Committee:	**Date:**
Planning and Transportation	1 February 2022
Subject: 61 - 65 Holborn Viaduct London EC1A 2FD Redevelopment of the site for a new building comprising two basement levels, lower ground, ground plus 12 upper floors including purpose built student accommodation and associated amenity space (Sui Generis), flexible cultural / community use at part ground and lower ground floor levels (Sui Generis), a publicly accessible roof terrace, a pedestrian route through the site, hard and soft landscaping, together with ancillary plant and servicing; and associated enabling works.	**Public**
Ward: Farringdon Within	**For Decision**
Registered No: 21/00781/FULMAJ	**Registered on:** 13 September 2021
Conservation Area:	**Listed Building:** No

Summary

61-65 Holborn Viaduct is located on the north side of the street at the junction with Snow Hill. The Site is bound to the west by an adjoining office building at no. 60 Holborn Viaduct.

The site was occupied by a vacant 1950's T-shaped office building with an area of 7,977 sq. m. serviced from Snow Hill. The building was demolished in 2020 under prior notification for demolition (ref: 19/00178/DPAR). The site was in use (until September 2021) as a temporary meanwhile public open space referred to as 'Gaia's Garden'

Planning permission was granted on 1 December 2020 on this site for the erection of a mixed-use building comprising four basement levels, lower ground, ground and ten upper storeys for (i) hotel use (Class C1) at part basement levels one to four, part lower ground, part ground and part first and second to tenth floor levels; (ii) restaurant / bar use (Class A3/A4) at part tenth floor level; (iii) office workspace use (Class B1) at part basement levels one to three, part lower ground and part first floor levels; (iv) flexible hotel/cafe¿/workspace (Sui Generis) at part ground floor level); (v) a publicly accessible terrace at roof level and; (vi) ancillary plant and servicing, hard and soft landscaping and associated enabling works (ref. 19/01038/FULMAJ).

Planning permission is now sought for the redevelopment of the site for a new 58.66m (AOD) high building comprising student accommodation and associated amenity space (Sui Generis), flexible cultural / community use at part ground and lower ground floor levels (Sui Generis), a publicly accessible roof terrace, a pedestrian route through the site, and public realm improvements.

The student accommodation will comprise 644 student rooms, of which 230 (35%) will be affordable. The rooms represent a range of typologies, including studios and shared accommodation. Student bedrooms are provided from first to twelfth floors.

A flexible cultural and community space is proposed at lower ground and ground floors of the proposed building, comprising 917 sqm (GIA). This space is proposed to be used for Cultural consumption' and 'cultural production' and include a double height performance/lecture space, smaller cellular workshops and a shared space would bring together creatives, resident students, visitors, and the public alike.

The Proposed Development comprises 543 sqm of free publicly accessible rooftop terrace, providing a new piece of elevated public realm for city's visitors, workers, residents and student occupants.

The scheme delivers significant public realm enhancements including a new pedestrian route linking City Thameslink Station to the new Museum of London Snow Hill Entrance.

The scheme delivers a high-quality development for student accommodation with a cultural use and a free publicly accessible roof garden within the City's Culture Mile. There would be a loss of office floorspace on the site, this is not existing office accommodation, and further, in terms of total permitted floorspace, it would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre.

The student accommodation and community spaces will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for 7 days per week, and contribute towards meeting Local Plan housing targets. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's ambitions for a post Covid City. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2036.

The provision of student accommodation in a highly accessible location is supported in strategic and local planning terms. The provision of purpose-built student accommodation in this mixed-use development will not prejudice the business function of the City, will not result in an excessive concentration of

student housing, is not considered to have an adverse impact on residential amenity and will not involve the loss of permanent residential accommodation.

The Applicant is in detailed discussions with the London School of Economics and Political Science (LSE) to take a nominations agreement for the purpose-built student accommodation beds within the scheme as required by London Plan Policy H15. The nomination agreement will be secured by S106 Agreement.

The design approach to the site would result in a development appropriate in scale, architectural form, innovative use of materials, and quality that would add a level of richness and visual interest to the local townscape. The accessible roof terrace would enhance the visitor experience and elevate public views of the rich heritage of the Townscape looking east. The public route would create a new engaging experience that would harness and contribute the emerging vibrancy of the Smithfield market area wider Culture Mile.

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

There would be no harm to the setting of Smithfield Conservation Area and Newgate Street and their character and appearance would be preserved. It is considered that the proposal would preserve buildings, the settings and the special architectural and historic interest and heritage significance and contribution made by setting of : No 5 Snow Hill (Grade (2), 4 Snow Hill (Grade 2), Church of St Sepulchre with Newgate (Grade 1), Old Bailey Central Criminal Court (Grade II*), Holborn Viaduct Bridge (grade II), 1-8 Holborn Viaduct, 15 Old Bailey (Grade 2); Smithfield Market (Poultry Market) (Grade 2); and The Viaduct Tavern (126 Newgate Street) (Grade 2) It is considered there would be no harm to the significance of identified non-designated heritage assets 1 Snow Hill, 10 Snow Hill, the Engine House and the Red House, West Smithfield. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1, draft City Plan 2036 policies S11 and, HE1 Publication London Plan Policy HC1.

The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles. Dedicated areas of planting and greening would be incorporated into the development through urban greening on the roof significantly increasing the biodiversity on site.

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

travel. The provision of both long stay and short stay cycle spaces would meet the requirements of the London Plan. Access for cyclists would be via two prominent cycle parking entrances at ground level off Snow Hill, with short stay cycle parking provided at ground floor within the site boundary.

The service area for both the cultural and community use and student accommodation is proposed at lower ground floor level. Delivery traffic and service vehicles would access the servicing yard via Snow Hill. There would be 19 deliveries per day, which would be consolidated and restrictions on timings of deliveries have been recommended during 0700 - 1000, 1200 - 1400, 1600 - 1900 and no night-time servicing between the hours of 2300 on one day and 0700 on the following day to protect the amenity of nearby residential occupiers.

Officers have expressed concern about the low level of light to some of the student bedrooms. In reviewing the amenity and breakout spaces and study areas would also have the option of various types of amenity, break out and study areas ranging from smaller hubs on levels 2-5 and a larger social amenity hub at lower ground and first floor level, along with the use of the publicly accessible roof terrace, on balance it is considered that the overall quality of the student accommodation is considered to be acceptable having regard to the specific requirements of LSE.

For the surrounding residential properties in respect of daylight, the majority of windows assessed are BRE compliant. For 10 Hosier Lane, all but one window is BRE compliant in the proposed scenario. The daylight assessment for 35-37 Cock Lane demonstrates that the majority of windows would be BRE compliant and where there would be noticeable reductions in daylight to windows, these reductions would all be minor in nature. Where there would be noticeable reductions, this can be attributed to the development of the existing site, which is currently underdeveloped, which is particularly the case at its eastern end, which is opposite 35-37 Cock Lane. For 32 Cock Lane, all windows would be BRE compliant for VSC. For St Selpulchre's Church, two windows would experience impacts considered to be minor adverse and would be considered minimally noticeable. The Church is served by multiple windows which remain unaffected, and all rooms are BRE compliant when considering daylight distribution (NSL). 5 Snow Hill would experience reductions beyond BRE, however, a hotel use is considered to be of a transitory nature, therefore the impacts are considered acceptable in this context. Overall, the impacts to the surrounding properties for daylight are considered to be acceptable.

For the surrounding residential properties in respect of sunlight, the majority of windows assessed are BRE compliant. For 10 Hosier Lane, all but three windows are BRE compliant in the proposed scenario. For 35-37 Cock Lane, 23 of 39 windows would not meet BRE guidelines in the proposed scenario and majority of these windows would retain the target level for annual sunlight (25%) and above. The windows which would not meet BRE guidelines and the

target for annual sunlight, would retain between 19-24% annual sunlight which can be considered reasonable for a city centre location, particularly at first floor level. All windows in the proposed scenario are BRE compliant for 32 Cock Lane, 8-9 Giltspur Street and St Selpulchre's Church.

The submitted sun on ground assessments demonstrate that existing levels of sunlight to nearby residential and public amenity spaces will largely be retained therefore impacts are considered acceptable.

Taking into account the BRE Guidance and the site's location within a dense urban environment, it is considered that the proposal would not result in an unacceptable impact on the existing properties and would not noticeably reduce the daylight and sunlight to nearby dwellings or open spaces to unacceptable levels. As such, the impact on daylight and sunlight as a result of the proposed development is considered to be in accordance with development plan policies.

There are no unacceptable adverse built development, construction or operational impacts anticipated for the proposed development and use, including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, including the requirement to provide deconstruction and construction logistics plans, a scheme of protective works, a student accommodation management plan, a rooftop terrace management plan and relevant environmental health conditions including relating to noise.

Overall, it is considered that the proposed student accommodation use would not prejudice the primary business function of the City; would contribute to the balance and mix of uses in the immediate locality; and would not result in unacceptable adverse impacts on the amenity of neighbouring properties.

The proposed development provides the opportunity for the influx of a new demographic of young people housed in the student accommodation, and the site's close proximity to future location of the Museum of London at Smithfield and Culture Mile, the proposal on this site would help to cultivate the transformation of the area to a Culture quarter of the City.

The proposals are considered to be in accordance with the development plan.

The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

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

Recommendation

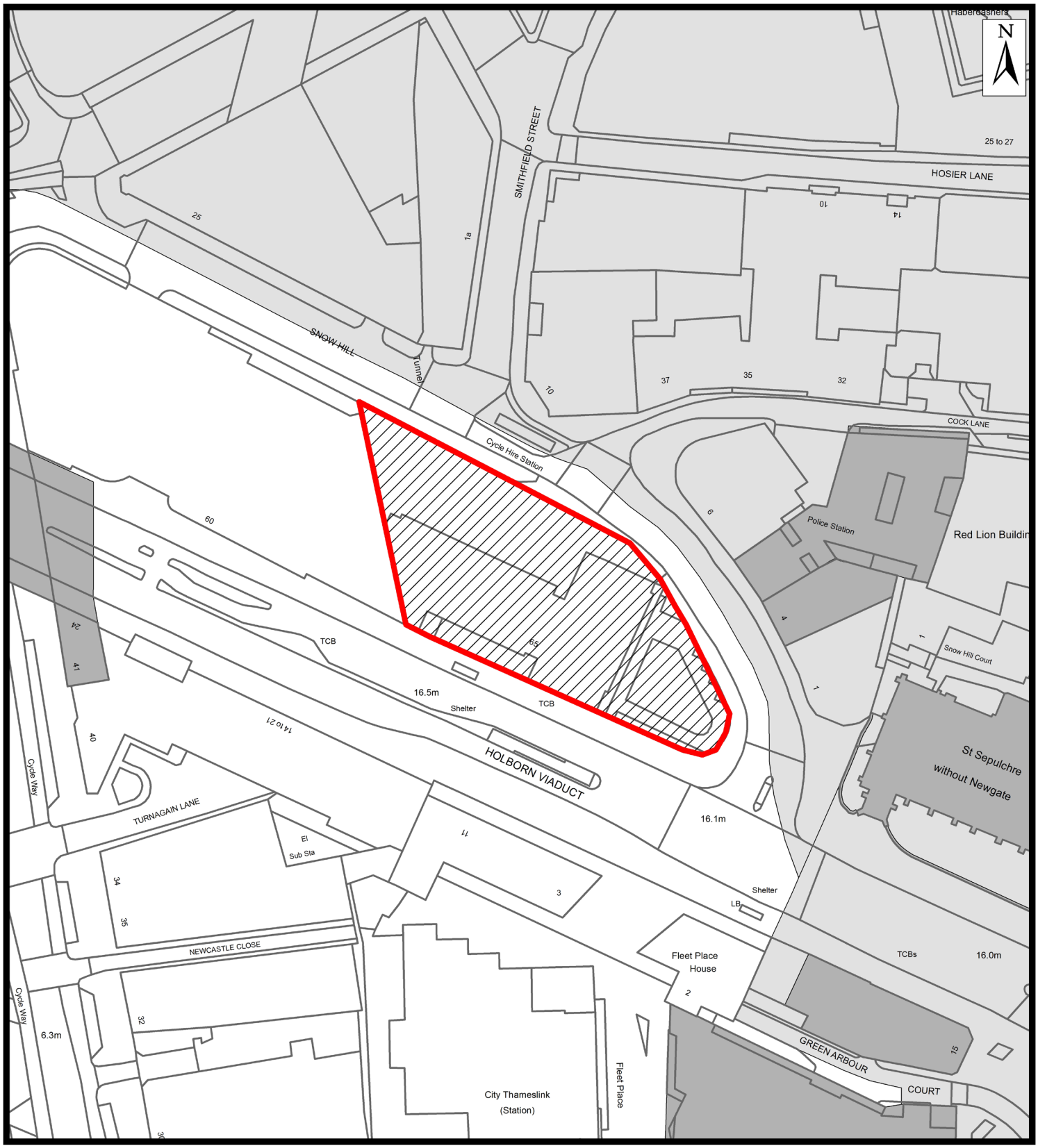
(1) That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule subject to:

(a) the Mayor of London being given 14 days to decide whether to allow the Corporation to grant planning permission as recommended, or to direct refusal, or to determine the application himself (Article 5(1)(a) of the Town & Country Planning (Mayor of London) Order 2008);

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

(c) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 and any necessary agreements under Section 278 of the Highway Act 1980.

Site Location Plan



ADDRESS:
61-65 Holborn Viaduct

CASE No.
21/00781/FULMAJ

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

ENVIRONMENT DEPARTMENT

1. Original Citiscape House office building (now demolished)

2. 2019/20 hotel scheme (app ref: 19/01038)

3. Existing site condition (with perimeter construction hoarding)

4. Proposed student accommodation led development

Main Report

Site

1. 61-65 Holborn Viaduct is located on the north side of the street at the junction with Snow Hill. The Site is bound to the west by an adjoining office building at no. 60 Holborn Viaduct.

