



CONSULTATION RESPONSE: OBJECT

Amy Williams
City of London Corporation
Guildhall
London
EC2P 2EJ

By email to: amy.williams@cityoflondon.gov.uk & PLNComments@cityoflondon.gov.uk

Our reference: 21119

11th November 2021

Dear Ms Williams,

Planning Application 21/00755/FULMAJ: 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 - 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT

SAVE Britain's Heritage strongly objects to the above application for the demolition of these three buildings on basis that the proposal involves the total loss of two non-designated heritage assets which will cause substantial and unjustified harm to the character of this part of the City and is unsustainable in terms of embodied carbon cost. The application therefore fails to comply with national and local policy for preserving the City of London's historic environment and sustainable planning goals, and we call on the Local Planning Authority to refuse planning permission.

Significance

Nos 34-35 and 32-33A Farringdon Street were built in 1921 as a pair of offices for the engineering firm Babcock and Wilcox. Designed in a classical style by the noted architect Victor Wilkins, both buildings are constructed in a proportionately grand manner, with steel frames clad in Portland stone, reflecting an established practice for constructing office buildings in the early 20th century.

Either side of the doorway of 34-35 Farringdon Street are unusual relief sculptures depicting figures engaged in industrial design, signed G. Alexander, which are considered to be of high historic and artistic significance. The buildings form an attractive pair of offices which contribute positively to the historic character of Farringdon Street and form an appropriate setting to the grade II listed Holborn Viaduct and associated gate houses from the south. In planning terms, they are non-designated heritage assets.

The concrete building at 14-21 Holborn Viaduct (dating from 1972-76) is of no significance in heritage terms but represents a substantial amount of embodied carbon.

Our Assessment

We object to this application on two grounds.

Firstly, we consider the proposed demolition of Nos 34-35 and 32-33A Farringdon Street to be substantially harmful in heritage terms. These buildings are refined and sophisticated examples of their period which survived the substantial redevelopment of the area in the 1990s and should therefore be considered non-designated heritage assets of considerable local historic and architectural significance when undertaking the balancing exercise required under paragraph 203 of the National Planning Policy Framework (2021). Having characterised Farringdon Street and the immediate setting of Holborn Viaduct for over 100 years, we consider their wholesale demolition to be unjustified and the scale of harm inherent in their total loss to be extreme and disproportionate.

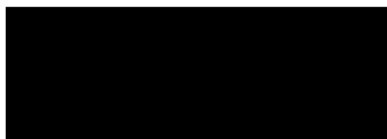
Secondly, the demolition of all three buildings would have a highly negative carbon cost, contradicting paragraph 152 of the NPPF which sets out a core principle of the planning system is to “*support the transition to a low carbon future in a changing climate [...] [and] encourage the reuse of existing resources, including the conversion of existing buildings.*” Retaining and converting historic buildings like these, and the embodied carbon they contain, is of paramount importance if the City is to comply and meet these important local and national policy commitments.

In October 2020, the City Corporation also pledged substantive action to reduce its own carbon emissions and those of the Square Mile as a whole. Refusal of demolition led schemes such as those proposed here, would show that it is serious about these commitments, especially in the wake of the COP26 summit.

Conclusion

For the reasons outlined above we object to this planning application and call on the Local Planning Authority to refuse planning permission. I trust these comments are useful to you and I ask that you keep me informed of further decisions regarding this application.

Yours sincerely,



Benedict Oakley

Conservation Officer

Comments for Planning Application 21/00755/FULMAJ

Application Summary

Application Number: 21/00755/FULMAJ

Address: 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT

Proposal: 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.
[The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated]

Case Officer: Amy Williams

Customer Details

Name: Miss Amber Patrick

Address: Association for Industrial Archaeology The Ironbridge Institute, Ironbridge Gorge Museum Coalbrookdale, Telford

Comment Details

Commenter Type: Other

Stance: Customer objects to the Planning Application

Comment Reasons:

- Other

Comment: The Association for Industrial Archaeology notes that this application is for the demolition of the existing buildings at 14-21 Holborn Viaduct, and 34-35 and 32-33A Farringdon Street, London. They are to be replaced by new buildings. The Association objects to the demolition of these non-designated heritage assets and supports the objection comments made by the Twentieth Century Society and the Historic Buildings and Places. These buildings have important historical connections as they served as the offices of the engineering firm of Babcock and Wilcox. This connection will be lost with replacement buildings.

Amber Patrick,

Planning Casework Officer,

Association for Industrial Archaeology



Twentieth
Century
Society

Amy Williams
City of London Corporation
Guildhall
London
EC2P 2EJ

Sent by email: Amy.Williams@cityoflondon.gov.uk

21 October 2021

Dear Amy Williams

21/00755/FULMAJ - 14-21 Holborn Viaduct and 32-33 & 34-35 Farringdon Street, London, EC1A 2AT

The Twentieth Century Society has been alerted to the above application for planning permission for the demolition of 14-21 Holburn Viaduct (Kimberley House) and 32-35 Farringdon Street and erection of “a new Commercial, Business and Service (Class E) building”. The Society objects to the proposed demolition of 32-35 Farringdon Street which is a non-designated heritage asset (NDHA). This case was reviewed by the Society’s advisory Casework Committee which met on 18 October, and the comments below summarise the committee’s response.

Background

32-35 Farringdon Street was built in 1920-21 to designs by the noted architect Victor Wilkins and served as the offices of the engineers Babcock and Wilcox. The offices are constructed from a steel frame and are clad in Portland stone. The building relates to a tradition of stone-clad, steel-framed offices erected in the early 20th century, which includes buildings like the Grade II listed Kodak House of c.1911 by Sir John Burnet and Partners on Kingsway. Designed in a classical style, the Farringdon Street offices comprise two matching 6-storey ranges. Each has a rusticated ground floor and upper floors with giant pilasters surmounted by a deep cornice, topped by an addition storey with a pedimented central bay and slate mansard roof. The offices feature relief sculptures of putti engaged in industrial design, signed G. (for George) Alexander.

14-21 Holborn Viaduct is a concrete office block built in 1972-76 by T.P. Bennett & Son. We do not wish to comment on the proposed demolition of this building.

Comments

32-35 Farringdon Street has been identified as a non-designated heritage asset. Its sophisticated stone elevations make a positive contribution to the local streetscape, and it adds to the historic interest of the area.

As outlined in paragraph 189 of the National Planning Policy Framework (NPPF, 2021), “Heritage assets range from sites and buildings of local historic value to those of the highest significance [...] These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”.

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 will result in the total loss of an NDHA. No justification has been provided for its total demolition, and no evidence submitted to show that the building cannot be retained and repurposed. In fact, the Design & Access Statement acknowledges that 32-35 has potential for reuse, stating that “It is likely both buildings could accommodate one or two additional storeys with moderate structural interventions and enhancements”.

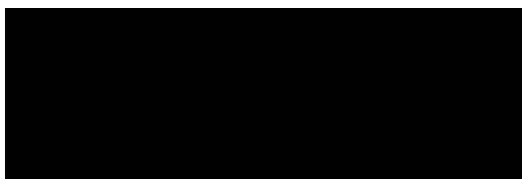
Ahead of COP26, we wish to point out that construction and material procurement represents about 40% of global greenhouse gas emissions. Reusing and retrofitting an existing building can result in a 70%-85% reduction in embodied carbon emissions compared to new construction. The NPPF advises that “The planning system should support the transition to a low carbon future in a changing climate [...] It should help to [...] encourage the reuse of existing resources, including the conversion of existing buildings”. The City of London Corporation has made clear its commitment to reducing its carbon emissions and should therefore encourage the reuse and retrofit of its existing buildings. This consideration, combined with the heritage impact of demolition, makes a strong case for retaining 32-35 Farringdon Street.

Summary

The Twentieth Century Society objects to the proposed full demolition of 32-35 Farringdon Street, a non-designated heritage asset of architectural and historic value. We urge the local authority to refuse planning permission.

I hope these comments are of use to you. Please do not hesitate to contact me if you have any questions.

Yours sincerely,



Coco Whittaker

Caseworker

Twentieth Century Society

Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.

Holborn Viaduct

Tavernor Response to Twentieth Century Society objection dated 21 October 2021

The Twentieth Century Society objection states: *“32-35 Farringdon Street has been identified as a non-designated heritage asset. Its sophisticated stone elevations make a positive contribution to the local streetscape, and it adds to the historic interest of the area... The current application will result in the total loss of an NDHA. No justification has been provided for its total demolition, and no evidence submitted to show that the building cannot be retained and repurposed...”* This objection has been supported by the Association for Industrial Archaeology.

Response:

It is acknowledged in the TVBHA that 32-35 Farringdon Street have modest historic and architectural interest as typical office development of the early 20th century, but the buildings are neither innovative nor of particularly high architectural quality; they are ordinary office buildings of modest quality. The wider townscape context of 32-35 Farringdon Street is extremely varied in scale, age and quality and 32-35 Farringdon Street are isolated pre-war survivals that do not contribute to a single coherent townscape character along Farringdon Street.

As stated in the TVBHA para 6.16, the demolition of Nos. 32-35 Farringdon Street would result in some loss to the historic townscape. Because Nos.32-35 are not designated heritage assets and do not contribute to a designated conservation area, their loss would not result in ‘harm’ in NPPF terms as referred to in paragraphs 201 and 202, which set out the balancing exercise required for harm to designated heritage assets. In accordance with paragraph 203 of the NPPF *“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 benefits of the Proposed Development that are of particular relevance to this balance are the delivery of an additional 18,917sqm of high quality, modern and highly sustainable office floorspace, improved continuity of the streetscape setting of the listed gatehouse to the north and the enhanced accessibility between the two street levels by provision of the new lift access next to the listed gatehouse. For a full list of the benefits of the Proposed Development refer to the Planning Statement para.8.7.

The client’s vision and aims for the project are to provide a high-quality modern office building that is flexible and adaptable for the future post-pandemic workplace. The development of the scheme has evolved through a series of focussed and iterative studies and the existing site has been assessed for suitability to achieve the aims of the development, ranging from full retention of existing buildings to full demolition with reuse of materials where possible. Decisions have been assessed relative to environmental, future adaptability and accessibility considerations.

We have concluded 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 building will be a modern, fit-for-purpose office with a healthy and adaptable environment that will safeguard the future of the site. The building will be comprised of components and modules designed for amendments and disassembly in the future. Material passports will be developed, including whole life carbon assessments and Environmental Product Declarations (EPDs), to aid with ability to reuse and recycle building elements in the future. Portland Stone from the existing Farringdon Street buildings will be salvaged and reworked into the new facades along the street. The project targets both BREEAM Outstanding and WELL certification.

For further detail please see the following chapters of the submitted Design and Access Statement:

Chapter 03 Existing Site introduces the details of the existing structures on the Site and analyses the conditions and quality of the existing accommodation and public realm.

Chapter 04 Design Evolution illustrates the design process and how the scheme evolved through pre-application consultations with the City of London Corporation and other stakeholders.

Chapter 05 The Proposed Development explains the design principles and details of the proposal.

From: [REDACTED]
To: [PLN - Comments](#)
Subject: Application Ref: 21/00755/FULMAJ - 14-21 Holborn Viaduct & 32-33 & 34-35 Farringdon Street, EC1A 2AT
Date: 18 October 2021 10:47:47

THIS IS AN EXTERNAL EMAIL



FAO: Amy Williams

By email: PLNComments@cityoflondon.gov.uk

Re: 14-21 Holborn Viaduct & 32-33 & 34-35 Farringdon Street, EC1A 2AT
Application Ref: [21/00755/FULMAJ](#)

Thank you for consulting Historic Buildings & Places on this application.

Please note that on 1 October 2021, the Ancient Monuments Society adopted Historic Buildings & Places (HB&P) as its new working name, which better reflects the Society's current focus on sustaining, defending and promoting historic buildings and places of all types and ages. We remain one of the National Amenity Societies, as per the 'Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021'.

We have viewed the documents available online and HB&P **objects** to the redevelopment of the above site due to the total loss of two non-designated heritage assets and the historic street pattern.

The existing building at 14-21 Holborn Viaduct, known as Kimberley House, was designed by TP Bennett and built in the mid-1970s. We agree that it is of limited architectural interest and do not object to its redevelopment, though we recommend seeking the specialist advice of the C20 Society.

Meridian House (34–35 Farringdon Street) and the building at 32–33 Farringdon Street are a pair of matching Portland stone buildings that date from 1921–22. They were designed by the architect Victor Wilkins. Both were originally used as workshops for an engineering company making boilers and are now in use as offices. This part of the City was heavily damaged during the war and much of the surrounding area was subsequently redeveloped. These two buildings are some of the last vestiges of the pre-war development that characterised Farringdon Street and are considered to be non-designated heritage assets. We strongly disagree with the assertion in the Townscape, Visual Impact and Built Heritage Assessment (p26) that the buildings are of little interest and that they do not contribute to the character of the area, simply because they are outside a conservation area. Indeed, their scale and materiality are important to the setting of the Holborn Viaduct and the four Portland stone gatehouses, which has been greatly diminished by the presence of the modern tall glass and concrete buildings that have since been built around it. As noted by Pevsner *"The ensemble is best seen from Farringdon Street"*, and no. 32-33 & 34-35 Farringdon Street makes an important contribution to the setting and views of the Viaduct along Farringdon Street.

As the Assessment notes, building technology by the 1920s 'allowed bigger, lighter workspaces to be created' and we do not believe the application has demonstrated that the buildings are not in a viable

use, nor adequately explored alternatives for these non-designated heritage assets, such as the addition of a suitably designed roof top extension that would deliver additional floorspace needed to retain the historic buildings in a viable use.

The loss of these buildings also damages the wider setting of the other remaining listed building on Farringdon Street, and this is not adequately addressed by the application. The wall of glass and cement buildings that would be created along either side of this section of the street, if this development proceeds, would further isolate and leave buildings standing out of context, particularly the grade II building at No. 26 Farringdon Street. This is emphasised in View A6 (p130) showing the No. 26 becoming even more overshadowed and dominated by much high buildings along the street.

The application also completely dismisses the history of Turnagain Lane and Newcastle Lane. Holborn Viaduct, which replaced Holborn Bridge, was built between 1863 and 1869 and bisected Turnagain Lane, which originally ran from Snow Hill to the Fleet dike. The lanes have medieval origins dating back to the C13. Turnagain Lane was once called Wendagayneslane, which according to historian John Stow, it was so called “for that it goeth down west to Fleet dike, from whence men must turn again the same way they came, for there it stopped”. It was recorded as Turnagain Lane by the early 1600s and together with Newcastle Lane, both are clearly indicated on the 'Ogilby and Morgan's Large Scale Map of the City As Rebuilt By 1676'. The application dismisses them as ‘murky service lanes’ and again doesn’t look at opportunities to reuse and re-establish connections through the site that would celebrate their legacy. So many historic streets and laneways have been lost in this part of the City following site amalgamations and construction of the various oversized post war redevelopments that have obliterated the traditional fine grained pattern of development. It is therefore more pressing that these remaining small lanes that chart the evolution of the City are retained.

The relevant NPPF (2021) policy considerations are:

- Paragraph 189: “Heritage assets range from sites and buildings of local historic value to those of the highest significance... These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.”
- Paragraph 195: “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”.
- Paragraph 203: “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.”

Meridian House and 32–33 Farringdon Street are two high quality buildings which make a positive contribution to the streetscape and setting of the Holborn Viaduct, and sufficient evidence has not been provided to demonstrate that the two non-designated heritage assets cannot be adapted to remain in a viable use. Any development must respect the historic qualities of the site, including Turnagain Lane and Newcastle Close. We therefore recommend the application is refused.

I would be grateful if we could be informed of the outcome when this becomes available.

