision of up to 29 planters with a mix of shrub, perennial and tree planting and incorporated benches all the way along Farringdon Street to Ludgate Circus. These would be secured through the S.278 agreement with Transport for London.

128. Lighting would be integrated throughout the ground floor plane of the new public route. This would ensure the sophisticated architecture and spatial qualities of the development are appreciated after nightfall and final details would be secured via condition.

129. The existing Turnagain Lane dates from the 13th century and is a remnant of the street pattern which was altered with the construction of Holborn

Viaduct and the Fleet Valley improvements. The eastern section of the road was built over at this time and it later became a service access road on the development of Kimberley House and Meridian House. The road would be built over, representing a loss of public realm and erosion of historic street pattern, contrary to policy DM12.1.3 and CS10.5 of the adopted Local Plan. However, the existing dead-end road is of low quality in terms of visual amenity, accessibility, and permeability and there are no building frontages to the street. It is used principally as access for service vehicles and contributes little to the City's public realm offer. Furthermore, reference to Turnagain Lane would be incorporated into the Farringdon Street public realm design, acknowledging its historical significance.

130. The existing Newcastle Close is a narrow road between 32-33 Farringdon Street and Meridian House, 34-35 Farringdon Street and provides access to the service entrance of 1 Fleet Place at the east end of the street. It may date from the medieval period and is a remnant of the street pattern which was altered with the construction of Holborn Viaduct and the Fleet Valley improvements. The eastern section of the road was built over at that time.

131. The road and access to the service entrance of 1 Fleet Place would be retained as a two-storey height route and its highway use would be unchanged. There would be a new service entrance for the development on the north side of the route. The oversailing of this public highway, although acceptable in terms of the height of the oversail, could lead to a worsening of the quality of the public highway, as in the Transport and Highways section below, including creating a dark environment with the potential for increased pollution.

132. However, the existing dead-end road is of low quality in terms of visual and public amenity, accessibility and permeability, as it is used principally as access for service vehicles and does not provide opportunities to dwell. Further, details of appropriate lighting to improve the pedestrian environment in Newcastle Close are to be reserved by condition, which would offset concerns about the oversail.

133. By contrast, the proposed public realm would be attractive, welcoming, accessible, permeable, greened, and inclusive. It would incorporate artistic, cultural, and educational digital art displays which would enliven the space and provide a greater understanding of the historical development of the area and its historic street pattern. The new route through the site and public lift bridging the 9m level change between Holborn Viaduct and Farringdon with step free access is a significant benefit offered by the development, as well as the removal of the existing service vehicle cross-over point. As such the loss of Turnagain Lane public realm is considered to be compensated for and justified by the gain of a new, attractive, and inclusive accessible route through the site and the merits of the proposed development.

Strategic views – London View Management Framework

134. The London View Management Framework (LVMF) designates pan-London views deemed to contribute to the capital's character and identity at a strategic level. The Site is situated within the following London View Management Framework (LVMF) Protected Vistas to St Paul's Cathedral:

- 2A.1 from Parliament Hill, London Panorama - eastern corner of 14-21 Holborn Viaduct within Landmark Viewing Corridor; remainder of Site (excluding front sections of both the 32 and 34-35 Farringdon Street buildings, which fall outside of the vista) within the Wider Setting Consultation Area.
- 3A.1 from Kenwood, London Panorama – eastern half of 14- 21 Holborn Viaduct within Wider Setting Consultation Area.
- 4A.1 from Primrose Hill, London Panorama – 32 (all), 34-35 (majority), & 40 Farringdon Street (single storey section) within Landmark Viewing Corridor, remainder of Site in Wider Setting Consultation Area.
- 5A.2 from Greenwich Park, London Panorama - entire Site within Background Wider Setting Consultation Area.
- 6A.1 from Blackheath Point, London Panorama - entire Site within Background Wider Setting Consultation Area.

135. Development on the Site would be potentially visible in these five designated LVMF London Panoramas listed above. Development on the Site would also be potentially visible in the LVMF River Prospect from the South Bank (Assessment Points 16B.1 and 16B.2).

136. The proposal would not breach the development plane of the (red) protected strategic landmark viewing corridors, however it would breach the (yellow) lateral or backdrop wider setting consultation area in London Panoramas view 2A.1 from Parliament Hill, view 3A.1 from Kenwood and view 4.A1 from Primrose Hill, and would rise above the threshold plane of the wider setting consultation area in the London panoramas from Greenwich Park, and Blackheath Point.

137. The magnitude of change in these is considered negligible and would accord with the visual management guidance for both, preserving the viewers' ability to recognise the Strategically Important Landmark (St Paul's Cathedral) and other landmarks in the views.

5A.2 – Greenwich Park looking from the General Wolfe statue to St Paul's Cathedral

138. The site of the proposed development is within the Background Wider Setting Consultation Area of assessment point 5A.2 of this Protected Vista. At 65.95m AOD, the proposed development would rise above the height threshold of 52.3m in this part of the Protected Vista. However, the

proposed development would be almost entirely obscured in the view by the existing buildings and Tower Bridge.

139. The guidance for this view states that the background of St Paul's Cathedral in the view is mostly unimpeded, with a clear silhouette of the dome above the peristyle, and the western towers, and that the ability to see sky between the upper parts of the various elements is crucial to the viewer being able to recognise and appreciate St Paul's Cathedral in this panorama (para 142).

140. As stated in the LVMF Visual Management Guidance: "The relationship between Tower Bridge, the Monument to the Great Fire and St Paul's Cathedral are important elements of the view. The threshold height of the Protected Vista between Assessment Point 5A.2 and St Paul's Cathedral acknowledges the visual relationship between these three landmarks. The relationship, and the elements themselves, are integral to the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers in the view." (para.145).

141. The guidance goes on to say that the dome (above the peristyle) and the upper parts of the western towers of St Paul's Cathedral are well defined against their background in this view. Development that exceeds the Wider Setting Consultation Area in the background of this view should preserve or enhance this level of definition (para 147).

142. The Proposed Development, in the background of the view, would not breach the red LVC of the Protected Vista in the foreground of the view of St Paul's. The magnified view in the submitted TVIBHA demonstrates that the parapet of the main mass of Proposed Development and the rooftop pavilion would rise above the Threshold Plane of the background WSCA. As a result, a sliver of the parapet would be visible above the upper walkway of Tower Bridge between the dome of St Paul's and the north bastion of Tower Bridge; the rooftop pavilion of the Proposed Development would be hidden behind the north bastion of Tower Bridge and development on the north side of the Thames. The top of the parapet of the Proposed Development would be technically visible above the horizontal upper walkway of Tower Bridge but seen at a distance of over 7km within a complex layered backdrop townscape, this would not be discernible by the human eye in the view. The magnitude of impact would be negligible. There would be no impact on an observer's ability to 'recognise and appreciate' St Paul's, or the relationship between St Paul's, the Monument and Tower Bridge, in the view and the nature of the effect would therefore be neutral.

143. In accordance with paragraphs 143 – 147 of the Visual Management Guidance in the LVMF, the development would preserve the viewer's ability to recognise and appreciate the dome, peristyle, and western towers of St. Paul's Cathedral, ensuring these elements remain within a backdrop of clear sky. It is considered the visual management guidance is complied with. The development would not harm the characteristics

and composition of the view and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.

6A.1 Blackheath Point to St Paul's Cathedral

144. The Proposed Development, in the background of the view, would not breach the red LVC of the Protected Vista in the foreground of the view of St Paul's. The majority of the Proposed Development would be concealed behind the dome of St Paul's itself. The magnified view in the submitted THVIA document, which has been rendered, demonstrates that although a small corner of the rooftop pavilion would be technically visible beyond the peristyle of St Paul's to its right, seen at a distance of over 8km within a complex layered backdrop townscape, this would not be discernible by the human eye in the view. The magnitude of impact would be negligible. There would be no impact on an observer's ability to 'recognise and appreciate' St Paul's in the view and the nature of the effect would therefore be neutral.

145. The guidance for this view states that the western towers of St Paul's Cathedral are integral to the viewer's ability to recognise and appreciate the landmark. Development in the Wider Setting Consultation Area should preserve or enhance the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers. It should generally not be taller than the base of the peristyle of the Cathedral although the effect of colour, scale, reflectivity, and distance from the landmark of new development should be understood and tested (para 155-156).

146. Being almost screened by St Paul's Cathedral in this Protected Vista and being indiscernible due to the distance of 8km and complex layers of back drop, it is considered that the proposed development would accord with the visual management guidance set out in paragraphs 154-156 of the LVMF for this view. Moreover, it is considered that the height, form, massing, and materiality of the proposed development would result in an understated presence which would preserve the level of definition of the peristyle and upper parts of the Cathedral in this view and consequently the ability to recognise the Strategically Important Landmark. The development would not harm the characteristics and composition of the view and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.

4A.1 – Primrose Hill to St Paul's Cathedral

147. The proposed massing would not breach the Threshold Plane of the red LVC of the Protected Vista to St Paul's, which passes across the southern part of the Site. The rooftop pavilion would rise above the yellow lateral WSCA to the left of St Paul's, but this would be concealed behind a closer existing building at Euston, 1 Eversholt Street. There would be no impact

on an observer's ability to 'recognise and appreciate' St Paul's in the view. The proposal would be in accordance with the visual management guidance for the view set out in paragraphs 130 – 135 of the LVMF. The development would not harm the characteristics and composition of the view and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.

3A.1 – Kenwood to St Paul's Cathedral

148. The Proposed Development would not breach the red Landmark Viewing Corridor of the Protected Vista to St Paul's. It would rise above the Threshold Plane of the yellow lateral WSCA well to the right of St Paul's. This would be technically visible above the closer roofscape of modern redevelopment at Kings Cross but would remain well below the horizon and be well integrated in the distant backdrop of the view. Seen at a distance of over 7km, it would not in reality be discernible by the human eye in the view. The magnitude of impact would be negligible but because the sensitivity of the view is high to very high the effect would be minor. There would be no impact on an observer's ability to 'recognise and appreciate' St Paul's in the view and the nature of the effect would therefore be neutral.

149. The proposed development would accord with the guidance for this view set out in paras 119 – 122 of the LVMF which states that Protected Vista includes a Landmark Viewing Corridor to the peristyle, drum, dome, and western towers of the Cathedral. Development above the threshold plane of this Landmark Viewing Corridor would compromise the viewer's ability to recognise the landmark, and should be refused.

150. The development would not harm the characteristics and composition of the view and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.

2A.1 – Parliament Hill to St Paul's Cathedral

151. From Parliament Hill, the Proposed Development would not breach the red LVC in the foreground of the Protected Vista of St Pauls. The upper levels of the Proposed Development would rise above the yellow lateral WSCA seen to the right of St Paul's Cathedral. This would be technically visible in front of Guy's Tower at London Bridge but, seen against the backdrop of the existing much taller tower, at a distance of over 5.5km, it would not in reality be discernible by the human eye in the view. The magnitude of impact would be negligible. There would be no impact on an observer's ability to 'recognise and appreciate' St Paul's in the view and the nature of the effect would therefore be neutral.

152. The Visual Management Guidance for this view is set out in paragraphs 98-103 of the LVMF and states that St Paul's Cathedral and its western

towers should be recognisable in the panorama. The proposed development would be some distance away to the right of the cathedral and would not harm the characteristics and composition of the view and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.

16B.1 and 16B.2 – Gabriel's Wharf

153. With regards to River Prospects 1B.1 and 16B.2 (Gabriel's Wharf), from the viewing platform, the river dominates the view whist the mature trees of Temple extend along the Northern embankment towards buildings on the embankment near Blackfriars Bridge. The proposed development would not be visible in these views orientated towards St Paul's Cathedral, the Strategically Important Landmark, as it would be obscured by buildings and the tree line.

154. The Visual Management Guidance for this view states that new development should preserve or enhance the townscape setting of St Paul's Cathedral in this view (para 281). It further notes that there are several landmarks and historic buildings other than St Paul's Cathedral in the view, which aid the viewers' strategic appreciation of London. The viewer's ability to recognise these landmarks should be preserved or enhanced (para 282). The proposed development would not be visible in this view, and it would preserve the Cathedrals townscape setting. Additionally, the proposed development would preserve the viewer's ability to read the riverside landmarks in the view.

Summary of LVMF Impacts

155. The proposed development would not harm the characteristics and composition of these strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG.

Other Strategic Local Views

St Paul's Cathedral – Views From

156. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. In these views, the building would be visible in the context of the coarse grained roofscape of mid-rise commercial buildings. Its height, although slightly taller than its adjacent neighbours, would sit comfortably in the view and would not draw the eye or distract from the closer skyline landmarks of the dome of the Central Criminal Court or the Tower of St Sepulchre. The towers of the Church of St Andrew and City Temple would remain visible.

157. The proposed development would not obscure or detract from a City skyline landmark. It is considered it would preserve the composition and character of these views in accordance with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

Monument - Views From

158. A slither of the roofline of the proposed building would be technically visible. However, due to the distance and coarse grained roofscape, it would not be discernible to the human eye. It is considered it would preserve the composition and character of this view in accordance with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

Townscape Views

159. The Townscape, Visual Impact and Built Heritage Assessment (TVIBHA) includes a comprehensive assessment of the impacts of the proposal on a range of strategic and local townscape views. This assessment concludes that the impact on local views is either negligible or minor or a beneficial impact.

160. The visual impacts of the proposed development would be localised being most evident in views along Farringdon Street and Holborn Viaduct. It would appear taller and more prominent than the existing Kimberly House on the site but, seen in relation to the existing taller modern context, would not dominate the local streetscape. It would not block views of, or compete on the skyline with, the three historic landmarks in the vicinity of the Site: St Andrew, St Sepulchre, and the City Temple. The proposed development would complement the character of the large footprint, taller, modern commercial townscape of Holborn Viaduct and Farringdon Street. The distinctive, historic townscape group comprising of the Viaduct bridge and the four Gatehouses would remain prominent features in views along Farringdon Street. The composition of the group would also remain in views looking east along Holborn Viaduct; however, some harm would be afforded to the reading of the Gatehouse group in views looking west along Holborn Viaduct given the overhang of the building, discussed below.

161. In the cumulative scenario, the consented redevelopment of Morley House, adjacent to the listed southwest Gatehouse, would increase the scale of development along the Holborn Viaduct frontage. The proposal would not harm the local townscape views in the proposed or cumulative scenarios.

162. The building is designed to have a contextual relationship to its wider surroundings whilst maintaining a clear identity of its own. The massing, materials and form of the proposed building have been developed to ensure that the overall scheme represents an enhancement to the immediate locality. The applicants have undertaken a comprehensive

analysis of a series of verified visual montages that demonstrate the above points and illustrate how the building would successfully integrate into the surrounding townscape.

163. The proposals would be visible in longer views from Newgate Street, Holborn Circus and Farringdon Road, but due to the distance and presence of large buildings in the middle and background, would not appear overly prominent in these longer views.

Heritage Assets

Impact on significance and setting of listed buildings

Bridge or Viaduct over Farringdon Street, Holborn Viaduct EC1 – Grade II listed

Significance and contribution of setting

164. The Holborn Viaduct Bridge over Farringdon Street was constructed in 1863-9, designed by Chief Engineer of the City of London, William Heywood. It is a significant piece of Victorian infrastructure and civil engineering, bridging the Fleet Valley and providing a much-needed improvement in the connection between the West End and the City.

165. The listed bridge comprises three cast iron spans supported on granite piers with elaborate decoration including pairs of statues and winged lions, three lamp standards and City arms to each balustrade.

166. The bridge is of historic significance as part of the 19th century Holborn Valley improvement works and Victorian civil engineering. It is of architectural and artistic significance for the architectural detail of its ornate cast iron work, including four bronze statues by Farmer and Brindley and Henry Burshill, and four bronze winged lions. Below, hexagonal granite piers support ornate massive cast-iron work painted red and gold with a recurring griffin motif.

167. The four pavilion Gatehouses on Holborn Viaduct and Farringdon Street are an integral part of the immediate setting of the listed bridge and contribute positively to its architectural and historic significance. Adjacent to each Gatehouse are taller, large commercial modern buildings which form the backdrop setting to the listed bridge. The contrast in historic Gatehouses and taller modern buildings is characteristic of the setting.

Impact Assessment

168. In views from both Farringdon Street and Holborn Viaduct, the proposal would appear as a much taller building in the backdrop setting of the bridge. However, the simple, elegant façade treatment would provide a neutral and calm backdrop which would not detract from the setting of the bridge. There would be a change, but one which would not harm the significance or setting of the listed bridge.

54 and 41 Farringdon Street and 24 and 25 Holborn Viaduct – Pavilion Gatehouses – grade II listed

169. The southern pair of Portland stone pavilions to the listed bridge are listed grade II and located on the southeast and southwest corners of the bridge. They contain stairs between Holborn Viaduct and Farringdon Street in their open, lower storeys and are also known as Gatehouses or stephouses. Built in 1863-9, they were designed by William Heywood and Thomas Blashill in an enriched, round arched style with Italian Gothic architectural detailing. They feature decorative ironwork and architectural sculpture by Henry Bursill. The southern Gatehouses are contemporary with the listed Farringdon Street bridge and are integral to the impressive Victorian civic engineering projects and improvements in the area. The southeast and southwest Gatehouses possess architectural, artistic, and historical significance.

170. The heritage significance of the Gatehouses is partly derived from their integral relationship with the listed Farringdon Street bridge which was built at the same time and forms part of the immediate setting. The backdrop setting of the Gatehouses is characterised by contrastingly tall, modern development, including Kimberley House, with which the southeast Gatehouse has an awkward junction. Further south on Farringdon Street are Meridian House and 32-33 Farringdon Street, 20th century buildings which form the wider setting of the listed Gatehouses but do not contribute to their significance.

171. The Gatehouses are best appreciated in views from the north and south on Farringdon Street, from the west and east on Holborn Viaduct and on the bridge itself.

172. The southern listed Gatehouses were originally matched by another pair of pavilions to the north of the bridge which were destroyed by WW2 bomb damage. These have been recently reinstated in replica and are a positive contributor to the setting and significance of the listed southern Gatehouses and the bridge.

Impact Assessment

173. The proposed building would be much taller than the existing and would impact directly on the setting of the adjacent southeast Gatehouse and to a lesser extent the southwest Gatehouse, which is opposite on the west side of Farringdon Street. The increase in height and massing would however maintain the dramatic contrast in scale that is characteristic of the setting.

174. The scale, materiality, and design treatment of the four-storey stone base on Farringdon Street would complement that of the southeast Gatehouse and would create an attractive and coherent street frontage. The recessed curved facade enables a landscaped area of public realm to be integrated and would enhance the setting of the listed building along

Farringdon Street and in views from the west along Holborn Viaduct.

175. The green walls of the development abutting the Gatehouse would set views of the listed building and the new building against a green wall on both Farringdon Street and Holborn Viaduct, softening the junction with the new development and providing an attractive setting.

176. The vertical arrangement of staggered metal fins on the upper facades would sweep continuously around the back of the Gatehouse to provide a calm, neutral backdrop in which the silhouette of the Gatehouse would be appreciated against a lighter backdrop. The curvilinear, organic form would soften the visual impact of the development in views from the north and south on Farringdon Street and from Holborn Viaduct and would complement the curved features of the Gatehouses.

177. The increased height of the proposed building, its appearance and materiality are considered to not adversely affect the settings of the adjoining Grade II listed southeast and southwest pavilion Gatehouse buildings. The relationship between the replacement building and the adjoining south-eastern pavilion is considered satisfactory and in conformity with the existing setting of the other three bridge pavilions, with the exception of the adverse impact of the projecting upper north facing façade on Holborn Viaduct.