2. The site was occupied by a vacant 1950's T-shaped office building with an area of 7,977 sq. m. serviced from Snow Hill. The building was demolished in 2020 under prior notification for demolition (ref: 19/00178/DPAR). The site was in use (until September 2021) as a temporary meanwhile public open space referred to as 'Gaia's Garden'.

3. The Site lies within the Central Activities Zone, adjacent to the Smithfield Conservation Area to the north and Newgate Street Conservation Area to the south east. Whilst the Site does not contain Listed buildings, the Site is immediately adjacent to a number of listed buildings including, Church of St Sepulchre without Newgate (Grade I listed), 1-3 Snow Hill (Grade II listed), 4 Snow Hill (Grade II listed), Snow Hill Police Station (Grade II listed) and 2-8 Holborn Viaduct (Grade II listed). The site is within the Culture Mile area which is a key strategy area in the Draft 2036 Local Plan.

4. Thameslink Station lines run to the south of the site and the railway tunnels run beneath the site.

5. The Site falls within the wider setting consultation area of London View Management Framework (LVMF) views 4A.1 (Primrose Hill), 5A.2 (Greenwich) and 6A.1 (Blackheath), and within the landmark viewing corridor of LVMF views 2A.1 (Parliament Hill) and 3A.1 (Kenwood).

Planning History

6. Before 2014 minor alterations were approved to the existing building. In June 2014 planning permission was granted for the demolition of the building and its redevelopment to provide a building in two parts. One part provided a basement, lower ground floor, ground and 8 upper floors of offices, with an area of 10,800 sq. m. and the other part, a 246-bedroom hotel with 10 upper floors and an area of 9,033 sqm. This scheme created a building with two identifiable parts and retained a green space at the eastern end of the site.

7. This permission lapsed on 30 June 2019. A separate prior approval (19/00178/DPAR) was granted in April 2019 to facilitate the demolition of the building in order to enable works on the site to commence earlier than would otherwise have been possible and was subject to conditions in the event of the works not commencing immediately.

8. The existing office building, which comprised basement, lower ground, ground and 10 upper floors located on site was demolished under prior notification for demolition in 2020 (ref.19/00178/DPAR).

9. Planning permission was granted on 1 December 2020 for the erection of a mixed-use building comprising four basement levels, lower ground, ground and ten upper storeys for (i) hotel use (Class C1) at part basement levels one to four, part lower ground, part ground and part first and second to tenth floor levels; (ii) restaurant / bar use (Class A3/A4) at part tenth floor level; (iii) office workspace use (Class B1) at part basement levels one to three, part lower ground and part first floor levels; (iv) flexible hotel/cafe/workspace (Sui Generis) at part ground floor level); (v) a publicly accessible terrace at roof level and; (vi) ancillary plant and servicing, hard and soft landscaping and associated enabling works (ref. 19/01038/FULMAJ).

10. Planning permission was granted on 13 July 2021 for the use of the site as a temporary cultural open-air work/event space and garden (Sui Generis) along with the provision of hard and soft landscaping and associated works (21/00392/FULL).

Proposal

11. Planning permission is sought for the redevelopment of the site for a new 58.66m (AOD) high building comprising student accommodation and associated amenity space (Sui Generis), flexible cultural / community use at part ground and lower ground floor levels (Sui Generis), a publicly accessible roof terrace, a pedestrian route through the site, and public realm improvements.

12. The proposals are considered to be in accordance with the development plan.

13. The proposed development would comprise:

Use	Floorspace (GIA)	Floorspace (GEA)
Student Accommodation (Sui Generis)	21,581 sqm	23,253sqm
Cultural/ Community Use (Sui Generis)	879 sqm	957 sqm

Use	Area
Publicly Accessible Roof Terrace	543 sqm
Public Realm incl. Public Route and Bullnose	468 sqm
Total	1,011 sqm

14. The student accommodation will comprise 644 student rooms, of which 230 (35%) will be affordable. The rooms represent a range of typologies, including studios and shared accommodation. Student bedrooms are provided from first to twelfth floors.

15. The mix of proposed student accommodation is as follows:

Room Type	Studio	Twodio	2 bed ensuite	3 bed ensuite	4 bed ensuite	7 bed ensuite	Total
Quantum	463	20	28	48	8	77	644

16. The studio accommodation ranges from 12 sqm to 32.5 sqm, containing an en-suite and kitchenette. Twodio apartments are 29.5 sqm in size and contain two bedrooms and a shared bathroom and kitchenette. The 3, 4 and 7 bedroom en-suite cluster apartments each contain open plan communal kitchens, living and dining space to encourage social interaction and inclusion. 10% of the bedrooms are proposed to be wheelchair accessible.

17. The Applicant is in detailed discussions with the London School of Economics and Political Science (LSE) to take a nominations agreement for the purpose-built student accommodation beds within the scheme. The nomination agreement will be secured by S106 Agreement.

18. A flexible cultural and community space is proposed at lower ground and ground floors of the proposed building, comprising 917 sqm (GIA). This space is proposed to be used for Cultural consumption' and 'cultural production' and include a double height performance/lecture space, smaller cellular workshops and a shared space would bring together creatives, resident students, visitors, and the public alike. The influx of a new demographic of young people housed in the student accommodation above, and the site's close proximity to future location of the Museum of London at Smithfield and Culture Mile, the cultural proposal on this site would help to cultivate the transformation of the area to a Culture quarter of the City. The opening hours and details of the management of this space will be secured by the S106 Agreement.

19. The Proposed Development comprises a 543 sqm of publicly accessible rooftop terrace, providing a new piece of elevated public realm for city's visitors, workers, residents and student occupants. The roof terrace would provide impressive views East where a historic skyline of grand landmarks including the Old Bailey Central Criminal court, St Sepulchre Church and in the distance, St Paul's cathedral would be appreciated. Access to the roof terrace for members of the public would be between 10am – 6pm Monday to Sunday. Access to the rooftop terrace will be via a dedicated lift at ground floor which visitors can access through a new dedicated entrance accessible from the proposed new public route through the Site. The roof terrace is free for members of the public to visit, with no booking required. Outside of public opening hours (after 6pm and before 10am), the rooftop terrace would be dedicated for use in association with the ground floor cultural offer. The opening hours and

details of the management of this roof terrace will be secured by the S106 Agreement. This inclusive space has been designed to be used as a space to dwell and observe the surrounding area as well as further supporting biodiversity. (All access and use of the roof terrace would be prohibited between 2300 on one day until 0700 the next day (Monday to Sunday) by condition for amenity reasons).

20. The proposed development would deliver 468 sqm of ground floor public realm through and around the proposed building. This includes a new public route through the Site, linking City Thameslink Station to the new Museum of London Snow Hill Entrance and public realm improvements at the bullnose of the building to accommodate short term cycle parking.

21. As part of the public realm offer, there will be an opening up of the previously private space at the junction of Holborn Viaduct and Snow Hill, including the removal of boundary walls. These changes represent a significant enhancement to the usability and inclusiveness of the public realm, in addition to the rooftop terrace.

22. The details of the management of this publicly accessible route through and the other areas of public realm within the proposed development will be secured by the S106 Agreement.

23. A total of 494 long stay and 32 short stay cycle parking spaces would be provided spaces at ground floor and within the public realm.

24. There is no new vehicle parking proposed within the Development Site with the exception of one disabled parking space within the loading bay area.

25. The service area for both the cultural and community use and student accommodation is proposed at lower ground floor level. Delivery traffic and service vehicles would access the servicing yard via Snow Hill. The servicing would be subject to consolidation which would be secured via a S106 obligation.

26. The Proposed Development would include an extensive range of soft landscaping features to enhance urban greening biodiversity, including on the roof terraces, pocket square and edge planters. Where roof spaces cannot be accessed for practical reasons the surfaces would be greened where possible.

Consultations

27. The Applicants have submitted a Statement of Community Involvement outlining their engagement with stakeholders. Prior to the application being submitted the applicant has undertaken extensive pre-application consultation with key decision-making authorities, key stakeholders and local community (including nearby residents and places of worship). A project website was established which included a virtual exhibition of the proposals for the public to view and make comments.

28. Following receipt of the application the application has been advertised and consulted on. Copies of all the letters and emails received are attached.

29. The application was reconsulted in January 2021 following the receipt of amended information including reducing the height of the building to bring the proposed development below the threshold levels of LVMF panorama viewing corridors 2A.1 (Parliament Hill) and 3A.1 (Kenwood) along with the submission of drawings and associated assessments.

30. Views of other City of London Corporation departments have been taken into account in the preparation of this scheme and some detailed matters are addressed by the proposed conditions and the terms of the S106 agreement.

31. A summary of the consultation responses are provided in the table below and are available to view on the public website and are listed in the background papers list at the end of this report.

Consultation Responses	
Historic England	Historic England did not wish to make any comments on the application
GLA Stage 1 Response – November 2021 and GLA Email 19 January 2022	Whilst the proposal could be supported in principle, the application does not fully comply with these policies, as summarised below: **Land use principle**: The applicant must satisfactorily evidence that there is no reasonable and demonstrable prospect of the site being used for offices. The delivery of purpose-built student accommodation could be supported subject to confirmation from the City of London Corporation that residential development would be appropriate within this part of the City of London. While the proposed cultural and community uses are supported in principle, the strategy should continue to be refined to ensure high quality spaces are delivered for the targeted end users. **Officers Response to Comments:** The applicant has provided further commentary on the loss of office floorspace. GLA and CoL officers acknowledge that the particular development constraints of the site, structural solution proposed, inferior office product and construction programme would be a significant impediment to delivery of an office scheme, as detailed within the supporting letter. Whilst there would be a loss of permitted office floorspace, this would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre.

	The student accommodation and community spaces will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for 7 days per week, and contribute towards meeting Local Plan housing targets. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's ambitions for a post Covid City. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2036. **Affordable Student Accommodation:** The scheme proposes 35% on-site affordable student accommodation which is supported in accordance Policy H15 of the London Plan. However, the applicant should confirm that the affordable provision would be equivalent in terms of room sizes and occupancy level to the non-affordable rooms. The accommodation must be secured for use by students and subject to a nomination agreement with a higher education institution. **Officers Response to Comments:** Confirmation has been provided by the applicant that the affordable student accommodation will be provided in line with the requirements set out in the London Plan is supported. The applicant has confirmed that the room size and occupancy level between the non-affordable and affordable rooms will be equivalent, and a plan to show the designated affordable rooms within the development to ensure policy compliance would be required by S106 obligation. The applicants would also be required to enter into a nominations agreement with one or more higher education providers prior to occupation and this would be secured within the S106. A letter from London School of Economics (LSE) has been received stating that they are in advanced talks to take up the majority of the bedrooms LSE students. **Quality of Student Accommodation:** While the layouts of the rooms are considered to be adequate, it is noted that the communal spaces for the apartment layouts would not have access to natural light/ventilation. While there is no formal BRE (or other) criteria for assessing

	student bedrooms, it is noted that the bedrooms facing the atrium would receive an Average Daylight Factor (ADF) of 0.1%-0.2%, which would be substantially below the target of 1% ADF for the student rooms. There are also a significant number of north-facing bedrooms. Overall, only 57% of the proposed bedrooms would achieve the equivalent of 1% ADF target. On this basis, GLA officers are concerned that the proposed student accommodation does not provide adequate functional living spaces and layouts as required by London Plan Policy H15. **Officers Response to Comments:** Officers have expressed concern that the level of light to some of the student rooms (particularly those located within the lightwell) do not meet BRE Guidelines for adequate daylight and have sought further revisions from the applicants to the layout of the student rooms, including requesting the student rooms within the lightwell being removed altogether. During the course of the negotiations 12 rooms on the southern side of the lightwell (on floors 2-5) and were removed and were replaced with communal areas overlooking the atrium. The internal layout of rooms were revised so that desks were placed closer to the windows. The horizontal band width depth and fin depths on the southern elevation were reduced so that more light could penetrate into the rooms on the southern elevation. Following these amendments a revised internal daylight of the student rooms (bedrooms and studios) has been assessed. Out of the 644 rooms proposed 574 (89%) of these rooms would achieve an ADF of at least 1%, which is recommended for bedrooms within the BRE Guidelines. 16 rooms would achieve an ADF of 0.8%-0.9% and 15 rooms would achieve an ADF of 0.6%-0.7% There would be 39 rooms which would have a ADF of between 0.1%-0.5%, these room are predominantly facing into the lightwell area. The majority of kitchen/cooking areas on the upper floors would have access to very little or no natural light. Whilst officers are concerned about the low level of light to some of the rooms and kitchen areas, on balance, (particularly taking into consideration LSE's need for a minimum number of rooms see letter from LSE dated 20 January 2022) officers

	are of the view that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of the publicly accessible roof terrace. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. On balance, the purpose-built student accommodation would accord with London Plan Policy H15, Local Plan Policy, CS5 and DM21.7 and Draft City Plan Policy HS6 and S23. **Urban Design**: While the massing and layout is broadly supported, further consideration should be given to enhance the architectural quality of the proposal. A public access management plan for the new public route and roof terrace should be provided which demonstrates conformity with the Public London Charter. The applicant should address the strong concerns raised in relation to the layout and quality of the student accommodation and communal amenity spaces. **Officers Response to Comments:** A public access management plan would be secured via S106 obligation along with a roof terrace management plan. The proposal would provide approximately 1,014 sqm of internal communal amenity space comprising a TV lounge, home cinema room, games room, gym, music room, cafe/bar and kitchen at basement level 1. A lounge, break-out space and study rooms would be provided at first floor level. The applicants have submitted an amenity provision note to explain the rationale of providing a central amenity hub at lower ground and first floor as opposed to smaller 'pepper potted' amenity hub on separate floors of the building. Officers consider that the amenity and communal facilities would be acceptable. **Strategic Views and Heritage**: The development will exceed the threshold height of LVMF strategic views 2A.1 (Parliament Hill) and 3A.1 (Kenwood). The proposal will also impact the setting of designated heritage assets, constituting less than substantial harm. Other material consideration detailed in this report require resolution before this