Regards,

Ross Anthony

Case Work



St Ann's Vestry Hall
2 Church Entry
London, EC4V 5HB

Historic Buildings & Places, the working name of the Ancient Monuments Society, is a registered charity in England and Wales (no. 209605). It is one of the National Amenity Societies and, as such, is a consultee on all Listed Building Consent applications involving an element of demolition as required by the *Arrangements for handling heritage applications – notification to Historic England and National Amenity Societies and the Secretary of State (England) Direction 2021*. We are concerned with historic assets of all types and all ages, including planning applications affecting historic buildings in conservation areas and undesignated heritage.



For the attention of Ms Amy Williams

14-21 Holborn Viaduct & 32-33 & 34-35 Farringdon Street, EC1A 2AT
Planning Application Reference 21/00755/FULMAJ

The London and Middlesex Archaeological Society (LAMAS) promotes London's archaeology, local history, and historic buildings. The LAMAS Historic Buildings and Conservation Committee reviews applications for listed building consent and seeks to ensure a sustainable future for vital aspects of London's built heritage.

The last sentence of the application description makes clear that what is proposed conflicts with the City of London's own development plan, which is reason alone for serious concern. The Committee's own review of the documents for this application has led it to form the view that the proposed development would be overly harmful to the historic environments of Farringdon Street and Holborn Viaduct. For the reasons set out in the following paragraphs, planning consent therefore should be **refused**.

Meridian House and 32–33 Farringdon Street

Of the greatest concern to the Committee is the proposed demolition of two historic buildings, Meridian House (34–35 Farringdon Street) and 32–33 Farringdon Street. The submitted Built Heritage Assessment (paragraphs 4.32–40 / pages 21–22) notes they date from 1921–22 (not the mid-20th century, as per paragraph 4.2.42 / page 16 of the Archaeological Desk-Based Assessment) and were designed by the architect Victor Wilkins.

As is to be expected given the context of their work, the author of the Built Heritage Assessment adjudges the buildings to be '*non-designated heritage assets of low local value*' (paragraph 4.40 / page 22). This underplays the contributions Meridian House and 32–33 Farringdon Street make as non-designated heritage assets. Nowhere in the application documents is it acknowledged that either side of the main entrance to Meridian House are original relief sculptures by George Alexander, as identified and discussed by Dr Philip Ward-Jackson in his 2007 study *Public Sculpture of the City of London* (page 100). The artistic contribution of the sculptures to the adjacent public realm are mirrored by the positive contributions of the two buildings to this section of Farringdon Street, especially experienced at close quarters; the interplay of the Portland Stone-faced buildings and the entrances to Turnagain Lane and Newcastle Close is particularly pleasing when viewed from the north. All this is in marked contrast to the exceedingly bland Farringdon Street elevation of the proposed building depicted in many of the application documents.

The Built Heritage Assessment places no little emphasis on the two buildings existing outside of a conservation area and that they *'do not contribute to the contemporary townscape of Holborn Viaduct or its bridge and gatehouses'* (paragraph 4.40 / page 22). We contend that these points are misleading. The situation of the two buildings on Farringdon Street makes it impossible for them to contribute to the townscape of Holborn Viaduct, an entirely different street on an entirely different, more elevated level — no heritage asset of their size, even if Grade I listed, could be expected to do so. Furthermore, they do contribute positively to the **setting** (the consideration enshrined in the National Planning Policy Framework, most pertinently in paragraph 195) of the listed viaduct and gatehouses when viewed from further south on Farringdon Street. Contrary to the impression given by the Built Heritage Assessment, historic buildings should not be limited to conservation areas; they should be retained and cherished wherever they stand. We note the submitted Design and Access Statement (Section 3, page 36) posits that both buildings *'could accommodate one or two extra storeys with moderate structural interventions and enhancements'*, indicating a viable alternative exists for retaining the buildings while delivering additional floorspace.

Turnagain Lane and Newcastle Close

The Committee also decries the proposed erasure of Turnagain Lane and the transformation of Newcastle Close into an enclosed service road passing underneath the new building. Turnagain Lane is named as such by 1601 and has medieval roots; Newcastle Close is also of several centuries standing. The two historic side streets are described in the Built Heritage Assessment as *'rather murky service access roads'* and 19th-century truncation and 20th-century development is asserted to mean *'their tangible heritage value has therefore been reduced to almost nothing'* (paragraph 4.43 / page 22). Such statements ignore not only the inferiority of the proposed outcomes, but moreover the ability for the streets to be reactivated through sensitive and imaginative development — to see their present state (whether or not it is viewed as pessimistically as it is in the application documents) as their ultimate state, incapable of amelioration, exhibits a lack of sensitivity and poverty of vision that characterise the submitted proposals. To diminish the public realm, particularly when the streets in question are of such heritage, is something that must be resisted.

Holborn Viaduct

The existing building on Holborn Viaduct (Kimberley House, designed by TP Bennett and built in the mid-1970s) is of limited architectural merit but does at least have some texture to its street frontage that provides visual interest greater than the dour, glass-dominated facade of its proposed replacement as shown in visualisations and drawings throughout the application documents. The effect would be exacerbated by the greater, arguably excessive, height of the proposed new building. The applicant claims that the new building would deliver an interface with the Grade II-listed south-east gatehouse of Holborn Viaduct (completed in 1869) better than the existing four-storey “wing” of Kimberley House. The visualisations show the opposite would be the case; the transition between old and new would be articulated by nothing more than a sliver of greenery separating the late 19th-century designated heritage asset from the 10+ storey mass of the new office building. The visual effect is one of dominance of the new

building over its historic neighbour, with the gatehouse appearing to be squeezed out rather than respected and enhanced.

Conclusions

The application documents time and again claim that the existing buildings and streets inside the development site boundary are of low or negligible heritage significance. This ignores the fundamental point that, in the eyes of the Committee, what is proposed is in comparison of inferior architectural design quality and moreover would diminish the appearance of Holborn Viaduct and Farringdon Street. The historic buildings and fine urban grain of the City of London are among its greatest assets; what is envisaged would erase both within the proposed development site and fail to replace them with anything of equivalent enduring merit. One only has to look across Farringdon Street at the new Goldman Sachs International building to see an oversized edifice that obliterated the historic topography of its site and has a deadening effect on the surrounding streetscapes.

Meridian House and 32–33 Farringdon Street have just turned 100 years old, and their centenary serves to underscore that the design quality of their proposed replacement, both in terms of visual appearance and the urban topography, simply is not sufficient as to believe it would not have been replaced after a century. Any development of the site must respect the historic context of the site and celebrate the heritage assets present (and we include Turnagain Lane and Newcastle Close among them). By looking at and looking after the past of the City of London, a better future may be secured for it.

Lastly, the Committee wishes to highlight how the proposed development jars with wider issues of sustainable development and emerging trends in working practices. To cite a very recent example, the Royal Academy of Engineering's report *Decarbonising construction: building a new net zero industry* focuses on, among other things, the embodied carbon of existing built infrastructure and the importance of minimising emissions from construction activity. Replacing three existing office buildings with one larger one very much runs counter to these and thus fails to do as much to help reduce the City's contribution to climate change as alternative approaches involving retention and adaptation of the existing structures. It also goes against the changes that have occurred in working patterns in the past two years, with the move away from fully office-based roles to more flexible arrangements, which mean a reduced need for office spaces — forecasts are that generally this will be a lasting change. A large new office building that is never occupied to anything close to its capacity would be an undesirable outcome, and the proffered reconfigurations for alternative uses in such a scenario (Design and Access Statement, page 105) do not inspire confidence that these would be anything other than sub-optimal for occupants.

Vicki Fox (Hon. Secretary)

LAMAS – Historic Buildings & Conservation Committee

6 October 2021

Holborn Viaduct

Tavernor Response to LAMAS objection dated 6 October 2021

The LAMAS objection states: *“the author of the Built Heritage Assessment adjudges the buildings to be ‘non-designated heritage assets of low local value’ (paragraph 4.40 / page 22). This underplays the contributions Meridian House and 32–33 Farringdon Street make as non-designated heritage assets. Nowhere in the application documents is it acknowledged that either side of the main entrance to Meridian House are original relief sculptures by George Alexander...”*

Tavernor Response:

Historic England consider the value of all designated heritage assets to be high in assessment terms but do not provide firm guidance on the value of non-designated heritage assets. The built heritage assessment methodology refers to the Guidance on Heritage Impact Assessments for Cultural World Heritage Properties (2011) produced by the International Council on Monuments and Sites (ICOMOS) in para.2.8 and states in para.2.9 that *“Although the ICOMOS Guidance was developed for assessing effects on World Heritage Sites it also provides useful guidance for the assessment of effects on heritage assets more generally.”*

Appendix 3A of the ICOMOS Guidance provides an example guide for *“Assessing the value of heritage assets”* which is used as a guide for the consideration of non-designated heritage assets. As stated by ICOMOS in Appendix 3A, townscape and structures of ‘low’ value include *“historic (unlisted) buildings of modest quality in their fabric or historical associations”*. We therefore consider the baseline assessment of low value to be justified. However more important to this assessment is their consideration as ‘non-designated heritage assets’ in NPPF terms.

George Alexander (1881 to 1940) was not a sculptor of particular renown. His best-known work is furniture at the Council Chamber in Cardiff County Hall and at County Hall, London and carving in wood and stone in the Ironmongers Hall, London. His historic association with the buildings contributes some minor historic interest.

It is acknowledged in the TVBHA that 32-35 Farringdon Street have modest architectural interest as typical office development of the early 20th century, but the buildings are neither innovative nor of particularly high architectural quality; they are ordinary office buildings of modest quality. They have a known architect and their historic associations with architect Victor Wilkins – and sculptor George Alexander – contribute some minor historic interest.

As stated in the TVBHA para 6.16, the demolition of Nos. 32-35 Farringdon Street would result in some loss to the historic townscape. Because Nos.32-35 are not designated heritage assets and do not contribute to a designated conservation area, their loss would not result in ‘harm’ in NPPF terms as set out in paragraphs 201 and 202, which sets out the balancing exercise required for harm to designated heritage assets. In accordance with paragraph 203 of the NPPF *“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 benefits of the Proposed Development that are of particular relevance to this balance are the delivery of an additional 18,917sqm of high quality, modern and highly sustainable office floorspace, improved continuity of the streetscape setting of the listed gatehouse to the north and the enhanced accessibility between the two street levels by provision of the new lift access next to the listed gatehouse. For a full list of the benefits of the Proposed Development refer to the Planning Statement para.8.7.

The LAMAS objection states: *"The Built Heritage Assessment places no little emphasis on the two buildings existing outside of a conservation area ... Furthermore, they do contribute positively to the setting (the consideration enshrined in the National Planning Policy Framework, most pertinently in paragraph 195) of the listed viaduct and gatehouses when viewed from further south on Farringdon Street..."*

Tavernor response:

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.

In considering the acceptability of change in NPPF terms it is important to make the distinction between visual changes to the setting of a heritage asset and changes to the appreciation of what is of value about a heritage asset ie its 'heritage significance'. Change to the visual setting of a listed building is not inherently harmful and this has been tested at numerous public inquiries. The wider townscape setting of the listed viaduct and gatehouses is extremely varied in scale and date, demonstrating the layered evolution of the City, but making a limited contribution to the appreciation of the heritage significance of the listed viaduct and gatehouses.

The LAMAS objection states: *"the Committee also decries the proposed erasure of Turnagain Lane and the transformation of Newcastle Close into an enclosed service road passing underneath the new building... The two historic side streets are described in the Built Heritage Assessment as 'rather murky service access roads' and 19th-century truncation and 20th-century development is asserted to mean 'their tangible heritage value has therefore been reduced to almost nothing' (paragraph 4.43 / page 22)...."*

Tavernor response:

Section 4 of the TVBHA acknowledges the historic and evidential interest of the two streets as a remnant of the pre-existing historic urban development of the area. However, these routes do not contribute to the urban layout of a designated conservation area or to the setting of any listed structure or Scheduled

Monument. Because they are now much altered: truncated, lack building frontages and used purely for service access, without any connectivity to the wider urban fabric to the east, their historic function is no longer meaningful or legible within the townscape and their ability to aid in the interpretation of the pre-19th century townscape of the area is largely lost.

Section 6 of the TVBHA notes that the removal of Turnagain Lane would result in some slight loss to the historic urban layout. Because Turnagain Lane is not a designated heritage asset and does not contribute to a designated conservation area, it would not result in 'harm' in NPPF terms as set out in paragraphs 201 or 202, which set out the balancing exercise required for harm to designated heritage assets. In accordance with paragraph 203 of the NPPF, *"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 loss of Turnagain Lane would have a limited impact on the historic townscape of the City and would be balanced by the public benefits of the Proposed Development. The benefits of the Proposed Development that are of particular relevance to this balance from a townscape and heritage perspective are the improved accessibility between the two street levels by provision of the new lift access next to the listed gatehouse close to the location of Turnagain Lane, the creation of new public realm on Farringdon Street and the recreation of a coherent streetscape setting to the south of the listed gatehouse. For a full list of the benefits of the Proposed Development refer to the Planning Statement para.8.7.

Draft City Plan Policy HE1: Managing Change to Heritage Assets Point 6, states that *"Development should not cause the loss of routes and spaces that contribute to the character and historic interest of the City. The reinstatement of historic routes and the creation of new routes will be sought."* Para. 6.4.20 expands on the policy: *"The pattern of streets, lanes, alleyways and other open spaces, such as squares and courts, is a distinctive element of the City's townscape and is of historic significance in itself. The City Corporation will seek to maintain the widths and alignments of streets, lanes and other spaces where these have historic value or underpin the character of a location or their surroundings. Some historic routes have been lost to the detriment of the City's historic townscape. Where possible, the City Corporation will seek to re-open or reintroduce such routes when the opportunity arises."* While they have some very minor evidential or archaeological interest, neither Turnagain Lane nor Newcastle Close currently contribute to the legible historic character of the City.

The LAMAS objection states: *"The existing building on Holborn Viaduct (Kimberley House, designed by TP Bennett and built in the mid-1970s) is of limited architectural merit but does at least have some texture to its street frontage that provides visual interest greater than the dour, glass-dominated facade of its proposed replacement as shown in visualisations and drawings throughout the application documents. The effect would be exacerbated by the greater, arguably excessive, height of the proposed new building. The applicant claims that the new building would deliver an interface with the Grade II-*

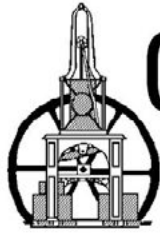
listed south-east gatehouse of Holborn Viaduct (completed in 1869) better than the existing four-storey “wing” of Kimberley House. The visualisations show the opposite would be the case; the transition between old and new would be articulated by nothing more than a sliver of greenery separating the late 19th-century designated heritage asset from the 10+ storey mass of the new office building. The visual effect is one of dominance of the new building over its historic neighbour, with the gatehouse appearing to be squeezed out rather than respected and enhanced.”

Tavernor Response:

As stated in Section 4 of the TVBHA, the existing south-east junction of Holborn Viaduct and Farringdon Street is characterised by the juxtaposition of the Grade II listed south-east gatehouse with the post-war Kimberly House. Its awkward resolution of the differing geometries of Holborn Viaduct and Farringdon Street appears to turn its back on the south-east gatehouse, with a section of blank wall and a service yard close to its south, which has removed the coherent streetscape of Farringdon Street that would have originally integrated the gatehouse within its context at the lower level. This fragmented streetscape to the immediate south of the gatehouse has eroded the quality of the setting of the south-east gatehouse. The wider townscape setting of the gatehouses is varied in scale and date, demonstrating the layered evolution of the City, but making a limited contribution to the appreciation of the heritage significance of the bridge and gatehouses.

