

Planning and Transportation Committee - 14 December 2021

**Addendum for Agenda Item 4 - Planning application 21/00755/FULMAJ – 14 – 21 Holborn Viaduct
32 – 33 & 34 – 35 Farringdon Street EC1A 2AT**

1. Letters of representation

Two additional letters of representation have been received in respect of this application.

The London Borough of Islington have made the following observations:

Observations	Officer Comments
The nearest part of the application site is some 180 meters away from the LB Islington boundary. None of Islington's protected local views pass over the site, nor do any strategic views which also pass over Islington. The transport assessment submitted by the applicant notes that Farringdon Street is proposed as a construction route. Should planning permission be granted by the City of London for the proposed development and should adjacent footways and highways (within Islington) be damaged during demolition and construction, appropriate reinstatement will need to be funded by the developer. The proposed development is considerably taller and bulkier than the existing building on Holborn Viaduct, especially the South-Western elevation. It is considered that the proposed development would have a detrimental impact on the openness of the view from Farringdon Street down to Holborn Viaduct and detract from the area's historical significance.	The developer has noted the comments in respect of construction routes. The impact of the proposal on local townscape and historic significance of the area is set out in the Design, Townscape Views and Heritage Assets sections of the committee report.

One letter of objection has been received from a local resident. The main issues raised are summarised as follows:

Grounds of objection	Officer comments
1. Sustainability a) The proposed increase in embedded carbon should be reason in itself for refusal. Total carbon emissions are estimated (paragraph 316) at:	a) There is no planning policy against new development that results in carbon emissions. The NPPF, the London Plan and the Local Plan require new development to be sustainable, with detailed policies of how the development should address and demonstrate sustainability. The proposed development complies with and in part exceeds those policies.

b) Scheme: Embedded: 34,040 tonnes: Operational: 36,025 tonnes p.a. Scenario 1: Embedded: 20,720 tonnes: Operational 31,995 tonnes p.a. Scenario 2: Embedded: 19,100 tonnes: Operational: 29,680 million tonnes p.a. Scenario 3: Embedded: 13,740 tonnes: Operational: 24,170 million tonnes p.a. Again, no credit is given to the potential reduction of operational carbon emissions from the existing buildings that the decarbonisation of the grid will bring. Whilst its total operating emissions are, it seems, currently, 65,000 tonnes per annum there must be scope for reduction with a relatively small increase in embedded carbon, irrespective of the grid. c) The area required by this tenant - 24,600 square metres appears to be 63% of the total GIA of the proposed building. This, added to the tenant's 85% space requirement suggests permissions are being made for a significant oversupply of office accommodation. d) As the update on City Plan 2036 points out, the officers' proposal for a rethink, follows the changed outlook between the Inspector's optimistic post-Covid expectations last year and the reality now. At some stage, the constant approval of developments, where destruction of existing buildings is permitted with a resulting substantial increases in embedded carbon, has to be contained.	b) The purpose of the exercise was to establish the marginal differences of each option and not to attempt to confirm the finite figures, which are impossible to establish accurately. For all the scenarios we analysed, in order to ensure a comparative analysis, we confirm the carbon figures used are based on current carbon grid factors. Hence this is a like-for-like comparison. Even if we could, applying carbon grid factor reductions (note, these are only predictions that could change in the future) it will not drastically change the relative comparisons already determined. In fact the existing building assumption would perform slightly worse, since the existing services include gas fired boilers, which will not benefit from carbon reductions, as much as electricity in the future. c) As is set out in paragraph 82 of the committee report the longer term geographical, economic and social fundamentals underpinning office demand remain in place. The proposed floorplates have been designed to be flexible to suit the needs of a range of occupiers. Notwithstanding, in respect of the potential tenant's requirements, their absolute minimum net office space requirement would be 24,619 sqm. The proposed scheme would provide 24,792 sqm. By virtue of the design of the building, 103 sqm (0.7%) of office space would be provided over and above the tenant's absolute minimum requirements. Notwithstanding, the tenant would utilise this space. d) See points a and c above. The policy approach is under review. The applicant is considered to have carried out sufficient appraisal work to look at options for the site as is set out in the committee report.
2. Biodiversity	