	may be weighed against public benefits. **Officers Response to comments:** The height of the proposal has been reduced and is no longer exceed the threshold height of LVMF strategic views 2A.1 (Parliament Hill) and 3A.1 (Kenwood). The proposed development would not harm the characteristics and composition of LVMF strategic views and their landmark elements, preserving the ability of the observer to recognise and appreciate the strategically important landmarks, in accordance with Local Plan Policy CS13(1), London Plan Policy HC4 and draft City Plan 2036 Policy S13 and guidance contained in the LMVF SPG. Officers consider that there would be no harm to the setting of Smithfield Conservation Area and Newgate Street and their character and appearance would be preserved. It is considered that the proposal would preserve buildings, the settings and the special architectural and historic interest and heritage significance and contribution made by setting of : No 5 Snow Hill (Grade (2), 4 Snow Hill (Grade 2), Church of St Sepulchre with Newgate (Grade 1), Old Bailey Central Criminal Court (Grade II*), Holborn Viaduct Bridge (grade II), 1-8 Holborn Viaduct, 15 Old Bailey (Grade 2); Smithfield Market (Poultry Market) (Grade 2); and The Viaduct Tavern (126 Newgate Street) (Grade 2) It is considered there would be no harm to the significance of identified non-designated heritage assets 1 Snow Hill, 10 Snow Hill, the Engine House and the Red House, West Smithfield. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1, draft City Plan 2036 policies S11 and, HE1 Publication London Plan Policy HC1. **Transport:** The active travel assessment requires further work, and in accordance with Healthy Streets and Vision Zero objectives, a Pedestrian Comfort Level assessment and Stage 1 Road Safety Audit should be undertaken. The proposed long-stay cycle parking should comply with LCDS guidance and the location of the proposed short-stay cycle parking should be reconsidered. **Officers Response to Comments:** The applicants have provided further information and it is being reviewed by TfL. A Travel Plan (incorporating a cycling promotion plan) would be secured by s106 agreement and

	this would ensure that the long stay cycle parking is in accordance with London Plan Cycling Design Standards. The off-site highway works that have been agreed are indicative only. CoL is currently designing footway strengthening works on Snow Hill and our pedestrian crossing will need to tie into that design when it is complete. The servicing access is existing with minor widening required and the TMO amendments on Snow Hill are still to be agreed. It is therefore not considered appropriate to undertake a Stage 1 Road Safety Audit. While it is not possible to accurately predict how many pedestrians will use this route, the applicants were able to demonstrate that at its narrowest the new pedestrian route could accommodate 780 peds/hour with a comfort level of A, 2,184 peds/hour with a comfort level of B and 3,120 peds/hour for a comfort level of C+. The site has planning consent for a hotel and office use. The trip generation comparison set out in the Transport Assessment demonstrates that 557 fewer pedestrians per day will be generated compared to the consented use and 1,556 fewer movements in general.
Health and Safety Executive	The omission of a firefighting lift serving the west stair (as required of a code-compliant design) means firefighters either have to climb twelve storeys of stairs and then travel horizontally in excess of 33m, or use the firefighting lift in the east stair then travel horizontally in excess of 50m. This poses a risk to firefighter safe. Two firefighting shafts, each containing a firefighting lift, stair and fire main, should therefore be provided, and firefighter travel distances should be limited. **Officers Response to Comments:** The applicants amended the application and a second firefighting lift serving the west core has been incorporated into the scheme. HSE have confirmed they are satisfied the new lift meets their requirements. The northwest stair case has a smoke shaft directly opposite the door to the stair. A smoke shaft should be at the remote end of a corridor away from the staircase so that it draws smoke

	away from the stair and not towards the stair. Plan drawings show flat windows in close proximity, and at right angles to the windows of other flats (for example the perpendicular windows of flats marked EN-02 and EN-03 on the twelfth floor). This proximity and angle may allow fire or smoke to exit a flat window and enter an adjacent flat windows. **Officers Response to Comments:** The applicants have recognised both these issues and are seeking to address them as the detailed design progresses. HSE have confirmed that the resolution of these issues at detailed design stage would be satisfactory and, in any case, will be subject to further regulatory approval.

Policy Context

32. The development plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

33. The City of London has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. Onward progress of the Plan has been temporarily paused to enable further refinement, but it remains a material consideration in the determination of applications (although not part of the development plan) alongside the adopted 2015 City of London Local Plan and the London Plan 2021. The Draft City Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.

34. Government Guidance is contained in the National Planning Policy Framework (NPPF) July 2021 and the Planning Practice Guidance (PPG) which is amended from time to time.

35. The Historic England Good Practice Advice notes, including Note 3 The Setting of Heritage Assets and Note 2 Managing Significance in Decision-Taking in the Historic Environment.

Considerations

Relevant Statutory Duties

36. The Corporation, in determining the planning application has the following main statutory duties to perform:-

- to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as

material to the application, and to any other material considerations.(Section 70 Town & Country Planning Act 1990); and

- to determine the application in accordance with the development plan unless other material considerations indicate otherwise.(Section 38(6) of the Planning and Compulsory Purchase Act 2004).

37. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).

National Planning Policy Framework (NPPF 2021)

38. The NPPF states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise".

39. It states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

40. Paragraph 10 states that "at the heart of the Framework is a presumption in favour of sustainable development". That presumption is set out at paragraph 11. For decision-taking this means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
  i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
  ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

41. Paragraph 48 states that local planning authorities may give weight to relevant policies in emerging plans according to:

a. the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
b. the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
c. the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging

plan to the policies in the Framework, the greater the weight that may be given).

42. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 105 states that “Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.”

43. Paragraph 111 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

44. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 126 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

45. Paragraph 130 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, establish or maintain a strong sense of place, optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development and create places that are safe, inclusive and accessible and which promote health and wellbeing.

46. Paragraph 134 sets out that in determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.

47. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 152 identifies that the planning system should support the transition to a low carbon future. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

48. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 195 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take

this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

49. Paragraph 197of the NPPF advises, "In determining applications, local planning authorities should take account of:

    a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
    b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
    c. c. the desirability of new development making a positive contribution to local character and distinctiveness."

50. Paragraph 199 of the NPPF advises "When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.".

51. Paragraph 200 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

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

52. Paragraph 202 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting.

53. Paragraph 203 states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

Considerations in this case

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

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

    - The extent to which the proposals comply with the relevant policies of the Development Plan.
    - The extent to which the proposals comply with Government guidance (NPPF).

56. The principal site specific issues in considering this application (in accordance with the over-arching issues above) are:

    - The loss of office floorspace
    - The acceptability of student accommodation use
    - Cultural and Community Strategy
    - The acceptability of the scheme in design and heritage terms including impact on heritage assets and Local and Strategic Views (incl. LVMF Views)
    - The impact of the proposal on any archaeology beneath the site.
    - Access and Inclusive Design
    - The impact of the proposal in highway and transportation terms.
    - The impact of the proposal in terms of environmental sustainability.
    - The impact of the proposal on air quality
    - The impact of the proposal on flood risk
    - Environmental Impact of Proposals on Surrounding Area (daylight, sunlight, wind, thermal comfort and noise)
    - Fire safety.
    - Health Impact Assessment
    - The requirement for financial contributions.

Principle of Development

Acceptability of the Loss of Office Floorspace

57. The previous building on site comprised 7,977sqm GIA of office floorspace. This building had been vacant for over 10 years prior to its demolition in 2020. The consented scheme proposed a mixed hotel/office development which retained 3,741sqm GIA of office, but with the equivalent number of workspaces as the demolished building. This application proposes 22,349 sqm of sui generis use, principally student accommodation, with no retained office space. There would be a loss of office floorspace against both the previous development on this site and the consented scheme. However, there would be no removal of existing office stock due to the demolition of the previous building

58. Local Plan 2015 Policy CS1 seeks to provide additional office accommodation to meet demand from long term employment growth and Policy DM1.1 (and draft City Plan Policy OF2) seeks to protect office accommodation. Policy DM1.1 states that loss of existing office accommodation should be refused where the site is not viable for office use and there are strong economic reasons why the loss of office use would be inappropriate. London Plan Policy SD4 (The Central Activities Zone (CAZ)) indicates that the nationally and internationally significant office functions of the CAZ should be supported. Policy DM1.1 indicates that a loss of office floorspace would be inappropriate where it would:

- prejudice the primary business function of the City;
- jeopardise the future assembly and delivery of large office development sites;
- remove existing stock for which there is demand in the office market or long-term viable need;
- introduce uses that adversely affect the existing beneficial mix of commercial uses.

59. The supporting text to Local Plan Policy DM1.1, paragraph 3.1.8, and the Office Use Supplementary Planning Document indicate that proposals for the change of use from offices will normally be refused if the building or site is considered suitable for long-term viable office use. The Local Plan indicates that, exceptionally, the loss of an individual office development to other commercial uses may be acceptable where the proposed alternative use meets the wider objectives of the Local Plan.

60. Local Plan Policy DM1.5 encourages a mix of commercial uses within office development which contribute to the City's economy and character and provide support services to its businesses, workers and residents. Paragraph 3.1.20 indicates that such complementary uses include retail, leisure, education and health facilities.

61. No viability evidence has been provided to demonstrate that office use on this site would not be viable in the longer term, but the applicant has provided commentary on the difficulties of construction on the application site, office market conditions in the Holborn/Midtown area and the City as a whole, and the wider benefits of the proposed development to the City's post Covid recovery.

Construction Difficulties

62. Due to the Thameslink rail tunnels running under the site, a complicated structural solution and cantilever will be required which affects the positioning of an office core and creates additional costs. The applicant has suggested that the need for constant liaison with and approvals from Network Rail will add 18 months to the development programme which would be a significant disincentive to achieving a pre-let and obtaining necessary funding.

63. The structural difficulties would limit the net lettable area of any office building, resulting in an inefficient building with very deep floorplates and an efficiency of around 58% compared with a usual target of over 75%.

64. It is accepted that there are significant construction difficulties and complications arising on this site, and that these will add significant cost and thereby impact on overall development viability. Similar concerns over construction cost arise with the proposed development. (Similar difficulties have also arisen in respect of other sites within the City, where office redevelopment has nevertheless been promoted) In the absence of detailed viability information, it is not possible to say that these difficulties and complications would make retention of office space unviable.

Office Market Conditions

65. The demolished office space on this site totalled 7,977 sqm, whilst the consented office floorspace on this site totals 3,741 sqm. On 31 March 2021, the total office stock in the City of London stood at 9.44 million sqm. The loss of office floorspace on the application site would represent between 0.04% (permitted floorspace) and 0.08% (demolished floorspace) of total City office floorspace. In March 2021, a further 871,000 sqm of office floorspace had either been permitted or was under construction. The Planning & Transportation Committee have approved in principle a significant additional quantum of new office floorspace during 2021.

66. The applicant has submitted an Office Market Report, dated November 2021, which considers the supply and stock of office accommodation in the Holborn area. This report suggests that at Q3 2021, there was just under 109,000 sqm of available office floorspace in Midtown, with a further 184,000 sqm scheduled to be delivered after 2022. The office floorspace permitted on this site would comprise of 2% of the total development pipeline and 3% of the existing floorspace.

67. The loss of office floorspace on this site would therefore be minimal when considered against the existing and pipeline floorspace in the Midtown area and the City of London as a whole. Whilst the Local Plan resists the loss of office floorspace, the scale of the loss on this site would not prejudice the overall supply of office space in the City, nor prejudice the potential for future site amalgamation or result in the loss of existing stock. for which there is demand or longer-term viable need.

Alternative Use to address the loss of office floorspace

68. Although the proposal will not result in any loss of existing office accommodation, nor significant loss to the overall stock of office floorspace, in the absence of a viability assessment, the applicant also needs to demonstrate that the proposed alternative uses address the City Corporation's wider planning aspirations, particularly through the provision of complementary uses under Local Plan Policy DM1.5, and contributes to the City's post Covid recovery.

69. The proposed development seeks to deliver high-quality, purpose-built student accommodation and cultural and community floorspace, providing inclusive social infrastructure that addresses a local and strategic need within the City, whilst providing opportunities to engage residential and working communities through new facilities, including publicly accessible space for local community uses.

70. The applicant is in discussion with the London School of Economics (LSE) to provide accommodation for LSE students. The proposed student accommodation will enhance educational provision in central London, diversify uses in this part of the City and add vibrancy and activation to support other land uses, including retail and leisure, 7 days a week. The additional student accommodation will also contribute towards meeting the Local Plan and London Plan housing targets.

71. The application proposes 917 sqm (GIA) of cultural and community space. This is intended to expand upon the temporary, meanwhile use Gaia's Garden which was located on site until September 2021. The community space is designed to accommodate a wide range of community programmes and to link into the City Corporation's wider Culture Mile initiatives.

72. On balance, therefore, whilst there would be a loss of permitted office floorspace, this would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The student accommodation and community spaces will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for 7 days per week, and contribute towards meeting Local Plan housing targets. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's ambitions for a post Covid City. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2036.

Acceptability of Student Accommodation

73. In considering the student housing element, regard must be had to the need for student housing, the suitability of the site for delivering student housing and the quality of accommodation that would be delivered.