The heritage significance of the gatehouses is best appreciated in views from the bridge itself at the upper level and from the lower levels to the north and south of bridge on Farringdon Street at closer range where the architectural detailing and relationship of the group of structures to each other can be appreciated. At all four corners of the bridge the modern setting is taller and more modern and it is now, at least in part, the contrast between the taller modern office buildings and the group of finely detailed skewed Victorian bridge and the stone gatehouses at the four corners of the bridge that characterises the townscape of the junction.

The taller modern development beyond the gatehouses seen from the upper level of the bridge or from Farringdon Street at the lower level, creates a contrasting backdrop to the gatehouses (both original and reconstruction), but does not block the intervisibility of the interrelated bridge and gatehouses or block close views of their fine architectural detail. The heritage significance of the group is still able to be well appreciated within the taller contrasting modern setting, and in fact the contrast and juxtaposition between new and old in the townscape contributes to the distinctive sense of place of the junction.



GLIAS

Vice-President: Malcolm Tucker

Company No. 5664688 England
Charity No. 1113162

Greater

London Industrial Archaeology Society

Please reply to : MT Tucker, 9 Blythwood Road, London N4 4EU, [REDACTED]

The Planning Department
City of London Corporation
Guildhall
London EC2P 2EJ
For the attention of Ms Amy Williams

26 Oct 2021

Your ref: 21/00755/FULMAJ

BY EMAILTO: Amy.Williams@cityoflondon.gov.uk

Dear Ms Williams

**14-21 Holborn Viaduct & 32-33 & 34-35 Farringdon Street, EC1A 2AT
Planning Application Reference 21/00755/FULMAJ**

The Greater London Industrial Archaeology Society objects to the demolition of Nos. 32-35 Farringdon Street within this application. These two buildings were completed in 1923 as the head offices of Babcock & Willcox Ltd, the free-standing British arm of an American company, who were the world's leading manufacturers of steam boilers for power generation and marine propulsion. With their manufacturing facilities elsewhere in the UK, the firm's operations throughout the British Empire and Europe were directed from here. The location reflected the aspirations of leading companies at that period to be based in the City of London. These offices have polite and well-composed, yet practical stone facades concealing 5-storied steel frames and well matched to their role and status. They illustrate the City's economic situation of 100 years ago and should not be disregarded. Moreover, they make a positive contribution to the streetscape and add to the area's historic interest.

Above the main entrance at Nos.34-35 there are featured two putti by the then important sculptor George Alexander (1881-1942). See following pages. One is holding a chart of the engineering properties of steam and the other shows a representation of the water-tube boiler, which was the mainstay of the company's business. In the event that your committee decides to approve the application, we would ask that these two sculptures be offered to an industrial heritage museum site which formerly made use of Babcock and Wilcox boilers, for preservation.

Yours sincerely

Malcolm T Tucker
Vice President of GLIAS





26th October 2021

Planning Application: 21/00755/FULMAJ

14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT (Kimberley House, Meridian House and 32 Farringdon Street)

Dear Sir or Madam,

On behalf of the Fleet Street Quarter, a business-led Partnership representing a number of businesses within the area, I am writing as a representative of the Fleet Street Quarter to support Royal London Asset Management's proposals to redevelop the above sites at Holborn Viaduct. The development team and associates have maintained constant and strong communication with the Partnership during the consultation phase for the proposed scheme.

The current buildings – Kimberley House, Meridian House and 32 Farringdon Street – offer an unremarkable and uninspiring aesthetic to the area, with outdated façades, narrow and constrained floorplates and a lack of permeability. Although Fleet Street acts as the geographical spine for our Partnership, the Fleet Street Quarter embraces a much wider area, with Holborn Viaduct acting as our northern boundary and thus a key gateway moment to the wider Quarter. The redevelopment of the three buildings proposes some instrumental improvements to the public realm, through the animation of the streets by introducing active frontages on both Holborn Viaduct and Farringdon Street and increased permeability. The new public spaces, joined by a lift, creating a new step free link between Holborn Viaduct and Farringdon Street, is particularly welcomed, creating an inclusive space.

The current Fleet Street Quarter lacks open and green spaces that promotes dwell opportunities. The new streetscape of the proposed redevelopment provides greening with planters and trees that enhances the quality and usability of public realm, creating a better micro-climate and reducing the urban heat island effect. Green infrastructure can improve air quality by providing barriers to sources of pollution such as busy roads and in turn counteracts the urban heat island effect. Rising evidence also suggests that investment into green infrastructure can in turn provide tangible benefits to local occupiers. In the short-term, co-benefits of greening will create pleasant spaces that encourages people to stay longer and engage more with their surroundings. This not only is a positive thing for the local area but adds to the vibrancy and character of the Quarter boosting peoples' wellbeing. The planters integrate bench seating, providing places for the public to stay and enjoy.

We recognise that existing commercial buildings, built by previous generations, often cannot meet the environmental or operational standards required by modern users, and believe when redevelopment is necessary, developers should seek to deliver the highest quality proposal, deploying the principles of the Circular Economy to ensure maximum benefit to the City. At a time of great focus on sustainable development, it is right that the developer seeks to achieve BREEAM Outstanding and has designed a building that is capable of adaption to respond to major changes of uses over its lifetime. These are impressive targets, befitting a city which places extreme importance on climate action. The proposals for the wider public realm, including planting in Farringdon Street

and the provision of publicly accessible cycle parking, will ensure those visiting the wider area benefit from the improvements delivered by this scheme.

A thorough and attentive cultural audit has been undertaken for the development, offering a cultural strategy that will broaden the use of the building. The cultural strategy for the development invites a varied demographic to make use and visit the space, contrasting to the heavily corporate environs in the surrounding area. The developers are committed to a series of external public art that will run during the development stages and beyond. Proposed external public digital art screens provide the opportunity to showcase art pieces in a 24/7 capacity, making visual connections and conceptual connections across the site. It is also noted that the developers will be looking to work with the Museum of London, that can create an organic link between the Fleet Street Quarter area and the Culture Mile. The cultural strategy not only considers local perspective but also seeks the ambition of the global stage through acknowledgment of the Mayor's London Plan (2021).

Whilst the scheme will primarily look to appeal to its building occupiers, there is consideration for the building responding to a wider audience that can be interacted with and used beyond 'working' hours. Fleet Street Quarter is supportive of the development of Holborn Viaduct. We believe the introduction of a new, highly sustainable, flexible office building will both drive the economic vitality of the City as well as deliver tangible benefits for the local area through the provision of public realm and accessibility improvements, new public art and a cultural strategy, and extensive greening and planting – aligning with the ambitions of the Partnership and its members.

We hope the City Corporation will approve this application and continue to support the ongoing regeneration and enhancement of the wider Fleet Street area

Kind Regards,

Martha Grekos

Chair, FSQ Public Realm & Environment Steering Group

Fleet Street Quarter Partnership



Amy Williams
The Department of the Built Environment
City of London
PO Box 270, Guildhall
London
EC2P 2EJ

3 September 2021

Dear Ms Williams,

Museum of London and the Holborn Viaduct project

The Museum of London was pleased to be contacted earlier this year by Futurecity, on behalf of Royal London Asset Management, about the planned Holborn Viaduct development. We have since been engaged in a detailed and positive dialogue regarding the opportunity to partner with them on the proposed Cultural Plan for this site.

This partnership would be built around innovative public engagement with, and crucial support of, the museum's expanding digital collections – a vital portal into the 7.5m objects in our care. The partnership would enable key new digitisation work to take place, which would not otherwise be possible, unlocking the huge academic, creative and educational potential of these collections for the largest possible audience. It would also underpin the creation of exciting new artistic commissions that would bring great vibrancy to this fascinating and historic part of the City.

In our view, the benefits of such a partnership to the museum's audiences and the wider public, in both the short and long term, are very exciting. We are enthusiastic about, and supportive of, the Holborn Viaduct Cultural Plan, and the contribution it would make to the immediate neighbourhood around our future home in West Smithfield, and to the wider Culture Mile.

We look forward to continuing this conversation and working with Futurecity, Royal London Asset Management and our close partners in the City of London.

Yours sincerely

Finbarr Whooley
Director of Content

cc. Gary Surridge, Head of Partnerships, Museum of London

City of London Corporation
Guildhall, London

29 November 2021

Letter of support for the planning application 21/00755/FULMAJ.

Dear City of London Corporation Planning Team,

We are writing to you as the Chair and Chief Executive of the Central District Alliance Business Improvement District to support Royal London Asset Management's proposals to redevelop the above site at Holborn Viaduct.

The Central District Alliance is one of the largest and most successful BIDs in the country, representing over 400 businesses. We support a vision that ensures central London has every opportunity to thrive and prosper. We want to inspire a sense of pride and discovery in our local area, connecting people, and realising the full potential of this diverse part of the City.

Following the Central District Alliance's core values – progressive, inspirational, and inclusive – we believe this scheme aligns with our vision to establish a sustainable and revitalised place, while providing new public realm improvements for both the local and wider community, further supporting our operational principles of green, clean, safe and welcoming.

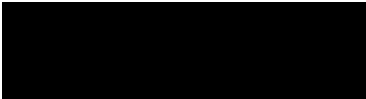
As a champion of local responses to the climate emergency, we endorse the significant sustainability improvements embedded in the proposed development. We feel that the ambition to deliver a net zero carbon emissions development (including offsetting) combined with a Circular Economy approach enables 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. The Central District Alliance's Grey-to-Green Strategy aims to bring all green to eye level, in line with slowly bringing people back into London, we are therefore encouraged by the proposed biodiversity uplift, with proposals for planting along Farringdon Street, which should enhance the quality and usability of 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.

In conclusion, the Central District Alliance is pleased to support Royal London's proposals for this site. We welcome the contribution to the wider area through public realm improvements, a new cultural offer and contribution to the City's economy.

Yours Sincerely,



Debbie Akehurst
Chief Executive



Alexander Jan
CDA Chair



8 November 2021

To whom it may concern,

Hogan Lovells is the 10th largest law firm by global revenue with in excess of 6,000 Partners and employees across a network of more than 45 offices globally. London is the second largest office with over 1,000 lawyers and business services personnel and recognised as one of the major business centres for the firm. We are consistently ranked amongst the most innovative law firms in Europe and advises on matters in highly regulated sectors, operating at the intersection of business and government. The firm has strong community investment and pro bono programmes focused on creating partnerships and collaborating with others to create thriving local communities.

Hogan Lovells has a long history with the City of London. Lovells was founded in 1899 on Snow Hill and has occupied various locations around the Square Mile before settling back in the Holborn Viaduct area in 1977.

Hogan Lovells currently occupies 320,000 sqft across two buildings spanning Holborn Viaduct. The co-terminus lease expiry for Atlantic House and 18-21 Holborn Viaduct is 2026. We therefore need new premises in order to meet the future demands of our business beyond 2026.

In 2019 an extensive market review of alternative buildings was undertaken considering buildings in Canary Wharf, London Bridge and the City of London. A number of sites and planning permissions were considered to meet our requirements, however a location in the west of the Square Mile was preferred.

It was felt by our London Partners that the 14-21 Holborn Viaduct scheme maintained the excellent access we have to the courts, our clients, transportation links for our people and future access to amenities and culture that will be offered by the Culture Mile initiative and particularly the new museum of London scheme. Above all, it was felt that Holborn Viaduct was our spiritual home!

Having the business split across two buildings has proved to be sub optimal and there is a requirement to accommodate all our people in a single building to enhance collaboration and security. Following a post-Covid occupancy review, it was determined that a 15% reduction in demand for office space could be achieved with the increased take-up of working from home. Working closely with our colleagues, and reviewing our future business plan we have determined that our floorspace requirement is a minimum of 265,000 sqft. We believe that the Royal London building designed by PLP Architecture will meet our accommodation requirements whilst offering a vibrant, well-utilised facility that can be enjoyed by our people and clients alike.

Hogan Lovells International LLP is a limited liability partnership registered in England and Wales with registered number OC323639 and is authorised and regulated by the Solicitors Regulation Authority of England and Wales (SRA ID 449616). Registered office and principal place of business: Atlantic House, Holborn Viaduct, London EC1A 2FG.

"Hogan Lovells" is an international legal practice that includes Hogan Lovells International LLP and Hogan Lovells US LLP, with offices in: Alicante Amsterdam Baltimore Beijing Birmingham Boston Brussels Colorado Springs Denver Dubai Dublin Dusseldorf Frankfurt Hamburg Hanoi Ho Chi Minh City Hong Kong Houston Johannesburg London Los Angeles Luxembourg Madrid Mexico City Miami Milan Minneapolis Monterrey Moscow Munich New York Northern Virginia Paris Perth Philadelphia Rome San Francisco São Paulo Shanghai Silicon Valley Singapore Sydney Tokyo Warsaw Washington, D.C. Associated Offices: Budapest Jakarta Riyadh Shanghai FTZ Ulaanbaatar. Business Services Centers: Johannesburg Louisville. Legal Services Center: Berlin.

The word "partner" is used to describe a partner or member of Hogan Lovells International LLP, Hogan Lovells US LLP or any of their affiliated entities or any employee or consultant with equivalent standing. Certain individuals, who are designated as partners, but who are not members of Hogan Lovells International LLP, do not hold qualifications equivalent to members. For more information about Hogan Lovells, the partners and their qualifications, see www.hoganlovells.com.

We are committed to playing a leadership role in driving inclusive and sustainable development in which people and planet prosper and we recognise that operating sustainably is core to being a responsible business. As part of this aim we are working in close collaboration with Royal London in supporting the buildings high commitments to sustainability, greening and culture. To this end, we believe the scheme will support our responsible business commitments to the environment that include RE100, Race to Zero and our SBTi pledge to be net zero by 2030.

In summary, Hogan Lovells are excited to be involved in the 14-21 Holborn Viaduct scheme. The location, size and sustainable design are reflective of the needs of our business. We are supportive of the cultural investment in the scheme and would continue to invest in outreach programmes for the city and neighbouring boroughs, including our commitments to diversity and inclusion, environment and sustainability, pro bono and fundraising.

Yours sincerely



David Crew
Head of Corporate Real Estate & Procurement



Environment Directorate / Development Management

Web: www.richmond.gov.uk/planning
Email: envprotection@richmond.gov.uk
Tel: 020 8891 1411
Textphone: 020 8891 7120



City Of London
City Of London
PO Box 270
Guildhall
London
EC2P 2EJ

Letter Printed 1 November 2021

FOR RECOMMENDATION DATED
1 November 2021

The Town and Country Planning Act 1990, (as amended)
Consultation – Raise no Objection

Application: 21/3309/CON
Your ref:
Our ref: DC/WEW/21/3309/CON/CON
Applicant:
Agent:

LOCATION

14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT

for

PROPOSAL

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. [The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated]

I refer to your consultation regarding the above mentioned proposal.

My Council's observations are as follows:

That the be advised that the London Borough of Richmond upon Thames raise no objection to the above mentioned proposal.

Yours faithfully,

www.richmond.gov.uk/planning

London Borough of Richmond upon Thames
Civic Centre, 44 York Street, Twickenham TW1 3BZ

Tel 020 8891 1411 **Textphone** 020 8891 7120 **Email** envprotection@richmond.gov.uk



Robert Angus
Head of Development Management

From: [REDACTED]
To: [Pln - CC - Development Dc](#)
Cc: [Town Planning Southern](#); [Asset Protection London South East](#)
Subject: FAO Amy Williams - Network Rail Consultation Response: 21/00755/FULMAJ - 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT
Date: 21 October 2021 14:09:10
Attachments: [image001.png](#)
[ASPRO Informatives 2021.pdf](#)
[ufm17.pdf](#)

THIS IS AN EXTERNAL EMAIL

OFFICIAL

Dear Amy,

Network Rail Consultation Response: 21/00755/FULMAJ - 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT

Thank you for consulting Network Rail on the above planning application, please see our formal comments below.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland and Wales. As statutory undertaker, NR is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway.