This application is another example of an applicant appearing to have done nothing on the applicant site with regard to biodiversity enhancement but suddenly becoming a champion of biodiversity in order to gain planning permission. Whatever the policy may be, the need to enhance the areas which will best benefit from investment, rather than hanging dying branches over the sides of walls etc would benefit both the environment and the developer.	The impact of the proposal in biodiversity terms is set out in the biodiversity section of the committee report. The scheme demonstrates net biodiversity gain in accordance with policy.
3. Cultural Plan a) It is unclear what the purpose of the Cultural Plans are except for box ticking. Wouldn't it be far simpler and less expensive to take videos of the MoL's collection of artefacts and display these online, as it's not clear how exhibiting anything at the site would <i>enhance this part of Farringdon Street and Holborn Viaduct as key routes to the Culture Mile and the potential [sic] new Museum of London site</i>. At the very least evidence should be produced of where those members of the public being attracted to the Culture Mile and/or the MoL by the cultural offering would come from. They are highly unlikely to emerge from City Thameslink and say "oh look, the Culture Mile and/or the MoL is over there", so why would they be at the site to say so? b) Certainly for a scheme that will destroy some of the historic part of the City, if nothing else, the comments of the MoL are surprising. It is queried why adding vibrancy is necessary.	a) The City's cultural infrastructure is important to the distinctive and historically significant character of the Square Mile. Policy S6 of the draft City Plan 2036 requires developers to submit Cultural Plans for major development outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer. The stretch of Farringdon Street and Holborn Viaduct adjacent to the application site are identified in Figure 35 of the draft City Plan as being key pedestrian routes around the Smithfield and Barbican Key Area of Change, of which the Culture Mile and the potential new Museum of London site are an integral part. In respect of this Area of Change the plan acknowledges that the opening of the Elizabeth Line and delivery of the Culture Mile initiative would cause increased visitor numbers and pedestrian flows in this area and the rest of the City. The proposed development would provide a cultural offer that is complementary to the Culture Mile. b) The art screens would provide welcome activation and visual interest for pedestrians along the ground floor frontage in order to avoid a sterile environment as is set out in paragraph 94 of the committee report.
4. Loss of Turnagain Lane a) Below is an extract from your report in respect of Turnagain Lane, which <i>holds historic and evidential significance due to its medieval origins, and as evidence of the medieval street pattern of the Fleet Valley</i>. However, you ignore this "historic and evidential significant" by	a) The committee report sets out how Turnagain Lane is of heritage significance and is a non-designated heritage asset in the design and non designated heritage assets section of the report.

treating Turnagain Lane as a “route’ - a route <i>considered to hold a low level of historic and evidential significance.</i> b) You conclude: <i>Given its low level of significance it is not considered to make a significant contribution to the City’s historic street network.</i> Perhaps you could explain how the historic significance of the medieval origins can, objectively, become a low level of significance?	b) The non-designated heritage assets section of the committee report sets out how the significance of the route has been diminished by its loss as a through route, loss of the building line on the north side and its use now principally as a service access to Kimberley House. It is now of low quality in terms of visual amenity, accessibility and permeability.
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2. Stage 1 Update

The applicant has been working to address the matters raised in the Stage 1 letter. The GLA has provided an update on the issues as per the attached email. A summary of the content is provided in the table below:

GLA’s Comments	Officer Response
Air Quality – Outstanding items from stage 1 resolved.	
Energy – Most items responded to. A condition to connect to Citigen required should this prove feasible. Further details required in respect of the PV panels.	Conditions are included in the condition schedule to require a connection to a district heating network should this prove feasible (53) and the provision of further information in respect of the PV panels (30).
Circular Economy – Most matters addressed. Further information is required on operational waste and conditions are required regarding the waste/resource management plan.	The applicant will engage with the GLA regarding the operational waste plan. The recommended circular economy condition (4) would cover the requirement for a site waste/resource management plan.
Whole Life Carbon – No further comments or actions required by the applicant at planning stage. Condition is recommended covering post construction WLC assessment.	The condition requiring the post construction WLC assessment has been included in the condition schedule (35).
Flood risk, drainage, water efficiency – SuDS information has been provided. No further comments in this respect.	
Green Infrastructure – Further information has been provided in respect of greening. The UGF score is strongly supported.	
Urban Design – A ground floor plan should be provided that shows how SMEs could be accommodated should the tenant end their lease. A street level tenancy option should be explored for the ground floor in order to contribute to street activation.	Flexible floorplates are proposed to meet the needs of a range of occupiers. Should the building not be taken by the proposed tenant affordable workspace would be provided for SME’s as is set out in paragraph 33 of the committee report. The proposed art screens and public realm enhancements would activate the building at street level.