74. Local Plan Policy DM21.7 states that student accommodation would be acceptable where is would not prejudice the primary business function of the City, result in the loss of office (contrary to Local Plan Policy DM1.1), result in excessive concentration of student accommodation, have an adverse impact on the residential amenity of the area. This is further supported in Draft City Plan Policy HS6 which supports proposals for new student accommodation provided that they do not prejudice the primary business function of the City.

75. London Plan Policy SD5 and Local Plan Policy DM21.1 states that residential development is not appropriate in defined parts of the City of London. The Local Plan identifies clustered locations for the delivery of future housing developments. The application site is located 'near to' the Smithfield residential cluster and policy DM 21.1 identifies the area as suitable for the provision of new residential accommodation, including student accommodation, to sit alongside commercial and other land uses. There is a need for student accommodation and this site offers a suitable location for its delivery.

76. Local Plan Policy CS5 (North of the City) encourages the enhancement of the distinctive character of the Smithfield area by retaining a range of buildings suitable for accommodating a mix of uses, whilst recognising the particular challenges arising from the 24 hour character of the area and the improvement of pedestrian permeability and connectivity at ground floor.

77. Draft Policy S23 (Smithfield and Barbican) encourages culture led mixed use development, improvement of pedestrian permeability and support residential development in appropriate locations.

78. The proposal would deliver 644 rooms of Purpose Built Student Accommodation (PBSA) with ancillary accommodation, including a Cafe/Bar, Cinema Room, Music Room, Games Area, Video Games Area, Gym/Exercise Area, Private Dining and Laundry. The accommodation would be provided over 11 floors above ground floor level. The 644 rooms would provide a mix of bedroom types including studios, two-dios and ensuites including cluster apartments, with 10% proposed to be wheelchair accessible.

79. Policy H15 of the London Plan requires that Purpose-Built Student Accommodation (PBSA) should be secured for student use and that a nomination agreement is in place to ensure occupation by students of a higher education provider and to commit to have such an agreement for as long as the development is used for student accommodation. Local Plan Policy DM21.7 also requires proposals for student accommodation to be supported by higher educational institution operating within the Central Activities Zone. The submitted planning statement details that the applicant is in detailed discussions with the London School of Economics and Political Science to take a nominations agreement for the student accommodation beds within the scheme. A nominations agreement would be secured by S106 agreement which limits occupation to students studying at the stated further or higher education institution in order for the development to be in accordance with London Plan Policy H15 Local Plan Policy DM21.7.

80. The London Plan (2021) states that London's universities make a significant contribution to its economy and labour market and states that it is important that the attractiveness and potential growth of universities is not compromised by inadequate provision for new student accommodation.

81. The London Plan seeks to ensure the local and strategic need for PBSA is addressed, and the Mayor's Academic Forum has established that there is an annual requirement for 3,500 PBSA bed spaces across London over the plan period. Paragraph 4.15.1 of the London Plan sets out that the housing need of students in London, forms an element of the overall housing need for London. The completion of new PBSA therefore contributes to meeting London's overall housing need and will contribute towards meeting City of London Local Plan housing targets.

82. The scheme proposes to deliver 656 new student bedrooms in a purpose-built student accommodation facility. This proposal would contribute to both PBSA bed space requirements and housing targets set out in the London Plan and the Local Plan. Specifically, paragraph 4.1.9 of the London Plan and the Draft City Plan 2036 sets out that "net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half student bedrooms/units being counted as a single home". As such, the delivery of 656 student beds is equivalent to 262 homes.

Affordable Student Accommodation

83. London Plan Policy H4 of the London Plan sets a strategic target for 50% of all new homes delivered across London to be genuinely affordable. The Mayor's Affordable Housing and Viability Supplementary Planning Guidance sets out that Affordable student accommodation should be provided on-site in line with the Mayor's Housing SPG. London Plan Policy H15 also specifies that purpose-built student accommodation schemes, which provide a minimum threshold of affordable student accommodation and meet the definition of affordable accommodation set out in Policy H15, are eligible to follow the Fast Track Route (FTR) which is the provision of 35% affordable units.

84. The applicant is proposing to provide 35% of the student bedspaces as affordable which is supported in accordance with H15 and H4 . The applicants have confirmed that the affordable student accommodation will be provided in line with the London Plan at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year. A plan showing the location of affordable rooms would be required to be submitted for approval and will be secured via section 106 agreement.

85. The provision in terms of room size and occupancy level between the non-affordable and affordable rooms will be equivalent. The affordable rooms will be subject to a nominations agreement, and will be allocated to a higher education provider, secured by the S106 agreement. The commitment to secure the flexible temporary use of the site during vacation period for ancillary uses would be secured by S106 agreement.

Student Accommodation Quality

86. Policy H15(A)(5) of the London Plan requires that student accommodation provides adequate functional living space and layout, and paragraph 4.15.6 of the London Plan sets out that the design of the development must be high quality and in accordance with the requirements of London Plan Policy D3 (optimising site capacity through the design- led approach).

87. Local Plan Policies DM21.1(Location of New Housing) states new housing (including student accommodation) will only be permitted where development would not result in poor residential amenity within existing and proposed development. Local Plan Policy 21.5 (Housing Quality Standards) requires all new housing to be designed to standard that facilitates the health and well-being of occupants including taking into account provision of acceptable daylight to dwellings commensurate with a city centre location.

88. The proposal would provide three different student accommodation typologies. The studio rooms would range in size between 12-20sq.m and would feature a small double bed, ensuite, kitchenette, wardrobe and desk along with associated shelving and storage. The apartment layout would feature 2, 3 or 4 bedroom ensuite rooms with a shared open plan communal kitchen, living and dining space. The cluster arrangement would typically provide 7 student rooms with a larger kitchen/lounge located close to the cluster entrance.

89. The internal daylight that would be available in the habitable rooms of the student accommodation has been assessed using the Average Daylight Factor (ADF) methodology and the No Sky Line (NSL) / daylight distribution methodology (the methodology for the mapping the no sky line is explained in the daylight and sunlight section of this report).

90. The Average Daylight Factor (ADF) assessment is a calculation of the overall amount of diffuse daylight within a room that is measured at a working plane 0.85m above a room's finished floor level. The ADF assessment takes account of: the size and shape of a room and its serving window(s); the actual or reasonably assumed reflectance values of a room's internal surfaces (walls, floors and ceiling); the diffuse transmittance of the glazing to the serving window(s); and the amount of visible sky, which is calculated through a Vertical Sky Component assessment.

91. The BRE Guidance recommends a minimum average daylight factor (ADF) of 1% for bedrooms, 1.5% for living rooms and 2% for kitchens. Student accommodation is not explicitly discussed within the BRE Guidelines, but it is understood that it is common practice is to assign a minimum target of 1% ADF to student rooms (the target for bedrooms), which is considered by officers to be reasonable.

92. The internal daylight of the student rooms (bedrooms and studios) has been assessed. Out of the 644 rooms proposed 574 (89%) of these rooms would achieve an ADF of at least 1%, which is recommended for bedrooms within the BRE Guidelines. 16 rooms would achieve an ADF

of 0.8%-0.9% and 15 rooms would achieve an ADF of 0.6%-0.7% There would be 39 rooms which would have a ADF of between 0.1%-0.5%, these room are predominantly facing into the lightwell area. The majority of kitchen/cooking areas on the upper floors would have access to very little or no natural light.

93. Officers (and GLA in their Stage 1 response) have expressed concern that the level of light to some of the student rooms (particularly those located within the lightwell) do not meet BRE Guidelines for adequate daylight and have sought further revisions from the applicants to the layout of the student rooms, including requesting the student rooms within the lightwell being removed altogether. During the course of the negotiations 12 rooms on the southern side of the lightwell (on floors 2-5) and were removed and were replaced with communal areas overlooking the atrium. The internal layout of rooms were revised so that desks were placed closer to the windows. The horizontal band width depth and fin depths on the southern elevation were reduced so that more light could penetrate into the rooms on the southern elevation. (As a result of these revisions more bedrooms (89% as opposed to 57%) would achieve an ADF of at least 1%).

94. The applicants have submitted a letter from LSE stating that in order for LSE to be able to sign a nomination agreement – they would require an 644 student beds at minimum to be provided. In their letter, LSE have stated that they are seeking to expand student bed space numbers from the current 4,500 to 6,000 over the next 5 years. To do this they will require approximately 1,000 new bedspaces that are not only close to the campus as possible but are of a high quality, sustainable and at rents that are attractive and affordable for students. Further they have had to recently give up circa 500 beds which were within walking distance of the campus as the rents on those leases became too onerous and are looking to replace them with more affordable accommodation. LSE have confirmed in their letter that they remain committed to the project given its location being in walking distance from their campus. LSE have discussed the specification with the applicants and are assured that the student accommodation would be of highest quality. In reviewing the amenity and breakout spaces and study areas ranging from smaller hubs on levels 2-5 and a larger social amenity hub at lower ground and first floor level, along with the use of the publicly accessible roof terrace, on balance it is considered that the overall quality of the student accommodation is considered to be acceptable having regard to the specific requirements of LSE.

95. The proposal would provide approximately 1,014 sqm of internal communal amenity space comprising a TV lounge, home cinema room, games room, gym, music room, cafe/bar and kitchen at basement level 1. A lounge, break-out space and study rooms would be provided at first floor level.

96. The applicants have submitted an amenity provision note to explain the rationale of providing a central amenity hub at lower ground and first

floor as opposed to smaller ‘pepper potted’ amenity hub on separate floors of the building.

97. The note states that feedback provided by students and operators has indicated that on-floor amenity areas at circa 20sqm - 30sqm to be generally less used compared to central well-designed hub amenity areas.

98. Students generally find it much easier to make themselves socially comfortable in larger amenity spaces, especially if those spaces are designed to cater for a variety of group sizes and seating configurations in terms of open space seating (e.g. cafe table arrangements etc.) and sheltered spaces (e.g. booth seating etc.).

99. The lower ground floor activities will include Cafe Bar, Cinema Room, Music Room, Games Area, Video Games Area, Gym/Exercise Area, Private Dining and Laundry, clustered around the lounge bench seating wrapped around the core which will also offer an informal social interaction space centred on a games areas.

100. In addition to the main ‘Social Activity Hub’ on the lower ground floor, the proposed central amenity provision also includes a ‘Study Zone Hub’ on first floor which is designed to serve as a central study area offering a variety of spaces for study and social interaction centred around individual and group study activities. This space will include Classic Study Rooms, Study Booths, Individual Study Room, High Bench Touchdown Space, Platform Seating and a Cafe style seating arrangement to in order to provide a generous breakout space and a more informal study seating arrangement. Smaller amenity spaces to supplement the

101. On floor cooking facilities are provided for each unit type to cater for variety of needs including self-contained cooking facilities provided in studios and communal cooking facilities provided in cluster apartments. Detailed plans showing the kitchenette/cooking facilities layout to ensure sufficient space for food preparation would be required to be submitted as part of the Student Management Plan. Bookable private dining rooms would be provided at lower ground floor if students wish to have meals in larger groups.

102. The supplementary information submitted with the application, including the Student Accommodation Management Plan, indicates that the site would be well managed. Staff would be on site 24/7 to oversee the running of the accommodation, health and safety and fire safety issues, maintenance and security and the management of the amenity of students as well as procedures to manage the impact on nearby occupiers including nearby residential properties. Running the site in accordance with the Student Accommodation Management Plan would ensure that the development would not detrimentally increase the current levels of noise and disturbance in the area and thereby protect residential amenity. A Student Accommodation Management Plan would be secured via S106 agreement. The amenity areas along with the range of room typologies, combined with the management of the student

accommodation would ensure that the development would be delivered and operated in accordance with Local Plan Policies DM21.1(Location of New Housing), DM21.5 (Housing Quality Standards) DM 21.7 (Student housing and hostels) and London Plan Policy H15.

Acceptability Of Student Accommodation Conclusion

103. Whilst there are no space standards for student accommodation, the development would be fit for purpose and provide for student well-being and activities, ensuring a range of high-quality and accessible, internal and external, communal amenity spaces. Overall, the provision of student accommodation in a highly accessible location is supported in both strategic and local planning terms. The provision of purpose-built student accommodation in this mixed-use development (within the Culture Mile) would not prejudice the business function of the City, would not result in an excessive concentration of student housing, is not considered to have an adverse impact on residential amenity of surrounding properties and would not involve the loss of permanent residential accommodation. Whilst officers are concerned about the low level of light to some of the rooms and kitchen areas, on balance, (particularly taking into consideration LSE's need for a minimum number of rooms) officers are of the view that students would have the option of using amenity, breakout and study areas located throughout the building, along with the use of the publicly accessible roof terrace. The proposals also include 35% affordable student bedspaces and provides for 10% accessible rooms. On balance, the purpose-built student accommodation would accord with London Plan Policy H15, Local Plan Policy, CS5 and DM21.7 and Draft City Plan Policy HS6 and S23.

Public Realm, Including Publicly Accessible Roof Terrace

104. Local Plan Policy DM10.1, DM19.1 and emerging City plan Policy HL1, DE3, London Plan Policy D8 all require high quality public realm and increased urban greening. Local Plan Policy DM 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces where they do not overlook residential premises.

105. The proposal provides a free, publicly accessible roof-top garden and, terrace which includes high quality hard and soft landscaping (543 sqm) for visitors to the area as well as workers in the City, student occupants and as part of the wider cultural and community offer at ground floor level. This inclusive space has been designed to be used as a space to dwell and observe the surrounding area as well as further supporting biodiversity.

106. Access to the rooftop terrace will be via a dedicated lift at ground floor which visitors can access through a new dedicated entrance accessible off of the proposed new public route through the Site. The roof terrace is free for members of the public to visit, with no booking required. The rooftop terrace would be open free of charge for the public Monday to Sunday 10am – 6pm. A roof terrace management plan would be secured

by S106 obligation. The roof terrace has been design having regard to suicide prevention and the details of this is subject to a further condition.