178. In oblique views from the east, the projection of the proposed building over the Holborn Viaduct footway, beyond the existing building line, would in places conceal the north façade of the southeast Gatehouse. The obstruction of the visibility of the Gatehouse, when looking west, would be limited. It should also be noted that this view is transitory and fleeting in the context of the whole kinetic view along Holborn Viaduct However, the proposed 2.4m projection would appear unduly prominent in relation to the Gatehouse in some views close to the west side of Snow Hill. This part of the development would therefore result in slight, low level of less than substantial harm to the setting of the listed building. In considering the planning application, considerable weight and importance has been given to the desirability of preserving the setting of this listed building. There is a presumption against granting planning permission that harms a listed building, and that presumption has been applied in evaluating the planning application.

179. The setting and significance of the southwest Gatehouse would not be harmed by the development due to relative distance which allows views of the Gatehouse to not be obstructed.

180. In the majority of views identified in the TVIBHA, the impact of the proposal would be beneficial and would enhance the setting of the listed Gatehouses. The existing discordant backdrop would be replaced with a calmer, neutral backdrop enabling the Gatehouse to appear distinct and prominent in townscape views. The high architectural quality of the proposed building would be an appropriate backdrop and would not

detract from the wider setting of the Gatehouses.

181. The development would preserve those elements of setting to the north and west which contribute to the significance of the listed building and would enhance the southern setting of the listed building by replacing the broken frontage on Farringdon Street with an attractive, coherent façade and new greened public route alongside the Gatehouse.

182. It is considered that the low level less than substantial harm to the southeast Gatehouse would be outweighed by the public benefits of the proposal as set out in the public benefits section of this report. Such benefits include the applicant's support for enhancing pedestrian routes around the site to include improvement works to the south-eastern Gatehouse, secured through the S.106 agreement, such as brickwork and stonework repairs and cleaning, repairs to the steps within the Gatehouse, the addition of CCTV and improvements to lighting for the safety and security of pedestrians.

City Temple, Holborn Viaduct – grade II listed

Significance and contribution of setting

183. City Temple is a grade II listed church, designed by Henry Francis Lockwood and dates back to 1873. It was extensively reconstructed in 1956 by Seeley and Paget owing to Second World War bomb damage. The building has four storeys on to Holborn Viaduct and six storeys on to Plumtree Court. It has a stone façade and Palladian portico. Internally it comprises the church, a large assembly hall, suite of meeting rooms and ancillary residential accommodation. City Temple has particular historical, evidential, communal, and aesthetic values that contribute to its significance. The building has high architectural significance as a highly individual interpretation of the Classical style.

184. Its tower is an important landmark feature in views from the west along Holborn and Holborn Viaduct. The listed church of St Andrew contributes positively to the westerly setting of City Temple, as a grouping of landmark buildings. To the east, the taller, modern developments of Morley House and Plumtree Court form the backdrop setting. The building's easterly setting contributes little to its significance.

Impact assessment

185. The proposed development is located to the east of the City Temple and would make a visible change to the easterly setting. However, the additional height and bulk would not impede on views and legibility of the landmark tower against open sky. The proposal would be seen in the background of the dominant modern elements in the backdrop setting. The Proposed Development would have no impact on the visual relationship of the City Temple to the Church of St Andrew or on the ability to appreciate the juxtaposition of the Victorian frontage and the post-war body of the building. The intervisibility of the listed building with the contemporary Holborn Viaduct Bridge and Gatehouses would not be

altered. The large scale commercial modern character of the wider setting to the east of the listed building would not be altered and the elements of setting that contribute to the ability to appreciate the building's heritage significance would not be affected. There would be no impact on the ability to appreciate the heritage significance of the listed building either cumulatively or in isolation. There would be no harm to the significance and setting of the listed building.

26 Farringdon Street – Grade II

Significance and contribution of setting

186. This former printing machinery works, now offices, constructed in red brick with terracotta dressings dates from 1886. The architect is known to be T. Knowles Green. Green used the Flemish Renaissance style for this building which is four storeys in height with an attic above, and four bays wide to Farringdon Street. The building has architectural and historic significance for its ornate Flemish style and as a surviving example of the highly decorated industrial architecture of the late C19.

187. The building is contemporary with the major infrastructure works of the railway to the east and Holborn Valley improvements to the north. In the late C19 it would have been integrated in a fine-grained streetscape of shops and offices on both sides of Farringdon Street. The building is now an isolated pre-WWII survival, and its immediate and wider setting is one of large-scale late C20 and early C21 commercial buildings which now line the majority of Farringdon Street. The heritage significance of the listed building is best appreciated in close views from Farringdon Street and due to its scale and the scale and alignment of the context the listed building is not widely visible. The contrasting large scale modern development is seen to either side and in the immediate backdrop of the listed building viewed from the west pavement of Farringdon Street.

Impact Assessment

188. The proposals would make a visible change to the northerly setting of the listed building. View A6 shows that the proposed development would slightly increase the built form in the westerly setting of the listed building in views of from the west, seen in relation to an existing setting of taller modern commercial character which includes large scale midrise commercial buildings adjacent to the listed building, and seen in its backdrop in views of the listed building from the west side of Farringdon Street. The proposed development would therefore not have a jarring effect on the setting of the listed building but would be perceived as an augmentation of the existing group of modern buildings in the background.

189. The proposed development in isolation and cumulatively would change the composition of the northerly setting of the listed building but would not alter its large scale modern commercial character. The ability to appreciate the architectural quality of the listed building in close views

from Farringdon Street and its relationship to the contemporary Holborn Viaduct Bridge and Gatehouses would not be altered. The large scale commercial modern character of the wider setting to the north of the listed building would not be altered and the elements of setting that contribute to the ability to appreciate the building's heritage significance would not be affected. There would be no harm to the significance and setting of the listed building.

Other Listed Buildings

190. The impact of the proposals on the settings of the other listed buildings and their significance, identified in the TVIBHA have been fully assessed and taken into consideration. These include 4 Snow Hill, Snow Hill Police Station, 15 Old Bailey (1-8 Holborn Viaduct), Britannia House, 16 Old Bailey, 26 Farringdon Street, 80 Farringdon Street, Church of St Andrew, and Church of St Sepulchre.

191. The settings and the contribution they make to the significance of the listed buildings, would not be adversely affected by the proposals due to the relative distance of the proposal where it would not appear unduly prominent, would not impact on the roofscape silhouette of the listed buildings, the presence of other tall modern buildings that characterise the existing settings and existing built fabric blocking the view of the proposed development in the backdrop. The proposed development would not harm the significance or setting of these listed buildings.

Impact on Conservation Areas

192. The site of the proposed development does not lie within a conservation area and does not affect the immediate setting of any conservation area. However, it is situated within approximately 250 – 500 metres of a number of conservation areas including Smithfield to the northeast, Newgate to the east, St Paul's to the southeast, Chancery Lane to the west, Fleet Street to the south and Hatton Garden to the northwest. The settings of these conservation areas are characterised by large modern office development and contrastingly small-scale historic buildings, in particular in the vicinity of Holborn Viaduct and Farringdon Street. As such the proposal would be characteristic of the existing settings.

193. The development would be seen in distant views out of and into the conservation areas but would only be visible in a limited way due to the presence of intervening development and the relative distance in relation to the conservation areas. Where visible, it would largely be read as an augmentation of the modern buildings of Holborn Viaduct and Farringdon Street. It would have no specific impact on any individual building or group of buildings within the conservation areas. Accordingly, it is considered that the proposed development would not be harmful to the setting and significance of the conservation areas.

Non-designated heritage assets

32-33 and 34-35 Farringdon Street

Significance

194. Nos 32-33 and 34-45 Farringdon Street are a pair of un-designated Portland stone office buildings dating from 1921-2, which flank the service road of Newcastle Close. They were designed by Victor Wilkins and formerly occupied as the British office of US engineers Babcock and Wilcox, known for their steam boilers.

195. Above the main door to Meridian House, 34-35 Farringdon Street are two Portland Stone carved relief panels of 0.7m high and 0.4m wide by the sculptor George Alexander. The relief panels feature infants and artefacts including pencil, paper, compass, cog wheel, and technical drawings which are symbolic of the activities of the firm which originally occupied the premises and for whom the building was designed. The reliefs are of some historic, evidential and artistic interest. The sculptor Alexander and architect Wilkins also collaborated on war memorials.

196. The buildings have six-storey Portland stone elevations to Farringdon Street with regular metal window openings and Portland stone dressings. The side elevations are plainer and faced with white tiles. They possess a traditional early 20th century classical style and motifs and are considered to hold a low level of architectural significance as a well-executed classical design, albeit simple example of the type. Furthermore, it is considered that the building has a degree of historical significance in the association with the architect Wilkins, as well as Babcock and Wilcox, steam boiler engineers. The buildings are thus considered to be non-designated heritage assets.

Impact Assessment

197. Objections have been raised to the demolition of these buildings and the removal of the relief panels. The objections note that the buildings make a positive contribution to the local streetscape and historic interest of the area. They raise concern that no justification has been provided for the demolition of the buildings.

198. The applicant has explored re-use options for the Farringdon Street buildings as is set out in further detail in the sustainability section of this report. The assessment demonstrates that the existing buildings have been found to be unsuitable to be transformed into an attractive and sustainable development for a 60+ year period. The sustainability credentials combined with the modest historic and architectural significance of the buildings comprise the applicant's justification for their demolition.

199. The proposed demolition would result in the total loss of the Farringdon Street buildings as non-designated heritage assets (with the exception of

the relief panels). These buildings are considered to hold a low level of historic and architectural significance as a well-executed classical design, albeit a simple example of the type. The proposed demolition would result in the total loss of this low-level heritage significance.

200. The two carved stone relief panels at the entrance of Meridian House have artistic, evidential and historic interest and it would be appropriate to reinstate the panels in a similar location on the new building. Should planning permission be granted a condition is recommended to cover their removal, secure storage, and reinstatement on the proposed building.

201. Paragraph 203 of the NPPF provides that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application and provides that in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement should be made having regard to the scale of any harm or loss and the significance of the heritage asset.

202. The proposal results in the total loss of the Farringdon Street buildings and the low level of architectural and historic significance that they embody. Given the low level of significance, it is not considered that the buildings have a significant impact on the area. The high-quality architecture of the replacement building would be in context with the locality which is characterised by large scale modern commercial developments alongside smaller historic buildings. The proposal would offer significantly enhanced and attractive public realm, greening and improved accessibility between Farringdon Street and Holborn Viaduct. Therefore, the merits of the proposal would outweigh the proposed loss of heritage significance.

Turnagain Lane

Significance

203. Turnagain Lane dates from the 13th century and was part of a series of streets and routes linking the Fleet Valley and Farringdon Street with Snow Hill. The 19th century Holborn Valley improvements and construction of Holborn Viaduct altered the street pattern in this area, the eastern section of Turnagain Lane was built over by buildings fronting Holborn Viaduct and it was no longer a through route. When Kimberley House was built in the 1970's the north side of Turnagain lane was widened and it became a service access to the building.

204. Turnagain Lane holds historic and evidential significance due to its medieval origins, and as evidence of the medieval street pattern of the Fleet Valley. It is considered to be a non-designated heritage asset.

Impact Assessment

205. Turnagain Lane would be built over as part of the proposal representing

an erosion of historic street pattern and a total loss of this non-designated heritage asset and its significance. This route is considered to hold a low level of historic and evidential significance given the route is now low quality in terms of visual amenity, accessibility, and permeability and its significance has been altered by its loss as a through route, loss of the building line on the north side and use principally as a service access to Kimberley House. Given its low level of significance it is not considered to make a significant contribution to the City's historic street network.

206. Paragraph 203 of the NPPF provides that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application and provides in weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement should be made having regard to the scale of any harm or loss and the significance of the heritage asset. It is considered that the total loss of Turnagain Lane and its associated heritage significance would be outweighed by the merits of the proposed scheme which include the provision of high-quality office building, enhanced public realm that would be attractive, accessible, greened, and inclusive and include interpretation of the history of the area. The public realm works would include reference to Turnagain Lane, further details of these works would be secured by condition.

Newcastle Close

Significance

207. Newcastle Close is a narrow road between 32-33 Farringdon Street and Meridian House, 34-35 Farringdon Street. It dates from the medieval period and was part of a series of streets and routes linking the Fleet Valley and Farringdon Street with Seacole Lane. The 19th century Holborn Valley improvements and construction of Holborn Viaduct altered the street pattern in this area and the eastern section of the Close was built over by buildings. It is no longer a through route and provides access to the service entrance of 1 Fleet Place to the east.

208. Newcastle Close holds historic and evidential significance due to its medieval origins, and as evidence of the medieval street pattern of the Fleet Valley. It is considered to be a non-designated heritage asset.

Impact Assessment

209. Newcastle Close would remain as highway and a route in the proposed development, and would continue to provide access to 1 Fleet Place. It would be a two-storey route and be built over above this level. This would represent an alteration to the historic street pattern and loss of its open aspect and appearance. This would cause a low level of harm to the significance of Newcastle Close. The existing route is considered to be of low significance given it is of low quality in terms of visual amenity, accessibility, and permeability. Historically its significance has been

altered by its loss as a through route and use principally as a service access to 1 Fleet Place.

210. In applying the balancing exercise in relation to non-designated heritage assets as set out in paragraph 203 of the NPPF, it is considered that the low level of harm identified by the alterations to the significance of Newcastle Close would be outweighed by the replacement building and the design benefits of the proposed scheme which include the provision of high quality office building, enhanced public realm that would be attractive, accessible, greened and inclusive and include interpretation of the history of the area.

Conclusion on Heritage Impact

211. 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).

212. 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 paragraph 202 NPPF balancing exercise.

213. Paragraph 202 states that 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. NPG, para 020, is clear that public benefits could be any economic, social or environmental objective as prescribed in the NPPF and should be of a nature and scale of benefit to the public at large (i.e., not a private benefit), and which can include heritage benefits.

214. Paragraph 203 of the NPPF states that 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.

215. Heritage related policies in the London Plan and the Local Plan seek to conserve and enhance heritage assets.

216. The proposal would involve the total loss of non-designated heritage assets and their significance comprising 32–33 Farringdon Street, 34–35 Farringdon Street and Turnagain Lane. The proposal would result in a

low level of harm to Newcastle Close as a non-designated heritage asset as it would be built over at second floor level diminishing its open aspect and appearance.

217. The Farringdon Street buildings are considered to have a low level of architectural and historic significance as a well-executed classical design, albeit simple examples of the type. Turnagain Lane and Newcastle Close are considered to have a low level of historic and evidential significance as these routes are low quality in terms of visual amenity, accessibility, and permeability. Their significance has been diminished by past alterations.

218. In applying the weighing exercise as set out in paragraph 203 of the NPPF it is considered that the total loss of these non-designated heritage assets and the low level of harm to the significance of Newcastle Close would be outweighed by the provision of a new sustainable office development of significant architectural quality that would deliver significant public realm enhancements.

219. The projecting Holborn Viaduct façade of the proposed development would result in slight, low level of less than substantial harm to the setting of the southeast Gatehouse through the obscuring of some views of the northern façade of the Gatehouse when looking west. It is considered that, for the reasons addressed in this report, that there is clear and convincing justification for that harm to the significance of the southeast Gatehouse. Even when applying considerable importance and weight to the statutory duty to preserve a designated heritage asset officers consider that in applying the tests in paragraph 202 of the NPPF this harm would be outweighed by the public benefits of the scheme. A detailed appraisal of the public benefits provided by the scheme is set out in the public benefits section of this report.

220. By virtue of the proposal involving the total loss of and low-level harm to non-designated heritage assets and less than substantial harm to a designated heritage asset, it would conflict with policies CS12 and DM12.1 and DM12.3 of the adopted Local Plan 2015, policies S11 and HE1 of the Draft City Plan 2036, and policy HC1 of the London Plan, which collectively seek to conserve and enhance the significance of heritage assets, taking account of cumulative impacts, seeking to repair, restore and put to viable uses consistent with their conservation.

221. In all other respects the proposed development would preserve the special interest and settings of designated and non-designated heritage assets in the locality.

Trees

222. There are two London Plane trees located within the pavement on Farringdon Street, which have been assessed in the submitted Arboricultural Impact Assessment as being Grade A specimens. There is

a small Photinia shrub, assessed as a Grade C specimen, within Turnagain Lane. Local Plan policy CS19 seeks to protect the amenity value of trees, retaining and planting more wherever practicable.

223. The trees are not subject to a Tree Preservation Order, and the site is not within a conservation area.

224. The proposed building has been designed to wrap around the trees and their canopy, which would highlight them and their importance in the streetscene.

225. As per the Arboricultural Impact Assessment, the proposed basement level would partially encroach the Root Protection Areas (RPA) of both trees. T1 (the 'left hand' tree when facing the site) would be encroached by 6.7% of the RPA, and T2 (the 'right-hand' tree) would be encroached by 0.7% of the RPA. The assessment concludes that the encroachment would be minor and would have a negligible impact on the trees provided that adequate tree protection measures are implemented during construction, such details would be secured by condition.

226. Furthermore, the existing pavement within the root protection areas is to be replaced with permeable paving as part of the wider public realm landscaping works. Again, provided the tree protection measures are implemented throughout construction, the replacement paving would not damage the roots and the change in surface layer from impermeable to permeable paving would have a positive impact on the health of the trees by increasing drainage and therefore potential water absorption.

227. Also part of the public realm landscaping works, raised planters are proposed on the pavement with three of them being within the RPA of the trees. These would not require footings as they would be built up above existing ground level, so no roots would be required to be pruned.

228. The canopies of the trees would need to be pruned to avoid contact with and damage by the proposed building façade. The trees would also need to be pruned to enable access to a piling rig for the construction period. The trees are not managed by City Gardens so this would be undertaken by the applicant in conversation with an agreement by Transport for London, being the Highway Authority responsible for the trees.

229. Policy OS4 of the Draft City Plan 2036 requires the retention of existing mature and semi-mature trees, and seeks to ensure that existing trees on or adjacent to development sites are protected from damage during construction works.

230. Tree protection measures are proposed during demolition and construction works. These would include tree protection boxes and ground protections within the Root Protection Areas (RPA) of the trees. Conditions are proposed to provide final details of these protection measures.

231. The loss of the Grade C shrub is not considered harmful given its relatively poor quality and immaturity. Overall, the proposals, subject to the recommended conditions, would accord with policy OS4 of the draft City Plan and are acceptable in this regard.

Archaeology

232. Policy DM12.4 of the Local Plan 2015 and policy HE2 of the draft City Plan 2036 outline the requirements with regards archaeology, outlining that the City will preserve, protect, safeguard and enhance archaeological monuments, remains and their settings, seeking inclusive access to, public display and interpretation where appropriate.

233. The site is situated outside the Roman and medieval City wall, to the south of a Roman road leading west from Newgate and on the east bank of the now buried River Fleet. It is in an area of high archaeological potential where remains from the Roman to the post medieval period are expected to survive.

234. An Archaeological Desk Based Assessment and report on archaeological evaluation have been submitted with the application. The assessment concludes that there is high potential for environmental remains associated with the River Fleet including alluvial deposits and evidence of past environments, Roman remans including a Roman east-west road, burials as it is on the edge of the Roman Western cemetery and waterlogged remains associated with the Fleet. There is low to moderate potential for remains of Saxon and medieval remains as these are more likely to have been removed by later or modern basement construction. Later medieval remains and 19th century remains may survive as the ground was raised for the construction of Holborn Viaduct. An Archaeological Desk based Assessment and Report on an Archaeological Evaluation have been submitted with the application.

235. There are three existing buildings on the site. Meridian House, 34-35 Farringdon Street, and 32-33 Farringdon Street have a single basement and have elevations to Turnagain Lane and Newcastle Close. Kimberley House, 14-21 Holborn Viaduct has a single basement. There is a nine-metre difference in ground level between Farringdon Street and Holborn Viaduct due to the location of the site in the Fleet Valley and the extent of ground raising for the construction of Holborn Viaduct.