Due to the close proximity of the proposed works to Network Rail's land and the railway tunnel which supports the operational railway, Network Rail requests the applicant / developer engages with Network Rail's Asset Protection and Optimisation (ASPRO) team via AssetProtectionLondonSouthEast@networkrail.co.uk if they have not already done so. This will allow our ASPRO team to review the details of the proposal to ensure that the works can be completed without any risk to the operational railway.

The applicant / developer may be required to enter into an Asset Protection Agreement to get the required resource and expertise on-board to enable approval of detailed works. A number of other agreements and consents may also be required. More information can also be obtained from our website <https://www.networkrail.co.uk/running-the-railway/looking-after-the-railway/asset-protection-and-optimisation/>.

The applicant / developer must also follow the attached Asset Protection informatives which are issued to all proposals within close proximity to the railway (compliance with the informatives does not remove the need to engage with our ASPRO team).

I trust the above is clear, however, if you require any additional information from Network Rail, please do not hesitate to contact me.

Kind regards,



Nick Donoghue

Town Planning Technician
Network Rail Property (Southern)
Office Address: 1 Puddle Dock, London, EC4V 3DS
Email: Nicholas.Donoghue@networkrail.co.uk
Mobile: 07732 639934
Website: www.networkrail.co.uk

Please note I am on study leave on Wednesdays.

The content of this email (and any attachment) is confidential. It may also be legally privileged or otherwise protected from disclosure.

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Network Rail Infrastructure Limited registered in England and Wales No. 2904587,
registered office Network Rail, 2nd Floor, One Eversholt Street, London, NW1 2DN

Amy Williams
City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Place Directorate
Development Management
Town Hall, Mulberry Place
5 Clove Crescent
London
E14 2BG
www.towerhamlets.gov.uk

Application Number: PA/21/02110
Your ref: 21/00755/FULMAJ

Enquiries to: Patrick Harmsworth
Tel: 020 7364 6393
Email: Patrick.Harmsworth@towerhamlets.gov.uk

19 October, 2021

Dear Amy Williams,

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
DEVELOPMENT MANAGEMENT PROCEDURE ORDER 2015**

OBSERVATIONS TO A NEIGHBOURING PLANNING AUTHORITY

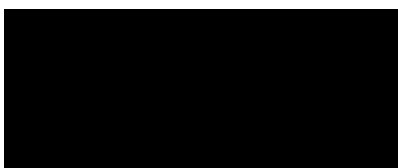
Location	14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT
Proposal	Observation requested by City of London for Demolition of existing buildings at 14-21 Holborn Viaduct, 34-35 and 32-33A Farringdon Street, and construction of a new building arranged over 2 basement levels, ground 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.

Thank you for your letter requesting the observations of the London Borough Tower Hamlets on the above application. I would be grateful if you would take the observations set out about into consideration:-

1. The Local Authority raises no objection to this application.

If you require any further information please contact the officer named at the top of this letter.

Yours sincerely,



Jennifer Peters, Divisional Director, Planning and Building Control



Your ref:
My ref: 21/06561/OBS

Amy Williams
City of London
PO Box 270, Guildhall,
London EC2P 2EJ

Please reply to: Nikki Mitchell
Tel No:
Email: southplanningteam@westminster.gov.uk

Development Planning
Westminster City Council
PO Box 732
Redhill, RH1 9FL

14 October 2021

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has considered the proposals described below and has decided it DOES NOT WISH TO COMMENT ON THE PROPOSAL(S).

SCHEDULE

Application No.:	21/06561/OBS	Application Date:	
Date Received:	24.09.2021	Date Amended:	24.09.2021

Plan Nos: Letter from City of London dated 20 September 2021.

Address: 14 - 21 Holborn Viaduct, City Of London, London, EC1A 2AT

Proposal: 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.

Yours faithfully

Deirdra Armsby
Director of Place Shaping and Town Planning

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



London Borough of Hammersmith & Fulham

Development Management, The Economy Department
Hammersmith Town Hall Extension, King Street, London W6 9JU

Tel: 020 8753 1081
Email: planning@lbhf.gov.uk
Web: www.lbhf.gov.uk



15th October 2021

City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Applicant:

Application Reference: **2021/03039/OBS**

City of London
PO Box 270
Guildhall
London
EC2P 2EJ

Registered on: **21st September 2021**

Town and Country Planning Act 1990

NO OBJECTION RAISED

Location and Description:

14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC2M 2PA

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 stepfree access between Holborn Viaduct and Farringdon Street hard and soft landscaping works and other works incidental to the development.

[The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated]

Drawing Nos:

Particulars of Decision:

This Council raises no objection to the proposed development.

Chief Planning Officer of The Economy
Department: Joanne Woodward

Joanne Woodward Chief Planning Officer of The Economy Department
Duly authorised by the Council to sign this notice.

Planning and Place

Kensington Town Hall, Hornton Street, LONDON, W8 7NX

Director of Planning and Place

Amanda Reid



THE ROYAL BOROUGH OF
**KENSINGTON
AND CHELSEA**

Amy Williams
City of London
Department of the Built Environment
PO Box 270 Guildhall
LONDON
EC2P 2EJ

Date: 07/10/2021
My Ref: OB/21/05986

Dear Sir/Madam,

TOWN AND COUNTRY PLANNING ACT 1990

14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT

I refer to your recent letter requesting observations from this Council on the proposal set out in the schedule below. The proposal has been considered and I would like to inform you that there are NO OBJECTIONS to the proposal.

SCHEDULE

Development:

This council has been asked for its observations on an application submitted to City of London (21/00755/FULMAJ) 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.

Site Address:

**14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street
London EC1A 2AT**

RBKC Drawing Nos:

OB/21/05986

Applicant's Drawing Nos:**Application Dated:**

20/09/2021

Application Completed:

20/09/2021

**FULL CONDITION(S), REASON(S) FOR THEIR IMPOSITION AND INFORMATIVE(S)
ATTACHED OVERLEAF**

CONDITION(S) AND REASON(S) FOR THEIR IMPOSITION

INFORMATIVE(S)

- . You are reminded that, if not properly managed, construction works can lead to significant negative impacts on the local environment, reducing residential amenity and the safe function of the highway. No vehicles associated with the building operations on the development site shall be parked on the public highway so as to cause an obstruction. Any such wilful obstruction is an offence under Section 137 of the Highways Act 1980. The Council can prosecute developers and their contractors if work is not managed properly. For advice on how to manage construction works in the Royal Borough please see [Advice for Builders](#) on the Council's website; from this page you will also find guidance on what to include in Construction Traffic Management Plans (where these are required) which are very valuable instruments in limiting the impact of large scale building work. (I.40)

The full report is available for public inspection on the Council's website at <http://www.rbkc.gov.uk/OB/21/05986> . If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

Yours sincerely,

Amanda Reid
Director of Planning and Place

The full report is available for public inspection on the Council's website at www.rbkc.gov.uk/268130 . If you do not have access to the internet you can view the application electronically on the ground floor of the Town Hall, Hornton Street, London, W8 7NX.

From: [Location Enquiries](#)
To: [PLN - Comments](#)
Subject: RE: Planning Application Consultation: 21/00755/FULMAJ
Date: 05 October 2021 09:16:41

THIS IS AN EXTERNAL EMAIL

FAO Amy Williams

Location: 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.

Thank you for your consultation.

I can confirm that the planning applicant is in consultation with London Underground on this project. As such we have no objection to the planning application for the property above. However we do ask that a condition is included on any planning permission granted stipulating that:

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:

- Provide Impact assessment of unloading and loading of the Development on LU/TfL assets
- Correlation survey of the LU/TfL assets will be required to determine clearances to the proposed re-development
- Provide Monitoring Action Plan if considered necessary following Impact assessment review
- Carry out Pre and post Condition survey of LU/TfL Assets
- Submit Design drawings for substructure (basement and piling) for approval by LU Engineer prior to commencement of works
- Submit RAMS for various construction phases for approval by LU Engineer
- 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.

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards

Shahina Inayathusein MAPM MIAM

Safeguarding Engineer (LU+DLR)

Infrastructure Protection -TfL Engineering

Email: SMBLocationEnquiries@tfl.gov.uk

Find out more about Infrastructure Protection - <https://youtu.be/0hGoJMTBOEg>

-----Original Message-----

From: PLNComments@cityoflondon.gov.uk <PLNComments@cityoflondon.gov.uk>

Sent: 20 September 2021 10:46

To: Location Enquiries <SMBLocationEnquiries@tfl.gov.uk>

Subject: Planning Application Consultation: 21/00755/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT .

Reply with your comments to PLNComments@cityoflondon.gov.uk.

Kind Regards

Planning Administration

On behalf of

Amy Williams

Department of the Built Environment

City of London

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Historic England

Ms Amy Williams

Direct Dial: 020 7973 3765

City of London Corporation

Guildhall, PO Box 270

Our ref: P01440177

London

EC2P 2EJ

30 September 2021

Dear Ms Williams

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**14-21 HOLBORN VIADUCT 32-33 & 34-35 FARRINGDON STREET LONDON EC1A
2AT
Application No. 21/00755/FULMAJ**

Thank you for your letter of 20 September 2021 regarding the above application for planning permission. On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater->



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

[london-archaeology-advisory-service/our-advice/](https://www.historicengland.org.uk/london-archaeology-advisory-service/our-advice/)

Yours sincerely

Breda Daly
Inspector of Historic Buildings and Areas
E-mail: breda.daly@HistoricEngland.org.uk



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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GREATER **LONDON** AUTHORITY
Good Growth

Amy Williams
City of London
By Email

Our ref: 2021/0968/S1
Your ref: 21/00755/FULMAJ
Date: 25 October 2021

Dear Amy Williams

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

14-21 Holborn Viaduct, 32-33A, and 34-35 Farringdon Street, EC1A 2AT

Local Planning Authority reference: 21/00755/FULMAJ

I refer to the copy of the above planning application, which was received from you on 14 September 2021. On 25 October 2021, the Mayor considered a report on this proposal, reference 2021/0968/S1. A copy of the report is attached, in full. This letter comprises the statement that the Mayor is required to provide under Article 4(2) of the Order.

The Mayor considers that the application does not yet comply with the London Plan for the reasons set out in paragraph 145 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.

If your Council subsequently resolves to make a draft decision on the application, it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged; or direct the Council under Article 6 to refuse the application; or issue a direction under Article 7 that he is to act as the local planning authority for the purpose of determining the application and any connected application. You should therefore send the Mayor a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to

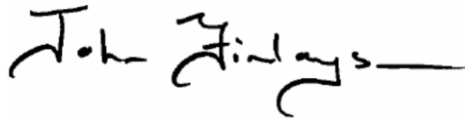
City Hall, London, SE1 2AA ♦ london.gov.uk ♦ 020 7983 4000

We are committed to being anti-racist, planning for a diverse and inclusive London and engaging all communities in shaping their city.

make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

Please note that the Transport for London case officer for this application is Max Faulkner, email MaxFaulkner@tfl.gov.uk, telephone 07891497435.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Finlayson', followed by a horizontal line.

John Finlayson
Head of Development Management

cc Unmesh Desai, London Assembly Constituency Member
Andrew Boff, Chair of London Assembly Planning Committee
National Planning Casework Unit, MHCLG
TfL
Zoe Smythe, DP9

14-21 Holborn Viaduct, 32-33A, and 34-35 Farringdon Street, EC1A 2AT

25 October 2021

Local Planning Authority: City of London

local planning authority reference: 21/00755/FULMAJ

Strategic planning application stage 1 referral

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008.

The proposal

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.

The applicant

The applicant is **Royal London Asset Management Ltd** and the architect is **PLP Architects**.

Strategic issues summary

Land use principles: The site is located in the CAZ and within the City of London which encourages the provision of new office space. The principle of office use is supported. Paragraphs 17 – 21.

Providing Suitable Business Space: The scheme does not provide any flexible office space suitable for SMEs. Paragraph 22.

Urban Design: The design of the scheme is well considered. The layout, architectural response public realm, inclusive design and visual impacts are generally considered acceptable although further information/ clarification is required in relation to the public

realm and layout. The scheme is supported by a Fire Statement which complies with London Plan Policy. Paragraphs 23 – 51.

Heritage: The scheme is considered to have no impact or negligible impacts on the significance of heritage assets and settings. The proposed development does not impact on the viewer ability to recognise and appreciate St Paul's in Strategic Views. An updated view of LVMF view 4A.1 should be provided. Paragraphs 52 – 61.

Transport: The City Corporation should secure improvements identified in the ATZ assessment. Funding for streetscape improvements proposed on Farringdon Street secured in the S106. Section 278 agreement required to undertake the streetscape improvements proposed on Farringdon Street and Pit Lane. Clarification required in relation to public transport impacts and Road Safety Audit. Full DSP and CLP secured via condition. Continued engagement with TfL in relation to Turnagain Lane. Paragraphs 62 – 91.

Sustainable Development: Further information is required in relation to Energy Strategy, Whole Life Carbon and Circular Economy Statements. No information has been provided for in relation to digital connectivity. Paragraphs 92 – 116.

Environmental Issues: The approach to urban greening, flood risk, sustainable drainage and water efficiency is supported. Further information is required in relation to air quality. Paragraphs 117 – 141.

Recommendation

That City of London be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 145. Possible remedies set out in this report could address these deficiencies.

Context

1. On 14 September 2021 the Mayor of London received documents from City of London Council notifying him of a planning application of potential strategic importance to develop the above site for the above uses. Under the provisions of The Town & Country Planning (Mayor of London) Order 2008, the Mayor must provide the Council with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. The Mayor may also provide other comments. This report sets out information for the Mayor's use in deciding what decision to make.
2. The application is referable under the following Categories of the Schedule to the Order 2008:
 - 3E vi Proposes at least 2500m² non residential floorspace class B1 business;
 - 4 Development in respect of which the local planning authority is required to consult the Mayor by virtue of a direction given by the Secretary of State.
3. Once City of London has resolved to determine the application, it is required to refer it back to the Mayor for his decision as to whether to direct refusal; or, allow the City of London to determine it itself. In this case, the City of London need not refer the application back to the Mayor if it resolves to refuse permission.
4. The Mayor of London's statement on this case will be made available on the GLA's public register: <https://planning.london.gov.uk/pr/s/>

Site description

5. The 0.4 hectare site is located within the City of London, at the intersection of Holborn Viaduct and Farringdon Street. It is bordered by Farringdon Street to the west, Holborn Viaduct to the north, Newcastle Close to the south and Fleet Place House and City Thameslink Station to the east.
6. The site comprises of 3 separate buildings; 14-21 Holborn Viaduct & 40 Farringdon Street (known as Kimberley House); 32-33 Farringdon Street; and 34-35 Farringdon Street (known as Meridian House).
7. The two buildings fronting Farringdon Street are divided by Newcastle Close. Kimberley House which fronts Holborn Viaduct and 34-35 Farringdon Street are separated by Turnagain Lane, which provides a service yard for both buildings. The north west corner of the Site abuts the south eastern Grade II listed gatehouse. The gatehouse contains a staircase which is accessible to the public to provide access between Holborn Viaduct and Farringdon Street. The site's frontages to Holborn Viaduct and Farringdon Street are at two different heights; Holborn Viaduct is approximately 9m above Farringdon Street.

8. The existing townscape is generally large-scale commercial buildings, although there are some historic streets and buildings that predate the Holborn Viaduct. The site is not located within a Conservation Area; however, both Newgate Street Conservation Area and Smithfield Conservation Area are in close proximity. There are no statutorily listed buildings within the site, however, the Viaduct and southeast gatehouse directly abutting the north western corner of the site are Grade II listed and there are a number of listed buildings within close proximity. The site is also within Wider Setting Consultation Areas and/or Landmark Viewing Corridor of five Strategic Views. 32-35 Farringdon Street is a non-designated heritage asset.
9. The site has a public transport access level (PTAL) of 6b, which is considered excellent. The site is within walking distance of Farringdon, City Thameslink, Chancery Lane, St Pauls and Blackfriars serving London Underground and National Rail services. Cycleway 6 runs along Farringdon Street as segregated track, in front of the site entrance. A Quietway link accessible from Snow Hill provides a direct route to Quietway 11. A Santander cycle hire docking station is opposite the site. Farringdon Street (A201) forms part of the Transport for London Road Network (TLRN). Holborn Viaduct is part of the Strategic Road Network (SRN).