3. Amendments

Paragraph 86 replace 18,210 sqm with 19,004 sqm.

4. Outreach Programme Update

The applicant has agreed to extend the scope of the Local Community Outreach Programme to allow facilities within the building to be used for Green skills training for SMEs a couple of times per year (exact details to be finalised as part of the S.106 agreement). This could include engagement with initiatives such as 'Heart of the City'.

Additional Background Papers

02.12.2021	Letter	London Borough of Islington
07.12.2021	Email	Frederick Rodgers
08.12.2021	Email	Greater London Authority

PLANNING DECISION NOTICE

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



ISLINGTON

Development Management Service
Planning and Development Division
Community Wealth Building
PO Box 3333
222 Upper Street
LONDON N1 1YA

Case Officer: Joseph Hennessy
T: 020 7527 3776
E: planning@islington.gov.uk

Issue Date: 02 December 2021
Application No: P2021/2740/OBS

(Please quote in all correspondence)

Dear Sir or Madam

TOWN AND COUNTRY PLANNING ACTS

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

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

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

Location:	14-21 Holborn Viaduct , 32-33 & 34-35 Farringdon Street , London , EC1A 2AT
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Application Type:	Observations to Adjoining Borough		
Date of Application:	20 September 2021	Application Received:	20 September 2021
Application Valid:	20 September 2021	Application Target:	11 October 2021

DEVELOPMENT:

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]

OBSERVATIONS:

The nearest part of the application site is some 180 metres away from the LB Islington boundary. None of Islington's protected local views pass over the site, nor do any strategic views which also pass over Islington.

The transport assessment submitted by the applicant notes that Farringdon Street is proposed as a construction route. Should planning permission be granted by the City of London for the proposed development, and should adjacent footways and highways (within Islington) be damaged during demolition and construction, appropriate reinstatement will need to be funded by the developer.

The proposed development is considerably taller and bulkier than the existing building on Holborn Viaduct, especially the South-Western elevation. It is considered that the proposed development would have a detrimental impact on the openness of the view from Farringdon Street down to Holborn Viaduct and detract from the area's historical significance.

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

Yours faithfully

A large black rectangular redaction box covering the signature area.

KAREN SULLIVAN
SERVICE DIRECTOR - PLANNING AND DEVELOPMENT
AND PROPER OFFICER

Subject:

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

From: Frederick Rodgers [REDACTED]

Sent: Tuesday, December 7, 2021 6:23 pm

To: Richards, Gwyn

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

THIS IS AN EXTERNAL EMAIL

Dear Mr Richards,

I object to this proposal on a number of grounds.

Obviously the proposed increase in embedded carbon should be reason in itself for refusal. Total carbon emissions are estimated (paragraph 316) at:

Scheme: Embedded: 34,040 tonnes: Operational: 36,025 tonnes p.a.

Scenario 1: Embedded: 20,720 tonnes: Operational 31,995 tonnes p.a.

Scenario 2: Embedded: 19,100 tonnes: Operational: 29,680 million tonnes p.a.

Scenario 3: Embedded: 13,740 tonnes: Operational: 24,170 million tonnes p.a.

Again, no credit is given to the potential reduction of operational carbon emissions from the existing buildings that the decarbonisation of the grid will bring. Whilst its total operating emissions are, it seems, currently, 65,000 tonnes per annum there must be scope for reduction with a relatively small increase in embedded carbon, irrespective of the grid.

Alastair Moss has been reported as saying:

Our emerging policy is that we have a presumption against development, because we are looking at embodied carbon and the whole carbon life cycle. Don't come to us with a report saying 'We can't let a building out as it is', without having considered every option.