236. The proposed development would involve the construction of two basement levels across the site including Turnagain Lane. The existing basements would have affected survival of archaeological deposits. A first phase of archaeological evaluation has been carried in areas that are currently accessible and the results show that survival below Kimberley House varies between 1.2 – 5.4m, including Roman remains, and deposits associated with the River Fleet surviving below Meridian House and 32-33 Farringdon Street. Further evaluation is required to better understand

the date, nature and character of archaeological survival and modern disturbance.

237. Subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundation design, the proposals for the site are acceptable. Furthermore, the proposed work with the Museum of London, as outlined in the Culture section below, would provide inclusive access to and public display of the archaeological artefacts that the Museum holds, and is welcomed within the policy context. The proposals are, overall and subject to condition, in accordance with policy DM12.4 of the Local Plan.

Culture

238. Adopted Local Plan policy CS11 seeks to provide, support, and further develop a wide range of cultural facilities and events in the City. Policy S6 of the draft City Plan 2036 seeks to enhance cultural experiences and access to a range of arts and heritage. The policy requires developers to submit Cultural Plans for major development outlining how it will contribute to the enrichment and enhancement of the City's inclusive cultural offer. These should set out how the development will contribute towards enriching and enhancing the City's cultural offer for example by incorporating cultural activities or displays in ground floor spaces; facilitating public access and providing exhibitions/interpretation boards in relation to matters of historic interest; providing permanent or temporary space for creative enterprises; and incorporating public art either within the design of the building or as freestanding structures.

239. Given the location of the site on the periphery of the Culture Mile and proximity to the proposed new Museum of London site, it is vital that the development provides a robust cultural offer to tie into the surrounding cultural elements.

240. A Cultural Plan has been prepared by FutureCity Ltd. consultants which outlines a strategic framework for the development. The Cultural Plan aims to strengthen Holborn Viaduct to become a cultural spine, as a gateway to Culture Mile from the Farringdon Street and Holborn Viaduct crossroads. This aligns with the aspirations of the Smithfield and Barbican Key Area of Change as set out in the Draft City Plan 2036.

241. The aims of the plan are as follows:
    - Digitisation of the Museum of London's artefacts by a **Digital Archivist**, that would take 4 years.
    - Collaboration between the Digital Curator and the **Artist-in-Residence** (fixed for 2 years) to create artwork briefs to then inform:
        (a) The artwork for the temporary construction **hoardings**; and
        (b) The artwork for the **permanent digital screens**
    - Enhancements to the **public realm**, including wayfinding, heritage interpretation, and artist commissioned street furniture.

242. In further detail, the Plan explains how a connection would be established with the Museum of London to facilitate the digitisation of their collection of 7.5 million artefacts, which would then provide context and content for the construction hoardings and permanent digital art commissions to be displayed on the digital screens, as discussed below. The content for the life of the screens would be worked up over the four-year period that the digital archivist would be in post for.

243. The development would feature permanent, digital, multi-channel and generative public art, embedded into the building through nine monitors that wrap around the building across the Farringdon Street and Holborn Viaduct frontages, to create a synchronised experience across the ground floor plane. The screens would also have the capacity to host temporary artwork commissions, separate to the artwork based on the Museum's collection.

244. A Digital Archivist post for the Museum of London would be funded for 4 years, working on digitising the whole collection of artefacts that the Museum holds. The digitisation of the Museum's collection would be available by development completion and be available online in perpetuity. The digital collection would be a multi-generational, multi-national resource for students, scholars, and other interested parties alike.

245. An Artist-in-Residence would be in place during the early stages of construction who would engage with community and Culture Mile stakeholders to create temporary and permanent artwork briefs, including in the public realm. A Hoardings Commission would be created to allow public art to be displayed over the canvas of the building's hoardings during construction. The Artist-in-Residence would create the brief for the digital artwork on the building, curated with the Digital Archivist, which would carry through in perpetuity.

246. The Cultural Plan seeks to celebrate the local cultural history and heritage of the immediate area, the Holborn Viaduct, and the Fleet River. S106 agreements will secure the proposed cultural benefits through a full Cultural Plan and Cultural Management Plan.

247. Policies CS11 of the 2015 London Plan and S6 of the draft City Plan 2036 seek to 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. Policy S24 seeks to support and enhance the implementation of the Culture Mile.

248. The Cultural Plan, and its intended actions, are welcomed and will be secured through the S106 agreement to ensure the benefits proposed are delivered.

Access and Inclusivity

249. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2036 and policy D5 of the London Plan.

250. The Proposed Development provides one 'blue badge' disabled parking bay within the private servicing yard at ground floor level, accessed from Newcastle Close. The scheme would include the loss of one publicly accessible blue badge space on Farringdon Street. The space would be removed as part of the public realm works to the TfL Highway. Further details on the loss of this space are set out in the transportation section of the report. Essentially, TfL consider that although the loss of the space is regrettable, the proposed public benefits of the scheme outweigh the loss.

251. The space meets Approved Document M dimensional guidance and would have transfer space to the side and end. The parking area would have in excess of 2.6m height clearance to allow use by vehicles with a wheelchair hoist, in line with the BS 8300 recommendation.

252. The parking bay would be located to have easy access to the lift lobby and there would be a marked-out route from the parking bay to the lift lobby where the lifts give access to all floors. Part of this route would slope to accommodate the small change of level from the car park area to lift lobby, however the gradient would be 1 in 21 and so not designated as a ramp.

253. In terms of cycle parking, the cycle storage is within the Wellness Wing, in the approximate location of the existing 32-33 Farringdon Street building. Spaces would be at ground floor and mezzanine level, with level access from Farringdon Street. The spaces would be serviced by two lifts, and escape stairs at either end of the space with wheelchair refuse space in the lobby.

254. There would be 25 spaces provided for larger accessible cycles (adapted, tricycles and recumbent cycles etc.), which would meet the London Plan requirements of 5% of the total cycle parking provision for such cycles. These would be accessed by the dedicated cycle parking entrance on Farringdon Street which would have powered sliding double doors with minimum 800mm clear opening with level threshold.

255. In terms of changing accommodation/end of trip facilities, the changing areas at basement levels 1 and 2 would be served by unisex wheelchair accessible WC/Showers, with one WC in each gendered area being designed for ambulant disabled use with outward opening door. Access to the basements would be step free.

256. The external amenity terraces proposed would be fully accessible for wheelchair users, with a firm and even surface within the landscaping/planting layout and wide circulation routes.

257. Safe, efficient egress depends upon a combination of management procedures and building design. Fire exits are proposed at both Farringdon Street and Holborn Viaduct that would have level thresholds with minimum 800mm clear opening.

258. Revolving doors are proposed to both main entrances on Farringdon Street and Holborn Viaduct. It is disappointing that suitable doors for all users, such as sliding or drum doors, are not being provided. However, it is understood that there are issues with thermal efficiency and security with such doors, and instead pass doors are proposed adjacent to the revolving ones. As long as these are suitably manned by staff in reception and appropriate height entry buttons/powered opening, the entrance door configuration is acceptable in this instance. As the glazed entrance doors would be situated immediately adjacent to the revolving doors, they are seen to be of equal importance as entrances to the building. All pass doors would be clearly sign-posted with appropriate manifestations.

259. Overall, the proposal accords with the access policies outlined above. The step-free access via the new lift between Farringdon Street and Holborn Viaduct is a great benefit towards an inclusive City for all and is welcomed as part of the proposals.

Transport and Highways

Cycling

260. The London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 (Cycling) 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.

261. The proposed level of cycle parking is compliant with the London Plan, with the short stay provision being provided in excess of policy requirements as is shown in the table below.

London Plan long stay cycle parking required	Proposed long stay cycle parking provided	London Plan short stay cycle parking required	Proposed short stay cycle parking provided
499	499	17	34

262. The long stay cycle parking would be accessed from Farringdon Street, and any required changes to access the cycle parking would be delivered through the Section 278 agreement with TfL (the highway authority).

263. There are 24 existing short stay cycle parking spaces around the site, located on public highway. All 24 are proposed to be re-provided as part of the development, albeit in amended locations.

264. The development would also provide 34 new short stay cycle parking spaces, split across the two levels of the site.

265. 28 short stay cycle parking spaces (14 stands total) are proposed to be provided in the undercroft by the proposed public lift off Holborn Viaduct (4 stands, 8 spaces), and in the semi-circle shaped public realm off Farringdon Street (10 stands, 20 spaces).

266. However, it should be noted that the semi-circular shape of public realm on Farringdon Street is proposed to be dedicated as TfL public highway to partially offset the stopping up of Turnagain Lane. 9no. of the 20 spaces on Farringdon Street are being provided for policy compliance, in addition to the 8no. spaces on the permissive path (private land) on Holborn Viaduct undercroft. Although policy compliant spaces are usually resisted on public land, in this case the Farringdon Street semi-circle, the land belongs to TfL as the Highway Authority, and they have raised no concerns with the proposal.

267. The applicant has proposed a minimum of an additional 17 short stay cycle parking spaces on public highway on Farringdon Street and Holborn Viaduct, over and above the London Plan requirements. This means in total, the public would have access to 34 new cycle parking spaces as a result of this development, and 58 cycle parking spaces in total.

268. The feasibility and installation of these additional proposed stands would form part of the S278 agreements should this application be approved.

269. 5% of the cycle parking spaces are accessible for adapted cycles and this arrangement will be secured by planning condition (in line the London Plan Policy T5 (Cycling) with the London Cycling Design Standards 8.2.1, and the draft City Plan 2036 6.3.24).

270. The proposals include 50 showers, and 499 lockers, which complement the cycle parking provision. 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. Therefore, the proposals meet the London Plan recommendations.

271. The applicant will be responsible for promoting the use of the cycle parking spaces and as such will be required by Section 106 obligation 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 (Assessing and mitigating transport impacts).

272. As agreed with TfL (as the highway authority for Farringdon Street), it is proposed that there would be two public cargo bike spaces provided along Farringdon Street. One of these would be in close proximity to the development's entrance on Farringdon Street. A second is proposed as part of the wider public realm improvements on Farringdon Street towards Ludgate Circus. This reflects the surveyed servicing demand for that area and would be provided as part of the Section 278 agreement with TfL.

Vehicular Access

273. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2036 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces.

274. There is an existing joint blue badge parking space/servicing bay on Farringdon Street, that is proposed to be removed as part of the public realm works to the TfL Highway. The blue badge space is therefore under TfL ownership, who have raised no objection to the loss of the space, which they state is needed in order to deliver the public realm improvement works.

275. The development is proposed to be car free except for one blue badge car parking space, which is proposed in the servicing area accessed from Newcastle Close. This would mean the 'relocation' of the existing bay from the public highway to within the development, the space therefore going from publicly accessible to accessible only to those who are accessing the proposed building and have authority from the building manager to park there. This is regrettable, but TfL consider that the proposed public realm benefits outweigh the loss. The nearest publicly accessible blue badge space to the application site is on Shoe Lane.

Servicing and deliveries

276. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. 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.

277. The servicing of the building would take place off-street accessed off Newcastle Close. Vehicles would be able to enter and exit the servicing area in forward gear. The servicing area would accommodate two vehicles up to 8m in size.

278. The draft City Plan 2036 Policy VT2 requires major commercial development to provide for freight consolidation. London Plan Policy T1 (Strategic approach to transport) requires development 'to minimise freight trips on the road network including through consolidation'. Proposal

38 in the City of London Transport Strategy is to 'Reduce the number of freight vehicles in the Square Mile'. The City of London Transport Strategy defines freight consolidation as 'routing deliveries to a business, building or area via a warehouse where they are grouped together prior to final delivery.' The City of London Freight and Servicing SPD, point 63, requires suppliers to use consolidation centres in suitable locations within Greater London to minimise the number of trips required to service developments.

279. The applicant is proposing to use an off-site consolidation centre in order to reduce the number of deliveries to the development per day. The applicant is proposing 37 deliveries to the development per day and this will be secured in the Section 106 agreement. The existing buildings on the development site (18,343 sqm) currently generate approximately 37 deliveries per day (based on an unmanaged situation, as existing). Therefore, the quantum of servicing vehicles for the new development will be the same as the existing situation.

280. Despite the delivery numbers being the same, the existing situation is unmanaged, and the proposed development would conform to policy restrictions as set out above and below particularly with regard to delivery hours. No deliveries would be permitted during the busiest times for pedestrians, improving pedestrian safety. Therefore, the proposed servicing arrangement would be an improvement over the existing situation.

281. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy. Cargo bikes would be permitted to access the proposed internal off-street servicing area whilst vehicular access to the site is restricted.

282. The development will be required to produce a delivery and servicing plan (DSP), and this would be secured by a Section 106 obligation.

Public Transport

283. 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.

Pedestrian Comfort and Trip Generation

284. Draft City Plan 2036 Policy AT1 states development proposals should maintain and, wherever feasible, provide for an increase in pavement widths to ensure that pavements provide sufficient safety, comfort, and convenience for the number of pedestrians using them.

285. Transport for London's Pedestrian Comfort Guidance recommends a minimum Pedestrian Comfort Level (PCL) of B+, and the aim in the City of London Transport Strategy is that all pavements will have a minimum PCL of B+. The existing PCLs for the streets surrounding the development are a minimum of B+ (B+ on Holborn Viaduct), with the minimum footway width surrounding the site being on Farringdon Street, which is currently 2.15m (PCL A). the minimum pavement width in the proposed public realm is 2.65m, in line with draft City Plan 2036 Policy AT1.

286. The PCL assessment shows that the minimum PCL in the proposed scenario remains a B+, in line with Transport for London's Pedestrian Comfort Guidance.

287. A trip generation assessment has been conducted for the site, using historic data due to the Covid-19 pandemic. The assessment is still considered robust. It is predicted that the total number of trips to the development would be 7501 per day, which is an increase compared to the existing. It is predicted that the total number of trips to the development in the AM peak hour (0800-0900) would be 1186, which is an increase of 691 in this period. It is predicted that the total number of trips to the development in the PM peak (1700-1800) would be 1006, which is an increase of 586 in this period. Based on the assessments the applicant has done, including rail line loading capacity, PCL and bus capacity assessments, the impacts associated with the proposed development on the surrounding transport network are considered to be negligible, due to the modal split of travel at peak times and the numerous options of travel in close proximity to the site.

288. 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.

Step-free access

289. The applicant has agreed to provide a lift between Holborn Viaduct and Farringdon Street, as the Gatehouse on the southeast side of Holborn Viaduct does not have step free access. This is considered a benefit of the scheme.

290. The applicant would be required to maintain and keep the lift in working order, and it would be open 24/7. Obligations relating to the lift provision and specification would be incorporated into a Section 106 agreement.

Stopping up

291. As the highway authority for Turnagain Lane, the City have a duty set out under section 130 of the Highways Act 1980, to "assert and protect the rights of the public to the use and enjoyment of any highway for which they are the highway authority, including any roadside waste that forms part of

it, and to prevent, as far as possible, the stopping up or obstruction of the highways".

292. It is proposed to stop up a total of 335.5sqm across Turnagain Lane and Farringdon Street, however the majority of this is on Turnagain Lane (332.61sqm). Turnagain Lane is not a through route, therefore a pedestrian route is not being lost as such; however, a large expanse of public highway is proposed to be removed.

293. In order to offsets some of this loss the applicant is proposing to dedicate as highway (for TfL), a semi-circular piece of land on Farringdon Street (178.86sqm). The applicant is also proposing to dedicate 34.17sqm as CoL public highway on Newcastle Close, and 132.41sqm of land at Holborn Viaduct as permissive path (private land). Overall, there would be a net loss of public highway of 122.47sqm, but a net gain in publicly accessible space of 9.94sqm.

294. Turnagain Lane is currently public highway with a single yellow line, and is currently used as an area for servicing the existing buildings on site as well as some neighbouring developments, waiting and loading. Turnagain Lane provides a valuable space for nearby occupiers to load from when they do not have their own onsite loading facilities. The loss of Turnagain Lane would put pressure on the loading facilities on Farringdon Street, adjacent to the busy Cycleway 6. The applicant has stated that vehicle deliveries would be able to utilise other existing loading bays located along Farringdon Street. Other loading bays are located to the north of Holborn Viaduct on Farringdon Street as well as on the island separating vehicular traffic and cyclists.

295. It is acknowledged that a major disbenefit of the scheme is the loss of Turnagain Lane, both as above in heritage terms, and for the loss of public highway. However, a judgement must be made about the quality of the Turnagain Lane as it currently stands – namely that it is used as a servicing area, does not provide a public route through, and does not provide good quality space that pedestrians may wish to use and dwell – and balance this against the loss and the wider benefits of the scheme. Overall, Officers acknowledge that the stopping up is unacceptable but consider that when looking at the scheme as a whole and the development plan and other material considerations in the round, that the loss of the public highway would be offset.

Oversailing

296. It is proposed to build over Newcastle Close, turning it into a covered roadway, as well as reprofiling the street by raising the carriageway. Newcastle Close is a dead end, narrow single-track carriageway, which provides access to neighbouring buildings and has a Network Rail access point at the end.

297. The oversailing would not impact the current access to the street, as the oversailing is proposed at a minimum height of 5.7m, which meets the minimum oversailing requirements. Technical approval would be required for oversailing of the highway.

298. Whilst the oversailing on Newcastle Close meets our minimum requirements, it is considered a disbenefit of the scheme, as it may make Newcastle Close feel enclosed and dark, and could feel more polluted. Should the application be approved, a S278 would be required to light Newcastle Close appropriately, to ensure people feel safe when using the street.

299. It is also proposed for there to be minor oversailing of Holborn Viaduct and Farringdon Street; this is over TfL highway and City Highway. The oversailing meets the City standards for oversailing, and the oversailing over these two streets is considered acceptable. These oversails would also require technical approval and licences from the relevant highway authority (the City or TfL).

Public Realm, Security, and Hostile Vehicle Mitigation (HVM)

300. Local Plan 2015 Policy DM3.2, the draft City Plan 2036 Strategic Policy S2 (Safe and Secure City), and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development. Policy D11 (Safety, security, and resilience to emergency) of the London Plan states development proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity, and help mitigate its effects.

301. Security proposals to protect the building and the new areas of public realm have been developed in consultation with the Designing Out Crime and the Counter Terrorism security officers within the City of London Police.

302. The HVM will mainly be within the façade of the building, with some located on the externally where there is a break in the façade line. No HVM is located on the public highway.

303. Trees are also proposed surrounding the development on Farringdon Street, which serve a dual purpose. They will enhance the environment and provide a visual deterrent to hostile vehicles.

Section 278 Agreement

304. Should this application be approved, both TfL and the City of London would require Section 278 agreements for the streets for which they are the highway authority.

305. Two Section 278 agreements would be secured for TfL, a temporary one for the period of construction, relating to the pit lane, and one permanent.

306. The permanent Section 278 agreement secured for TfL would include (but would not be limited to):
    - 1 no. cargo bike parking space on the central island located on Farringdon Street to the north of Ludgate Circus, and 1 no. cargo bike parking space along Farringdon Street.
    - Greening on Farringdon Street in the form of street trees and planters
    - Public cycle parking on TfL highway (this is over and above the London Plan requirements)
    - Footway upgrades to Farringdon Street in the vicinity of the site
    - Amendments (including removal and/or relocation) to the motorcycle parking (existing retained), public blue badge space, public loading facilities and other kerbside activity as required to facilitate the development and public realm proposals
    - A Road Safety Audit (RSA) to ensure the design of the public realm and proposed use of Newcastle Close are acceptable

307. A Section 278 agreement would be secured for the City which would include (but would not be limited to):
    - Reprofiling of Newcastle Close and associated drainage and lighting
    - Public cycle parking on City highway (this is over and above the London Plan requirements)
    - Footway upgrades to Holborn Viaduct fronting the development, if feasible (due to the constraints of the viaduct) including re-paving in Yorkstone.

308. The Section 278 works will be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

Construction Logistics Plan

309. The submission of a deconstruction logistics plan and construction logistics plan will be secured by condition. The logistics arrangements will be developed in consultation with the City's Highways Licensing and Traffic Management teams to minimise the disruption to neighbouring occupiers and other highway users.