107. There are residential properties on Cock Lane (28 flats) at No's 32 and 37 slightly further north at No 10 Hosier Lane (124 flats). Environmental Health have recommended a condition on the use of the proposed roof terrace being restricted between the hours of 23:00 on one day and 07:00 on the following day (other than in the case of an emergency) to safeguard amenity of adjoining premises in accordance with Policy DM15.7 and DM21.3.

108. The Proposed Development comprises 468 sqm of public realm through and around the proposed building. This includes a new public route through the site, linking City Thameslink Station to the new Museum of London Snow Hill Entrance and public realm improvements at the bullnose of the building to accommodate short term cycle parking. The new public route through provides the opportunity for a gateway from an important transport node to the beginning of the Cultural Mile and the important new Museum of London site. Active shopfronts are proposed at ground floor level which would activate the route public route through. There are level changes within the route through from Snow Hill toward Holborn Viaduct. The new public route through comprises steps and platform lifts. The steps are designed so that they form part o the design of the route through and can double up as spaces for people to congregate and sit on. The existing boundary walls at the bullnose of the building would be removed which are currently in situ at the junction of Holborn Viaduct and Snow Hill. This previously private open space would be opened up and transformed into public realm accessible by users of the building and workers and visitors.

109. The final details of the public realm including planting, materials, lighting, and management would be subject to conditions, S106 and S278. The overall vision for the public realm and the dynamic with the base of the building would positively transform the existing public spaces. The improvements to the public realm represent good place making and there would be gains quantitively and qualitatively compliant with the NPPF design policies, London Plan policies, Local Plan policies, Draft City Plan policies, and the City Public Realm SPD.

Cultural and Community Use

110. Local Plan policies CS11 and DM11.2 and draft City Plan 2036 Strategic Policy S6 encourage new cultural experiences and art works. A Cultural Plan has been submitted in accordance with draft City Plan 2036 Strategic Policy S6

111. The applicant hopes to build off the success of Gaia's garden, a temporary community use which occupied the site post demolition. This brought people together from a wide range of communities to benefit from gardening, creative activities and events it hosted. The applicant has developed a coherent cultural proposal through engagement with local stakeholders and expertise from cultural curators such as Sound

diplomacy and the Creative Land Trust to ensure the practical implementation and success of the plan.

112. The applicant would be committed to dedicating the ground floor plan for flexible spaces able host a range of cultural uses (except for necessary circulation and utility areas) which would expand to the roof terrace during non-public hours (after 6pm and before 10am, but excluding hours when access and use is prohibited by condition) . The proposed uses which would be integrated with the proposed public route would create a vibrant gateway experience from Holborn Viaduct into the Museum of London Smithfield market complex.

113. The Creative Land Trust have been engaged to imagine the ground floor as an eco-system of cultural spaces where creatives can benefit from the clustering of ideas and activity to form a wholly new character to this location. An operator such as the Creative Land Trust would be employed to select and curate the occupiers who would embody the objectives of the Culture Plan:

- Promoting social mobility and nurturing the next generation of talent, including supporting pathways for individuals into the creative and quaternary industries.
- Encouraging wider access to arts, heritage and culture specifically from underrepresented groups within society.
- Encouraging social connectivity with neighbouring unempowered communities.
- Encouraging wellbeing and addressing isolation.
- Supporting the creation of new businesses and helping those businesses to thrive

114. Compounded with the influx of a new demographic of young people housed in the student accommodation above, and the site's close proximity to future location of the Museum of London at Smithfield and Culture Mile, the cultural proposal on this site would help to cultivate the transformation of the area to a Culture quarter of the City.

115. The cultural spaces have been designed to be flexible in order to adapt to the changing needs of the future users and uses. A multitude of layouts have been developed with the Creative Land Trust to ensure that the facilities and spaces are robust to accommodate changing needs whilst remaining fit for purpose.

116. The activities that are suggested in these spaces have been divided between 'Cultural consumption' and 'cultural production' and include a double height performance/lecture space, smaller cellular workshops and a shared space would bring together creatives, resident students, visitors, and the public alike. The spaces for cultural consumption would be placed where visibility from the public realm is highest and would animate the street as a result.

117. The details of management, final spatial layouts, the activation of windows at ground floor and final programme would be shaped by future needs, users and the market secured by condition and S106 agreements.

118. The proposal would be in accordance with Policy CS11 To maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy, Policy DM 11.2 Public Art To enhance the City's public realm and distinctive identity; and the proposed management strategy in the form of a Culture Plan, to be agreed via condition and S106 agreements would accord with Policy DM 11.1 Protection of Visitor, Arts and Cultural Facilities and emerging Strategic Policy S6: Culture, Visitors and the Night-Time Economy and Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities

Design

Height, Bulk and Massing

119. The proposed development takes cue from the building form of the nineteenth century Victorian Wellcome and Boroughs building that once stood on the site. The proposed height and scale would match that of 60 Holborn Viaduct, a modern commercial building with which it shares the island site and is the immediate neighbour to the west.

120. The proposed building would rise to a height of 55.34m AOD and would extend to the edges of the site boundaries. The distinct bull nose plan and orientation is a direct response to the topography and historic street pattern. It would comprise of 13 levels, inclusive of roof terrace, plus two basement levels with a central atrium extending down to ground to allow daylight into the centre of the site.

121. In longer views the height and massing would be a compatible addition to the established building scale and plots along Holborn Viaduct and Snow Hill. The upper most crown would step back in parts on the north and south elevations and to the bullnose facing east, reducing any potential visual bulk of the top two floors and create a distinct and legible silhouette.

122. In the more immediate context, the building line would be largely consistent to Holborn Viaduct reflecting the wider townscape to this southern aspect. The proposals would also repair the historic building line on Snow Hill with a more articulated and staggered building edge again a contextual response to the finer urban grain and narrower plot widths which define Snow Hill and the setting of this part of the Smithfield Conservation area.

Architecture, Public realm and lighting

123. The proposed development would respond to the historic context of both the Smithfield Conservation Area where it meets the boundary on Snow Hill and the surrounding commercial developments on Holborn Viaduct with the traditional expression of base, body and attic. The base of the building would have three public realm frontages and would be predominantly glazed to showcase the cultural activities and add vibrancy to the street scene. This would be further enhanced by a new north/south public route creating a direct line of sight and walkway from City Thameslink station to Smithfield Market. The base would also be planted with pockets of greenery placed around the various entrances into the site. This would be framed in a double height regular rhythm of glazed terracotta and grey terrazzo columns and pilasters which would unify and anchor the base in a pleasing coherent manner

124. The ground floor columns would carry vertically through the façade and crossed with thick horizontal spans, like string courses to articulate the tripartite composition, reflecting the classical proportions evident on 1,4 and 5 Snow Hill and that of the former existing on the Wellcome and Burroughs Building on the site. The façade of the body of the building would be expressed as a grid of two storey increments, with a frame of terracotta, within which are vertical panels of green upcycled glass and recycled aluminium framed windows, an unusual and innovative use of low carbon materials; horizontal bands of back painted glass separate each floor beneath the windows, altogether creating a layered depth to the façade. Solar shading would be managed by the addition of vertical bronze anodised fins which would add further texture and interest to the façade. Solar shading would be managed by the addition of vertical bronze anodised fins which would add further texture and interest to the façade

125. The façade treatment of the bullnose and the ‘bookends’, where the development would meet the existing building of 60 Holborn Viaduct, would be distinguished by a denser splay of bronze anodised aluminium fins and absence of contrasting recycled green glass. This design detail would be particularly effective as part of a townscape experience travelling round the curve of the bullnose where the diagonal fins would appear to glint and shift with the changing light. The windows and framing proportions have taken inspiration from studying the windows and framing of the original Wellcome and Burroughs Building as well as references from heritage buildings in Snow Hill and Cock Lane.

126. The facades facing on to the internal lightwell and public route would be articulated in a similar vein; layering, framing and detailing of windows bays albeit with a lighter and simpler colour palette to maximise the light down into the atrium.

127. At a distance, the overall composition emphasises legibility of the street pattern of the site and creates a strong identity drawing on classical forms of the Smithfield Conservation Area

128. The free public roof terrace, accessed via a dedicated public lift accessed from the proposed public route, would comprise meandering paths and intimate dwell spaces which would offer a green haven from the bustle of Holborn Viaduct. The orientation would exploit the impressive views East where a historic skyline of landmarks including the Old Bailey Central Criminal Court, St Sepulchre Church and in the distance, St Paul's Cathedral would be appreciated.

129. The rooftop plant would be sunken and discrete with solar panels sited on the west side and out of sight of views looking east. The balustrade and low-level planting is designed to avoid any breach of the threshold planes of the LVMF views and is visually concealed from views from the street. The layout of the roof plan would create a pleasant fifth elevation when viewed from other taller buildings. The rooftop garden would contain various climate resilient planting types including grassland and wetland habitats and a pond which would greatly improve the opportunities for attracting and sustaining biodiversity and bring nature to users. There are also modest green ledges and pockets of planting throughout the building which would contribute aesthetically to the building's fifth elevation when viewed from St Paul's cathedral gallery and higher buildings on Holborn Viaduct as well the building's ability to attenuate water as part of their response to climate change.

130. At the bullnose, the building frontage is stepped back from the street edge at ground floor level behind a colonnade, which creates a generous and inviting entrance-dwell space, open to the air. The articulation of this entrance would make this legible in the townscape and add prominence to the bullnose elevation. The Student entrance would be articulated by a canopy a storey above the ground level, tucked in the dog-leg profile of the building and located in the more domestic setting of Snow Hill. This would provide a legible and provide a welcoming, human scale arrival experience for students into the building which is intended to operate as a residential community. The servicing entrance would be discrete and located on Snow Hill and would be set away from the student entrance and the portal into the public route. The entrance would be flanked with living green walls either side which would create a soft and neutral backdrop to the liveliness of the public route. The details of the entrances would be secured via condition.

131. The proposed public route through the site would be accessed at lower ground level via steps and a platform lift from Snow Hill towards the western side of the site and accessed at ground level from Holborn Viaduct. The new public route would be clearly defined by portal frames creating an intimate path flanked by cultural spaces. This would expand into a central daylit atrium, which would house the entrance to the public roof terrace lift.

132. The architecture embraces and celebrates the changing levels of the site and incorporates this into the architecture, which would result in a

dynamic experience with steps doubling up as seating or planters, and vision panes into active ground floor spaces at different levels. The route would create a new direct line of sight through the island block, increasing public realm way finding. It is well overlooked and would benefit from natural surveillance, creating a sense of safety. The internal courtyard would feature planting, seating and bike storage and would be fronted by the cultural and community use spaces.

133. At ground level, the quality of design can be appreciated at a human scale; the soffit proposed for the public route reinterprets the patterned and faceted ceiling featured in the historic interior detailing of the Burroughs and Wells Building. There is a careful attention to crafted details with intricate motifs and patterns moulded into the terracotta and granite columns, creating a rich and tactile surface, similar to the cast iron details of Smithfield market. The large beams of building's skeleton create horizontal planes which span above and across the width of the public route which would be used as a canvas for artwork would further animate the walkway and the details of which would be secured by condition.

134. The architecture would be celebrated by a sensitive architectural lighting scheme and would provide an appropriate sense of arrival though the public route during hours of darkness without creating unnecessary light spill. The lighting at roof terrace would be at low level and discreet. Final details of the comprehensive lighting strategy including colour, candela and street lighting would be secured by condition.

Design Conclusion:

135. The design approach to the site would result in a development appropriate in scale, architectural form, innovative use and palette of materials and quality that would add a level of richness and visual interest to the local townscape. The final details of the development including greening, public realm, artwork, lighting, soffits, fins, entrances, and materials, would be secured via condition to ensure a high-quality appearance and finish in the final construction. The accessible roof terrace would enhance the visitor experience and elevate public views of the rich heritage of the townscape looking east. The public route and cultural uses would create a new engaging experience that would harness and contribute to the emerging vibrancy of the reimagined Smithfield Market Area and the wider Culture Mile.

136. The proposals comply Local Plan Policies CS10 and DM10.1, emerging City Plan Policy S8 and DE2, and London Plan D3 and paragraphs 130 and 132 of the NPPF. The proposal would deliver lighting which is in accordance with Local Plan policy DM 10.1, draft City Plan 2036 policies S8(11) and DE9 and Intend to Publish London Plan policy D8.

Strategic views – London View Management Framework

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

- 2A.1 from Parliament Hill, London Panorama – the development would be within the Landmark Viewing Corridor but would not breach the threshold plane
- 3A.1 from Kenwood, London Panorama, - – the development would be in the Landmark Viewing Corridor but would not breach the threshold plane
- 4A.1 from Primrose Hill, London Panorama – the development would be in the in the Wider Setting Consultation Area and would incur a minor breach to the threshold plane, triggering a qualitive assessment (below)
- 5A.2 from Greenwich Park, London Panorama – Background Wider Setting Consultation Area and would incur a minor breach to the threshold plane triggering a qualitive assessment (below)
- 6A.1 from Blackheath Point, London Panorama – the development is in the Background Wider Setting Consultation Area and would incur a minor breach to the threshold plane triggering a qualitive assessment (below).

View 2A.1 – Parliament Hill

138. The site lies within the landmark viewing corridor of the Parliament Hill Protected Vista (London Panorama) focussing on St Paul's Cathedral. After officer negotiation, the proposed development was reduced in height so that it does not breach the threshold height of the landmark viewing corridor which rises from 55.115m to 55.735m across the site.