Details of this proposal

10. The scheme is for the demolition of existing buildings at 14-21 Holborn Viaduct (including 40 Farringdon Street), 34-35 and 32-33A Farringdon Street, and the 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.
11. New public realm and a new publicly accessible lift to provide step-free access between Holborn Viaduct and Farringdon Street is proposed; as well as hard and soft landscaping works and other works incidental to the development.

Case history

12. There have been a number of planning applications for the sites. These are:

14/21 Holborn Viaduct & 37/40 Farringdon Street

4657 (1973) - Erection of a new building containing shops, offices & commercial development at 14/23 Holborn Viaduct & 37/40 Farringdon Street.

- 4657L (1975) - Use of 3rd and 4th floors. At 14/21 Holborn Viaduct & 40 Farringdon Street as one office unit 14,800 sqft under condition 7 (4657)

18 Holborn Viaduct

- 4657AP (1983) - Change of use of lower floor preparation & storage area to a wine bar/restaurant & alterations to ground floor sandwich bar at 18 Holborn Viaduct.

19 Holborn Viaduct

- 05/00913/ADVT (2005) - ADVT Installation and display of internally illuminated fascia sign.
- 05/00440/FULL (2005) - Erection of two satellite dishes and aerials at roof level.
- 05/00862/FULL (2006) - Installation of new shopfront. Installation of louvre to rear elevation.
- 06/00738/FULL (2007) - Installation of new shopfront.

21 Holborn

- 05/00181/FULL (2005) - Use of part ground floor, part basement and lower ground floor for a betting office (Class A2) in lieu of approved retail use (Class A1) (234sqm). Installation of a new shopfront.
- 09/00080/ADVT (2009) - Installation and display of non-illuminated fascia sign.
- 09/00081/FULL (2009) - Installation of new shopfront.

Building Structures (14- 21) Holborn Viaduct

- 4969FL (2000) - Change of use of part ground floor from Class A2 to Classes A3/A1 use.

32-33 Farringdon Street

- 0904H (1979) - Stair housing on roof (on eastern end, as secondary means of escape) at 32/33a.
- 07/00528/FULL (2007) - Change of use of part ground and basement (399 sqm) from office (Class B1) to gymnasium studio (Class D2) use.

Meridian House, 34-35 Farringdon Street

- 4925 (1990) - Additional office space at fifth floor level behind existing mansard roof on Farringdon Street elevation.
- 4925B (1997) - Office refurbishment including new entrance canopy; new double glazed windows and associated new roof top plant and screen.

13. There have also been 12 pre application discussions with the City of London between October 2020 and August 2021 and one with GLA officers in June 2021.

Strategic planning issues and relevant policies and guidance

14. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the City of London Local Plan (2015) and, the London Plan 2021.

15. The following are also relevant material considerations:

- The National Planning Policy Framework and National Planning Practice Guidance;
- The City Plan 2036 (draft 2021)

16. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:

Good Growth	London Plan
World City Role	London Plan
Central Activity Zone	London Plan
Office	London Plan
Urban design	London Plan; Character and Context SPG; Public London Charter draft LPG; Housing SPG; Play and Informal Recreation SPG; Good Quality Homes for All Londoners draft LPG
Heritage	London Plan
Inclusive access	London Plan; Accessible London: achieving an inclusive environment SPG; Public London Charter draft LPG
Sustainable development	London Plan; Circular Economy Statements draft LPG; Whole-life Carbon Assessments draft LPG; 'Be Seen' Energy Monitoring Guidance LPG; Mayor's Environment Strategy;
Air quality	London Plan; the Mayor's Environment Strategy; Control of dust and emissions during construction and demolition SPG;

Transport and parking	London Plan; the Mayor's Environment Strategy;
Agent of Change	London Plan
Biodiversity	London Plan; the Mayor's Environment Strategy;

Land use principles

17. The site is within the City of London and Central Activity Zone. London Plan Policy SD4 recognises the CAZ as an internationally and nationally significant office location. London Plan Table 6.1 indicates that the CAZ and the Northern Isle of Dogs are projected to accommodate more than 367,000 additional office jobs with a net increase of 3.5 million sqm (GIA) of office floorspace over the period 2016-2041.
18. Policy SD4 states that the nationally and internationally significant office functions of the CAZ should be supported, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values. This is reinforced by London Plan Policy E1 that also supports the provision of new offices, especially in the CAZ, 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.
19. London Plan Policy SD5 states that offices and other CAZ strategic functions such as leisure and retail are to be given greater weight relative to new residential development within the CAZ.
20. The floorspace is relatively dated, with low floor to ceiling heights, narrow and long floorplates, inadequate lift provision, and poor energy performance ratings. Consequently, the offices have poor internal daylight levels, and limited opportunities for increasing urban greening. GLA officers conclude that the redevelopment of the three buildings would result in a quantitative and qualitative enhancement of 35,948 sqm (GIA) office floorspace in accordance with London Plan Policies SD4 and E1, equating to an increase of 19,044 sqm (GIA) above existing provision.
21. The principle of office use is therefore supported. The proposed development of the site would result in a quantitative increase and qualitative improvement in office floorspace within the CAZ.

Suitable Business Space

22. London Plan Policy E2 encourages applications for office development over 2,500 sq.m. to make provision for flexible workspace or smaller office units

suitable for micro, small and medium sized enterprises (SMEs). The application does not include flexible workspace which would be suitable for SMEs.. GLA officers would, encourage the applicant to consider an area that could be subdivided and kept separate, that would be suitable for SMEs.

Urban design

23. Chapter 3 of the London Plan sets out key urban design principles to guide development in London. Design policies in this chapter seek to ensure that development optimises site capacity; is of an appropriate form and scale; responds to local character; achieves the highest standards of architecture, sustainability and inclusive design; enhances the public realm; provides for green infrastructure; and respects the historic environment.

Optimising development capacity

24. London Plan Policy D3 states that all development must make the best use of land by following a design-led approach that optimises the capacity of sites. The site has had 12 pre applications meetings and workshops with the City of London as well as pre application meeting with GLA officers to develop the proposals and refine its design; and there is evidence the applicant has responded positively to these discussions.

25. A number of options have also been considered in terms of refurbishment and extension, part-retention/refurbishment, and wholesale redevelopment. This is welcomed and demonstrates that the proposed option is the most appropriate from the point of sustainability, future adaptability, and accessibility. It is therefore considered the scheme has followed a design-led approach to optimising the development capacity of the site.

Layout

26. London Plan Policy D3 states that development proposals should provide active frontages and positive relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest. They should encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes and legible entrances to buildings; and achieve indoor and outdoor environments that are comfortable and inviting for people to use.

27. The proposals seek to provide high grade office use for a single tenant. This includes an expansive space fronting Holborn Viaduct as well as a smaller dead-end and irregular shaped space fronting Farringdon Street. Building 'Receptions' are co-located adjacent to these spaces and as such, it is unclear how they will activate the public realm, create visual interest or support local communities. As such, a preferred outcome would provide a limited number of additional ground floor tenancies (potentially affordable) to help generate and contribute to activity in the streetscape(s) rather than extensive and often empty lobby spaces. This provision would also help offer a range of employment types / providers to help support the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand as outlined in the London Plan Policy E2.

28. The floor plate and floor to ceiling heights provides flexibility for the internal layout, allowing it to be adaptable in the future for small and medium sized occupiers. The atrium also brings daylight through the building which helps to support wellbeing.
29. The location of the cargo bike bay (on Farringdon Street) is not in close proximity to the building entrance and as such, is unlikely to be routinely used by couriers / others. A more convenient location should be considered.

Scale and massing

30. London Plan Policy D9 requires that tall buildings should only be developed in locations identified as suitable in development plans and requires that development proposals for tall buildings should address their visual, functional, environmental and cumulative impacts. It further stipulates that tall buildings should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
31. The City of London Plan 2015 identifies tall buildings as those that significantly exceed the height of their general surroundings with the City of London Local Plan Proposed Submission Draft March 2021 identifying them as over 75m above Ordnance Datum (AOD). The proposed development, at 12 storeys (c.58.65m) and is therefore not considered a tall building. The applicant should confirm the height in AOD.
32. London Plan Policy D3 states that development proposals should enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions.
33. The form and massing have been considered through the townscape, visual and build heritage assessment. Seventeen views were assessed, including 5 strategic views. GLA officers agree with the conclusions of the assessment that in the majority of views, the impact would be negligible to moderate and, in most cases, beneficial.
34. Much of the fine grain of the local context and setting is reflective of the City's unique heritage and organic historical development. The resulting height/mass would appear to sit comfortably with the nearby buildings on Farringdon Street and Holborn Viaduct. On Farringdon Street, the general building heights and massing, which are in keeping / below the local context (especially Plumtree Court), are supported. The "lower" façade treatment responds well to the lower level of the street, with the "upper" façade response successfully wrapping around the corner of the building.
35. On Holborn Viaduct, the continuation of the height datum from the east is logical, along with the increased height to the west signifying the corner of the urban block whilst also responding to the heights of the opposing Amazon office and Plumtree Court beyond.

Public realm

36. London Plan Policy D8 states that development proposals should encourage and explore opportunities to create new public realm where appropriate; and ensure the public realm is 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.
37. The creation of new areas of public realm is fully supported. The two mature trees on Farringdon Street are the only remaining mature trees in this stretch of the road (and on the site in general), are in good condition, provide visual and environmental amenity, and contribute to London's tree canopy. Their retention is therefore supported.
38. The proposed public realm improvements on Farringdon Street extending to Ludgate Circus (subject to the Section 278 Agreement) are supported and contribute towards the Mayor's desire to increase tree canopy by 10% across London as set out within Policy G7. However, considering the relatively sparse ground plane / streetscape along Holborn Viaduct, the applicant should consider additional street greening through the introduction of in-ground or raised planters that intersperse the proposed bicycle parking.
39. The safety of the Newcastle Close service road should be further considered given it is accessible at all times of the day (to facilitate access to adjoining sites) yet it is fully enclosed. Its ongoing management should be in accordance with the principles of the Public London Charter and Secured by Design. It is noted it will be overlooked by the internal spaces at Level 01 (as stated) but this is unlikely to be at all times of the day.

Architectural quality

40. London Plan Policy D3 states that development proposals should be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well.
41. The architecture approach is generally supported and of a quality that is appropriate for the city and the scale of the building. The built form is clearly broken down in a top, middle and base.
42. The scale of the framed stonework at the base of the building, which generally only fronts Farringdon Street, successfully acknowledges the horizontal datums within the adjoining streetwall. The recessed (full storey) shadow gap, above, helps to differentiate the base from the middle of the building. The use of a light coloured stone appropriately grounds the proposals whilst also referencing the gate house's importance in the local context – providing a calm and somewhat neutral heritage setting.

43. The wrapping of the built form (and façade treatment) along Holborn Viaduct, around the corner (continuing above the gatehouse) is supported. Its continuation to neatly respond to the existing mature trees through the use of a curvaceous façade creates a new area public realm at street level. The perforated aluminium fins also bring verticality to the building, successfully countering its notable floorplate size.
44. The top of the building appears to successfully utilise lighter colours and employs urban greening to soften the perceived height by creating visual interest and intrigue.
45. The 'Curated Urban Route' of the Public Art Strategy is thoroughly supported and any proposed interventions should consider both temporary and permanent installations. This should include propositions within the public realm (e.g., street furniture), on and within the building itself (e.g., mounted on the façade, within lobby spaces and on external soffits), as well as within the staircases of all gatehouses (in collaboration with the City of London) that celebrate and enhance the vertical connection / journey between Holborn Viaduct and Farringdon Street.

Fire safety

46. London Plan Policy D12 states that development proposals must achieve the highest standards of fire safety in relation to the building's construction; means of escape; features which reduce the risk to life; access for fire service personnel and equipment; ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.
47. In addition, Policy D5 requires that where lifts are installed, as a minimum at least one lift per core should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
48. The application is supported by a Fire Safety Statement which demonstrates that the above requirements are addressed.

Inclusive access

49. London Plan Policy D5 requires development proposal to achieve the highest standards of accessible and inclusive design, ensuring they are convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment; and that buildings are able to be entered, used and exited safely, easily and with dignity for all.
50. A new publicly accessible lift is to be provided, which will create a new step-free connection between Farringdon Street and Holborn Viaduct. This is supported.
51. The proposed development provides disabled toilets on each floor and there is a separate lift provided within the building in line with Policy D5 and D12 to ensure the building can be entered and exited with dignity.

Heritage

52. The Planning (Listed Buildings and Conservation Areas) Act 1990 sets out the statutory duties for dealing with heritage assets in planning decisions. In relation to Conservation Areas, for all planning decisions “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area”. In relation to listed buildings, all planning decisions ‘should 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’. If it is judged that harm to the heritage asset/s would arise from the proposed development, considerable importance and weight must be attributed to that harm, in order to comply with the statutory duty.
53. In addition, the NPPF states that when considering the impact of a development proposal 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. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Where a proposed development will lead to ‘substantial harm’ to or total loss of the significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. Where a development will lead to ‘less than substantial harm’, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. In line with case law, any harm identified must be given considerable importance and weight.
54. The NPPF also 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.
55. London Plan Policy HC1 states that development proposals affecting heritage assets and their settings should conserve their significance and should avoid harm. Policy HC1 also applies to non-designated heritage assets.
56. None of the existing buildings on the site are listed, however Nos. 32-35 Farringdon Street are considered to be non-designated heritage assets by City of London Corporation. Adjacent to the site is the Southwest Gatehouse and the Holborn Viaduct, both of which are Grade II Listed. In addition to these, there are a further 9 Listed Buildings within close proximity. There are also two Conservation Areas – Smithfields Conservation Area and Newgate Conservation Area within 100m of the site.
57. GLA officers agree with the conclusions of the submitted Townscape, Visual and Built Heritage Assessment. The proposed development would provide an acceptable backdrop to the Grade II listed south-east gatehouse and to Holborn Viaduct Bridge and its four gatehouses (two listed and two reproduction) as a townscape group. It would preserve the ability to appreciate the significance of the listed south-east gatehouse with the provision of the lift complementing the

historic function of the gatehouse, improving the accessibility of between the two street levels. GLA officers also agree with the conclusion of the assessment that there would be no effect on the other designated heritage assets identified in the local area.

58. In relation to the Conservation Areas, GLA officers agree that the visual impacts on the setting of Smithfields Conservation Areas would be limited and that when considered cumulatively with other proposed developments, the impact can be considered minor and beneficial. In relation to Newgate Conservation Area, whilst the proposed development would make a visible change to the westerly setting of the CA, particularly in View 11, this is in the context of the other taller modern commercial buildings, and would therefore not effect the ability to appreciate the significance of the CA.
59. GLA officers also agree that whilst 32-35 Farringdon Street (non-designated assets) display some typical 20 Century office characteristics, they do not specifically contribute to the contemporary townscape of Holborn Viaduct. It is acknowledged that their demolition would result in some loss to the historic townscape, due to their low value, however this is considered less than substantial harm with the benefits of the scheme significantly outweighing the loss, including an increase in new modern office floorspace, new public realm and the provision of a lift to provide step free access between the 2 street levels.