Transport and Highways conclusion

310. The proposal would promote active travel through the excellent provision of cycle parking over and above the London Plan requirements, and would deliver a public benefit by consolidating freight and providing public realm improvements, including additional public cycle parking and cargo bike spaces on TfL Highway. The existing motorcycle parking spaces around the site would be retained, and the blue badge parking space would be

re-provided. There would be no alterations to the Cycleway 6, and the wider public realm works would enhance the cycling and pedestrian environment along Farringdon Street, being a key route both in terms of pan-London transport strategy, and as the entrance gateway to the Culture Mile.

311. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking, T7 deliveries, servicing and construction, and D11 Safety, security, and resilience to emergency. It accords with the Local Plan 2015 Policies DM3.2 and DM16.5, and the draft City Plan 2036 Policies AT1 – 5, SA3, VT2, and VT3. The proposed stopping up is not considered acceptable in transport terms, but would be offset by the wider development and its associated benefits.

Waste Storage

312. Local Plan policy DM17.1 requires development schemes to incorporate waste facilities and allow for the separate storage and collection of recyclable materials.

313. The proposals incorporate a waste storage area within the servicing area at ground floor level on Farringdon Street. This store would serve the whole development. Prior to collection, Facilities Management would move the waste bins from the storage area to the loading bay ready for collection. As per all other deliveries for the development, refuse vehicles would also need to pre-book a delivery slot. Waste collections would take place from the loading bay off Farringdon Street/Newcastle Close at suitable frequencies.

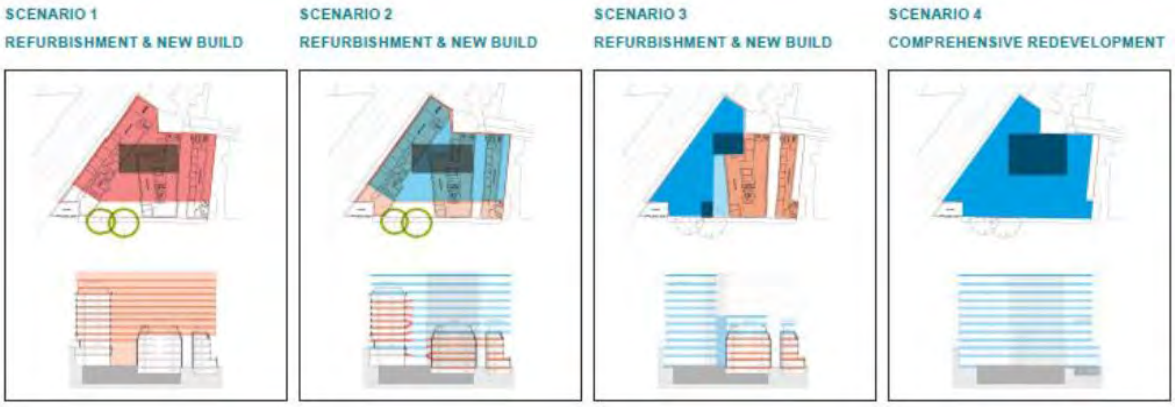
314. The City of London's Cleansing Team have confirmed that the proposed waste storage and collection facilities complies with their requirements.

Sustainability

Circular Economy

315. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2036 Policy S16 sets out the City's support for Circular Economy principles.

316. The submitted Draft Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance. Various retention scheme scenarios have been assessed and compared to the redevelopment option:



Scenario 1: Existing superstructure retained, Kimberley House refurbished, floorplates extended

Scenario 2: Existing superstructure retained, new build infill, interconnecting bridges added

Scenario 3: Farringdon St. buildings refurbished and additional floors, Kimberley House replaced

Scenario 4: Full redevelopment as proposed

Scenarios 1-3 are based on a number of assumptions and uncertainties that are detailed in the submitted assessment. The achievable uplift in floorspace for each option differs due to structural limitations.

The results of the embodied and operational carbon emissions assessment over a lifespan of 60 years are demonstrated in the table below:

		Scenario 1	Scenario 2	Scenario 3	Scenario 4
	Existing buildings** (EPC) *	Option A2 29,860 m² GIA	Option A3 28,134 m² GIA	Option B1 22,526 m² GIA	Option D 38,948 m² GIA
m² area	17,309	29,860	28,134	22,526	38,948
Embodied Carbon EN 15978: A1-A3, A4-A5, B1-B5, C1-C4	0	694	679	610	874
Operational Energy EN 15978: B6	3,756	1,078	1,055	1,073	925
Operational Water EN 15978: B7		2	1	1	2
Total ($kgCO_2e/m^2$ 60yr)	**3,756**	**1,773**	**1,735**	**1,685**	**1,801**
% difference (compared to scenario 4)	**+108.5%**	**-1.6%**	**-3.7%**	**-6.5%**	**New build baseline**

(Table 1 - Carbon emission break down for all options) *based on EPC area and combined for all three buildings ** Meridian house (E rated), 32 Farringdon Street (D rated) and Kimberly House (E rated)

317. The estimated results show that scenarios 1-3 are likely to have a similar Whole Life-Cycle carbon performance per square meter when compared to the new build scenario. While the embodied carbon emissions of scenarios 1-3 are slightly lower than of the new build option, the operational carbon emissions would be higher, due to known plant

inefficiencies with scenario 1-3, limited roof space and equivalence areas for photovoltaics. Overall, the new build option would have the highest Whole Life-Cycle carbon impact of the 4 scenarios, but only with small differences compared to scenarios 1 and 2, while scenario 3 would have the lowest impact with a clearly lower floorspace potential.

318. This result has been balanced against the technical challenges associated with the construction of scenarios 1-3 and the opportunities of the new build option for high quality floorspace, flexibility, future adaptability, urban greening/biodiversity and accessibility. The application therefore is for the redevelopment of the site.

319. The applicants intend to reuse as much as practicable of the existing buildings and recycle the remaining materials. The strategy has been informed by a pre-demolition audit.

320. The proposed key commitments and targets are:
    - Optimised, lean structural and standardised design
    - Reuse of the foundations of Kimberly House (at Holborn Viaduct)
    - Repurposing stone from demolition for Farringdon Street façade
    - Design informed by pre-demolition audit and sustainable procurement plan
    - Design for longevity, adaptability, functionality, flexibility, and disassembly, e.g., including openable windows and on-floor plant to provide flexibility for different tenant scenarios and uses
    - Using cement replacement products (21-35%)
    - Plant replacement strategy developed
    - Reduction of water usage in operation
    - Prioritising leasing and take back schemes
    - Development of an “end of life” plan including materials passports.

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

Energy and CO2 emissions

322. The Energy Statement accompanying the planning application demonstrates that the development (option A) has been designed to achieve an overall 54% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

323. The proposed energy demand reduction strategy would reduce the building’s operational carbon emissions by 34% compared to a Building Regulations compliant building and includes the following main elements:
    - Enhanced thermal envelope performance and air tightness

- Solar shading provided by façade fins or stone cladding
- Solar controlled glazing on all façades
- Optimised glazing to solid ratio
- Mixed mode ventilation system with mechanical cooling provided by air handling units and active cooling provided by air source heat pumps, natural ventilation through openable windows and perforated fins
- Incorporation of heat recovery from the building services systems, to support space heating.

324. There is currently no capacity available in the nearest district heating network (circa 450m away from the site), however, the opportunity to connect to a planned future extension to the district heating network just metres away from the site would be incorporated into the proposed development and discussions have taken place between the applicant and E.On in this regard.

325. The proposed low carbon/renewable energy technologies are an air source heat pump system (air to water) for the heating and cooling load, supported by a water source heat pump for high temperature water. In addition, a 30sqm PV panel array would be installed on roof level 11 and PV panels of 240sq.m vertically installed (with 204sq.m free useful area) would be fixed to the south facing elevations at level 12 and 13. These technologies would contribute carbon emissions savings of 21% compared to a Building Regulations compliant building.

326. The applicant's consultants have provided table 1.2 that compares the predicted annual operational carbon emissions per square meter of the existing and the proposed building as the grid decarbonises:

	Existing			**Proposed**	Unit
	Kimberley House	Meridian House	32-33 Farringdon St		
Basis of Energy (gas, electric,…)	Gas and electric	Gas and electric	Gas and electric	All Electric	
EPC	E (110)	E (120)	D (85)	A (22)	
EPC areas (GIA)	9,431	4,974	2,904	33,064	
Net Internal Area (NIA) *see for more details on Sustainability statement page 17*	994 and 5,382.9	3,656.1	2,002	24,792	m^2
Total NIA for all usages	**12,035**				m^2
Increase in NIA				12,757	m^2
SAP 10 current Grid Carbon Factors					

Operational Carbon emissions per $m^{2,}$ (per EPC area)	127.3	6.43	kgCO_2e/m^2 /yr
% reduction in carbon intensity		-95%	
Total Operational Carbon emissions	750,350.02	212,480	kgCO_2e/ yr
% increase/reduction in Total Annual Carbon Emissions		-72%	
Assuming predicted 2035 Grid carbon Factors *			
Operational Carbon emissions per m^2 (EPC area)	56.158**	0.003	kgCO_2e/m^2 /yr
% reduction in carbon intensity		-99.995%	
Total Operational Carbon emissions	331,069.817	89,111.621	kgCO_2e/ yr
% increase/reduction in Total Annual Carbon Emissions		-73%	

*The Future Energy Scenarios (FES 2020) indicate an electricity carbon intensity of 95.2gramsCO2/KWh using the steady progression scenario which is suggested to be utilised in future carbon calculations in GLA WLC guidance. This carbon intensity has been used for the above calculations. However, there are evidence that the carbon intensity will be further reduced, as per ICC prediction for grid decarbonisation, indicating to the government a target of 10gramsCO2/KWh. The previous BEIS prediction was 70 gramsCO2/KWh as per the energy strategy report, however, with announcement for a decarbonised grid to 2035, this should be further reduced following ICC recommendations for achieving the decarbonised electricity grid.

** For 2035, we assume that the gas boilers will have to be phased out so, all emissions from existing buildings will be from electricity. However, we keep the same energy usage intensity of the buildings, for comparison purposes.

327. The site-wide energy strategy demonstrates compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and 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 GLA's zero carbon target in the London Plan.

BREEAM

328. A BREEAM New Construction 2018 pre-assessment has been prepared for the building. The strategy aims to achieve an "Outstanding" rating for the offices as a "shell and core" development (base build plus services). The assessment is therefore based on a development that is not fully fitted out which means that maximum credits cannot be achieved. The assumptions made as part of the pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted "outstanding" rating with a score of >90%, aspiring to maximise the score during the detailed design phase. The pre-assessment indicates a score of 90.3% and aims to achieve a high number of credits in the CoL priority categories of Energy, Water, Pollution and Materials.

329. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and draft City Plan 2036 Policy DE1. A post construction BREEAM assessment is requested by condition.

Other Benchmarking

330. The WELL standard is a third-party wellness-focused certification scheme. A WELL standard v2 pre-assessment was undertaken with the result that the base build design would provide the minimum requirements for future tenants to meet the highest rating.

Whole Life-Cycle Carbon Emissions

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

332. The existing buildings on site have been found unsuitable to be combined and transformed into a high quality, sustainable development over a 60+ year lifetime (see Circular Economy paragraph). The proposed Whole

Life-Cycle carbon reduction strategy is based on reducing embodied carbon impacts of the development by retention of the Kimberly House piles, the reclamation of Portland stone façade elements and by focussing on using cement replacements and high steel recycled content.
Embodied carbon benchmark comparison:

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	670	1000	GLA Standard
		600	GLA Aspirational
		600	LETI 2020 Design
		350	LETI 2030 Design
A–C (excluding B6-B7)	874	1500	GLA Standard
		1400	RIBA Business as Usual
		1180	RIBA 2021 Good
		970	RIBA 2025
		900	GLA Aspirational
		750	RIBA 2030
A-C (including B6-B7)	1801		

Modules A1-A5: Product and Construction Process stage
Modules B1-B5: Use, Maintenance, Repair
Modules B6-B7: Operational Energy Use and Operational Water Use
Modules C1-C4: End of Life stage

333. The above table shows the embodied carbon benchmark compared to various benchmark sources over the proposed development's whole life-cycle at planning stage, demonstrating emissions that achieve the Greater London Authority's aspirational benchmark emissions target. A detailed Whole Life-Cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Urban Greening and Biodiversity

334. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces.

335. With the exception of the two mature trees in Farringdon Street that will be retained, the site currently has a low biodiversity value as it is hardscaped with no planting, and the proposals offer significant enhancements to biodiversity on the site.

336. The proposed development maximises green areas and a variety of landscaping elements across the building and public realm, including the provision of green roof habitats across various levels of the building, accessible landscaped terraces across Level 06 and Level 11, planters on Levels 03 to 05, all with resilient planting, as well as vertical greening elements across various levels of the building on both the northern and western façades.

337. There are two accessible roof gardens forming part of the proposals at Levels 6 and 11 and two non-accessible areas at Levels 11 and 13. An intensive green roof would feature on Level 6 and is referred to in the applicant's information as a 'working garden'. It would include a green wall with amenity spaces running along the perimeter of the building along Farringdon Street (above office lobby area).

338. Level 11 would include extensive green roof around the perimeter of the building and an accessible intensive green roof with biodiverse planting including growing beds, shrubs, perennial planting, and trees. The extensive sedum green roof is of appropriate depths. This area is intended to be the main roof garden utilised by the occupiers of the building and would offer important amenity spaces set within a green setting. 'Garden Rooms' would be able to accommodate several activities such as outdoor dining, entertainment, and exercise with seating for rest and socialising positioned in the middle of the garden. On Level 13 photovoltaic (PV) panels would feature through a biosolar green roof and a blue roof would sit below the roof terraces, green roofs, and the plant enclosure.

339. The existing mature London Plane trees would be retained as the centrepiece of a new public plaza on Farringdon Street and new green planters with shrubs, perennials and tree planters, and integrated seating are proposed along Farringdon Street and will be reviewed as part of the S278 works with TfL.

340. Green walls would feature on both Holborn Viaduct and Farringdon Street, adjacent to the Gatehouse and entrance to the new public lift.

341. Planted setbacks across Levels 3, 4, 5 and 6 provide additional multiple levels of greening. The green roofs and living walls proposed would enhance biodiversity and encourage the use of outdoor spaces for the occupiers of the buildings improving well-being. The vertical greening elements and planted areas help enhance the urban environment as currently this area of the city is lacking in green features. The planting would include food growing opportunities and has been designed to attract birds and insects through the introduction of habitat interventions such as bee bricks, inset hotels and bird houses.

342. An Urban Greening Factor (UGF) calculation score has been submitted with the application based on both the London Plan and City Plan. The red line planning application boundary is based on a site area

of 4,394sq.m and includes the following surface cover types as set out in the table below (based on the City Plan):

Total Site Area: 4,394sq.m			
Surface Cover Type	**Area (sq.m)**	**UGF (City Plan)**	**Score**
Intensive green roof	579	0.9	521.1
Extensive green roof (80mm substrate depth)	731	0.8	584.8
Flower rich perennial planting	18	0.7	12.6
Green Wall	712	0.7	498.4
Trees II	300	0.7	210
Permeable Paving/Blue Roof	1,222	0.1	122.2
Sealed Surfaces	1,544	0	0
Measured Area **Green Wall/climbers not included in total area (sq.m)**	4,394		
Total	**4,394**	-	**1,949**
Calculating UGF Score			
UGF Calculation	**1,949/4,394**		
UGF Score Total	**0.44**		

343. The UGF for this application has been calculated as 0.39 (London Plan methodology) and 0.44 (CoL methodology) based on the information provided, which exceeds both the London Plan and the City's draft Local Plan UGF target of 0.3 for commercial development.

344. The development would also deliver a change in biodiversity value of 818.05% over the existing condition.

345. Details of the quality and maintenance of the proposed urban greening are required by condition.

346. Local Plan Policies DM10.2 (Design of green roofs and walls) and DM19.2 (Biodiversity and Urban Greening) encourage the inclusion of green roofs and walls. Planting would provide a green and attractive setting and the roof terrace offers important amenity space for occupiers of the building.

The proposed greening accords with Local Plan policies DM10.2, DM10.3 and DM19.2.

Climate Change Resilience

347. The Sustainability Statement prepared by Hilson Moran includes a Climate Change Risk and Adaptation Strategy which identifies the risks from climate change and demonstrates how the building has been designed to manage these risks. The applicant is seeking an Exemplary BREEAM credit for climate resilience which requires confirmation that all viable measures have been included in the design.

Water Resources

348. The development will target a minimum 55% reduction on water consumption using low flow fittings and a greywater recycling system. Irrigation systems will include rainwater harvesting from the proposed blue roofs.

Flooding

349. The Flood Risk Assessment and SuDS strategy prepared by Heyne Tillett Steel identifies the main flood risk to this property as surface water flooding but states that the flood risk from public sewers is considered low. This site is within an area that is at risk of sewer surcharge from the Fleet Sewer which has a catchment area that extends to Hampstead heath in the neighbouring borough of Camden. Therefore, the use of SuDS at this development although welcomed will not ultimately determine the risk of flooding from the public sewers.

350. The intention to implement flood resistance and resilience measures for the areas at risk of surface water / sewer surcharge flooding is welcomed. The basement plans show that these areas are to be used for Plant and Storage. Suitable flood resilience measures need to be designed into the building to enable swift recovery following a flood. Further details are reserved by condition, which will also require the submission of a Flood Emergency Plan.

351. Sustainable Drainage SuDS techniques incorporated in the proposed Development include blue roofs, green roofs, planters, and surface water attenuation storage. Rainwater attenuation with a 40% allowance for climate change would be provided. The construction of the basement would be robust and include waterproofing.

Heat Stress

352. The sustainability statement outlines measures to prevent overheating through the design of the building envelope, such as the incorporation of solar shading elements and solar control glazing. Rejected heat from the air con system would be recovered and reused rather than discharged into

the atmosphere. The incorporation of green roofs and other forms of vegetation would help to reduce urban heat island effects. The building services system and layout would be adaptable to a changing climate.

Natural Capital and Pest & Diseases

353. The proposed development would incorporate urban greening on various levels that would provide a significant increase of quantity and quality of diverse planting in the area, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.

354. Overall, this development would include a wide range of measures that will contribute to climate change resilience. 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.

Sustainability Conclusion

355. 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.

356. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy work/life environment, and its response to climate change resilience and mitigation, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy is considered to be exemplary for a focussed approach to reduce operational and embodied carbon emissions for new development, exceeding London Plan and Local Plan policies including targeting an “outstanding” BREEAM assessment rating.

357. In particular, the proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced, exceeding industry benchmarks including the GLA’s aspirational benchmark. The existing buildings on site have been assessed and found to be unsuitable to be transformed into an attractive and sustainable development for a 60year+ period, however, significant operational carbon savings can be achieved over the lifetime of the proposed building. Circular Economy principles have been

positively applied to achieve an exemplary, long term, robust, low carbon, flexible and adaptable development. The building design addresses climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Microclimatic Impacts

Wind Microclimate

358. Policies DM10.1 of the Local Plan 2015, policy S8 of the draft City Plan 2036 and policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of developments should avoid unacceptable wind impacts.

359. Wind tunnel testing has taken place to predict the local wind environment associated with the proposed development and the resulting pedestrian comfort within and immediately surrounding the site. CFD simulation analysis has also been carried out in accordance with the City's Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

360. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting/occasional sitting/standing/walking/uncomfortable.

361. A separate safety criterion is also applied to ascertain if there would be any safety risks to pedestrians or cyclists.

362. If resulting conditions are identified as being unsafe or unsuitable in terms of the intended use, then mitigation is required. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.