In this case,

36. The tenant has written a letter supporting the application and have been involved in the design of the building throughout; in the letter they explain that the proposed location and their floorspace requirement of a minimum 265,000sq.ft, has been derived from meeting their business needs and their desire to remain both in the City, and the local area in which they were founded in 1899. The reduction in their required floorspace from their current 320,000sq.ft. to 265,000sq.ft. has been driven by a post-Covid occupancy review, based on a 15% reduction in demand for office space with the increased take-up in working flexibly.

You report the gist of the letter as:

They are excited to be involved in the application scheme. The location, size and sustainable design are reflective of the needs of the business. They are support of the cultural investment in the scheme and would continue to invest in outreach programmes for the City and neighbouring boroughs, including commitments to diversity and inclusion, environment and sustainability, pro bono and fundraising.

Hogan Lovells has a long history in the City. The business currently occupies two buildings where the leases are due to expire in 2026. New premises are needed in order to meet the future demands of the business. Other sites have been explored, but a location in the west of the Square Mile is preferred.

The proposed scheme would maintain access to the courts, clients, transportation and future access to amenities and culture that will be offered by the Culture Mile initiative.

The area required by this tenant - 24,600 square metres appears to be 63% of the total GIA of the proposed building. This, added to the tenant's 85% space requirement suggests permissions are being made for a significant oversupply of office accommodation.

As the update on City Plan 2036 points out, the officers' proposal for a rethink, follows the changed outlook between the Inspector's optimistic post-Covid expectations last year and the reality now. At some stage, the constant approval of developments, where destruction of existing buildings is permitted with a resulting substantial increases in embedded carbon, has to be contained.

This application is another example of an applicant appearing to have done nothing on the applicant site with regard to biodiversity enhancement but suddenly becoming a champion of biodiversity in order to gain planning permission. Whatever the policy may be, the need to enhance the areas which will best benefit from investment, rather than hanging dying branches over the sides of walls etc would benefit both the environment and the developer.

I'm not sure what the purpose of Cultural Plans are except for box ticking:

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

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

Wouldn't it be far simpler and less expensive to take videos of the MoL's collection of artefacts and display these online, as it's not clear how exhibiting anything at the site would *enhance this part of Farringdon Street and Holborn Viaduct as key routes to the Culture Mile and the potential [sic] new Museum of London site*. At the very least evidence should be produced of where those members of the public being attracted to the Culture Mile and/or the MoL by the cultural offering would come from. They are highly unlikely to emerge from City Thameslink and say "oh look, the Culture Mile and/or the MoL is over there", so why would they be at the site to say so?

Certainly for a scheme that will destroy some of the historic part of the City, if nothing else, the comments of the MoL are surprising, if not concerning. At the same time, rather than having publicity on its doorstep, MoL would benefit in having that publicity displayed further away.

The Museum of London welcomes the opportunity that this scheme would provide to partner with Royal London Asset Management regarding Cultural Plans for this site. The partnership would enable key new digitalisation work to take place, which would not otherwise be possible, unlocking the academic, creative, and educational potential of these collections for the largest possible audience. The new artistic commissions would bring vibrancy to this historic part of the City and there is support for the proposed cultural plan.

Why adding vibrancy is necessary or why, more importantly, *key new digitalisation work .. would not otherwise be possible* etc certainly requires explanation.

Finally, below is an extract from your report in respect of Turnagain Lane, which *holds historic and evidential significance due to its medieval origins, and as evidence of the medieval street pattern of the Fleet Valley*. However, you ignore this “historic and evidential significant” by treating Turnagain Lane as a “route’ - a route *considered to hold a low level of historic and evidential significance*.

You conclude: *Given its low level of significance it is not considered to make a significant contribution to the City’s historic street network*. Perhaps you could explain how the historic significance of the medieval origins can, objectively, become a low level of significance?

I look forward to receiving your response to the above prior to next Tuesday.