Strategic Views

60. The townscape, visual and built heritage assessment assessed 7 Strategic Views - 5 Townscape views and 2 River Prospects (which included non-verified views as the view was not visible in them). In each of the townscape views with a Protected Vista (2A.1 Parliament Hill to St Pauls and 3A.1 Kenwood to St Paul's) the proposed development does not breach the height threshold of the Landmark Viewing Corridor and is considered acceptable in the Wider Setting Consultation Areas as it does not impact the viewer's ability to recognise and appreciate St Paul's. However, it should be noted that in View 4A.1 Primrose Hill to St Paul's the building in front of the proposed development at Euston is no longer there. The applicants are therefore advised to provide an updated view.
61. In views 5A.2 Greenwich Park to St Paul's and 6A.1 Blackheath Point to St Paul's, again, where it is seen in the Wider Setting Consultation Area, the proposed development does not impact the viewer's ability to recognise and appreciate St Paul's.

Transport

Healthy Streets and Public realm

62. The application is supported by a Healthy Streets Transport Assessment (TA) and includes an Active Travel Zone (ATZ) assessment, which is welcomed. The improvements identified in the ATZ should be secured in line with London Plan Policies T2 (Healthy Streets) and T4 (Assessing and mitigating transport impacts).

63. Officers welcome that the development design has been amended, since pre application, to retain the trees on Farringdon Street in line with the Mayors Environmental Strategy, proposal 43 of the Mayors Transport Strategy (MTS) and policies G1 (Green infrastructure), G5 (Urban greening) and G7 (Trees and woodlands) of the London Plan.

Streetscape improvements

64. The applicant proposes additional planters, seating and short stay cycle parking in the public realm on Farringdon Street.

65. The proposals are supported by a Pedestrian Comfort Levels (PCL) assessment showing existing and proposed peak hour PCL levels, which is welcomed. The assumptions regarding the distribution of new walking trips on the surrounding street network are considered acceptable.

66. The future PCL scores on Holborn Viaduct are forecast to achieve the recommended minimum level of comfort, which is welcomed in line with London Plan Policy T2 (Healthy Streets). The applicant has also demonstrated that PCL future scores will remain at least the recommended minimum for the indicative locations of the planters, seating and Sheffield stands proposed. Therefore, officers are supportive of the additional planters proposed on Farringdon Street and their design is considered to align with Policy T2 (Healthy Streets).

67. Officers are also satisfied for the loading and disabled bay on Farringdon Street to be removed to facilitate the delivery of the enhanced public realm along Farringdon Street.

68. Officers welcome the level of consideration that has gone into assessing the types of shrubs and trees that are appropriate for the scale and location of the proposal. The applicant has demonstrated that the trees and shrubs in planters proposed can provide environmental benefits in line with the London Plan Policies G1 (Green infrastructure) and G7 (Trees and woodlands).

69. On the Transport for London Road Network (TLRN), TfL will be unable to take on any unusual, complex or costly long-term maintenance responsibilities for on-street elements delivered as part of such highway improvement works, and would therefore welcome further discussions with the City Corporation, the developers involved, and relevant adjacent landowners, to agree an appropriate long-term maintenance regime, with guaranteed funding in perpetuity.

70. Funding and maintenance for the streetscape improvements proposed should be secured in the S106 agreement, with the applicant required to enter a S278 agreement with TfL to undertake the indicative works proposed.

71. A publicly accessible lift is proposed as part of the application providing step free movement between Holborn Viaduct and Farringdon Street. This provision is welcomed in accord with the Healthy Streets indicators although officers request clarification on the responsibility and maintenance of the lift. Officers would support the lift being accessible for cyclists and the dimensions of the lift complying with TfL's LCDS size standards.

Public transport impact assessment

72. The approach to the trip generation impact assessment in the transport assessment is broadly acceptable with the use of representative survey data to forecast trips.
73. The development is expected to generate 7,501 two-way daily trips. Of those, 1,186 two-way trips are estimated in the morning peak and 1,006 two-way trips in the evening peak. At pre-application stage, the applicant was advised to use TfL's strategic models to assess these trips, however this has not been undertaken. Furthermore, the applicant should clarify their line loading assessment before officers can agree that the impacts of the proposed development on the London Underground network would be negligible and no mitigation is required.
74. This should be undertaken prior to the application being determined by the Council to ensure compliance with London Plan Policies T3 (Transport capacity, connectivity and safeguarding) and T4 (Assessing and mitigating transport impacts).

Cycle Parking

75. The primary access point for cyclists is on Farringdon Street, aligning well with current cyclist desire lines running north-south along CS6 on Farringdon Street.

Long stay

76. 499 long stay spaces are proposed within the building at Level 00 and Mezzanine Level. The level of long stay cycle parking accords with London Plan Policy T5 (Cycling) minimum standards and complies with LCDS guidance.
77. As advised at the pre application stage, the applicant should increase the aisle widths for the cycle store to ensure it take account of all users. The provision of two-tier stands has been agreed given the site constraints.
78. The provision of extensive end of journey facilities for cyclists are strongly supported in accordance with London Plan Policy T5 requirements.

Short stay

79. A total of 63 short stay cycle parking spaces is proposed. 20 Sheffield Stands equating to 40 spaces are proposed on Farringdon Street, where 14 existing short stay spaces will also be re-provided. On Holborn Viaduct, 9 Sheffield stands equating to 14 spaces are proposed in addition to the 10 existing short stay cycle parking spaces which will be re-provided.
80. This level of provision exceeds the minimum requirements of the London Plan. The provision of additional short stay cycle parking is strongly supported in line with London Plan Policy T5 (Cycling). The provision of short stay cycle parking outside of the application site would be provided as part of any section 278 agreement with the relevant highway authority.

Access and servicing

81. The proposed servicing yard will be accessed from Newcastle Close at ground level, part of the City Corporation road network, by crossing over Cycleway 6 from Farringdon Street.
82. 40 delivery and servicing trips are anticipated to be generated by the development proposed and deliveries will be consolidated by 50%. All delivery and servicing vehicles would be required to pre-book a delivery slot with trips taking place outside of the AM and PM peaks. This is supported in line with London Plan Policy T7 (Deliveries, servicing and construction). A full Delivery and Servicing Plan (DSP) should be secured by condition.
83. A swept path analysis of the vehicle access arrangements has been provided. A Stage 1 Road Safety Audit (RSA) for vehicular movement across cycleway 6 (C6) to the proposed servicing yard on Newcastle Court has also been undertaken in line with TfL guidance as requested at pre-application stage. The applicant is advised to address any design and safety issues that have been identified.
84. In particular, the visibility of servicing vehicles crossing C6 may be compromised when accessing and egressing Newcastle close onto Farringdon Street. This must be addressed in line Vision Zero principles; especially as proposed planters threaten the visibility spray of servicing vehicles further.
85. A cargo bike loading space on Farringdon Street to the north of Ludgate Circus is proposed as part of the Section 278 agreement for public realm improvements along Farringdon Street. Cargo bikes will also be permitted access to the off-street internal servicing area during periods of restricted vehicular access. This provision is strongly supported in line with London Plan Policy T7 (Deliveries, servicing and construction).

Car parking

86. The site is car free except for one disabled parking bay in the servicing yard accessed from Newcastle Close. London Plan Policy T6.5 (Non-residential disabled persons parking) sets out that for non-residential uses that at least one on of off-street parking bay should be provided.

Stopping up of Turnagain Lane and part of Farringdon Street

87. As part of the development proposal Turnagain Lane will be stopped up and the existing crossover will be removed. The proposal to reduce vehicle movements across Cycleway 6 is supported in principle in line with London Plan Policy T2 (Healthy Streets) and Policy 3 (Vision Zero) of the Mayors Transport Strategy. Further details are set out in TfL's detailed cover note to the applicant.

Construction

88. A Pit Lane is proposed on Farringdon Street during construction. This will require TfL's authority under the Highways Act 1980 and a section 278 agreement with TfL.

89. The provision of a cycling gantry providing 2.5 metre width for cyclists is welcomed as is 2.5 metre provision for pedestrians. TfL are engaging in further detailed discussions with the applicant and City Corporation to establish the network impact and lane rental liabilities associated with the use of the pit lane during construction.
90. A full CLP should also be secured by condition. All construction proposals in the full CLP should also support the Mayor's Vision Zero Action Plan.

Travel Planning

91. The development is supported by a Cycling Promotion Plan. This should focus on increasing the cycling mode share in line with the Mayor's Transport Strategy cycling mode share target for central London. Officers request a commitment requiring further measures to be identified should three- and five-year mode shift targets not be achieved.

Sustainable development

Energy strategy

92. London Plan Policy SI 2 requires development proposals to reduce carbon dioxide emissions in accordance with the energy hierarchy. Energy comments, which are summarised below, have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.
93. The applicant has submitted the GLA's Carbon Emission Reporting, however the applicant should submit as a excel spreadsheet to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors.

Be Lean

94. Based on the information provided, the non-domestic element of the proposed development is estimated to achieve a reduction of 156.6 tonnes per annum (34%) in regulated CO2 emissions compared to a 2013 Building Regulations compliant development. This is welcomed.

Overheating

95. The area weighted average (MJ/m2) and total (MJ/year) cooling demand for the actual and notional building has been provided and the applicant has demonstrated that the actual building's cooling demand is 87% lower than the notional. This is welcomed.
96. A Dynamic Overheating Analysis has been undertaken using the CIBSE TM52 methodology. Its results demonstrate that compliance was not achievable through ventilation alone and therefore active cooling was specified. This is accepted in this case.

97. A thermal comfort analysis taking into consideration both current and future weather scenarios was carried out by the applicant and determined that the g-value should not exceed 0.28 for occupied office areas, 0.41 for level 02, 03 on North and 0.23 for atrium roof.

Be Clean

98. The applicant has identified the Citigen district heating network within the vicinity of the development and is suggesting that there is no capacity on the existing network or the proposed extension. The applicant should submit evidence they have contacted relevant stakeholders including the borough energy officer, local heat network operators and nearby developers to ask whether they know of any local heat network connection opportunities. To note - Appendix 3 seems to be missing the communication.

99. The applicant is proposing a communal heat network supplied by a centralised energy centre. It should be confirmed that all non-domestic building uses will be connected to the heat network.

100. A drawing showing the route of the heat network linking all uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.

101. The applicant has provided a commitment that the development is designed to allow future connection to a district heating network. Drawings demonstrating how the site is to be future-proofed for a connection to a district heating network have been provided.

Be Green

102. The applicant is proposing 234m² PV, to generate 27,860 kWh across the development. The applicant should confirm the kWp.

103. A detailed roof layout has been provided demonstrating that some of the roof's potential for a PV installation has been explored alongside with vertical areas on the South and East facades. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas and should review this opportunity and clearly outline any constraints to the provision of further PV, such as plant space or solar insolation levels.

104. The on-site savings from renewable energy technologies should be maximised regardless of the London Plan targets having been met.

105. Heat pumps are being proposed in the form of a (centralised) ASHP system. The SCOP is 3.6. The SCOP for hot water is 2. The heat pumps provide 100% of the heat demand. Further information on the heat pumps should be provided including – further details are set out in the cover note.

106. The applicant committed to the Design for Performance approach. The applicant should ensure that their approach includes for all Be Seen criteria if they are utilising an alternative framework.

Be Seen Energy Monitoring

107. The applicant should review the 'Be seen' energy monitoring guidance to ensure that they are fully aware of the relevant requirements. A commitment should be provided that the development will be designed to enable post construction monitoring and that the information set out in the 'be seen' guidance is submitted to the GLA's portal at the appropriate reporting stages. This should be secured through the S106.

Carbon Offset

108. The applicant has confirmed the carbon shortfall in tonnes CO₂ and the associated carbon offset payment that will be made to the borough. This should be calculated based on a net-zero carbon target for domestic and non-domestic proposals using the GLA's recommended carbon offset price (£95/tonne) or, where a local price has been set, the borough's carbon offset price. The draft s106 agreement should be submitted when available to evidence the agreement with the borough.

Whole Life Carbon

109. In line with London Plan Policy SI 2, the applicant has submitted a WLC report which appears to cover much of the assessment requirements. Whole Life Carbon comments, which are summarised below, have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.
110. Further information is required in relation to the operational carbon (B6) results – these seems very low; there are negative values given for module C which is not typical; and Assessment 2 should account for future decarbonisation to embodied carbon under lifecycle module B2-B5 and D.
111. The applicant should also submit excel version of the GLA WLC template to allow a full review to be completed against the guidance. This is for tracking and monitoring of data.

Circular Economy

112. London Plan Policy SI7 requires development applications that are referable to the Mayor of London to submit a Circular Economy Statement, whilst Policy D3 requires development proposals to integrate circular economy principles as part of the design process.
113. The applicant has submitted a Circular Economy Statement, however further information is required. A separate cover note has been sent to applicant and

Council. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.

114. Further information is required in relation to the description of development, the strategic approach, recycling and reporting tables, operational waste, plans for implementation, appendices and a commitment to a post-completion report.

Digital Infrastructure

115. London Plan Policy SI 6 requires development proposals to ensure sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available; that expected demand for mobile connectivity generated by the development is met; and that the development proposals take appropriate measures to avoid reducing mobile connectivity in surrounding areas.
116. Currently no details have been provided in relation to digital connectivity and therefore compliance with Policy SI 6 cannot be determined at this stage. The applicant is therefore required to provide further details and the Council should ensure that appropriate conditions are secured to comply with Policy SI 6.

Environmental issues

Urban greening

117. The proposed development presents a well-considered approach to integrating green infrastructure and urban greening which is strongly supported and should be brought to fruition. This includes the incorporation of green roofing which supports multifunctionality, in accordance with London Plan Policy G1.
118. The applicant has calculated the UGF of the proposed development as 0.39, which exceeds the target set by London Plan Policy G5. The proposed development is therefore compliant with Policy G5 of the London Plan.
119. Within the covered north facing public realm fronting Holborn Viaduct, the species selection and irrigation strategy of the green living wall should ensure that the planting survives for an extended period of time.
120. A key should also be provided for the surface cover type drawings to evidence the UGF score prior to Stage 2.

Flood risk

121. The Flood Risk Assessment (FRA) generally complies with London Plan Policy SI 12.
122. The site is in Flood Zone 1 but is located in a surface water hotspot. The FRA acknowledges the site's location in a surface water flood risk hotspot and

assesses the predicted flood depths for a range of return periods. The FRA states that raising FFLs above the design flood level is not achievable, and therefore proposes flood resilience and resistant measures at ground and basement level, which is supported. The inclusion of appropriate flood resilience/resistance measures should be secured by condition.

123. A Flood Warning and Evacuation Plan (FWEP) should be prepared particularly as the proposal includes resilience measures such as flood doors which the occupants will need to be aware of. This can be provided post-planning to be secured by condition.

124. The FRA adequately assesses the risk of flooding from fluvial/tidal, groundwater, and reservoir flooding, which is considered to be low.

Sustainable Drainage

125. The submitted Drainage Strategy generally complies with London Plan Policy SI 13.

126. The drainage strategy proposes to restrict runoff to 5.0 l/s for the 100 year event plus 40% climate change. The strategy proposes a range of blue roofs and a below ground attenuation tank. Due to the number of blue roofs it is understood that it would be challenging to further reduce the rate below 5.0 l/s, which is therefore supported. Thames Water have confirmed that the existing sewer network can accommodate the proposed flows.

127. In terms of SuDS, the drainage strategy proposes green roofs, permeable paving, and rainwater harvesting in the form of passive irrigation from the blue roof system for the soft landscaping above, which is welcomed.

128. The applicant should ensure that the City of London's version of the London Sustainable Drainage Proforma is completed and accompanies the planning application. The proformas for all Local Authorities can be found here: <https://www.london.gov.uk/what-we-do/environment/climate-change/surfacewater/london-sustainable-drainage-proforma>.

Water Efficiency

129. The proposed development generally meets the requirements of London Plan Policy SI 5. The Sustainability Statement notes that five Wat 01 credits are targeted for the non-residential uses on site, with water consumption reduced by 55% in line with Policy SI 5.