363. Assessments have been carried out for both the Windiest Season and the Summer Season.

364. The wind tunnel and CFD results broadly give the same assessment results, with the most noticeable differences being an area of standing conditions to the south of the site on Farringdon Street and an area of standing conditions under the Viaduct to the north of the site. The CFD analysis shows the Farringdon Street standing region extending further north than the wind tunnel results and while the wind tunnel results show the Viaduct standing area as being the same length as the CFD results they show it as being slightly broader. The wind tunnel analysis also showed that an area of the proposed roof terrace would only be suitable

for standing conditions, whereas the CFD analysis did not show any standing areas.

365. Notwithstanding, where there is variance, this would only be by one category and in either category the condition would remain suitable to use. Variance occurs as the two methods use different tools to predict the wind microclimate; the purpose of the two assessments is to give the broadest picture and to ensure that in either test the conditions are acceptable.

366. The following configurations have been assessed:
    - Existing site with existing surrounding buildings
    - Proposed scheme with existing surrounding buildings
    - Proposed scheme with consented cumulative schemes
    - Existing site with cumulative surrounding buildings (this scenario was only analysed in the wind tunnel)

Existing Baseline Conditions

367. In the existing baseline conditions, the wind tunnel tests and CFD analysis shows that conditions around the site are suitable for their intended use in both the summer and windiest scenarios, primarily standing and walking around the site. The conditions at the existing and surrounding building entrances are suitable for their intended use (either standing or calmer).

Existing building with cumulative schemes

368. The introduction of cumulative surrounding schemes would have minimal impact on wind conditions around the existing site. The introduction of Citicape House would increase the windiness at thoroughfare locations 126, 127 and 123 (outside Citicape House, north and south sides of Holborn Viaduct).

Wind conditions at thoroughfares

369. In the presence of the proposed development, all thoroughfares around the site would experience wind conditions which are suitable for intended use in both the summer and winter scenarios (conditions would be standing or calmer). Several thoroughfare locations (north and south side of Holborn Viaduct and at the base of the Gatehouse on Farringdon Street) would be one category windier than in the baseline scenario (summer and windiest). However, these locations would remain suitable for their intended use. Some thoroughfare locations would be one category calmer than the baseline scenario (these locations are to the north and south of the site along Farringdon Street, Newcastle Close, Fleet Place and the north side of Holborn Viaduct).

370. The conditions would remain broadly the same in the cumulative scenario.

Wind conditions at entrances

371. Entrances to the proposed development would have wind conditions ranging from frequent sitting to occasional sitting use and would therefore be suitable for the intended use. The majority of off-site entrances would remain similar to the baseline scenario (standing or calmer) except for entrances at probe locations 34, 163 (Atlantic House) and 168 (Gatehouse) which would be one category windier than the baseline during the winter. These entrances would, however, continue to be suitable for intended use (standing or calmer)

372. The conditions would remain broadly the same in the cumulative scenario, with some improvement to probe locations 34 (Atlantic House) and 101 (Farringdon Street) in the windiest scenario. All entrances in the cumulative scenario would be suitable for intended use (occasional sitting or calmer).

Wind conditions in amenity spaces (ground level and roof terraces)

373. Wind conditions during the summer season at existing seating areas on Holborn Viaduct and the northern part of Fleet Passage would be consistent with the baseline scenario, this is except for the spill out seating off Fleet Place which would be calmer under the proposed scenario.

374. The proposed seating and amenity spaces off Holborn Viaduct and Farringdon Street would be suitable for their intended purpose in both the proposed and cumulative scenarios (occasional sitting or calmer).

375. The roof terrace areas have been tested in a summer scenario. The wind tunnel analysis showed that there would be areas of standing use, alongside areas suitable for frequent and occasional sitting. Standing use would be one category windier than suitable for amenity provisions. Furthermore, occasional sitting may not be appropriate if the intention were to use the terrace on a frequent basis. Mitigation would therefore be required. The proposed landscaping scheme which would include planters and benches, could be used to improve the conditions, and ensure that the terrace would be suitable for use during the summer months. Further details of the mitigation measures would be secured by condition.

376. The condition would remain broadly the same in the cumulative scenario.

Wind Microclimate Conclusion

377. Under the proposed and cumulative scenario, the majority of tested locations would be suitable for their intended purpose. Mitigation would be required to the level 11 roof terrace to ensure that it would be suitable for frequent/occasional sitting. Details of the mitigation would be required by condition. Subject to conditions the development would have an acceptable impact on wind flows in and around the site in accordance with

policies DM10.1 of the Local Plan, S8 of the draft City Plan 2036 and D8 of the London Plan.

Daylight, Sunlight, Overshadowing, Solar Glare and Light Pollution

Assessment Context

378. An assessment of the impact of the development on the daylight and sunlight to surrounding residential buildings has been undertaken in accordance with the Building Research Establishment (BRE) guidelines and considered having regard to policy D6 of the London Plan, policy DM10.7 of the Local Plan and policy DE8 of the draft City Plan.

379. Policy D6(d) of the London Plan 2021 states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space. The BRE guidelines can be used to assess whether harm is likely to occur.

380. The approach indicated by planning policy is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. Local Plan policy DM10.7 states that development which would noticeably reduce the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels, taking into account BRE guidelines, should be resisted. The draft City Plan 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 its context.

381. The buildings to be considered under this application are those at:
    a. 26-27 Farringdon Street (C3 residential)
    b. 7 St. Andrew Street (C3 residential)
    c. Former offices at Morley House with consented scheme, City Temple, with overnight accommodation (C1) and office uses.

382. 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. Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. Within the BRE Guidance commercial premises such as offices are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same test requirements as residential premises. Whilst the proposed development would result in a minor diminution of daylight and sunlight to surrounding commercial premises, notably 44 windows to City Temple as consented, it is not considered to be such as to have an unacceptable impact on the amenity of those properties and would not prevent the beneficial use of their intended

occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in these respects.

Daylight

383. Daylight has been assessed for both Vertical Sky Component (VSC) and Daylight Distribution (DD). These are complementary assessments for daylight: VSC is the measure of daylight hitting a window, and DD (No Skyline) divides the areas of the working plane which can receive direct skylight, from those that cannot.

384. The BRE Guidance state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e., experiences a 20% or more reduction.) In terms of DD, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).

385. Both the London Plan 2021 and the draft City Plan 2036 require daylight and sunlight to residential buildings to be appropriate to their context, and this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

386. The daylight assessment of VSC and DD has been backed-up by a radiance-based daylight study.

387. The impact on each neighbouring residential building is outlined below.

388. The baseline condition includes Morley House as it currently exists, and the consented City Temple scheme is used for the cumulative impact.

Baseline condition

389. A total of 30 windows were assessed for VSC.

390. All windows tested would fully comply (100%) with the BRE guidelines for VSC, experiencing a negligible impact.

391. A total of 8 rooms were tested for Daylight Distribution (NSL), and all 8 rooms would meet the BRE target value of 80% well-lit area, with the largest reduction being 4%.

392. Overall, the effect of the proposed development on daylight to surrounding buildings with the baseline condition are considered negligible and acceptable.

Cumulative condition

393. A total of 535 windows were assessed for VSC.

394. 491 of the 535 windows tested would fully comply (100%) with the BRE guidelines for VSC, experiencing a negligible impact.

395. The only minor derogations are to ancillary office rooms of the consented City Temple scheme, with 100% of windows to 26-27 Farringdon Street and 7 St. Andrew's Street passing.

396. A total of 118 rooms were tested for Daylight Distribution (NSL), and 114 of these 118 rooms would meet the BRE target value of 80% well-lit area. All rooms within 26-27 Farringdon Street and 7 St. Andrew's Street fully meet BRE criteria. The four rooms were there are transgressions are office rooms to City Temple, but these would also fail to meet the criteria without the proposed development hereby under consideration being built.

397. Overall, the effect of the proposed development on daylight to surrounding buildings with the cumulative condition are considered negligible and acceptable.

Sunlight

398. The BRE Guidelines state that to assess loss of sunlight to an existing building all main living rooms of dwellings should be checked if they have a window facing 90 degrees of due south. Kitchens and bedrooms are less important, although care should be taken not to block too much sun. To quantify the available sunlight, the BRE Guidelines advise measuring the percentage of Annual Probable Sunlight Hours (APSH), which is defined as "the total number of hours in the year that the sun is expected to shine on unobstructed ground, allowing for average levels of cloudiness for the location in question".

399. The BRE Guidelines state that sunlight to neighbouring buildings will be adversely affected if the centre of the window will receive less than 25% of APSH (calculated over the whole year) or less than 5% APSH during the winter months (between 21st September and 21st March); and less than 0.8 times its former sunlight during either period; and the reduction in sunlight over the whole year would be greater than 4%.

400. APSH has been calculated over the whole year (annual sunlight) and between 21st September and 21st March (winter sunlight). All rooms within the neighbouring residential properties that have a window facing within 90 degrees of due south have been included in the assessment.

Baseline condition

401. With the current Morley House as the baseline, due to the orientation of the neighbouring property facing due north, only 26no. windows are required to be tested for Annual Probable Sunlight Hours (APSH). 100% of windows tested pass both annual sunlight and winter sunlight.

Cumulative condition

402. With the consented City Temple scheme as the baseline, due to the orientation of the neighbouring property facing due north, 426no. windows are required to be tested. 89% of all windows tested pass annual sunlight and 83% of all windows tested pass winter sunlight.

403. Where there are transgressions, the rooms the windows serve are to the hotel rooms, and for the 12% that do not comply, the existing light has been assessed as being low, with the majority of transgressions being either very close to the 20% reduction, or retaining good residual sunlight.

404. Overall, the majority of windows would continue to receive excellent annual and winter sun.

Radiance

405. A radiance study was also carried out by the applicants to complement the daylight and sunlight assessments undertaken. The results of demonstrate that the rooms which fail to meet the 80% target for well-lit rooms experience very low existing levels of daylight distribution of 1, 4, 8 and 18%. The radiance study confirms that there is negligible change in the daylight factor on this basis.

Daylight, Sunlight and Overshadowing Conclusion

406. Three relevant residential locations were assessed for potential adverse impacts on daylight and sunlight from the proposed development. 26-27 Farringdon Street, 7 St Andrew Street and 26-30 Holborn Viaduct, which is an office block with a consented scheme for a hotel (City Temple Hotel).

407. The detailed technical assessments demonstrated that the residential units at 26-27 Farringdon Street and 7 St. Andrew Street would achieve full (100%) BRE compliance.

408. The consented City Temple scheme overall would achieve near full compliance (97%) with the BRE guidelines. 12% of the 118 rooms assessed rooms do not fully comply, but the majority are borderline (i.e., very close to the 20% reduction) or else retain good residual sunlight. There are 4 mezzanine rooms that would fall well below BRE criteria. These rooms currently have a low level of light and are ancillary office spaces. A further Radiance Study was undertaken to further explore this situation, which show that the existing levels of light are low, and that they would continue to be poorly lit spaces with the implementation of the proposed hotel development and the development in question.

409. The Radiance study used specialist lighting stimulation software to assess lighting levels if the proposed development went ahead and concluded that 96% of the 110 rooms within the consented City Temple scheme

would meet BRE guidelines in terms of radiance. However, 1 of the rooms would suffer over 40% loss of light.

410. The BRE Guidelines acknowledge that hotel accommodation is less sensitive than residential use due to the nature of occupation. It is acknowledged that the minor losses of light would not have any material effect on the use, occupation, or amenity of the rooms.

411. Policy DM10.7 of the Local Plan 2015 seeks to resist development that would have an adverse effect on daylight and sunlight levels to existing residential units. Policy DE8 in the draft City Plan states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and acceptable living standards. Both policies recognise that it may not always be practicable to enable ideal daylight and sunlight conditions in densely developed city-centre locations.

412. Overall, the development would not result in any material harm to existing levels of amenity and any percentage reductions would be maintained to a reasonable level within the parameters of the BRE guidelines. All existing C3 residential dwellings would continue to receive acceptable VSC and DD levels when measured on an absolute scale. The hotel rooms which would suffer minor transgressions are regarded as less sensitive than residential uses in daylight and sunlight terms.

413. There would be no areas of public amenity space immediately adjacent the site that would be adversely affected by overshadowing.

414. The proposals, therefore, would meet the requirements of the City of London Local Plan and draft City Plan policies, and London Plan policy in terms of daylight and sunlight.

Solar Glare and Light Pollution

Solar Glare

415. The BRE Guidelines recommend that solar glare analysis be carried out to assess the impact of glazed facades on road users in the vicinity. Policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan seek to ensure that developments address and do not have any intrusive solar glare impacts on the surrounding townscape and public realm.

416. The applicant has assessed the proposal and considers that there would be a very low likelihood of the development creating any solar glare related issues. This is given that the Holborn Viaduct elevation is north facing and that the building would have non-reflective projecting ‘fins’ on the west facing Farringdon Street elevation. The fins would reduce any potential for solar glare impacts to occur.

417. Given the orientation, design and materiality of the building, officers are satisfied with the applicant's assertions. Notwithstanding, should planning permission be granted, a clause would be included within the S.106 agreement that would require a post completion solar glare assessment to be submitted if requested by the City. This would include details of any mitigation measures if considered necessary. In the light of the information provided and the S.106 clause it is not considered that the development would result in any undue solar glare issues and would therefore accord with policy DM10.1 of the Local Plan and policies S8 and DE8 of the draft City Plan.

Light Pollution

418. 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.

419. New lighting is proposed in internal and external parts of the development. A condition is recommended requiring a lighting strategy for internal, external and semi external lighting, which would include details of levels and how the lighting has been designed together with management measures to reduce glare and light trespass.

420. Subject to the recommended condition, the proposed development would comply with the Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9.

Overlooking

421. As above, amenity terraces are provided at levels 6 and 11 of the proposed development, and would be for use only by building occupiers.

422. Due to the distance, angle, and relative heights of the terraces it is considered that none of the nearby residential properties would be directly overlooked.

423. Similarly, due to the separation distance and angle of the buildings there would be no direct overlooking of residential properties from within the proposed office floors. The façade fins, mullions/transoms and facade planting provide a further physical barrier which would prevent overlooking.

424. Conditions are recommended to limit the hours of use of the terrace to ensure a good level of amenity to neighbouring occupiers, both residential and commercial.

Thermal Comfort Assessment

425. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood - must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise microclimatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space.

426. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

427. In accordance with the City of London Thermal Comfort Guidelines a thermal comfort assessment has been prepared. The technique involves merging wind, sunlight, temperature, and humidity microclimate data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the Site.

428. The Universal Thermal Climate Index (UTCI) metric will be utilized for predicting thermal comfort. The usage categories for thermal comfort are set out below and is used to define the categorization of a given location.

Usage Category	**% of hours with Acceptable UTCI**	**Description**
All Season	≥90% in each season	Appropriate for use all year round (e.g., parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g., outdoor dining)
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g., unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or

		infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season	Appropriate for public spaces where people are not expected to linger for extended periods (e.g., pavements, cycle paths).

429. All areas have been assessed for all hours in a year between 8:00 am and 8:00 pm (GMT), as specified by the City of London Thermal Comfort Guidelines. This analysis was conducted for three configurations: Existing Site with Existing Surrounding Buildings, Proposed Development with Existing Surrounding Buildings, and Proposed Development with Consented Cumulative Surrounding Buildings.

430. The Thermal Comfort Assessment states that the two existing mature London Plane trees on Farringdon Street would have a significant influence on the wind microclimate in their immediate vicinity. As a result, they have been approximated in the wind models, representing a conservative bare-branch state. Their effect on radiation was excluded from the assessment.

Existing Baseline Conditions

431. The vast majority of the current pedestrian realm in the area surrounding the Site has seasonal or all-season thermal comfort conditions.

432. The majority of the areas in the pedestrian realm around the existing Site have suitable thermal comfort conditions for their intended uses. The exceptions are a small area underneath Holborn Viaduct bridge, and a small area running along the west of Plumtree Court, where short-term thermal comfort conditions were predicted.

Proposed Building with Existing Surrounding Buildings and Proposed Landscape

433. At ground level, thermal comfort conditions with the Proposed Development in situ would generally remain similar to the baseline conditions.

434. The roof terraces within the Development are predicted to have all-season thermal comfort conditions. The proposed landscaping to the terraces has not been included in the assessment. Conditions are suitable for the intended use.

435. In terms of the percentage of daylight hours in which thermal comfort (0°-32°UTCI) is achieved; the surrounding area and on-site terrace levels remain at or near 100% for summer; for spring and autumn, percentages along those areas found to have short-term suitability in the baseline

condition drop to around 90%; and for winter the on-site terraces remain near 100%, whilst the surrounding area drops to between 60-80% with the majority of this area being public highway where it would be acceptable for conditions to be between short-term and transient. The largest drops for winter are again those areas which were predicted to have short-term thermal comfort conditions in the baseline scenario. The daylight hours scenarios, testing thermal comfort between 0° and 32° UTCI, were not undertaken for the baseline conditions, so it cannot be concluded that the drops outlined above can be attributed to the proposed development. Overall, thermal comfort conditions would be suitable for the intended uses.

Proposed Building with Consented Cumulative Surrounding Buildings

436. With the introduction of nearby consented cumulative schemes, thermal comfort conditions remain similar to both the baseline conditions and the proposed building with existing surrounding buildings scenario. Conditions would still be suitable for their intended uses.

Thermal Comfort Conclusion

437. The results of the thermal comfort assessment show the site is within a sheltered location which provides suitable thermal comfort conditions for the current activities. The introduction of the proposed development and the cumulative scenario are not predicted to change the thermal comfort conditions to the point that they would be incompatible with the current or proposed use types. The terrace levels of the Proposed Development would have 'all season' thermal comfort conditions, acceptable for their intended use.

Noise and Vibration

438. Local Plan policy DM15.7 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment.

439. An Acoustic Planning Report has been submitted which provides an assessment of the impact of noise and vibration from the mechanical plant on the surrounding area.

440. The proposed development includes mechanical plant which would be located at both roof and basement levels. To ensure that noise from plant is adequately controlled and minimised, conditions are recommended relating to plant noise and vibration.

441. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and the early construction phases. Noise and vibration mitigation, including control over working hours and types of

equipment to be used, would be included in a Demolition Management Plan and Construction Management Plan to be approved by condition.

442. All deliveries would take place within a dedicated servicing/loading bay within the building, and would therefore have a negligible impact in terms of noise associated with unloading.

443. In order to minimise any disturbance from the amenity terraces, conditions are recommended restricting the hours of use of the terraces and the playing of music.

Air Quality

444. 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.

445. The proposed development would be car free, and heating would be through air source heat pumps. The emissions associated with vehicle trips have been assessed and should have negligible impact on the local air quality. The development would meet both the transport and building emissions benchmarks for the Air Quality Neutral Assessment.

Fire Safety

446. Policy D12 of the London Plan and policy S2 of the draft City Plan seek to ensure that major developments are accompanied by a Fire Statement setting out how the development would address fire safety in the design, construction and operation of the building. In accordance with these policy requirements, the application is accompanied by a fire statement which details the construction methods and materials that would be used, escape strategy, active and passive fire safety measures and access and facilities for the fire and rescue service. The details are satisfactory for this stage of the design process and demonstrate that fire safety has been embedded into the development from an early stage.

Health Impact Assessment

447. Policy HL9 of the Proposed Submission 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 applicants have submitted a HIA which has been based on the NHS Healthy Urban Development Unit criteria, with adaptions to take into

account the particular circumstances of the City. Policy GG3 of the London Plan, and TfL's Healthy Streets Indicators are also relevant. The Assessment concludes that the development would have an overall positive impact on health.