139. A slither of the top of the building would be visible in front of the base of the Western Towers of St Paul's Cathedral. The base of the Western Towers is currently partially obscured by the dome of the Old Bailey. The proposed building's rust-coloured would just be visible in front of the dome of Old Bailey in magnified views. The silhouette of the proposed uppermost part of the roof and palette of materials would not be intrusive, prominent or unsightly in the view. The magnitude of impact would be negligible. There would be no impact on an observer's ability to 'recognise and appreciate' St Paul's as a Strategically Important Landmark in the view and the nature of the effect would therefore be neutral.

140. The Visual Management Guidance for this view is set out in paragraphs 98-103 of the LVMF and states that St Paul's Cathedral and its western towers should be recognisable in the panorama. The proposed development would be some distance away to the right of the cathedral

and would not harm the characteristics and composition of the view and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13.

View 3A.1 – Kenwood

141. The site lies within the Landmark Viewing Corridor of the Kenwood Protected Vista (London Panorama). After officer negotiation, the proposed development was reduced in height and the proposal does not breach the threshold plane which rises from 55.437 m to 56.125 m across the site.

142. Again, a slither of the top of the proposed building would be visible in front of the base of one of the Western Towers, which is partially obscured by the dome of the Old Bailey and which is not identified within the view. The proposed facade would just be visible in front of the dome of Old Bailey. The silhouette of the proposed uppermost part of the roof and palette of materials would not be intrusive, prominent or unsightly in the view. The magnitude of impact would be negligible. There would be no impact on an observer's ability to 'recognise and appreciate' St Paul's as a Strategically Important Landmark in the view and the nature of the effect would therefore be neutral.

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

144. The development would not harm the characteristics and composition of the view and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13.

View 4A.1 – Primrose Hill

145. The site lies within the Wider Setting Consultation Area of the Primrose Hill Protected Vista (London Panorama) focussing on St Paul's Cathedral. The consultation threshold is a constant plane of 52.1m AOD at this point and the site lies within the vista foreground of the Strategic Important Landmark. The proposal breaches this height by 2.99m and the uppermost part of the building would be partially visible. However, the scheme is located some distance to the left of the Cathedral and is largely obscured by other taller foreground buildings within LB Camden. The facade and flat roofline would add a neutral addition to the skyline and will not affect the ability to appreciate and recognise St Paul's Cathedral as the Strategically Important Landmark or other landmarks identified in this LVMF view.

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

View 5A.2 – Greenwich Park

147. The site lies within the Background Wider Setting Consultation Area of the Greenwich Park Protected Vista (London Panorama). The proposal breaches the consultation threshold height (53.6AOD) by 1.49m and a small portion of the roof would be visible some distance to the right of the Monument strategic landmark in this view. The distance, dark rust-coloured façade and the dominance of other layers of buildings in front of the proposed building would make this massing recessive. There would be no impact on an observer's ability to 'recognise and appreciate' St Paul's, and due to the location in the view there would be no impact on the relationship between St Paul's as the Strategically Important Landmark, the Monument and Tower Bridge, in the view and the nature of the effect would therefore be neutral.

148. In accordance with paragraphs 143 – 147 of the Visual Management Guidance in the LVMF SPG, the development would preserve the viewer's ability to recognise and appreciate the dome, peristyle, and western towers of St. Paul's Cathedral, ensuring these elements retain a backdrop of clear sky. It is considered the visual management guidance is complied with. The development would not harm the characteristics and composition of the view or other landmark elements and the protected vista and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.

View 6A.1 – Blackheath Point

149. The site lies within the background Wider Setting Consultation Area (left lateral) of the Blackheath Point Protected Vista (London Panorama). The proposal breaches the threshold plane height (54.2) by 0.9m. A very small portion of the roof would be visible in this magnified view, in the backdrop some distance to the northeast of the Cathedral.

150. The visual management guidance for this view states that the western towers of St Paul's Cathedral are integral to the viewer's ability to recognise and appreciate the Strategically Important Landmark. Development in the Wider Setting Consultation Area should preserve or enhance the viewer's ability to recognise and appreciate St Paul's Cathedral and its western towers. It states development should generally not be taller than the base of the peristyle of the Cathedral although the

effect of colour, scale, reflectivity, and distance from the landmark of new development should be understood and tested (LVMF SPG para 155-156).

151. Being indiscernible due to the distance of 8km and complex layers of back drop, it is considered that the proposed development would accord with generic and view specific the visual management guidance set out in paragraphs 154-156 of the LVMF SPG. The development would not harm the characteristics and composition of the view and is in accordance with London Plan policies HC3 and HC4, Local Plan Policy CS13 and proposed Submission Draft City Plan policy S13 which seek to protect strategic views.

Summary of LVMF Impacts

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

Other Strategic Local Views

St Paul's Cathedral – Views From

153. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral. The proposed roof has been designed so that the greenery would be visible at the prow of the building which faces St Paul's with the plant sunken into the massing and solar panels placed to be in the background. The Protected Views SPD seeks special attention be paid to the roofscape surrounding the Cathedral. In these views, the building would be visible in the context of the coarse grained roofscape of mid-rise commercial buildings. Its height, although slightly taller than its adjacent neighbours, would sit comfortably in the view and would not draw the eye or distract from the closer skyline landmarks of the dome of the Central Criminal Court or the Tower of St Sepulchre.

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

Monument - Views From

155. A slither of the roofline and the upper most part of the proposed building would be technically visible. However, due to the distance and coarse grained roofscape, it would not be discernible to the human eye. It is considered it would preserve the composition and character of this view

in accordance with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

Heritage

156. Through the pre-application and application process the proposals have been assessed against Local Plan Policies CS 12, DM 12.1, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There has also been special regard to the desirability of preserving surrounding listed buildings including their setting and any features of special architectural or historic interest which it possesses, under s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.

Indirect impacts on the setting of designated heritage assets

Holy Sepulchre Without Newgate Church (Grade 1) and Railings and dwarf wall to the Church of St Sepulchre (Grade 2)

157. The church is situated on the northwest quadrant of the junction of Holborn Viaduct and Giltspur street and lies west immediately west of the proposed development. The impact of the proposed development on the Church's architectural, historic, archaeological and artistic values is assessed below.

158. Holy Sepulchre is the largest parish church in the City and has been receiving patronage from St. John's College, Oxford since 1622. Kept within the church is the handbell immortalised within the nursery rhyme Oranges and Lemons as "the bells of Old Bailey" wrung outside the cell of the condemned before their execution in Newgate Prison. The Church has been a spiritual centre in London dating back to Saxon times when the church was dedicated to St. Edmund.

159. The existing church building dates to circa 1450 with the outer walls, porch and the majority of the tower the only original features from this construction having survived the Great Fire of London in 1666. Little historic fabric remains of the interiors which have been wholly redesigned after damage of the Great Fire of 1666 and have undergone alterations as recent as 1955. However, there are several notable stained-glass windows in the church of architectural value, albeit all dating from the 20th Century (their predecessors having been destroyed by fire or bombs), of which several are memorial windows including one dedicated to Captain John Smith. The railings and wall date from the early C19th and enclose the churchyard and have historic and architectural value.

160. The setting is defined by the churchyard, prominent location fronting the interchange of Giltspur Street, Newgate Street, Snow Hill Court, Old Bailey, Cock Lane and Holborn Viaduct as well as the radiating curve of

Snow Hill which contribute to its significance as an historic landmark in the townscape. The railings and wall date from the early C19th and enclose the churchyard, a small green oasis with mature trees and vegetation which have a sense of serenity and separate the building from its context of the heavily trafficked and congested High Holborn. These attributes contribute to the building's historic and architectural value.

161. The wider setting is lower quality dominated by the rear elevations of Snow Hill and Cock Lane buildings and the busy commercial, more varied architecture and coarser urban grain of High Holborn although this includes some monumental and civic historic buildings.

162. The proposal would appear within the setting of the church but the height and scale of the proposed building is located at a sufficient distance from the Church so as not to over-dominate the prominence of the Church or detract from existing setting. The proposed building would curve away from the Church the proposed facade would provide an attractive backdrop to the Church The warm and darker tones of the proposed terracotta and anodised bronze materials would complement and contrast with the materiality of the Church and would preserve its prominence in the foreground in views west. The proposed height of the building would be below the height of the Church spire, preserving the designated heritage asset's silhouette and landmark status in the townscape. The ground floor green fringes of the proposed building would complement the mature trees and planting within the churchyard. The proposed public roof terrace would provide an enhance viewing experience and appreciation of the historic and architectural values of the designated heritage asset and the wider historic context and this is a public benefit.

163. The proposed height and massing of the building would not have an adverse impact on the existing daylight conditions to the church and therefore there would be no noticeable impact on the ability to appreciate the stained-glass windows from within.

164. Overall the proposal would preserve the building, the setting and the special architectural and historic interest and heritage significance of the Church of St Sepulchre and the railings, including the contribution made by setting. There is not considered to be any harm to the significance of this designated heritage asset.

<u>No. 5 Snow Hill (Grade 2 listed)</u>

165. The proposed building lies within the immediate setting of 5 Snow Hill located mid-terrace on the opposite side (north) of the street in the tight urban block.

166. 5 Snow Hill was a purpose-built police station and has historic and architectural values. It is the oldest purpose-built police station to survive in the City of London and was the second station on this site.

Constructed 1925-1926 and designed by Sydney Perks, Architect and Surveyor to the City of London. The part of the building, fronting Snow Hill, is generally well preserved and comprises a unique and imposing narrow Portland stone clad frontage of five storeys and recessed mansard. This facade has very high architectural value for its fusion of restrained interwar classicism with the material and form of the Arts and Crafts movement reflected in the bronze framed polygonal bow window across the upper four floors.

167. The setting is defined by the mid terrace location alignment of Snow Hill and the rich variety of buildings on Holborn Viaduct and Farringdon Street which reflect the former uses of the area and St Sepulchre's Church. This dense, architecturally varied urban character and rich variety of former uses as well as the finer urban grain of neighbouring buildings and links to law and order in the locality such as Old Bailey and Newgate Prison all reinforce the historic and architectural values of 5 Snow Hill. The congested bustling nature of Holborn Viaduct makes a lesser contribution to setting and significance.

168. The proposed development would be within the immediate setting of 5 Snow Hill. The curved footprint and facade of the proposed development would reinforce and emphasise the distinct street contours and re-establish the building line of Snow Hill. The materiality, scale, vertical emphasis, and proportions of the proposal would integrate with the finer urban grain of the setting to 5 Snow Hill. Overall, the proposal would preserve the special architectural and historic interest and heritage significance of 5 Snow Hill, including the contribution made by setting. There is not considered to be any harm to the significance of this designated heritage asset.

<u>No. 4 Snow Hill (Grade 2 listed) and the setting</u>

169. No 4 Snow Hill adjoins 5 Snow Hill and dates from 1875 and is 5 storeys of a plain red brick and Portland stone with tiled roof and is an office building but former furniture warehouse. The building has architectural and historic significance derived from the front elevation, the building has been remodelled and extended at the rear and the interior has been comprehensively modernised. The buildings central alignment within the terrace and prominent roofline is defined by the pinnacle of its brick gable end and is a distinct feature.

170. The setting is defined by the mid terrace location alignment of Snow Hill and the rich variety of buildings on Holborn Viaduct and Farringdon Street which reflect the former uses of the area and St Sepulchre's Church. This dense, architecturally varied urban character and rich variety of former uses as well as the finer urban grain of neighbouring buildings reinforces the historic and architectural values overall visual interest of the front elevation. The congested bustling nature of Holborn Viaduct makes a lesser contribution to setting and significance.

171. The impact to setting would be similar to 5 Snow Hill. The curved footprint and facade of the proposed development would be distinct in the setting and reinforce and emphasise the street topography and re-establish the building line of Snow Hill. The materiality, scale, vertical emphasis and proportions of the proposal would integrate with the finer urban grain of the setting to 4 Snow Hill. Overall, the proposal would preserve the building, its setting, and the special architectural and historic interest and heritage significance of 4 Snow Hill, including the contribution made by setting. There is not considered to be any harm to the significance of this designated heritage asset.

Bridge or Viaduct over Farringdon Street, Holborn Viaduct EC1 – Grade 2 listed

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

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

174. The bridge is of historic significance as part of the 19th century Holborn Valley improvement works and Victorian civil engineering. It is of architectural and artistic significance for the architectural detail of its ornate cast iron work.

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

176. In views from the west along Holborn Viaduct, the proposal would appear in the foreground to the bridge. Due to its location, height and separation from the listed building the development would sit comfortably with the scale of the surrounding taller modern buildings adjoining the historic gate houses and would not detract from the contrasting nature. In views east the development would largely be concealed by taller buildings along Holborn Viaduct and the development would only be glimpsed and this would not be adverse in the setting of the listed buildings. Overall, the proposal would preserve the Bridge or Viaduct, its setting, and the special architectural and historic interest and heritage significance of the Bridge or Viaduct over Farringdon Street, including the contribution made by setting. There is not considered to be any harm to the significance of this designated heritage asset.

1-8 Holborn Viaduct, 15 Old Bailey (Grade 2 listed)

177. Nos. 1 – 8 Holborn Viaduct, 15 Old Bailey stand to the southeast of the site. These buildings comprise offices and shops and date from 1874 to designs by Evans Cronk. They were restored and internally reconstructed in 1985 and are in a French Second Empire style. They are of brick in mixed bond with cream and red stone dressings. Their setting is defined by the heavily trafficked and busy crossroads of Holborn Viaduct, Newgate Street, Giltspur street and Old Bailey and a variety of architectural styles, and ages and a context which has a coarser, more monumental urban grain. This building is one of 4 historic ornate and grand buildings which mark the 4 corners of the junction, albeit set back behind street trees and a modest modern dwell space which breaks away from the cross-formation of the roads and thoroughfare nature.