130. Water efficient fittings, water meters, leak detection systems, and rainwater and greywater harvesting are proposed, which is welcomed.

Air quality

131. London Plan Policy SI 1 states that development proposals to be at least Air Quality Neutral; and that development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make

provision to address local problems of air quality in preference to post-design or retro-fitted mitigation measures.

132. A construction dust risk assessment has been carried out. There is a high risk of dust soiling/human health impacts identified for demolition and construction activities and medium for earthworks and trackout. In accordance with the City of London Code of Construction Practice, 'High risk' site mitigation should be recommended. Given the location of the proposed development, in proximity to many human health receptors, construction works mitigation relevant to a *high* risk site should be secured by condition, in line with London Plan Policy SI1 (D).
133. The assessment of emissions from backup diesel generator has been scoped out however but there is insufficient information on exhaust location and maintenance and testing schedule provided to justify this. Additional information on the exhaust location and proposed maintenance and testing schedule of any backup diesel generators installed should therefore be provided to demonstrate that emissions will not lead to any exceedances of the air quality objectives (e.g. 1-hour NO₂ objective) at existing sensitive receptors.
134. Exposure of the Development's occupants through dispersion modelling is found to be acceptable. The development does not introduce any new sensitive receptors (i.e. offices) and is not located in an Air Quality Focus Area. No additional mitigation measures are therefore required to improve occupant exposure.
135. All impacts of additional operational road traffic emissions on existing sensitive receptors are found to be negligible, demonstrating that there will be no adverse impacts on air quality. Assessment of air quality impacts associated with emissions from additional road traffic during demolition and construction has been scoped out in accordance with EPUK/IAQM guidance. There will therefore be no adverse impacts on air quality – compliant with London Plan policy SI 1 (B) (1a).
136. Development areas used in Air Quality Neutral assessment differ from those quoted in the Planning Statement. The benchmarks appear to have been calculated incorrectly. This does not comply with London Plan Policy (B) (2a). The Air Quality Neutral assessment should be revised to ensure the correct areas and benchmarks for Central London are used. Currently If exceedances are identified, appropriate mitigation should be recommended.
137. In addition to the above, the following conditions should also be secured.
 - On-site plant and machinery must comply with the London Non-Road Mobile Machinery (NRMM) Low Emission Zone standards for the Central Activities Zone (London Plan Policy SI 1 (D)).
 - Measures to control emissions during the construction phase relevant to a high risk site should be written into an Air Quality and Dust Management Plan (AQDMP), or form part of a Construction Environmental Management Plan, in line with the requirements of the Control of Dust and Emissions during Construction and Demolition SPG. The AQDMP should be approved by the

LPA and the measures and monitoring protocols implemented throughout the construction phase (London Plan Policy SI 1 (D)).

Biodiversity

138. London Plan Policy G6 states that proposals that create new or improved habitats that result in positive gains for biodiversity should be considered positively. Policy G6 further states that development proposals should aim to secure net biodiversity gain. The DAS states an 818% change in biodiversity value which is strongly supported.
139. London Plan Policy G7 states that development proposals should ensure that, wherever possible, existing trees of value are retained; and that if development propose the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system.
140. The Arboricultural Impact Assessment (AIA) states that there are three trees located on the site, including two mature trees and a Category C shrub. The two trees are to be retained as part of the proposed development, which is supported. The shrub is proposed to be removed however the AIA states that its loss will not be detrimental to the character of the area and that the landscaping scheme will mitigate its removal. The AIA advises that protection measures should be put in place for the two retained trees.
141. The applicant appears to demonstrate a consideration of a diverse range of proposed tree species, which is positive in terms of biosecurity and should be brought to fruition. The applicant should also consider large-canopied trees to target urban heat island (UHI) effects.

Local planning authority's position

142. City of London planning officers are currently assessing the application. The application is expected to be considered at a planning committee meeting in November 2021.

Legal considerations

143. Under the arrangements set out in Article 4 of the Town and Country Planning (Mayor of London) Order 2008 the Mayor is required to provide the local planning authority with a statement setting out whether he considers that the application complies with the London Plan, and his reasons for taking that view. Unless notified otherwise by the Mayor, the City of London Corporation must consult the Mayor again under Article 5 of the Order if it subsequently resolves to make a draft decision on the application, in order that the Mayor may decide whether to allow the draft decision to proceed unchanged; or, direct the City of London Corporation under Article 6 of the Order to refuse the application. In this case, the City of London Corporate need not refer the application back to the Mayor if it

resolves to refuse permission. There is no obligation at this stage for the Mayor to indicate his intentions regarding a possible direction, and no such decision should be inferred from the Mayor's statement and comments.

Financial considerations

144. There are no financial considerations at this stage.

Conclusion

145. London Plan policies on Central Activity Zone, Office, Suitable Business Space, Urban Design, Heritage, Transport, Sustainable Development and Environmental Issues are relevant to this application. Whilst the proposal is supported in principle, the application does not fully comply with these policies, as summarised below:

- **Land use principles:** The site is located in the CAZ and within the City of London which encourages the provision of new office space. The principle of office use is supported. London Plan Policies SD4, SD5, E1.
- **Suitable Business Space:** The scheme does not provide any flexible office space suitable for SMEs. London Plan Policy E2.
- **Urban Design:** Further information/ clarification is required in relation to the public realm and layout. London Plan Policies D3 and D8.
- **Transport:** The City Corporation should secure improvements identified in the ATZ assessment. Funding for streetscape improvements proposed on Farringdon Street secured in the S106. Section 278 agreement required to undertake the streetscape improvements proposed on Farringdon Street and Pit Lane. Clarification required in relation to public transport impacts and Road Safety Audit. Full DSP and CLP secured via condition. Continued engagement with TfL in relation to Turnagain Lane. London Plan Policies T2, T3, T4 and T7.
- **Heritage:** An updated view should be provided for LVMF View 4A.1 Primrose Hill. London Plan Policies HC4 and HC5.
- **Sustainable Development:** Further information is required in relation to Energy Strategy, Whole Life Carbon and Circular Economy Statements. No information has been provided for in relation to digital connectivity. London Plan Policies SI 2, SI 6 and SI 5.
- **Environmental Issues:** Further information is required in relation to air quality. London Plan Policy SI 1.

For further information, contact GLA Planning Unit (Development Management Team):

Rachael Rooney, (case officer)

email: rachael.rooney@london.gov.uk

Allison Flight, Deputy Head of Development Management

email: alison.flight@london.gov.uk

John Finlayson, Head of Development Management

email: john.finlayson@london.gov.uk

Lucinda Turner, Assistant Director of Planning

email: lucinda.turner@london.gov.uk

We are committed to being anti-racist, planning for a diverse and inclusive London
and engaging all communities in shaping their city.

PROJECT: 14-21 HOLBORN VIADUCT, LONDON

SCHEDULE OF RESPONSES TO GLA COMMENTS RECEIVED

The following table outlines our response to the comments received by the GLA dated October 2021.

I.D	GLA COMMENT	RESPONSE
Business Space		
1.	Para 22 - The application does not include flexible workspace which would be suitable for SMEs. GLA officers would, encourage the applicant to consider an area that could be subdivided and kept separate, that would be suitable for SMEs.	<p>As per recent discussions with the GLA, should planning permission be granted for the development, Hogan Lovells, one of London's largest legal occupiers is expected to occupy the entirety of the building as their new London headquarters. The enclosed letter from Hogan Lovells provides further background to the importance of their remaining in this part of the City of London. Should the building ever become vacant, as outlined in the Design & Access Statement, the development has been designed so that its floorplates are inherently flexible and adaptable so that they can accommodate multiple tenancies across each of its floorplates. This would enable the building to accommodate multiple occupiers of a range of sizes from SMEs through to large multinational organisations.</p> <p>As part of the S106 agreement, the Developer will also be implementing a programme of local community outreach, a large part of which is aimed at furthering education and employment opportunities for the local community within the City of London, as well as other neighbouring boroughs including Islington, Tower Hamlets, Hackney and Lewisham to name a few. This includes engaging with local schools and providing access to the building to host educational workshops and employability skills sessions.</p>
Urban Design		
2.	Para 27 - The proposals seek to provide high grade office use for a single tenant. This includes an expansive space fronting Holborn Viaduct as well as a smaller dead-end and irregular shaped space fronting Farringdon Street. Building 'Receptions' are co-located adjacent to these spaces and as such, it is unclear how they will activate the public realm, create visual interest or support local communities. As such, a preferred outcome would provide a limited number of additional ground floor tenancies (potentially affordable)	The proposal will deliver activated frontages through the inclusion of digital art screens into the facades fronting Farringdon Street and Holborn Viaduct to create a 'Gallery Without Walls'. The new areas of public realm created along both street frontages will provide areas for people to sit, dwell and relax, and are strategically located and activated to ensure a safe and overlooked public realm that significantly enhances urban legibility and accessibility for all. As referred to above in response to Paragraph 22, a programme of local community outreach will be secured within the

PROJECT: 14-21 HOLBORN VIADUCT, LONDON

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	to help generate and contribute to activity in the streetscape(s) rather than extensive and often empty lobby spaces. This provision would also help offer a range of employment types / providers to help support the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand as outlined in the London Plan Policy E2.	S106 agreement associated with the development. This will secure a range of initiatives relating to furthering education and employment opportunities for the local community.
3.	Para 31 – The City of London Plan 2015 identifies tall buildings as those that significantly exceed the height of their general surroundings with the City of London Local Plan Proposed Submission Draft March 2021 identifying them as over 75m above Ordnance Datum (AOD). The proposed development, at 12 storeys (c.58.65m) and is therefore not considered a tall building. The applicant should confirm the height in AOD.	Holborn Viaduct – 49.25m AOD Farringdon Street – 58.65m AOD
Heritage		
4.	Para 60 - The townscape, visual and built heritage assessment assessed 7 Strategic Views - 5 Townscape views and 2 River Prospects (which included non-verified views as the view was not visible in them). In each of the townscape views with a Protected Vista (2A.1 Parliament Hill to St Pauls and 3A.1 Kenwood to St Paul's) the proposed development does not breach the height threshold of the Landmark Viewing Corridor and is considered acceptable in the Wider Setting Consultation Areas as it does not impact the viewer's ability to recognise and appreciate St Paul's. However, it should be noted that in View 4A.1 Primrose Hill to St Paul's the building in front of the proposed development at Euston is no longer there. The applicants are therefore advised to provide an updated view.	We are able to confirm that the view submitted is correct and is up to date in respect of Euston demolitions. The submitted baseline view for 4A.1 shows One Euston Square and Grant Thornton House to the right of St Paul's in the view (on the west side of the station) having been demolished. The demolition was completed at the end of 2020 I believe. These towers are also no longer visible in LVMF view 5A.2 to the right of St Paul's as submitted – this may be where the confusion has arisen. We can confirm that the two towers at Euston visible to the left of St Paul's in the view (One Eversholt St which conceals the proposal in the view and Evergreen House North further to the left of St Paul's in the view).
Transport		
5.	Para 73 - The development is expected to generate 7,501 two-way daily trips. Of those, 1,186 two-way trips are estimated in the morning peak and 1,006	Please refer to formal response memo prepared by Momentum dated 09/11.

PROJECT: 14-21 HOLBORN VIADUCT, LONDON

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	two-way trips in the evening peak. At pre-application stage, the applicant was advised to use TfL's strategic models to assess these trips, however this has not been undertaken. Furthermore, the applicant should clarify their line loading assessment before officers can agree that the impacts of the proposed development on the London Underground network would be negligible and no mitigation is required.	
6.	Para 77 - As advised at the pre application stage, the applicant should increase the aisle widths for the cycle store to ensure it take account of all users. The provision of two-tier stands has been agreed given the site constraints.	Confirmation in email received from Max Faulkner (TfL) on 30 th June, noting the aisle widths are acceptable in line with manufacturers specification.
7.	Para 83 – A swept path analysis of the vehicle access arrangements has been provided. A Stage 1 Road Safety Audit (RSA) for vehicular movement across cycleway 6 (C6) to the proposed servicing yard on Newcastle Court has also been undertaken in line with TfL guidance as requested at pre-application stage. The applicant is advised to address any design and safety issues that have been identified.	Please refer to formal response memo prepared by Momentum dated 09/11.
8.	Para 84 – In particular, the visibility of servicing vehicles crossing C6 may be compromised when accessing and egressing Newcastle close onto Farringdon Street. This must be addressed in line Vision Zero principles; especially as proposed planters threaten the visibility spray of servicing vehicles further.	Please refer to formal response memo prepared by Momentum dated 09/11.
9.	Para 86 - The site is car free except for one disabled parking bay in the servicing yard accessed from Newcastle Close. London Plan Policy T6.5 (Non-residential disabled persons parking) sets out that for non-residential uses that at least one on of off-street parking bay should be provided.	Please refer to formal response memo prepared by Momentum dated 09/11.
10.	Para 91 - The development is supported by a Cycling Promotion Plan. This should focus on increasing the cycling mode share in line with the Mayor's Transport Strategy cycling mode share target for central London. Officers	Please refer to formal response memo prepared by Momentum dated 09/11.

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	request a commitment requiring further measures to be identified should three- and five-year mode shift targets not be achieved.	
Sustainable Development		
11.	Para 93 - The applicant has submitted the GLA's Carbon Emission Reporting, however the applicant should submit as a excel spreadsheet to allow the use of the updated SAP 10 emission factors alongside the SAP 2012 emission factors.	Please refer to completed Holborn Viaduct – Energy Statement – Part 4 – excel spreadsheet.
12.	Para 98 – The applicant has identified the Citigen district heating network within the vicinity of the development and is suggesting that there is no capacity on the existing network or the proposed extension. The applicant should submit evidence they have contacted relevant stakeholders including the borough energy officer, local heat network operators and nearby developers to ask whether they know of any local heat network connection opportunities. To note - Appendix 3 seems to be missing the communication.	Please refer to EB_004_Appendix 3_RE (EXT) Citigen Network Potential Review.
13.	Para 99 – The applicant is proposing a communal heat network supplied by a centralised energy centre. It should be confirmed that all non-domestic building uses will be connected to the heat network.	Please refer to 14-21 Holborn Viaduct GLA Consultation – Energy Memo 2021.
14.	Para 100 – A drawing showing the route of the heat network linking all uses on the site should be provided alongside a drawing indicating the floor area, internal layout and location of the energy centre.	Please refer to 14-21 Holborn Viaduct GLA Consultation – Energy Memo 2021.
15.	Para 102 – The applicant is proposing 234m ² PV, to generate 27,860 kWh across the development. The applicant should confirm the kWp.	Please refer to 14-21 Holborn Viaduct GLA Consultation – Energy Memo 2021.

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16.	Para 103 – A detailed roof layout has been provided demonstrating that some of the roof's potential for a PV installation has been explored alongside with vertical areas on the South and East facades. The applicant is expected to situate PV on any green/brown roof areas using biosolar arrangement and should indicate how PV can be integrated with any amenity areas and should review this opportunity and clearly outline any constraints to the provision of further PV, such as plant space or solar insolation levels.	Please refer to 14-21 Holborn Viaduct GLA Consultation – Energy Memo 2021.
17.	Para 105 – Heat pumps are being proposed in the form of a (centralised) ASHP system. The SCOP is 3.6. The SCOP for hot water is 2. The heat pumps provide 100% of the heat demand. Further information on the heat pumps should be provided including – further details are set out in the cover note.	Please refer to 14-21 Holborn Viaduct GLA Consultation – Energy Memo 2021.
18.	Para 109 – In line with London Plan Policy SI 2, the applicant has submitted a WLC report which appears to cover much of the assessment requirements. Whole Life Carbon comments, which are summarised below, have been provided to the applicant and Council in full under a separate cover. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.	Please refer to 14-21 Holborn Viaduct – Stage 1 WLC Memo.
19.	Para 110 – Further information is required in relation to the operational carbon (B6) results – these seems very low; there are negative values given for module C which is not typical; and Assessment 2 should account for future decarbonisation to embodied carbon under lifecycle module B2-B5 and D.	Please refer to 14-21 Holborn Viaduct – Stage 1 WLC Memo.