448. Positive impacts include:
    - Provision of new jobs associated with the uplift in commercial floorspace, supporting access to local employment;
    - Provision of high-quality outdoor amenity spaces for office users which would provide much needed green space;
    - Provision of a high-quality public realm areas at Holborn Viaduct and Farringdon Street, in addition to planting/seating areas along Farringdon Street down to Ludgate Circus. This would provide pleasant greenery and dwell spaces for all users of the local area, with a sense of separation and protection from the road through the public realm landscaping, and a general enhancement to the attractiveness of the physical environment;
    - Inclusivity and accessibility through the introduction of a public lift to navigate between the level differences across the site. Wayfinding signage would direct non-vulnerable pedestrians to the Gatehouse stairs to encourage active travel and ensure the lift is available for those who need it;
    - Capitalising on excellent PTAL rating with a car free building that would minimise vehicles travelling to the site, along with cycle parking that exceeds the London Plan requirements, to support active travel;
    - Building and landscape design considering sustainability and climate change with Air Source Heat Pumps (ASHP) and photovoltaic panel (PV) renewable technologies;
    - Building design also providing an enhanced environment for workers and site users through greening measures to the façade and throughout, amenity terraces, wellbeing hub with on-site gym, passive ventilation as well as active travel measures.

449. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example through:
    - Implementation of a travel plan to maximise uptake of active travel options;
    - Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight;
    - Implementation of a Construction Environmental Management Plan (CEMP) including dust, noise and vibration and hours of construction works;
    - Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction;
    - Securing local employment and training initiatives via planning obligations;

- An Air Quality and Management Plan to minimise the impact of dust and particulates during the construction phase; and

450. Any potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

Microclimate conclusion

451. Overall, the submission materials adequately address the impact the proposed development would have on its local surroundings, future tenants, surrounding neighbours and visitors in terms of wind, thermal comfort, fire, daylight and sunlight, and overshadowing.

452. With regards Daylight, Sunlight and Overshadowing, taking into account the BRE Guidance, it is considered that the proposed development would not reduce noticeably the daylight or sunlight available to nearby dwellings to unacceptable levels, and would accord with Local Plan policy DM10.7.

453. The results of the thermal comfort assessment show the site is within a sheltered location and would provide suitable thermal comfort conditions for the proposed activities.

454. The details submitted relating to fire are suitable for the current stage, with further details required under Building Regulations legislation. Clauses in the S106 agreement would ensure the development would mitigate against any solar glare/light spill issues should these arise post-completion.

455. The development would provide an acceptable microclimate to its surrounding neighbours and nearby area.

Equality Impact

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

456. In consideration of the proposed development, the Public Sector Equality Duty (PSED) requires the City of London to consider how the determination of the application would 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.

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

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

459. This application has been assessed against the Equality Act 2010 and any equality impacts identified. The assessment has taken into consideration the Equality Statement produced by the applicants. The assessment identifies that during the construction of the development there would be a temporary closure of the access between Holborn Viaduct and Farringdon Street and potential closure of the Holborn Viaduct pedestrian walkway.

460. Whilst these arrangements would only be temporary, they may provide issues for those with mobility restrictions. It would need to be ensured that diverted footpaths and routes are fully accessible. Details of alternative routes would be provided in the Construction Logistics Plan which would be secured by condition. The Construction Logistics Plan would be developed in consultation with the City's Transportation team and Transport for London.

461. Once operational the scheme would be inclusive and accessible with appropriately designed internal and external spaces including accessible entrances, accessible cycle storage, wheelchair accessible lifts, accessible terraces, accessible toilets, blue badge parking within the development and a new accessible link between Holborn Viaduct and Farringdon Street.

462. Subject to the provision of further details regarding diverted footpaths, it is not considered that the proposal would result in disadvantages or have a material impact on any persons who share a relevant protected characteristic as identified in the Equalities Act 2010.

Public Benefits and the paragraph 202 NPPF balancing exercise

463. 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".

464. 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 paragraph 202 NPPF balancing exercise.

465. Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the NPPF (paragraph 8). 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 be genuine public benefits.

466. The key social, environmental, and economic public benefits of the proposal are considered to be:

- Accessibility: the proposed public lift adjacent to the Gatehouse would allow those who need to or would prefer to use a lift to traverse the level difference between Farringdon Street and Holborn Viaduct, where at present the only option is via the stairs, or various much longer routes around the west of the City. Accessibility is a key tenet of important work the Corporation are aiming to achieve on making the Square Mile an inclusive environment to all. This benefit is therefore attributed significant weight.

- Cultural Offering: the proposed cultural offering is extensive and would include the provision of digital screens on the application site. The screens would display artistic interpretation of the Museum of London's collection that would be digitised by the digital curator employed through the cultural plan. Following the digitisation of some of the collection for display as part of the artwork, the relevant artefacts would be made accessible online to be viewed by members of the public. This artistic offering would enhance this part of Farringdon Street and Holborn Viaduct as key routes to the Culture Mile and the potential new Museum of London site. Further, the digitised artefacts would then inform the brief for the artwork to be displayed on the temporary construction hoardings. Culture Mile wayfinding signage is also proposed. This would be extremely beneficial in terms of attracting the public to the Culture Mile. The Cultural Plan would go above and beyond policy requirements. These benefits together are attributed moderate weight.

- Local Community Outreach Program: The applicants have offered a multi-faceted community outreach program to be secured through the S106 agreement. The program would include: engaging with schools within the City and neighbouring

London Boroughs for access to career insight sessions, educational workshops and employability skills sessions, and access to the roof terrace for biodiversity learning at least six times a year; hosting sustainability education programmes for local/neighbouring Borough schools at least four times a year; providing Culture Mile partners/charities with access to meeting facilities (i.e. auditorium and roof terrace) at least twelve times a year; and hosting employability workshops with jobseekers from the City and neighbouring Boroughs at least twice a year. The management plan would also have a suitable review mechanism. The offer would cover multiple sectors of society with a variety of topics catered for. Access to the roof terraces for biodiversity/sustainability learning would provide children with valuable access to such facilities in an area of the City which lacks large open spaces at ground level. Overall, the benefit is attributed moderate weight.

- Public realm improvements and street greening: The development would deliver enhanced public realm along Farringdon Street and Holborn Viaduct. This would include an open 'pocket park' style space in front of the building entrance on Farringdon Street, situated around the two retained mature street trees. This would celebrate the trees where they are currently let down by the unattractiveness of the servicing yard at Turnagain Lane, and provide an attractive dwell space for passing pedestrians and visitors to the building. This would be further enhanced by increased greening along Farringdon Street, down to Ludgate Circus as part of the TfL S278 works. The greening would include biodiverse planters and incorporate benches and artwork; the increased greening would create an attractive vista up and down Farringdon Street, enhancing routes to the Culture Mile, and would help to combat pollution on this busy London artery. The planters would also provide separation between the road/cycleway and pedestrians, for both safety and enhancing the dwell space. These benefits are therefore attributed moderate weight.

- Gatehouse improvement works: In order to enhance the pedestrian experience in and around the site the applicant would support the City with improvement works to the south-eastern Gatehouse where required, such as brickwork and stonework repairs and cleaning, and repairs to the steps within the Gatehouse, as well as the addition of CCTV and improvements in lighting to promote safety and security for pedestrians using the stairs. These benefits are attributed moderate weight.

467. Given the location of the building within the Central Activity Zone (CAZ), as identified by paragraph 83 of the NPPF, significant weight should be placed on the need to support economic growth and productivity, taking into account both local business need and wider opportunities for

development. The provision of a modern, sustainable office building with large uplift in office floorspace is welcomed within the context of the NPPF as well as policy CS1 of the Local Plan.

468. When applying the policy in paragraph 202 of the NPPF those public benefits are to be weighed against the low level less than substantial harm to the setting of the southeast Gatehouse. Considerable importance and weight should be given to the desirability of preserving this designated heritage asset and therefore to the harm that would be caused its significance.

469. It is the view of officers that the public benefits should together be afforded significant weight, and that giving great weight to the low level less than substantial harm to the significance of the southeast Gatehouse and considerable importance and weight to the desirability of preserving the setting of this listed building the public benefits of the proposal outweigh the harm to significance of this heritage asset as identified in this report.

CIL and Planning Obligations

470. 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.

471. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

472. 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).

473. CIL contributions and City of London Planning obligations are set out below.

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable		£3,275,195	£136,466

	£3,411,662		

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,425,300	£1,354,035	£71,265
City Planning Obligations			
Affordable Housing	£950,200	£940,698	£9,502
Local, Training, Skills and Job Brokerage	£570,120	£564,419	£5,701
Carbon Reduction Shortfall (*as designed*) ***Not indexed***	£605,910	£605,910	£0
Section 278 (Evaluation and Design) ***Not indexed***	£50,000	£50,000	£0
S106 Monitoring Charge	£5,500	£0	£5,500
Total liability in accordance with the City of London's policies	**£3,627,030**	**£3,535,062**	**£91,968**

City's Planning Obligations

474. 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

(incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)

- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction*)
- Delivery and Servicing Management Plan including Consolidation - restricted during 7am-10am; 12pm-2pm; and 4pm-7pm
- Travel Plan and Cycling Promotion Plan
- Public Lift Provision and Maintenance
- Legible London Contribution (£20,000)
- Construction Monitoring Costs
- Carbon Offsetting
- Be Seen Energy Monitoring
- Utility Connections
- 14 Affordable (SME) Workspaces to be provided in the event that a single-let tenant does not occupy the building
- Section 278 Agreement (*CoL*)
- Section 278 Agreement (*Transport for London) Farringdon Road*
- Public Route (*Specification & Access*)
- Local Community Outreach Management Plan to include:
  - Engaging with schools in the City of London and Neighbouring London Boroughs for career insight sessions, educational workshops or employability skills sessions within the Premises or access to the roof terrace for biodiversity learning at least six times a year
  - Hosting a sustainability and biodiversity education programme for local schools in the City of London and Neighbouring London Boroughs at least four times a year, which would link with employability workshops to forge Green Skills;
  - Providing Culture Mile Partners with access to the Development's meeting facilities (meeting rooms/any auditorium and roof terraces) at least twelve times a year; and
  - Hosting employability workshops with jobseekers from the City of London and Neighbouring London Boroughs to support them into employment at least twice a year

- Cultural Implementation Strategy to deliver a viable, meaningful, and long-lasting cultural offer to include:
  - Permanent Digital Public Art Screens – 'Gallery Without Walls' Maintenance and renewal of the screens. Working with the

Museum of London for a Digital Archivist to accelerate the digitisation of the museum's collection required for 4-years in order to create the content for the screens for the life of the development.

- Temporary artwork to cover the building's hoardings during construction, inspired by the Museum of London's collection to be public art focused.
- Television Interference Survey
- Wind Audit
- Solar Glare

475. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement. The scope of the s278 agreement may include, but is not limited to:

- Reprofiling of Newcastle Close and associated drainage and lighting
- Public cycle parking on City highway (this is over and above the London Plan requirements)
- Footway upgrades to Holborn Viaduct if feasible (due to the constraints of the viaduct)

476. The Scope of the S278 agreement with TfL may include but is not limited to:

- 1 no. cargo bike parking space on the central island located on Farringdon Street to the north of Ludgate Circus, and 1 no. cargo bike parking space along Farringdon Street.
- Greening on Farringdon Street in the form of street trees and planters
- Public cycle parking on TfL highway (this is over and above the London Plan requirements)
- Footway upgrades to Farringdon Street in the vicinity of the site
- Amendments (including removal and/or relocation) to the motorcycle parking (existing retained), public blue badge space, public loading facilities and other kerbside activity as required to facilitate the development and public realm proposals
- A Road Safety Audit (RSA) to ensure the design of the public realm and proposed use of Newcastle Close are acceptable

<u>Monitoring and Administrative Costs</u>

477. 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.

478. 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

479. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the wider area. However, 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 1998

480. 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")).

481. 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, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace within the City Cluster area and contributing to the City's primary business and professional services function, outweighs any minor adverse impacts and that such impact is necessary in the interests of the economic well-being of the country and is proportionate.

482. 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

483. 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 including SPDs and SPGs, the NPPF, the emerging Local Plan and considering all other material considerations.

484. 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 plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

485. In this case the proposals are considered to comply with a number of policies in the development plan in particular those which relate to the provision of office development in the City, high quality accessible public realm and sustainable development.

486. The proposal would deliver a high-quality flexible office led development that would meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of business. An uplift in office space would be provided that would accord with the City's objective to support a thriving economy and remain the world's leading international financial and professional services centre.

487. The office space would be complemented by a robust cultural offer and enhancements to the public realm to include greening, seating and improved permeability.

488. The proposal would transform the streets around the development, increasing vibrancy and activity at the crossroads of two key routes, at the gateway to the Culture Mile. It would also deliver on aspirations for the North of the City Key Place Area as defined in the Local Plan 2015, and help towards delivering the aspirations of the Smithfield and Barbican Key Area of Change as outlined in the Draft City Plan 2036.

489. The development would achieve compliant pedestrian comfort levels. The pedestrian experience around the site would improve as a result of the proposals with the significantly enhanced public realm providing an attractive, distinctive, and sheltered route around and through the site, which would include heritage interpretation of the area and its links to the Fleet River and the Victorian engineering project of Holborn Viaduct bridge. The pedestrian experience would also include new step-free access to traverse the level difference across the two streets through a public lift.

490. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel.

491. The building would be designed to high sustainability standards, incorporating integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting circular economy and whole life carbon principles.

492. Objections have been received to the loss of the Farringdon Street buildings and their associated relief sculptures, the alteration of the City's historic street network through the loss of Turnagain Lane and the enclosure of Newcastle Close, the impact of the proposal on the setting of the Gatehouse, the impact of the demolition of the Farringdon Street buildings in sustainability terms and that the proposal does not account for flexible working patterns and a reduced need for office space.

493. It is acknowledged that the proposal would be contrary to policies CS12 (1), DM12.1(1,3,4), CS10(5), and DM16.2(2) of the adopted Local Plan and policy HC1 of the London Plan in respect of the total loss of or low level harm to the significance of the non-designated heritage assets comprising the Farringdon Street buildings, Turnagain Lane and Newcastle Close, including the harm to the setting of the grade II listed south-eastern Gatehouse, the erosion of the City's historic street pattern through the loss of Turnagain Lane (public highway) and the enclosure of Newcastle Close, and contrary to policy DM20.2 with regards the loss of retail uses.

494. The heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraphs 202 (relating to designated heritage assets) and 203 (relating to non-designated heritage assets). As a result, if a proposal results in any harm to the significance of a heritage asset, even if less than substantial and at the lower end of the scale, will result in conflict with heritage policies. As set out above the application proposals conflict with policies CS12, DM12.1 and London Plan policy HC1 in respect of heritage matters.

495. With regard to designated heritage assets, NPPF paragraph 202 requires that any less than substantial harm be balanced against the public benefits of the development proposal. The paragraph 202 balancing exercise is to be applied when considering the harm to the setting of the Gatehouse. That balancing exercise is set out earlier in this report.

496. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the setting of the listed building, the identified harm is outweighed by the public benefits. These public benefits are set out in the public benefits section of this report and include the proposed cultural offer, public realm, and accessibility enhancements.

497. In respect of non-designated heritage assets, NPPF paragraph 203 requires that 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 paragraph 203 weighing exercise is to be considered in respect of the total loss of the Farringdon Street buildings and Turnagain Lane and low-level harm to Newcastle Close through its enclosure.

498. It is considered that these non-designated heritage assets hold a low level of significance. Given the low level of significance their contribution to the area is limited. It is considered that the proposed level of loss and harm would be outweighed by the merits of the proposal which include the provision of a new high quality sustainable development that would deliver significant public realm enhancements.

499. The scheme would provide benefits through CIL for improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement. Together these would go some way to mitigate the impact of the proposal.

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

Background Papers

Application Documents

Covering Letter, DP9 Ltd, dated 3 September 2021.

Townscape, Visual Impact and Built Heritage Assessment, Tavernor Consultancy, 2 September 2021.

Acoustic Planning Report, Hilson Moran, 3 September 2021.

Air Quality Impact Assessment, Hilson Moran, dated 3 September 2021.

Arboricultural Impact Assessment, PJC Consultancy Ltd, 1 September 2021.

Archaeological Desk Based Assessment, MOLA, 2 September 2021.

Circular Economy Statement, Hilson Moran, 3 September 2021.

Cultural Plan, Future City, September 2021.

Daylight and Sunlight Assessment, Behan Chartered Surveyors, September 2021.

Design and Access Statement, PLP Architecture, September 2021.

Ecology Appraisal Report, Hilson Moran, 3 September 2021.

Economic Statement, Volterra, September 2021.

Energy Statement, Hilson Moran, 3 September 2021.

Equality Statement, Volterra, September 2021.

Fire Statement, Jensen Hughes, 18 August 2021.

Flood Risk Assessment and SuDs Strategy, HTS, September 2021.

Health Impact Assessment, Hilson Moran, 3 September 2021.

Land Contamination Assessment, HTS, September 2021.

Landscape Statement, Farrer Huxley, September 2021.

Planning Statement, DP9 Ltd, dated September 2021.

Thermal Comfort Assessment, Hilson Moran, 3 September 2021.

Statement of Community Involvement, JBP, September 2021.

Structural Statement and Preliminary Ground Movement Assessment, HTS, September 2021

Sustainability Assessment, Hilson Moran, 3 September 2021.

Transport Assessment (including Framework Delivery and Servicing Plan, Cycling Promotion Plan and Framework Construction Logistics Plan), Momentum, 2 September 2021.

Whole Life Cycle Carbon Assessment, Hilson Moran, September 2021.

Wind Microclimate Assessment, Hilson Moran, 3 September 2021.
CoL SuDs Proforma, HTS, dated 2 November 2021.
Fin Profile Design Clarifications, PLP Architecture, 29 October 2021.
Views Appendix, Miller Hare, 5 November 2021.
S106 Proposed Public Highway Plan Farringdon Street, PLP Architecture, 17 November 2021.
S106 Proposed Public Space Plan Holborn Viaduct, PLP Architecture, 17 November 2021.
Fire Strategy Lift Shaft Response, PLP Architecture, 17 November 2021.
Sustainability Comments Response, Hilson Moran, 16 November 2021.
Whole Life Cycle Carbon Options Response, PLP Architecture & Hilson Moran, 18 November 2021.
Roof/Pavilion Level Clarifications, PLP Architecture, 2 November 2021.
Gatehouse Interfaces Clarifications, PLP Architecture, 2 November 2021.
Response to LAMAS Objection, Tavernor, 19 October 2021.
Response to Twentieth Century Society, 21 October 2021.
UGF Appendix to Landscape Statement, Hilson Moran, 8 November 2021.
Waste Transfer Routes Clarification, Momentum, 11 November 2021.
Short Stay Cycle Parking Update, Momentum, 19 November 2021.

External

Objects:

Letter, SAVE Britain's Heritage, 11 November 2021.
Comment, Association for Industrial Archaeology The Ironbridge Institute, 27 October 2021.
Letter, Twentieth Century Society, 21 October 2021.
Email, Historic Buildings and Places, 18 October 2021.
Letter, London and Middlesex Archaeological Society, 6 October 2021.
Letter, Greater London Industrial Archaeology Society, 26 October 2021.

Supports:

Letter, Fleet Street Quarter, 26 October 2021.

Letter, Museum of London, 3 September 2021.
Letter, Central District Alliance, 29 November 2021.
Letter, Hogan Lovells International LLP, 8 November 2021.

Other:

Letter, London Borough of Richmond Upon Thames, 1 November 2021.
Email, Network Rail, 21 October 2021.
Letter, London Borough of Tower Hamlets, 19 October 2021.
Letter, Westminster City Council, 14 October 2021.
Letter, London Borough of Hammersmith & Fulham, 15 October 2021.
Letter, Royal Borough of Kensington and Chelsea, 7 October 2021.
Email, London Underground Infrastructure Protection, 5 October 2021.
Email, Thames Water, 24 September 2021.
Letter, Historic England, 30 September 2021.
Stage 1 Letter, Greater London Authority, 25 October 2021.
Stage 1 Report, Greater London Authority, 25 October 2021.
Memo, Lead Local Flood Authority, 5 October 2021.