178. The proposed development would be apparent in the setting of the listed buildings in views from Newgate Street and Holborn viaduct. The bronze anodised fins would complement the sandy tones of the listed façade and the bullnose feature proposed at the southeast corner would echo the round edges of 15 Old Bailey and soften its presence in the setting. The proposal in terms of massing, scale and materiality would be a contextual and compatible response some distance from the listed building separated by Holborn Viaduct. Overall the proposal would preserve the building, its setting and the special architectural and historic interest and heritage significance of 1-8 Holborn Viaduct, 15 Old Bailey, including the contribution made by setting. There is not considered to be any harm to the significance of this designated heritage asset.

The Old Bailey (Central Criminal Court) (Grade 2)

179. This is located to the southeast of the development. In views west, in particular along Newgate Street. This three storey building dates from 1900-1907 and is to designs by Mountford; the elevations front onto the junction of Holborn Viaduct, Newgate Street, Giltspur street and Newgate Street are of classical style and Portland stone, complete with dome and gilt bronze sculpture of Lady justice sword in hand and weighing the scales of justice. The architecture evokes the civic importance and grave nature of its use as a law court. The building has architectural and historic values and is a local and City-wide landmark. The setting is defined by the busy junction of Newgate Street, Giltspur Street, Holborn Viaduct and Old Bailey. The local context of historic buildings on Newgate Street match in masonry material, classical architecture, height and richness, together they create the sense of a grand boulevard. The existing modern buildings on Old Bailey opposite the Central Criminal Court provide a neutral backdrop and do not contribute to the significance.

180. The proposal would appear in the setting of Old Bailey but some distance back in an oblique view of the north elevation in view looking west down Holborn Viaduct. The proposed development would echo the distinct narrow elevation and curved corners of 15 OId Bailey (Grade 2) and would be a contemporary but contextual response. The proposals in terms of massing, footprint, scale and materials would be a positive addition to setting.

181. In longer views from Parliament Hill the upper section of the upper drum at the base of the dome of the Old Bailey which is visible in the foreground would be slightly obscured by the proposed development. However, this would not diminish the ability to distinguish the roof silhouette or its significance in this view as a City landmark. Furthermore, the public roof terrace which forms part of the proposal would offer exceptional new elevated public views of the cupola of the Old Bailey enhancing the ability to appreciate the architectural significance. The impact on the LVMF View 2A.1 Parliament Hill is discussed in more detail in the Strategic View section of the report. The Old Bailey is not identified as landmark or significant building within the view.

182. Overall, the proposal would preserve the building, its setting and the special architectural and historic interest and heritage significance of Old Bailey, including the contribution made by setting in immediate and more distance viewing experiences of setting and significance. There is not considered to be any harm to the significance of this designated heritage asset.

<u>The Viaduct Tavern (126 Newgate Street) Grade 2 listed</u>

183. This This corner public house is located to the east of the site and dates from 1874-5 and its interior was remodelled in 1898-1909 by Arthur Dixon. This four storey high building is in an Italianate style. It is of granite to the ground floor and has brick end stacks with moulded stone cornices. The setting is defined by the busy junction of Newgate Street, Giltspur Street, Holborn Viaduct and Old Bailey. Facing its south elevation, the Central Criminal Court north elevation mirrors the bow frontage of 126 Newgate Street forming a discernible ‘mouth’ and gateway experience to the start of Newgate Street in long views looking east down Holborn Viaduct. The lively nature of the public house is complemented by the shops and active frontages experienced in neighbouring terraced buildings which positively contribute to the setting and continue down the south facing side of Newgate Street contrasting architecturally and functionally with the civic and sober status of the Central Criminal Court.

184. The proposal would appear some distance back with an oblique view of the south elevation in views looking west along Holborn Viaduct echoing the narrow elevation and curved corners of 15 OId Bailey (Grade 2). The proposal in terms of massing, scale and materiality would be a contextual and compatible response some distance from the listed

building. Overall, the proposal would preserve the building, its setting, and the special architectural and historic interest and heritage significance of The Viaduct Tavern (126 Newgate Street), including the contribution made by setting. There is not considered to be any harm to the significance of this designated heritage asset.

St Paul's Cathedral (Grade 1)

185. The proposed development would not impact on the immediate setting of St Paul's Cathedral due to the proximity of taller buildings which would conceal the development. The impact of the development on the ability to appreciate St Paul's Cathedral in more distance views is assessed in the Strategic Views Section of the report and no harm is identified.

186. The free to visit public roof terrace which forms part of the application proposal would offer high quality elevated public views of St Paul's Cathedral. This would provide an opportunity to appreciate the Cathedral's architectural significance and its status as a metropolitan and national landmark and is considered to be a public benefit

Smithfield Market (Poultry Market) (Grade 2)

187. The proposed development would be glimpsed in views looking south at the most south-eastern corner of the north facing façade. The Poultry Market was built between 1961-63 to designs by architect T.P. Bennett and structural engineers Ove Arup and Partners. The only realised part of an ambitious 1960s masterplan to rebuild the entire Smithfield complex, the Poultry Market strikingly juxtaposes its modern architecture to the Victorian market buildings while conforming to their scale and basic layout. The building's vibrant 'pop-architecture' stylings and impressive structural engineering reflect the prevailing aesthetic and technologies then being pioneered at the time. This trait is expressed most strongly by the dome and the use of translucent glazing below so that it appears rest improbably on four small corners.

188. The setting is defined by the adjoining General Market, built 1879-83, completing the sequence of Victorian market buildings by Sir Horace Jones; and a triangle cluster of buildings comprising of the Fish Market also by Horace Jones, the Red House and Engine House completed by later contemporaries, Reeves and Styche in 1898 and 1899. All buildings share Jones' and traditional materiality and Renaissance stylings and conform to the formal grid street pattern. The massing is of finer grain and smaller scale than the General, Poultry, West and East Market buildings giving them a subservient quality. These are all considered non designated heritage assets and positive contributors to the Smithfield Conservation Area.

189. The setting is defined by the grid street pattern which borders and runs through the market complex taking on a complex nature of grandiose and utilitarian. The surrounding buildings are modern and of similar

scale. The larger modern commercial buildings on Holborn Viaduct create a contrasting back drop to the historic market complex. The proposal would form part of this backdrop and would be consistent in scale. The proposed development would only be glimpsed, and the proposed scale, materiality and design would complement this wider varied setting. Overall, the proposal would preserve the building, its setting, and the special architectural and historic interest and heritage significance of Smithfield Market (Poultry Market), including the contribution made by setting. There is not considered to be any harm to the significance of this designated heritage asset.

Conservation Areas

Smithfield Conservation Area

190. The proposed building lies within the setting of this Conservation Area which is located to the north and east of the site. The Smithfield Conservation Area SPD adopted in September 2012 summarises the character and appearance of the area as deriving from its two-millennia established history, reflected in the incremental evolution of its built forms and street pattern and the juxtapositions of its townscape, the presence of ancient, still-functioning institutions including the markets, its rich associations with notable figures and organisations and the high quality of its architecture, cultural significance, heritage assets, archaeology and open space. The Smithfield Market area will be undergoing a change in character further to its conversion to the new Museum of London site and is expected to become a vibrant cultural centre, bringing visitors and new businesses in the future. The Smithfield Conservation Area comprises of 5 character areas. The site lies on the boundaries of Areas 3 and 4.

191. Area 3 is occupied by the Smithfield market complex; the buildings of the market and their associated structures are substantial in scale and elaborate in appearance, and as such have a dominant presence in the conservation area. Their character reflects the single commercial use for which they were built whilst their layout allows for the ease of movement which facilitates the distribution of wholesale goods. Although architecturally varied, the buildings are united in their scale and urban grain; use of architectural detailing and statuary to enliven the roofscape; red brick and Portland stone, stone carvings to the roofline and decorative ironwork which makes a particular contribution to the character of the buildings. Their style has been described as French-Italian Renaissance.

192. The settings of sub conservation areas 3 is characterised by a mix of urban development, large modern office development on busy grand streets of Holborn Viaduct and Farringdon Street as well as the tighter and low rise historic grain of charterhouse Street, which is quieter and engages directly with the market buildings. The proposed development would appear as the backdrop in Views looking south from Smithfield

Street. This would sit comfortably with the other larger scale buildings on High Holborn in the background. The glazed terracotta colour and anodised bronze aluminium fins would complement the tones of the redbrick and Portland stone without competing.

193. In this view the proposed development's public route would open directly onto this sight line and would visually connect and engage with the existing street pattern. The proposed public route would enhance the visitor's experience of the Conservation Area approaching from High Holborn and support the visitor way finding experience in the context of Smithfield's market transformation into the Museum of London.

194. Area 4 is bounded by Smithfield Street, West Smithfield, Giltspur Street and Snow Hill. The character and appearance is defined by a historic street pattern, a change in topography, relatively uniform building heights and materials such as York stone paving and varied palette of brick types. The change in levels and gentle curves of the streets provide interest to local views. Snow Hill has a varied and attractive architectural grouping alongside St Sepulchre Church bolstered with greenery and street trees at either end of the street.

195. The proposed development would appear in the foreground in identified Conservation Area View no.4. In this view, the sweep of the north side of Snow hill with a mix of masonry terraced buildings which proceeds the Holy Sepulchre Without Newgate Church. The proposed development would emphasise the curvature of Snow Hill and would preserve the view of the terrace and listed Church and the green fringes at ground level of the proposed building would integrate well with street planting without over dominating. The hierarchical proportions of base, middle and attic emphasised by the strong horizontal banding, akin to cornice lines, would be appropriate to the similar expression of cornice lines and proportions articulated particularly on no. 1,4 and 5 Snow Hill.

196. Overall, the proposal will not detract from the setting, or harm the significance, character or appearance of the Smithfield Conservation area.

Newgate Street Conservation Area

197. This Conservation Area is located to the south and east of the site and the proposed development would appear in its Setting. The crossroads of Newgate Street, Holborn Viaduct, Old Bailey and Giltspur Street generally define the boundaries and the 4 historic buildings sited on the corners of the junction, all of which are also listed; Central Criminal Court, the St Sepulchre Church, 126 Newgate Street and 15 Old Bailey dominate the character and appearance of the Conservation Area.

198. The character and appearance is summarised by the arrangement of the hierarchy of streets, buildings and spaces. The hierarchy in the street pattern here is generally echoed by the scale of the buildings; The historic north-south route and the civic formality of Holborn Viaduct,

added later in the middle of the 19th Century, create a landmark cross roads on which the Central Criminal Court and the Holy Church of Sepulchre are located. Counter-balancing this is the informality of Snow Hill and the tight enclosure of Green Arbour Court and Bishops Court lined with a denser grain of buildings. The Church yard and pocket park on the southwest quadrangle further heighten the importance of the St Sepulchre Church and the Central Criminal Court. This reveals the contrast between the historically density of the City which has given way to the more open relationship and more relaxed demand for space beyond.

199. The resulting effect is one which heightens the importance of the St Sepulchre Church and the Central Criminal Court enclosing the spaces. This reveals the contrast between the historically density of the City which has given way to the more open relationship and more relaxed demand for space beyond.

200. Appreciation of the spaciousness of Old Bailey and Holborn Viaduct, defined by the largest buildings, is emphasised by the contrasting scale of Newgate Street, Snow Hill and the western side of Giltspur Street with their smaller scale architecture.

201. The individual design of the major buildings shares an affinity of Classical architectural style and Portland stone. An essential cohesion is therefore evident in terms of scale, style and materials. There is considerable attention to the individuality of these major buildings and creating a varied flamboyance at roof level which takes advantage of the more expansive views afforded by their setting. The Central Criminal Court and St Sepulchre rise above this again to contribute to the wider City and London skyline.

202. To the North, the setting is defined by the Smithfield Conservation Area, to the East, Postman Park Conservation Area and to the South, St Paul's Conservation Area. St Paul's Conservation Area and the Smithfield Conservation Area townscapes are considered to be positive contributions to the setting of Newgate Street Conservation Area. The remaining surrounding streets such as Holborn Viaduct and Limeburner Lane comprise of modern buildings of significantly larger scale, different materiality and character which do not contribute to the significance of the Conservation Area.

203. The proposal would be most visible in the background of Views looking West towards Holborn Viaduct. The bullnose of the proposed development would be set some way back and would appear subservient to the Church of St. Sepulchre and would maintain the dominance of the Church's spires in the skyline. The classical proportions of the proposed development of base, middle and recessed attic storeys would provide a sympathetic background context for the classical architectural styles of buildings in the foreground along Newgate Street and Holborn viaduct. Looking East, along Holborn Viaduct towards Newgate Street, the south façade of the proposed development would be seen in oblique views. The distance away from the crossroads which lies at the heart of the Conservation Area would

mean that the corner stone building at Newgate Street would remain clearly visible. The proposed massing would be consistent with the contrasting scale of large commercial buildings visible in the foreground on Holborn Viaduct with the smaller scale of Newgate Street in the background. Overall, the proposed development would not harm of the setting, significance, character or appearance of the Conservation Area.

Non-designated Heritage Assets

1 Snow Hill

204. No 1 Snow Hill Court dates from 1859 and is tucked behind the Church of Sepulchre and stands within the churchyard with its own secluded garden. The white rendered gabled single storey building served as a parish school house/vestry and has historic and architectural values and its setting is defined by St Sepulchre's Church, its peaceful setting and the surrounding rear elevations of Cock Lane and Snow Hill and is considered characterful and a positive contribution to the Newgate Conservation Area. Due to the distance from the site, the proposed development would change the setting of the non-designated heritage assets and therefore the setting and significance of the listed building would not be harmed.

