

Grounds of objection	Officer comments	FR response to 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.	a) Surely the point of sustainability is to ensure that the environment is protected for future generations. This surely means that the overriding public benefit is in reducing carbon emissions and not increasing them.
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.	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.	b) As mentioned in a), these are estimated figures, so obviously not finite. However these are the applicant's figures.
Again, no credit is given to the potential reduction of operational carbon emissions from the existing buildings that the decarbonization 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.	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.	Presumably, gas boilers could be replaced by, for instance, a Citigen supply or even electrically powered systems.
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	c) As is set out in paragraph 82 of the committee report the longer term geographical, economic and social fundamentals underpinning office demand	c) This is confusing as the total GIA is 39,000 m ² . Please explain why it's only 24,619 m ² .

<p>suggests permissions are being made for a significant oversupply of office accommodation.</p>	<p>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.</p>	
<p>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.</p>	<p>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.</p>	<p>d) According Alastair Moss: <i>Our emerging policy is that we have a presumption against development, because we are looking at embodied carbon and the whole life carbon 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.</i> Please explain how this is compatible with the Officer comment.</p>
<p>2. Biodiversity</p>		
<p>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</p>	<p>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.</p>	<p>The policy is to enhance biodiversity per se and, as mentioned in the objection, this can best be done by investment elsewhere in the City.</p>

sides of walls etc would benefit both the environment and the developer.		
3. Cultural Plan		
a) It is unclear what the purpose of the Cultural Plans are except for box ticking.	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.	a) It certainly seems like 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?	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.	As mentioned above, parts of the draft City Plan are likely to be rethought. There is little actual evidence of Crossrail delivering additional numbers over and above those delivered by existing services. As for the Culture Mile initiative, it would be interesting to know what this is, let alone how it might be delivered.
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	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.	a) Noted.

<p>evidential significant” by treating Turnagain Lane as a “route’ – a route <i>considered to hold a low level of historic and evidential significance.</i></p>		
<p>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?</p>	<p>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.</p>	<p>b) Whether or not Turnagain Lane <i>is now of low quality in terms of visual amenity, accessibility and permeability, it holds historic and evidential significance due to its medieval origins, and as evidence of the medieval street pattern of the Fleet Valley.</i> As such there can be no justification for obliterating it.</p>