Internal

Memo, Access Advisor, 8 October 2021.
Memo, Air Quality Officer, 11 October 2021.
Email, Transport Planner, 13 October 2021.
Comments, Planning Policy, 3 November 2021.
Memo, Environmental Health Officer, 15 October 2021.
Comments, Planning Obligations Team, 21 November 2021.
Memo, District Surveyor, 9 November 2021, and email, District Surveyor, 18 November 2021.
Email, Cleansing Team, 11 November 2021.
Memo, Energy and Sustainability Officer, 3 November 2021.

Appendix A

Relevant London Plan Policies

Policy GG1 (Building strong and inclusive communities) encourages early and inclusive engagement with stakeholders, including local communities, in the development of proposals, seeking to ensure positive changes to the physical environment and provide access to good quality community spaces, services, amenities and infrastructure. In addition, it supports London continuing to generate a wide range of economic and other opportunities promoting fairness, inclusivity and equality.

Policy GG2 (Making the best use of land) supports the prioritisation of well-connected sites for development including intensifying the use of land to support, amongst other things, workspaces, and promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

Policy GG3 (Creating a healthy city) seeks to "ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold" and to "promote more active and healthy lives for all Londoners and enable them to make healthy choices."

Policy GGS (Growing a good economy) recognises the strategic aim to "promote the strength and potential of the wider city region", including the support and promotion of "sufficient employment and industrial space in the right locations to support economic development and regeneration."

Policy SD4 (The Central Activities Zone (CAZ)) states that "the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values".

Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that "offices and other CAZ strategic functions are to be given greater weight relative to new residential development."

Policy D4 states that "design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan."

Policy D5 (Inclusive Design) seeks to achieve the highest standard of accessible and inclusive design across new developments.

Policy D8 (Public Realm) establishes criteria for proposals which include public realm space. These criteria include making public realm "well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution."

Policy D11 (Safety, security and resilience to emergency) states that "development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards. Development should include measures to design out crime that - in proportion to the risk - deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area."

Policy D12 (Fire Safety) encourages proposals to achieve the highest standards of fire safety and ensure that they: "1) identify suitably positioned unobstructed outside space for fire appliances to be positioned on and which is appropriate for use as an evacuation assembly point; 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire."

Policy D14 (Noise) seeks to avoid significant adverse noise impacts on health and quality of life, and mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development.

Policy S1 (Developing London's social infrastructure) states that development proposals should provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies. New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.

Policy El (Offices) explicitly supports increases in the current office stock, noting that "improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development."

Policy E2 (Providing suitable business space) states that Boroughs should seek to "support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range

of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand." The policy also states that "development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises."

Policy E9 (Retail, markets and hot food takeaways) states that development proposals should enhance local and neighbourhood shopping facilities and prevent the loss of retail. Proposals should also bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres.

Policy HC1 (Heritage conservation and growth) requires development proposals "should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings."

Policy HC3 (Strategic and Local Views) states that development proposals must be assessed for their impact on a designated view if they fall within the foreground, middle ground or background of that view.

Policy HC4 (London View Management Framework) states that "development proposals should not harm, and should seek to make a positive contribution to, the characteristics and composition of Strategic Views and their landmark elements. They should also preserve and, where possible, enhance viewers' ability to recognise and to appreciate Strategically-Important Landmarks in these views and, where appropriate, protect the silhouette of landmark elements of World Heritage Sites as seen from designated viewing places."

Policy G1 (Green infrastructure) states that "development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network."

Policy G4 (Open space) identifies that "development proposals should 1) not result in the loss of protected open space; 2) where possible create areas of publicly accessible open space, particularly in areas of deficiency."

Policy GS (Urban greening) states that "major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

Policy G6 (Biodiversity and access to nature) states that "development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process."

Policy SI1 (Improving air quality) states that "development proposals should not: a) lead to further deterioration of existing poor air quality; b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; c) create unacceptable risk of high levels of exposure to poor air quality."

Policy SI2 (Minimising greenhouse gas emissions) requires that all new major development should be net zero-carbon. Major development proposals should also include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Policy SI3 (Energy infrastructure) states that "development proposals should: 1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure; 2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter- connecting existing networks as we!! as establishing new networks."

Policy SI4 (Managing heat risk) identifies that "development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure." The policy also states that "major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems."

Policy SI7 (Reducing waste and supporting the circular economy) identifies that "referable applications should promote circular economy outcomes and aim to be net zero-waste."

Policy SI12 (Flood risk management) requires development proposals to "ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses."

Policy SI13 (Sustainable drainage) states that "development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible."

Policy Tl (Strategic approach to transport) highlights that development "should make the most effective use of land, reflecting its connectivity and accessibility

by existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks and supporting infrastructure are mitigated." Development that promotes walking through improved public realm is also supported.

Policy T2 (Healthy streets) encourages development proposals to deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Proposals should "1) demonstrate how they will deliver improvements that support the ten Healthy Streets Indicators in line with Transport for London guidance; 2) reduce the dominance of vehicles on London's streets whether stationary or moving; 3) be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport."

Policy T3 (Transport capacity, connectivity and safeguarding) states that "development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed."

Policy T4 (Assessing and mitigating transport impacts) notes that "where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified."

Policy TS (Cycling) supports increases in cycling across London through the provision of secure, integrated, convenient and accessible cycle parking facilities as well as associated changing and facilities and showers.

Policy T6 (Car parking) sets out parking standards which need to be complied with and that "car- free development should be the starting point for all development proposals in places that are (or are planned to be) well connected by public transport."

Policy T7 (Deliveries, servicing and construction) states that "development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Relevant GLA Supplementary Planning Guidance (SPGs)

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

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city
HL1 Inclusive buildings and spaces
HL2 Air quality
HL3 Noise and light pollution
HL4 Contaminated land and water quality
HL9 Health Impact Assessments
S2 Safe and Secure City
SA1 Crowded Places
SA3 Designing in security
HS3 Residential environment
S4 Offices
OF1 Office development
S5 Retailing
RE2 Retail links
S6 Culture, Visitors and the Night -time Economy
CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities

S8 Design

DE1 Sustainability requirements

DE2 New development

DE3 Public realm

DE4 Pedestrian permeability

DE5 Terraces and viewing galleries

DE8 Daylight and sunlight

DE9 Lighting

S9 Vehicular transport and servicing

VT1 The impacts of development on transport

VT2 Freight and servicing

VT3 Vehicle Parking

S10 Active travel and healthy streets

AT1 Pedestrian movement

AT2 Active travel including cycling

AT3 Cycle parking

S11 Historic environment

HE1 Managing change to heritage assets

HE2 Ancient monuments and archaeology

S13 Protected Views

S14 Open spaces and green infrastructure

OS1 Protection and Provision of Open Spaces

OS2 City greening

OS3 Biodiversity

OS4 Trees

S15 Climate resilience and flood risk

CR1 Overheating and Urban Heat Island effect

CR2 Flood Risk

CR3 Sustainable drainage systems (SuDS)

S16 Circular economy and waste

CE1 Zero Waste City

S23 Smithfield and Barbican

S24 Culture Mile Implementation

S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

City of London's Wind Microclimate Guidelines (2019);

Planning Obligations SPD (May 2021);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Relevant Local Plan Policies

CS1 Provide additional offices

To ensure the City of London provides additional office development of the highest quality to meet demand from long term employment growth and strengthen the beneficial cluster of activities found in and near the City that contribute to London's role as the world's leading international financial and business centre.

DM1.1 Protection of office accommodation

To refuse the loss of existing (B1) office accommodation to other uses where the building or its site is considered to be suitable for long-term viable office use and there are strong economic reasons why the loss would be inappropriate. Losses would be inappropriate for any of the following reasons:

a) prejudicing the primary business function of the City;
b) jeopardising the future assembly and delivery of large office development sites;
c) removing existing stock for which there is demand in the office market or long term viable need;

d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

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.

CS4 Seek planning contributions

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

CS5 Meet challenges facing North of City

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

CS10 Promote high quality environment

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

DM10.1 New development

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

a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
c) appropriate, high quality and durable materials are used;
d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
f)the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that

would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
k) there is provision of amenity space, where appropriate;
l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

2) To encourage the installation of green walls in appropriate locations, and to ensure that they are satisfactorily maintained.

DM10.3 Roof gardens and terraces

1) To encourage high quality roof gardens and terraces where they do not:

a) immediately overlook residential premises;
b) adversely affect rooflines or roof profiles;
c) result in the loss of historic or locally distinctive roof forms, features or coverings;
d) impact on identified views.

2) Public access will be sought where feasible in new development.

DM10.4 Environmental enhancement

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

a) the predominant use of the space, surrounding buildings and adjacent spaces;
b) connections between spaces and the provision of pleasant walking routes;

c) the use of natural materials, avoiding an excessive range and harmonising with the surroundings of the scheme and materials used throughout the City;
d) the inclusion of trees and soft landscaping and the promotion of biodiversity, where feasible linking up existing green spaces and routes to provide green corridors;
e) the City's heritage, retaining and identifying features that contribute positively to the character and appearance of the City;
f) sustainable drainage, where feasible, co-ordinating the design with adjacent buildings in order to implement rainwater recycling;
g) the need to provide accessible and inclusive design, ensuring that streets and walkways remain uncluttered;
h) the need for pedestrian priority and enhanced permeability, minimising the conflict between pedestrians and cyclists;
i) the need to resist the loss of routes and spaces that enhance the City's function, character and historic interest;
j) the use of high quality street furniture to enhance and delineate the public realm;
k) lighting which should be sensitively co-ordinated with the design of the scheme.

DM10.7 Daylight and sunlight

1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.

2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

DM10.8 Access and inclusive design

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

a) inclusive and safe for of 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.

DM11.2 Public Art

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

a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
b) ensuring that financial provision is made for the future maintenance of new public art;
c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

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.

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.

DM16.2 Pedestrian movement

1. Pedestrian movement must be facilitated by provision of suitable pedestrian routes through and around new developments, by maintaining pedestrian routes at ground level, and the upper level walkway network around the Barbican and London Wall.

2. The loss of a pedestrian route will normally only be permitted where an alternative public pedestrian route of at least an equivalent standard is provided having regard to:

a) the extent to which the route provides for current and all reasonably foreseeable future demands placed upon it, including at peak periods;
b) the shortest practicable routes between relevant points.

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.

4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.

5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.

6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

DM16.3 Cycle parking

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

2. On-street cycle parking in suitable locations will be encouraged to meet the needs of cyclists.

DM16.4 Encouraging active travel

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.

2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

DM16.5 Parking and servicing standards

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and

with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.

5. Coach parking facilities for hotels (use class C1) will not be permitted.

6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.

7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

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 recyclate 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

CS18 Minimise flood risk

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

DM18.1 Development in Flood Risk Area

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:

a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
b) the benefits of the development outweigh the flood risk to future occupants;
c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.

2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:

a) all sites within the City Flood Risk Area as shown on the Policies Map; and
b) all major development elsewhere in the City.

3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.

5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.

6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

DM18.3 Flood protection and climate

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.

2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

CS19 Improve open space and biodiversity

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

DM19.1 Additional open space

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

2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;
c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

DM19.2 Biodiversity and urban greening

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

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

CS20 Improve retail facilities

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

DM20.2 Retail links

To encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Links, ensuring that the location and balance of uses does not adversely affect the function of the Link, any nearby PSC or their surrounding areas.

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.

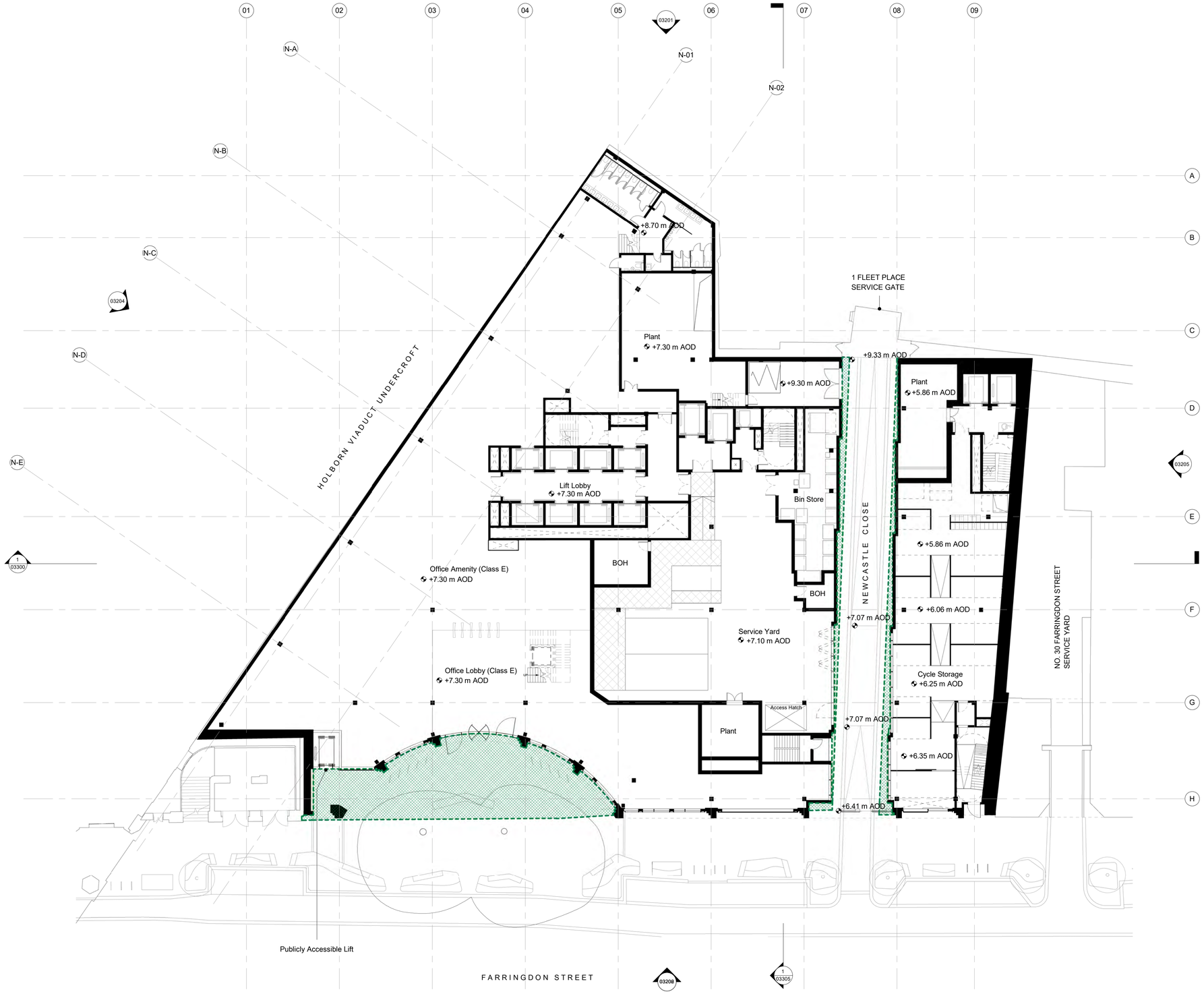
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.

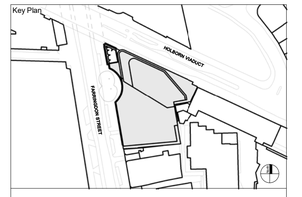
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.

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.

Appendix B – Stopping Up Plan and Plan of Highway to be declared





0 2 4 6 8 10 m

Proposed area to adopted highway (213.03 sqm)