Best regards,

Fred Rodgers

100 Breton House
Barbican
London
EC2Y 8PQ



Turnagain Lane

Significance

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

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

Impact Assessment

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

Subject: FW: GLA 0986 Holborn Viaduct Email 5 of 5
Attachments: 20211111 0968 14-21 Holborn Viaduct GLA Consultation (Post Stage 1) - Energy Memo 2021.xlsx; 4. 14-21 Holborn Viaduct_GLA CE Memo_Stage 2_19.11.21.xlsx; 2. 14-21 Holborn Viaduct_GLA WLC Memo_18.11.21.xlsx; Urban Design Comments.docx

From: Rachael Rooney [REDACTED]
Sent: 08 December 2021 11:44
To: Zoe Smythe [REDACTED]
Cc: Williams, Amy [REDACTED] Tim Holtham [REDACTED]
Subject: RE: GLA 0986 Holborn Viaduct Email 5 of 5

THIS IS AN EXTERNAL EMAIL

Dear Zoe

Thank you for your email below.

I've received most of the responses, these are set out below:

Air Quality

An updated air quality assessment has been provided which confirms that the development is air quality neutral and provides further information regarding the diesel-fuelled backup generators. Outstanding items from Stage 1 are therefore now resolved.

Energy

Please see attached energy memo. The applicant has responded to most outstanding items. The application will need to have an appropriately wording condition requiring connection to the Citigen network should the published feasibility study indicate that a connection the proposed development will be viable prior to the heat on date. Furthermore, the applicant is require to further clarify the PV proposals.

Circular Economy

Please see attached memo. Most outstanding issues addressed. Further info on operations waste , conditions required and provision of Municipal / Operational Waste Management Plan.

Whole Life Carbon

The applicant should note that Assessment 2 C1-C4 figure is higher than the Assessment 1 C1-C4 figure. However Module C as per template notes is not required to be reported with a decarbonised figure. No further comments and no further actions required by the applicant at the planning stage - all previous queries have been responded to, as confirmed on the attached memo (for reference).

Please note the conditioning wording for the post-construction WLC assessment below:

The applicant is required to submit a Post-Construction Whole Life-Cycle Carbon (WLC) Assessment to the GLA within three months of completion of the development or commencement of RIBA Stage 6 (whichever occurs earlier) and in any event prior to the building being occupied (or handed over to a new owner (if applicable)). The WLC assessment shall be submitted to ZeroCarbonPlanning@london.gov.uk. The developer shall use the post construction tab of the GLA's WLC assessment template, and the relevant forms must be completed accurately and in their entirety in line with the criteria set out in the latest GLA's WLC assessment guidance.

Flood risk, drainage and water efficiency

The applicant has now provided a completed SuDS Pro Forma. There are no further comments relating to flood risk, drainage, or water efficiency.

Green Infrastructure

The GLA Stage 1 response states that the applicant should provide a key with the surface cover type drawing to evidence the Urban Greening Factor (UGF) score. The applicant has provided this information which evidences the UGF score of 0.39. This score is strongly supported and should be brought to fruition through future design consultation. No further information required.

Urban Design

See attached comments

I am still awaiting comments from TfL which I have chased. I will also get back to you on Friday if we have any further comments to make re the strategic view.

Let me know if you have any questions.

Kind Regards

Rachael

Rachael Rooney MRTPI

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Urban Design Comments

Para 22 – flexible workspace

p105 of the DAS demonstrates how a typical floor plan has future adaptability to accommodate SMEs.

We would suggest that the ground floor should also demonstrate how it can accommodate SMEs. If Hogan Lovells were to end their lease... this would help future proof the building in terms of attracting smaller scale tenancies.

Para 27

Linked to Para 22, public art and public realm proposals are welcomed but it is still not clear why small scale street level tenancies could not be provided given the overly expansive ground floor lobbies fronting both streets.

The Business Case states they need 24,600 / 24,800 sqm of commercial office space for their needs which is already a 15% reduction from their current office space.

A single 100 - 250 sqm street level tenancy on either street condition would be just 0.25 - 0.7% of the entire floorspace. And this would not be "lost"... It would still be revenue generating.

LP Policy D8 Part F - *'ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm'*.

And additional uses also support LP Policy HC6 - night-time economy given that outside of office hours, where there would be limited building activation, and associated street activation, introducing additional street level tenancies could help contribute to the night-time economy, particularly important in the CAZ, and in this relatively secluded location (Farringdon Street) but yet on key transport links.