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20.	Para 111 – The applicant should also submit excel version of the GLA WLC template to allow a full review to be completed against the guidance. This is for tracking and monitoring of data.	Please refer to 14-21 Holborn Viaduct – Stage 1 WLCA Memo.
21.	Para 113 – The applicant has submitted a Circular Economy Statement, however further information is required. A separate cover note has been sent to applicant and Council. The applicant should respond to this detailed note to address outstanding issues to ensure compliance with the London Plan in advance of the borough planning committee to ensure that any conditions can be appropriately secured.	Please see enclosed GLA CE Memo Stage 1 responses, and the Circular Economy Statement has been updated to reflect the responses.
22.	Para 114 – Further information is required in relation to the description of development, the strategic approach, recycling and reporting tables, operational waste, plans for implementation, appendices and a commitment to a post-completion report.	Please refer to 14-21 Holborn Viaduct – Stage 1 WLCA memo.
Urban Greening		
23.	Para 120 – A key should also be provided for the surface cover type drawings to evidence the UGF score prior to Stage 2.	Please refer to Urban Greening Factor Extract for Landscape Appendix v2.
Sustainable Drainage		
24.	Para 128 – The applicant should ensure that the City of London’s version of the London Sustainable Drainage Proforma is completed and accompanies the planning application. The proformas for all Local Authorities can be found here: https://www.london.gov.uk/what-we-do/environment/climate-change/surfacewater/london-sustainable-drainage-proforma .	Completed SuDs proforma issued to GLA/CoL on 02/11.
Air Quality		
25.	Item 133 - The assessment of emissions from backup diesel generator has been scoped out however but there is insufficient information on exhaust location and maintenance and testing schedule provided to justify this. Additional information on the exhaust location and proposed maintenance and testing schedule of any backup diesel generators installed should therefore be provided to demonstrate that emissions will not lead to any	Please refer to further information on Generator Flue Location, shown in drawing prepared by Hilson Moran.

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	exceedances of the air quality objectives (e.g. 1-hour NO2 objective) at existing sensitive receptors.	
26.	Para 136 - Development areas used in Air Quality Neutral assessment differ from those quoted in the Planning Statement. The benchmarks appear to have been calculated incorrectly. This does not comply with London Plan Policy (B) (2a). The Air Quality Neutral assessment should be revised to ensure the correct areas and benchmarks for Central London are used. Currently If exceedances are identified, appropriate mitigation should be recommended.	Please refer to updated Air Quality Assessment, dated 5 November 2021 (doc ref. 29044-HM-HV-XX-RP-IE-002_P03).

Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Telephone 020 7332 1949

Email tim.munday@cityoflondon.gov.uk



Date 5 October 2021

Our Ref DS/SUDS21/0032

Your Ref PT_AW/21/00755/FULMAJ

Subject 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the Flood Risk Assessment and Sustainable Urban Drainage Strategy (Rev P1) for the above application and would recommend the following conditions should the application be approved:

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.

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, its 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.

Memo

To Assistant Director (Development Management)
Environment Department

From Access Advisor
Environment Department

Telephone 07842 601190

Email lydia.morley@cityoflondon.gov.uk



Date 08 October 2021

Our Ref 21/00755/FULMAJ

Subject 14-21 Holborn Viaduct 32-33 Farringdon Street & 34-35 Farringdon Street London EC1A 2AT

The Access Team has assessed the planning application to ensure that the proposal meets the highest standards of accessibility and inclusive design required by London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2036 Intend to Submit Policy HL1.

1. The comprehensive access statement by Access Design is welcomed.
2. There are a couple of references to DDA within the Design and Access Statement and Transport Assessment. Please note that neither the Disability Discrimination Act (DDA) nor its replacement, the Equality Act 2010, prescribes any building design standards. It is therefore preferable, and more meaningful, to use the terms 'Part M or BS8300 compliant', or in this case 'accessible parking' or 'blue badge parking'.

Horizontal circulation

3. Revolving doors are inaccessible to people with ambulant mobility impairments, people who are blind or partially sighted and many others. It is recommended that alternative inclusive door styles should be considered such as automated curved sliding doors.
4. If alternative door styles are unfeasible then the pass doors should be clearly signed and evident on approach. They should be available to all and remain unlocked during all times the revolving doors are open.
5. It is pleasing to note within the Access Statement that for Farringdon Street "the pass door swing area will be protected in line with guidance in AD K", as the outward opening door projects more than 100mm past the building line.
6. It is noted within the Access Statement that "security barriers, if fitted, will allow wheelchair user access", however this does not appear to be

proposed. It is important to ensure that at least one barrier in each location has a 1000mm minimum clear opening width.

7. The doors to the bridge links (L06, L08 and L10) and rooms adjacent to the atrium (L07 and L09) lack the required minimum 300mm unobstructed space on the pull side of door between the leading edge of the door and return wall (Approved Document M Volume 2 3.10c).

WC facilities

8. It is pleasing that a wheelchair-accessible WC is proposed on every floor and that each set of male and female WC facilities would have a cubicle for ambulant disabled people and an enlarged cubicle.
9. It is pleasing that the transfer handing of the wheelchair-accessible WC's would alternate between most floors, although this is not proposed for Basement 1 and 2, and both facilities on L02 have left-hand transfers.
10. Wheelchair-accessible WC facilities should not be located in a way that compromises the privacy of users, however the facility on Level 00 opens directly into the office (Approved Document M Volume 2 5.10b). Consideration should be given to improving the privacy such as introducing a lobby.

External environment

11. The proposed introduction of a public lift between Holborn Viaduct and Farringdon Street is welcomed. It is important that the public are aware of its presence. It is noted that large signage is proposed, i.e. To Farringdon Street, however it is recommended that a universal lift symbol is also used.
12. It is noted that either granite or yorkstone setts are proposed in front of the office entrances. The use of yorkstone is preferable as this material is used for widely for the City of London public realm, which would help indicate that the public lift is available to all. The introduction of granite could make these spaces feel private and could impact the perceived accessibility of the lift.
13. There are concerns that the digital public artworks, large screens and in the public lift, could be problematic for people with sensory/neurological processing difficulties or who are blind or partially sighted or have photosensitive epilepsy due to bold colours, patterns and flickering lights (refer to BS8300-2:2018 Section 11 for more details).
14. The positioning of the lighting needs to be designed to avoid creating glare, pools of bright light and strong shadows. Uplighters located at

low levels can also cause glare problems for some people (BS8300-1:2018 11.2).

15. Sculptural seating is proposed on Holborn Viaduct and although it is noted that these are indicative designs, the western bench projects into the centre of the pavement of Holborn Viaduct and would obstruct the desire line.
16. Consideration should be given to providing a variety of seating within the roof terraces and public realm. Back and arm supports provide positive aids to ambulant disabled people, particularly when rising. It is also preferable for a variety of seat heights to be provided, with at least one each with a seat height of 380 mm, 480 mm and 580 mm from ground level. A seat height of 380 mm is suitable for people of short stature; 480 mm allows for lateral transfer onto the seat by wheelchair users; and 580 mm is suitable for people who require a higher seat (BS8300-1:2018 10.7).
17. There is concern that the placement of furniture (F9 low stools and tables) on L6 terrace restricts access to one of the doors and narrows an access route to less than 1200mm wide.

Transport

18. It is pleasing that 25 long-stay spaces for larger cycles would be provided in the Wellness Wing, which would meet the 5% requirement by London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1. However as the layout of the cycle store has not been provided, it is not possible to assess whether the spaces would be adequate for cycles such as tricycles, handcycles and recumbent cycles, which can be up to 1.2m wide and 2.8m long.
19. The loss of a blue badge parking bay on Farringdon Street is unsatisfactory. It is noted that a survey of this bay was undertaken in October 2020 and that it was not used within this time, however due to Covid-19 this unlikely to be a true representation of its usage (shielding, working from home, government restrictions etc.). The number of on-street blue badge parking spaces within the City should not be reduced, therefore it is recommended that it is relocated to a nearby suitable location.
20. The proposal of one off-street accessible parking bay is welcomed.

The Access Team promotes good practice standards of inclusive design and encourages early consideration of accessibility in the design process so that

a truly inclusive environment can be achieved that everyone will be able to visit, use and enjoy.

Yours sincerely

Lydia Morley

Access Advisor

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email: plncomments@cityoflondon.gov.uk



From Ms Hazel Austin
Environmental Health Officer
Department of Markets and Consumer Protection
Telephone 020 7332 3590
Email hazel.austin@cityoflondon.gov.uk

Date 15 October 2021
Our Ref WK202113119
Your Ref PT_AW/21/00755/FULMAJ

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.

[The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated]

This department acknowledges receipt for the above application and have the following comments and observations to make:

Roof Terrace Hours:

The roof terraces on level 6 & 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.

Roof Terrace Music:

No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

Promoted Events:

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.

Noise Control:

- (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.

Demolition and Construction:

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.

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.

Noise and vibration from mechanical systems or other plant:

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.

Sewer Vent Condition:

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.

Fumes from Use Class E / Sui Generis affecting offices or residential:

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

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

ventilation and extraction equipment:

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

Lighting:

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 pursuant to this consent shall be carried out 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

Regards

Hazel Austin
Environmental Health Officer
Pollution Team

Dept. of Markets & Consumer Protection
City of London, PO Box 270,
Guildhall, London, EC2P 2EJ

Tel: 020 7332 3590
Mob: 077 709 66721

Memo

To Assistant Director (Development Management)
Department of the Built Environment
Email plncomments@cityoflondon.gov.uk



From Stefanie Hughes
Air Quality Officer
Telephone 0207 332 3541
Email Stefanie.hughes@cityoflondon.gov.uk

Date 11/10/2021

Your Ref 21/00755/FULMAJ

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

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.

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

Should the development be approved please attach the following conditions:

M26F 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.

REASON:

REASON: In order to ensure the proposed development does not have a detrimental impact on air quality, reduces exposure to poor air quality and in accordance with the following policies: Local Plan policy DM15.6 and London Plan policy 7.14B.

M32 Prior to the commencement of development the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery

Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Department of the Built Environment

Telephone 020 7332 1953

Email mark.pundsack@cityoflondon.gov.uk

Date 9 November 2021

Our Ref DS/FC21/0012

Your Ref PT_AW/21/00755/FULMAJ

Subject 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT



In response to your request for comments in relation to the fire statement, the District Surveyors Office has the following comments to make:

The District Surveyors Office has reviewed the fire statement.

In respect of the Mayor's policy D5, whilst the statement mentions that there will be two evacuation lifts provided, it does not state where these are on the plans, in relation to the refuge areas, and whether they are separate from the firefighting lifts. I would consider this insufficient details be able to assess the proposals against the policy.

Devlia, Neel

From: PLN - Comments
To: Williams, Amy
Subject: RE: Memo from Cleansing FW: 14-21 Holborn Viaduct 21/00755/FULMAJ - collective comments/responses

From: Varma, Vimal <Vimal.Varma@cityoflondon.gov.uk>
Sent: 11 November 2021 19:43
To: Williams, Amy <Amy.Williams@cityoflondon.gov.uk>
Subject: RE: 14-21 Holborn Viaduct 21/00755/FULMAJ - collective comments/responses

Hi Amy,

Based on the below.

The waste storage and collection facilities indicated in the Framework Delivery & Service Plan, September 2021 and drawing No. 1395-PLP-DR-A-03100 Rev 00 comply with our requirements. This Division will, therefore, raise no objections to this application.

Thanks

Vimal

From: Williams, Amy <Amy.Williams@cityoflondon.gov.uk>
Sent: 11 November 2021 19:26
To: Varma, Vimal <Vimal.Varma@cityoflondon.gov.uk>
Subject: FW: 14-21 Holborn Viaduct 21/00755/FULMAJ - collective comments/responses
Importance: High

Hi Vimal,

Please see responses below and attached. Can this now be agreed?

Kind regards,
Amy

Amy Williams | pronouns: she/her
Planning Officer (Development Management)
Development Division
Environment Department
Tel: 07749 714 816



Environment Department
City of London Corporation

City of London Corporation | PO Box
270 | London EC2P 2EJ |
www.cityoflondon.gov.uk

From: Zoe Smythe <zoe.smythe@dp9.co.uk>
Sent: 11 November 2021 17:13
To: Williams, Amy <Amy.Williams@cityoflondon.gov.uk>
Cc: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>; Tim Holtham <tim.holtham@dp9.co.uk>
Subject: RE: 14-21 Holborn Viaduct 21/00755/FULMAJ - collective comments/responses

THIS IS AN EXTERNAL EMAIL

Hi Amy,

Please see attached and our response below in [blue](#).

Kind Regards,

Zoe Smythe

Assistant Planner

direct: 020 7004 1785

mobile: 07872 149 720

e-mail: zoe.smythe@dp9.co.uk

DP9 Ltd

100 Pall Mall

London

SW1Y 5NQ

telephone: 020 7004 1700 **facsimile:** 020 7004 1790 **website:** www.dp9.co.uk

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From: Williams, Amy <Amy.Williams@cityoflondon.gov.uk>
Sent: 10 November 2021 19:08
To: Tim Holtham <tim.holtham@dp9.co.uk>; Zoe Smythe <zoe.smythe@dp9.co.uk>
Cc: Delves, Gemma <Gemma.Delves@cityoflondon.gov.uk>
Subject: RE: 14-21 Holborn Viaduct 21/00755/FULMAJ - collective comments/responses

Hi both,

I've had a further comment in from Cleansing, please can you address:

I cannot approve waste storage facilities as there is no internal route from cycle storage building to waste store without taking waste bags over public highway. Internal routing is provided via Level 2 (routing illustration attached). This would also incorporate waste collection of the Gym. No waste will be transferred via the public highway.

I need tracking done with a standard or large refuse truck, details attached, with confirmation of 4.5m clearance where refuse truck will travel. 4.75 height is provided where a refuse truck will travel and is confirmed in 6.1.3 of the Framework DSP. Tracking is included at Figure 6.2 of the Framework DSP with a refuse vehicle of 7.75m length and 2.2m width ad accords with the Auto Track settings indicated. Re-attached for ease.

I also need confirmation of the following

1. Waste store will comply with BS5906. This is confirmed at 6.1.3 of the Framework DSP.
2. All occupants of the development will have access and be required to use the communal waste storage facilities. The building will be a single tenant and so all those that require access will have access to the waste store.
3. Maximum compaction ratio for GW will be 3:1 and 2:1 for recycling. These ratios are in line with those used for the waste provision forecasts.

Kind regards,
Amy

Amy Williams | pronouns: she/her
Planning Officer (Development Management)
Development Division
Environment Department
Tel: 07749 714 816



Environment Department
City of London Corporation

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APPLICATION COMMENT FORM

Application No: 21/00755/FULMAJ

Development Management Case Officer: Amy Williams

Site Address: 14-21 Holborn Viaduct 32-33 & 34-35 Farringdon Street London EC1A 2AT

Proposal: 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.

[The proposed development does not accord with the provisions of the development plan in force in the area in which the land to which the application relates is situated]

Date Received: 20/09/2021

Comment:

Flood Risk:

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.

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 would be welcomed at this stage or should be required by condition to be approved by the Local Planning Authority prior to commencement of the development.

A flood Emergency Plan should be provided in line with the City Corporation's [Flood emergency plans for new developments planning advice note](#).

Recommendation: Request further details of flood resistance and resilience measures or apply a pre commencement condition requiring such details.

Request Flood Emergency Plan for this site

Climate Resilience:

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.

Recommendation: No objection

JL
29/10/21

JL
29/10/21