Rev	Date	Notes	Insp By	Drwn By

PLP/ARCHITECTURE

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Client

ROYAL LONDON ASSET MANAGEMENT

Project Name

1395 Holborn Viaduct

Status

Planning Application

Drawing Title

S106 Proposed Public Highway Plan Farringdon Street

Drawing Number

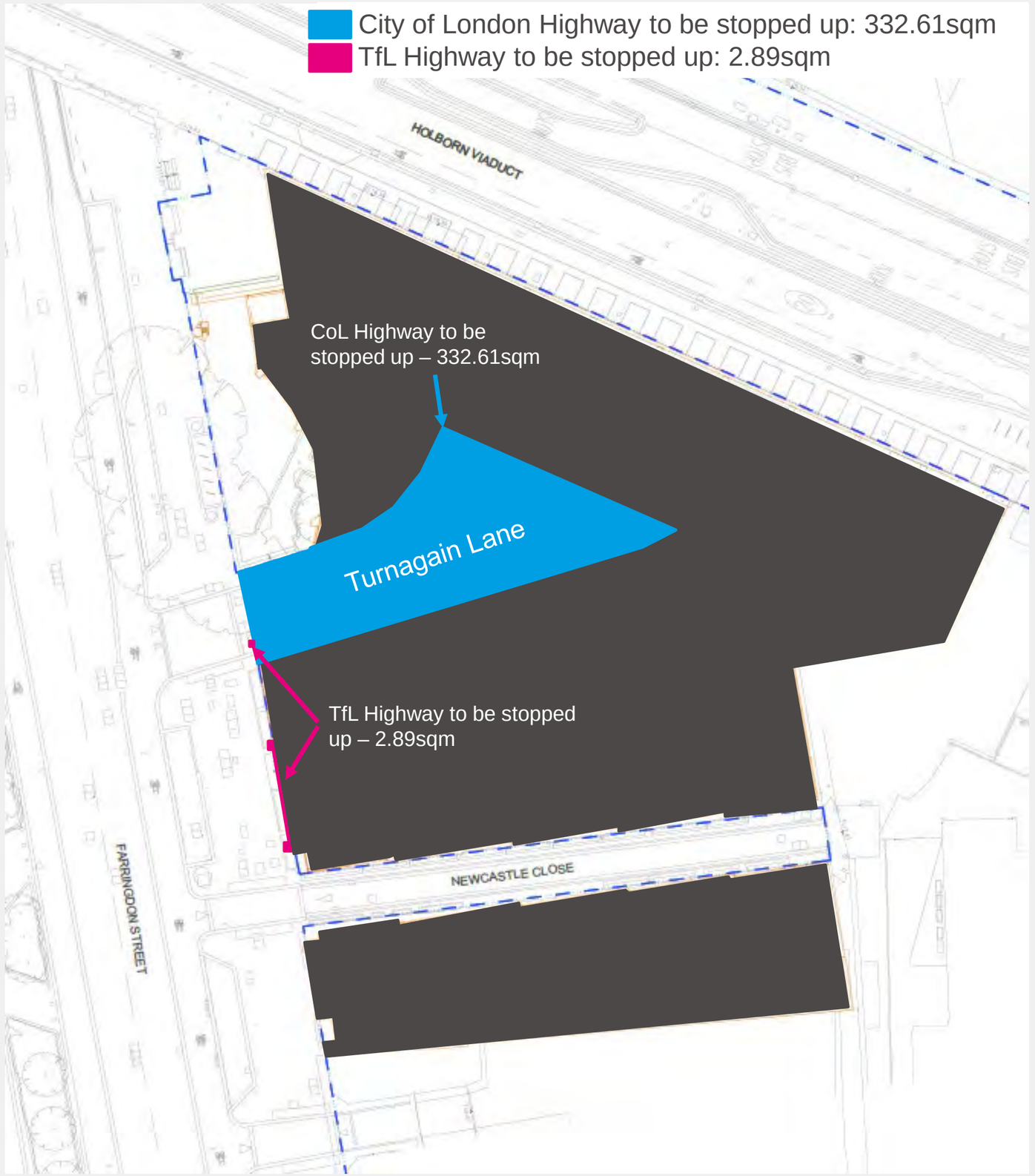
1395-PLP-DR-A-03002

Scale	Sheet Size	Creation Date
1 : 200	A1	02/12/21

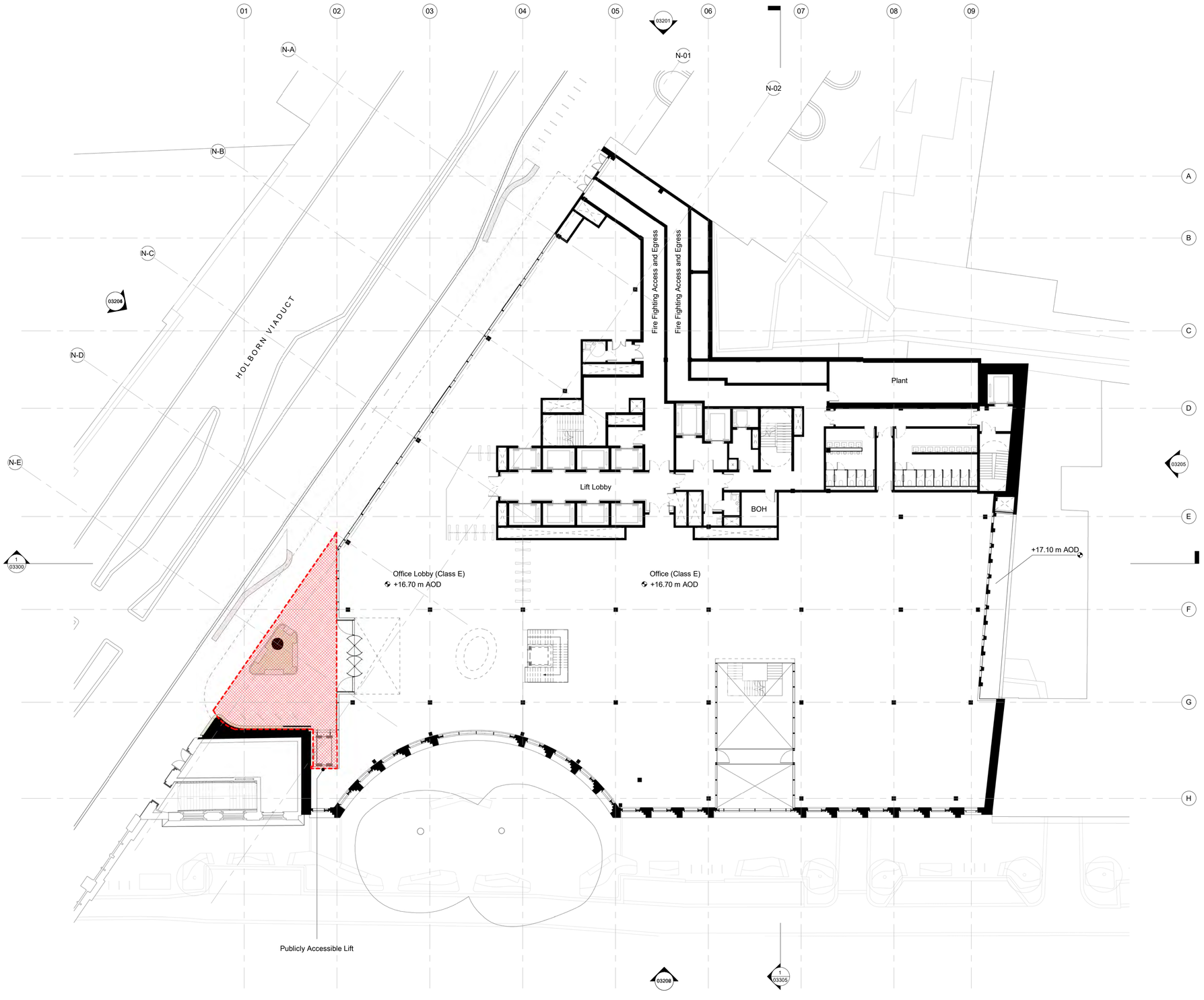
Revision

Drawn By

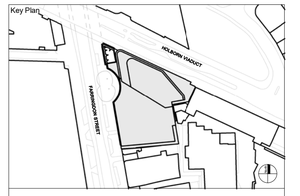
SG


City of London Highway to be stopped up: 332.61sqm
TfL Highway to be stopped up: 2.89sqm
HOLBORN VIADUCT
CoL Highway to be stopped up – 332.61sqm
Turnagain Lane
TfL Highway to be stopped up – 2.89sqm
NEWCASTLE CLOSE
FARRINGDON STREET

Appendix C – Plan of Permissive Path to be designated



Key Plan



Do not scale dimensions. Dimensions govern.

All dimensions are in millimetres unless noted otherwise.

PLP Architecture shall be notified in writing of any discrepancies.

All Drawings to be read in conjunction with Project Notes & Descriptions - Refer to sheet 1395-PLP-DR-A-00012

0 2 4 6 8 10 m

Proposed area to be Permissive Path (132.41 sqm)

Rev	Date	Notes	Insp By	Drwn By

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ROYAL LONDON ASSET MANAGEMENT

Project Name

1395 Holborn Viaduct

Status

Planning Application

Drawing Title

S106 Proposed Public Space Plan Holborn Viaduct

Drawing Number

1395-PLP-DR-A-03003

Scale	Sheet Size	Creation Date
1 : 200	A1	02/12/21

Revision	Drawn By
	SG

SCHEDULE

APPLICATION: **21/00755/FULMAJ**

14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London

Demolition of existing buildings at 14-21 Holborn Viaduct, 34-35 and 32-33A Farringdon Street, and construction of a new building arranged over 2 basement levels, ground and 10 upper floors to Holborn Viaduct and 12 upper floors to Farringdon Street to provide a new Commercial, Business and Service (Class E) building; new publicly accessible lift to provide step-free access between Holborn Viaduct and Farringdon Street; hard and soft landscaping works and other works incidental to the development.

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 Fencing for the protection of any retained tree(s) including the roots shall be installed in accordance with plans and particulars to be submitted to and approved in writing by the Local Planning Authority and shall be erected before any equipment, machinery or materials are brought on to the site for the purposes of the development, and shall be maintained until all equipment, machinery and surplus materials have been removed from the site. Nothing shall be stored or placed in any area fenced in accordance with this condition and the ground levels within those areas shall not be altered, nor shall any excavation be made, without the written consent of the Local Planning Authority.
REASON: In order to protect the trees on the site during building operations in accordance with the following policies of the Local Plan: DM10.4, DM19.2.

3 Prior to any stripping-out or demolition of the existing building, an updated material audit of the building should be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.
REASON: To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing

impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: London Plan; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.

4 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.

5 Prior to the commencement of the development (other than demolition) 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

6 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 prior to commencement due to the potential impact at the beginning of the construction.

7 There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition 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.

8 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.

9 No development other than demolition shall take place until the detailed design of all wind mitigation measures have been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.
REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

10 The two 'relief' sculptural panels at the entrance to 34-35 Farringdon Street shall be carefully removed prior to demolition commencing, stored for the duration of building works, reinstated and retained for the life of the building on the new building in accordance with detailed specifications including fixing details which shall be submitted to and approved in writing by the Local Planning Authority prior to commencement of the works affected thereby.
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.

11 Archaeological evaluation shall be carried out in order to compile archaeological records in accordance with a timetable and scheme of such archaeological work submitted to and approved in writing by the Local Planning Authority before any commencement of archaeological evaluation work.
REASON: To ensure that an opportunity is provided for the archaeology of the site to be considered and recorded in accordance with the following policy of the Local Plan: DM12.4.

12 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in

writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are understood to exist in accordance with the following policy of the Local Plan: DM12.4.

13 No works except demolition to basement slab level shall take place before details of the foundations and piling configuration, to include a detailed design and method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of surviving archaeological remains which are to remain in situ.
REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

14 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.
REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact/cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

15 No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement. REASON: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to impact on local underground water utility

infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email:developer.services@thameswater.co.uk.

16 Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.
REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

17 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 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 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.

18 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems (including

blue roofs), rainwater pipework, flow control devices, pumps, green roofs, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 5 l/s, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 406m3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

19 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.

20 No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works.
REASON: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

21 Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work. The details 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. No demolition or construction shall be carried out other than in accordance with the approved details and methods.
REASON: To ensure that demolition and 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 demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.

22 The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun and the development shall not be carried out otherwise than in accordance with the approved details.
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

23 Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) details of entrances;
(b) details of a typical bay of the development;
(c) details of glazing and fenestration;
(d) details of fins and solar shading;
(e) details of ground floor facades;
(f) details of the Farringdon Street facade;
(g) details of the Holborn Viaduct facade;
(h) details of the Newcastle Close facades;
(i) details of parapets, balustrades, BMU cradles and other excrescences at roof level;
(j) details of external plant enclosures and plant;
(k) details of external ducts, vents, louvres and extracts;
(l) details of photovoltaic panels;
(m) details of the public lift and associated signage;
(n) details of junctions with neighbouring buildings including the gatehouse;

(o) details of green walls including supporting structure, type and volume of growing medium, planting, including species and varieties, method of irrigation, maintenance regime and junctions with adjacent vertical surfaces;
(p) details of Art Panels and Art Screens, including any associated signage and lighting and proposed reinstated location of relief sculptures;
(q) details, samples and particulars of external facing materials;
(r) revised details of the doors to the bridge links (L06, L08 and L10) and rooms adjacent to the atrium (L07 and L09) to ensure sufficient unobstructed space on the pull side of the door between the leading edge of the door and return wall.
(s) revised details of the transfer handling arrangements between floors to show alternate handling between floors.
(t) revised details of the access arrangements for the wheelchair accessible WC facility on level 00.
(u) details of the layout of the 25 long stay spaces for larger cycles.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM10.4, DM10.8, DM11.3, DM12.1, DM12.2, DM12.3, DM19.2.

24 Details of the position and size of any green and blue roofs, the type of planting and the contribution of the green and blue roofs 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.

25 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036.

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

27 Before any works thereby affected are begun, the layout and the arrangement of the long stay and short stay cycle parking shall be submitted to and approved in writing by the Local Planning Authority in consultation with Transport for London. The cycle parking detailed in the approved arrangement plans and report shall thereafter be maintained in accordance with the approved plan(s) for the life of the building.
REASON: To ensure the cycle parking is accessible and has regard to compliance with the London Cycling Design Standards in accordance with the following policy of the Local Plan: DM16.3 and Intend to Publish London Plan policy: T5.

28 Before any works affected thereby are begun, details of one car parking spaces suitable for use by people with disabilities to be provided on the premises shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with those details, and such parking spaces shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors without charge to the individual end users of the parking.
REASON: To ensure provision of suitable parking for people with disabilities in accordance with the following policy of the Local Plan: DM16.5.

29 Before any works thereby affected are begun, details shall be submitted to and approved in writing by the Local Planning Authority showing details of the size and treatment of the surface areas to be left exposed at the base of the trees on Farringdon Street and the works shall be implemented in accordance with the approved details.
REASON: To ensure the protection of the trees on the site; in accordance with the following policies of the Local Plan: DM10.4, DM19.2

30 Before any works thereby affected are begun details and the location and specification of the PV panels shall be submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.
REASON: To ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

31 Before any works thereby affected are begun details of new information and historic interpretation plaques in the new public realm route and lift, including location, materials, text, images and fixing details, shall be submitted to and approved in writing by the Local Planning Authority. The approved information and historic interpretation plaques shall be installed prior to first occupation of the building and remain in situ for the lifetime of the building. The development shall be implemented in accordance with the approved details.
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.

32 All unbuilt surfaces, including terraces/balconies and public realm, shall be treated in accordance with a landscaping scheme, including details of:
(a) the position, size and types of planting of the green roof, its method of irrigation;
(b) details of the final Urban Greening Factor of the scheme;
(c) Irrigation, including provision for harvesting rainwater run-off from road ground and roof surfaces to supplement irrigation;
(d) Soil including details of the type and depths of soil and substrates;
(e) Species and selection of trees including details of its their age, growing habit, girth of trunk, how many times transplanted, root development;
(f) Planting pit size and construction, tree guards;
(g) Details of all soft landscaping including species and contribution to enhance biodiversity;
(h) Seating;
(i) Paving materials;
(j) Maintenance plans for all proposed landscaping;
(k) Planters;
(l) Vertical greening including species, supporting structure, method of fixing, growing medium and method of irrigation.
(m) Contribution to biodiversity enhancement of all landscaping including greening, green walls and green roofs.
to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or

become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

33 Prior to any plant being commissioned and installed in or on the building an Air Quality Report shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail how the finished development will minimise emissions and exposure to air pollution during its operational phase and will comply with the City of London Air Quality Supplementary Planning Document and any submitted and approved Air Quality Assessment. The measures detailed in the report shall thereafter be maintained in accordance with the approved report(s) for the life of the installation on the building.
REASONS: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

34 Before any mechanical plant is used on the premises it shall be mounted in a way which will minimise transmission of structure borne sound or vibration to any other part of the building in accordance with a scheme to be submitted to and approved in writing by the Local Planning Authority.
REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.

35 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 in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed. The developer shall use the post construction tab of the GLA's WLC assessment template and the relevant forms must be completed accurately and in their entirety in line with the criteria set out in the latest GLA's WLC assessment guidance.

Reason: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the Publication London Plan.

36 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 Circular Economy report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the Publication London Plan.

37 (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.

38 A minimum of 1 electric car charging points within the delivery and servicing area must be provided prior to the first occupation of the development.
REASON: to further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS 16 and draft Local Plan 2036 Policy VT2.

39 A post construction BREEAM assessment for the new office building demonstrating that a target rating of 'Outstanding' has been achieved (or, if first agreed by the local planning authority a minimum rating of 'Excellent' has been achieved) shall be submitted as soon as practicable after practical completion. In the event that the local planning authority is asked to agree a minimum rating of "Excellent" it must be first demonstrated to the satisfaction of the local planning

authority that all reasonable endeavours have been used to achieve an "Outstanding' rating. The details shall thereafter be retained.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

40 Within 6 months of completion details must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

41 No doors, gates or windows at ground floor level shall open over the public highway.
REASON: In the interests of public safety

42 Except as may be approved in writing by the Local Planning Authority the loading and unloading areas must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.

43 Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

44 The threshold of the new pedestrian route shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

45 Changing facilities and showers shall be provided adjacent to the bicycle parking areas and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

46 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

47 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of long stay and short stay pedal cycles in conjunction with the redevelopment. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

48 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.

49 No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

50 The roof terraces on level 6 and 11 hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

51 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: 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

52 No amplified or other music shall be played on the terraces.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

53 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.

54 The development shall provide:
37,391 sq.m (GEA) of office floorspace (Class E).
REASON: To ensure the development is carried out in accordance with the approved plans.

55 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at ZeroCarbonPlanning@london.gov.uk and the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development, including for tenanted floorspace through the provision of appropriate clauses which will be included in any leases granted to tenants in respect of their fit-out, and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.

REASON : To ensure that the GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: 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.

56 Notwithstanding the drawings hereby approved, the installation of 5no. cycle parking spaces parallel to the kerb line as shown on the plans on Holborn Viaduct is hereby precluded.
REASON - To ensure sufficient footway widths for the safe passage of pedestrians in line with the following Local Plan policies: DM16.1.

57 Prior to occupation a full Flood Emergency Plan shall be submitted to and approved in writing by the local planning authority in consultation with the Lead Local Flood Authority, and the plan shall be implemented in accordance with the approved details.
REASON: To ensure that the premises is safe for future occupiers in line with Local Plan Policy DM18.1 Development in the City Flood Risk Area.

58 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.

59 The development hereby permitted shall not be commenced until detailed design and method statements (in consultation with London Underground) have been submitted to and approved in writing by the local planning authority which:
o Provide Impact assessment of unloading and loading of the Development on LU/TfL assets
o Correlation survey of the LU/TfL assets will be required to determine clearances to the proposed re-development
o Provide Monitoring Action Plan if considered necessary following Impact assessment review
o Carry out Pre and post Condition survey of LU/TfL Assets
o Submit Design drawings for substructure (basement and piling) for approval by LU Engineer prior to commencement of works
o Submit RAMS for various construction phases for approval by LU Engineer
o Provide Lift Plans
The development shall thereafter be carried out in all respects in accordance with the approved design and method statements, and all structures and works comprised within the development hereby permitted which are required by the approved design statements in order to procure the matters mentioned in paragraphs of this condition shall be completed, in their entirety, before any part of the building hereby permitted is occupied.
Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with

London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

60 Prior to any demolition taking place on site, a detailed Schedule of Condition of the south-eastern Gatehouse shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To ensure the preservation of historic building features and fabric of the adjoining designated heritage assets in accordance with the following policy of the Local Plan: DM12.3.

61 No works at basement level hereby permitted shall take place before details of the underpinning, foundations and groundworks, to include a detailed construction method statement, have been submitted to and approved in writing by the Local Planning Authority, such details to show the preservation of historic building features and fabric to the adjacent designated heritage asset and surviving archaeological remains which are to remain in situ. The applicant shall consult the adjoining historic asset owners prior to the submission of the approval of details for this condition.
REASON: To ensure the preservation of historic building features and fabric and archaeological remains on the site and of adjoining designated assets in accordance with the following policies of the Local Plan: DM 12.3 and DM12.4.

62 Before any works thereby affected are begun, details of all protection measures to the historic fabric and to the structural stability of the adjacent designated heritage asset, to be carried out prior to and for the duration of the works, shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development, to ensure a satisfactory external appearance and to ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

63 The pass doors shown adjacent to or near to the main entrances on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.
REASON: In order to ensure that people with mobility disabilities are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

64 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:

1395-PLP-DR-A-01000
1395-PLP-DR-A-01001
1395-PLP-DR-A-02119
1395-PLP-DR-A-02120

1395-PLP-DR-A-02121
1395-PLP-DR-A-02122
1395-PLP-DR-A-02123
1395-PLP-DR-A-02124
1395-PLP-DR-A-02125
1395-PLP-DR-A-02126
1395-PLP-DR-A-02127
1395-PLP-DR-A-02128
1395-PLP-DR-A-02129
1395-PLP-DR-A-02130
1395-PLP-DR-A-02131
1395-PLP-DR-A-02132
1395-PLP-DR-A-02133
1395-PLP-DR-A-02134
1395-PLP-DR-A-02135
1395-PLP-DR-A-02136
1395-PLP-DR-A-03000
1395-PLP-DR-A-03001
1395-PLP-DR-A-03098
1395-PLP-DR-A-03098M
1395-PLP-DR-A-03099
1395-PLP-DR-A-03100
1395-PLP-DR-A-03100M
1395-PLP-DR-A-03101
1395-PLP-DR-A-03102
1395-PLP-DR-A-03103
1395-PLP-DR-A-03104
1395-PLP-DR-A-03105
1395-PLP-DR-A-03106
1395-PLP-DR-A-03107
1395-PLP-DR-A-03108
1395-PLP-DR-A-03109
1395-PLP-DR-A-03110
1395-PLP-DR-A-03111
1395-PLP-DR-A-03112
1395-PLP-DR-A-03113
1395-PLP-DR-A-03114 R01
1395-PLP-DR-A-03200 R01
1395-PLP-DR-A-03201 R01
1395-PLP-DR-A-03202 R01
1395-PLP-DR-A-03204 R01
1395-PLP-DR-A-03205 R01
1395-PLP-DR-A-03206 R01
1395-PLP-DR-A-03217
1395-PLP-DR-A-03300 R01
1395-PLP-DR-A-03305 R01
761-FH-XX-00-DP-L-101
761-FH-XX-00-DP-L-102
761-FH-XX-06-DP-L-101
761-FH-XX-11-DP-L-101

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 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We

would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via https://gbr01.safelinks.protection.outlook.com/?

url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=04%7C01%7C%7Cbba7031c73fa4c2c1b9008d97f365d16%7C9fe658cdb3cd405685193222ffa96be8%7C1%7C0%7C637680693729110381%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C1000&sdata=Fv2tSYARCTno6G8FVZjbb%2Bj0LroseLE6m79qiGerVkM%3D&reserved=0. Please
refer to the Wholesale; Business customers; Groundwater discharges section.

3 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx. 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

4 This approval relates only to the details listed above and must not be construed as approval of any other details shown on the approved drawings. Please note that a separate listed building consent application may be required for any works to the listed gatehouse that adjoins the site.