10 Snow Hill

205. No 10 Snow Hill occupies the junction of Snow Hill and Cock Lane and is a 1980s building with chamfered corner building line which follows the street patter, of classical proportions and detailing, deep window reveals in high quality materials and deeply recessed windows and is a positive contextual building. The setting is defined by the nodal point on which it occupies; the joining of Cock Lane, Snow Hill and Smithfield Street. On the north side, the red brick of the Smithfield market is echoed on the building and down Cock Lane but is heavily contrasted by the glass and metal façade and dramatic increase in scale of the rear façade of 60 Holborn Viaduct. 60 Holborn Viaduct is not considered to contribute to the setting. Whilst the proposed building would be of similar scale to 60 Holborn Viaduct, the new public route would terminate in front of 10 Snow hill and would provide a new view of the building where one could appreciate it within the context of the Smithfield Conservation Area. The proposed materials of glazed terracotta would be a positive nod to the tones of the red brick which is characterises the setting. The proposed development would not harm the values these non-designated heritage assets would contribute to its appreciation in the setting. There would be no harm to significance of the non-designated heritage asset.

Engine House and the Red House, West Smithfield

206. The Engine House is a near contemporary of Horace Jones' Poultry Market, 1873-75 and is considered an integral part of the Smithfield Complex and a strong contribution to the Smithfield Conservation Area. The building is considered a well-crafted and detailed piece of architecture belying its utilitarian origins; its use as a public convenience serving the markets, it also once bore an 80ft chimney serving the boilers powering the refrigerator engines in the Poultry Market. The washed red clay brickwork, of the finest quality, with Portland Stone dressings in the tradition of the market buildings, and with rusticated pilasters and stone chimneys with have a patina of age evocative of the wear-and-tear of the historic market and function.

207. The Red House was originally the London Central Market Cold Store and was built in 1899 on leftover land abutting the open railway line over a former ramp to the basements of the Poultry Market and like the Engine House is also considered an integral part of the Smithfield Market complex. The architects Reeves and Styche adopted Horace Jones's common Renaissance style in red brick and Portland Stone, 'completing' his vast market ensemble. The building comprises two distinct parts; The first is the northern block, 'flat iron' in plan, with a tall range comprising of blind arcading with segmental arches. The second part is a lower, single-storey range to Smithfield Street and short return to Snow Hill. The return onto Snow Hill is also largely blind, with monumental blind arcading including faux door architraves and parapet, fenestration, and carved relief panels, reflecting the sculpture of the Fish Market. The 'blind' nature of the cold store and its' part of a family of associated uses integral to the operation of the historic market is illustrative of its historic uses.

208. The setting of the Red House and the Engine house is defined by the complex of market buildings and associated uses and functions. The buildings have a group value, and their significance can be appreciated in views which encompass the two buildings and the markets. The buildings occupy island sites but are joined to the larger market buildings to the west by a canopy and subterranean structures which make it part of a rare and unique example of a Victorian industrial landscape in the capital, and of their civic architectural, engineering, and urban planning prowess on an epic scale. The line of modern buildings to the east are considered to offer a neutral contribution to the setting of these non-designated heritage assets.

209. Planning and Transportation Committee has resolved to grant for alterations and change of use of these buildings as part of the new Museum of London proposals. However, the proposed changes would preserve the character and appearance of the setting of these non-designated heritage assets and there would be no harm to their significance.

210. The north facing elevation of the proposed development would be visible on the east side of the background setting in views looking South on Smithfield Street. The traditional proportions of the proposed building, divided horizontally by strong cornice-like banding, would provide a contextual response to the proportions of the Engine House and the Red House. The large scale of the massing of the proposed building, although much larger than the engine house, and the colour of the terracotta proposed would provide a harmonious final layer of townscape where the Red House, Engine House and proposed development form a regular stepping up in massing in this view. The direct physical connection and line of sight from Smithfield Street into the proposed Public route would also connect the proposed development with the setting and, equally, the view from the public route looking north to Smithfield street would enhance the ability to appreciate the non-designated heritage assets in the setting of the Smithfield Market complex.

Heritage Conclusion

211. The proposals have been assessed against Local Plan Policies CS 12, DM 12.1, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208.

212. There would be no harm to the setting of Smithfield Conservation Area and Newgate Street and their character and appearance would be preserved.

213. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance and setting of : No 5 Snow Hill (Grade (2), 4 Snow Hill (Grade 2), Church of St Sepulchre with Newgate (Grade 1), Old Bailey Central Criminal Court (Grade II*), Holborn Viaduct Bridge (grade II), 1-8 Holborn Viaduct, 15 Old Bailey (Grade 2); Smithfield Market (Poultry Market) (Grade 2); and The Viaduct Tavern (126 Newgate Street) (Grade 2).

214. It is considered there would be no harm to the significance of identified non-designated heritage assets 1 Snow Hill, 10 Snow Hill, the Engine House and the Red House, West Smithfield.

215. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1, draft City Plan 2036 policies S11 and, HE1 Publication London Plan Policy HC1.

Archaeology

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

217. The site is in an area of archaeological potential situated to the west of the Roman and medieval walled City, to the north of a major Roman road, within the Roman Western Cemetery and on the eastern edge of the Fleet River valley. There is potential for Roman remains including burials, features associated with or adjacent to the Roman road, and 19th century remains. An Historic Environment Assessment, incorporating an archaeological evaluation report, has been submitted with the application.

218. The archaeological reports set out the archaeological potential and impact of the existing building. There would be no remains surviving where the rail tunnel crosses the west part of the site or on the southern edge adjacent to Holborn Viaduct. The results of the archaeological evaluation have shown that the archaeological potential is limited and only cut features such as pits and wells are likely to survive below the existing basement. There is also potential for Roman burials to survive.

219. The proposed building would have a new lower ground and two basement floors at a deeper level than the existing building which would remove any surviving archaeological remains on the site.

220. The proposed scheme is acceptable subject to the recommended conditions to cover a programme of archaeological work and foundation design to record archaeological remains affected by the development.

Access and Inclusive Design

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

222. The development would provide step-free access and consideration has also been given to the circulation and access within the building as detailed within the Inclusive Design and Access Statement summary.

223. At ground floor level there are level changes form Snow Hill to Holborn Viaduct. Steps are provided centrally through the new publicly accessible route through with tactile paving and hand rails. The handrails comprise a double-sided handrail with a flight on both sides; this allows for left or right-handed use when ascending or descending and platform lifts have been incorporated within the public route through to ensure there is step free access and the route is fully accessible and inclusive.

224. 25 out of 536 cycle parking spaces are provided as wide bays measuring 1m x 2m. One blue badge space is proposed within the loading bay entrance off Snow Hill. The management of this space will be secured via S106 obligation.

225. The entrance to the building including to the Community and Cultural Use, the rooftop terrace, student accommodation and cycling facilities would all provide step free access as well as all vertical and horizontal circulation within the building to the rooms and amenity facilities.

226. A total of 10% of the bedrooms will be accessible, with 5% wheelchair accessible and 5% adaptable units located on each floor. Two of the accessible bedrooms would be designed to accommodate a ceiling hoist to assist in transfer to the bed and bathroom. These two rooms also offer direct connection to a bedroom for a support worker or companion. The accessible bedrooms would be spread across all student bedroom floors and are on different sides of the building, offering a choice of views and locations, at different distances from the lifts etc.

227. The Access Officer welcomes the inclusive access to and within the building which would meet the requirements of Local Plan policy DM10.8 and London Plan policy D5. S106 obligations/conditions are recommended to ensure the facilities meet the requirements for the student accommodation and community uses ensure full accessibility and provision.

Transportation and Highways

Cycling

228. The London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements published in the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.

	Long Stay required	Short Stay required
Student Accommodation	492	17
Cultural	2	10
Total spaces	494	28

229. The London Plan requirements are shown in the table above. The applicant is proposing 494 long stay cycle parking spaces 28 short stay cycle parking spaces, which meets the London Plan standards.

230. The long stay cycle parking would be accessed from Snow Hill. The short stay cycle parking is provided in various locations around the public realm including within the publicly accessible pedestrian route. All short stay cycle parking is on private land.

231. 5% of the cycle parking spaces are accessible for adapted cycles and this arrangement would be secured by planning condition (in line the London Plan Policy T5 (Cycling) with the London Cycling Design Standards 8.2.1, and the draft City Plan 2036 6.3.24). The aisle widths between the stacked bicycles are less than the prescribed 3.5m in the LCDS due to structural constraints however accessible cycle parking is provided, so this is considered acceptable.

232. The proposals include a shower and lockers for the cultural/community use, which complement the cycle parking provision. The student rooms have individual showers in the rooms therefore no additional showers are deemed necessary. The London Plan Policy 10.5.7 recommends a minimum of 2 lockers per 3 long-stay spaces, and at least 1 shower per 10 long-stay spaces. Therefore, the proposals exceed the London Plan recommendations.

233. The applicant would be responsible for promoting the use of the cycle parking spaces and as such would be required by Section 106 obligation to produce a Cycling Promotion Plan, which is a cycling focused Travel Plan. It would be submitted to the City for approval in line with the London Plan Policy T4 (Assessing and mitigating transport impacts).

Vehicular access

234. London Plan Policy T6 (Car parking), Local Plan 2015 Policy DM16.5 and the draft City Plan 2036 Policy VT3 require developments in the City to be car-free except for designated Blue Badge spaces. A single disabled parking space in the lower ground. The blue badge parking space would be accessed from Snow Hill and would be located within the service yard.

Servicing and deliveries

235. Policy DM16.5 of the Local Plan states developments should be designed to allow for on-site servicing. London Plan Policy T7 G and draft City Plan 2036 Policy VT2 – 1 requires development proposals to provide adequate space off-street for servicing and deliveries, with on-street loading bays only used where this is not possible.

236. The servicing of the building would take place off-street accessed off Snow Hill in a relocated servicing area. Vehicles would be able to enter and exit the servicing area in forward gear. The servicing area would accommodate vehicles up to 8m in length (up to 7.5t). There is clear head height of 4.6m which is enough for the proposed vehicles and refuse trucks.

237. The draft City Plan 2036 Policy VT2 requires major commercial development to provide for freight consolidation. London Plan Policy T1 (Strategic approach to transport) requires development ‘to minimise freight trips on the road network including through consolidation’. Proposal 38 in the City of London Transport Strategy is to ‘Reduce the number of freight vehicles in the Square Mile’. The City of London Transport Strategy defines freight consolidation as ‘routing deliveries to

a business, building or area via a warehouse where they are grouped together prior to final delivery.' The City of London Freight and Servicing SPD, point 63, requires suppliers to use consolidation centres in suitable locations within Greater London to minimise the number of trips required to service developments.

238. The applicant is proposing to use a consolidation strategy in order to reduce the number of deliveries to the development per day. The applicant is proposing a cap of 20 vehicles to the cultural/community space per week (on average 3 per day), and a cap on the number of deliveries to the student accommodation of 112 per week (on average 16 per day). Therefore, there would be around 19 deliveries to the development per day. Weekly caps would be secured in the Section 106 agreement.

239. In January 2020 committee resolved to grant permission for a hotel on this site. The previous scheme proposed a maximum of 16 deliveries per day, proposed servicing at off-peak times and proposed a consolidation strategy with other hotels in the group's ownership. Therefore, the current proposals represent an increase in a maximum of 2 additional servicing trips to the development per day. The increase of 2 deliveries per day is considered acceptable, since the deliveries will be at off peak times, the refuse trips can be done on site and there are caps for both use types.

240. The draft City Plan 2036 Policy VT2 requires delivery to and servicing of new developments to take place outside peak hours (0700-1000, 1200-1400, and 1600-1900 on weekdays) and requires justification where deliveries within peak hours are considered necessary. The applicant has agreed to no servicing at peak times 0700-1000, 1200-1400, and 1600-1900, in line with the City of London Transport Strategy. Due to the location of the servicing bay in close proximity to nearby residential properties, environmental health officers have recommended a restriction on servicing at night time between the hours of 2300 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays.

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

242. It is expected that there may be a number of fast food deliveries ordered by students on an ad hoc basis. As these are expected to be delivered by cycle or motorcycle, no management of this is proposed. Students would be advised to ask to delivery drivers to stop in an appropriate location for example at the cycle parking on Snow Hill, or the servicing yard, depending on time of day. This would be dealt within the Student Management Plan which would be secured by S106 agreement.

Student moving in and out days

243. Given the location of the site, and its excellent PTAL rating it is expected that a large number of students would arrive by public transport. However, it is acknowledged that some students may still require a car

to load and unload. The applicant has agreed to produce a Student Management Strategy (a draft was submitted as part of this application) which includes specific drop off times for students, and the requirement to drop off in line with on-street restrictions. This would be dealt within the Student Management Plan which would be secured by S106 agreement.

Public Transport

244. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. The site is located close to City Thameslink and Farringdon national rail stations, and St Pauls and Holborn underground stations. The site is close to several bus routes running close by on Farringdon Street and Holborn Viaduct.

Pedestrian Comfort

245. The applicant is proposing a new route through the site that would facilitate movement to the new Museum of London. The new route would be classed as permissive path and would be a minimum of 4.3m in width. Due to the level changes around the site, the route would only be step free through the provision of two platform lifts.

246. Transport for London's Pedestrian Comfort Guidance recommends a minimum Pedestrian Comfort Level (PCL) of B+, and the aim in the City of London Transport Strategy is that all pavements would have a minimum PCL of B+.

247. A PCL assessment has not been conducted for the site due to the provision of a new route, and the significant reduction in trips to the development. It is predicted that the total number of trips to the development would be 1011. It is predicted that the total number of trips to the development in the AM peak would be 68, which is a decrease of 184. It is predicted that the total number of trips to the development in the PM peak would be 79, which is a decrease of 136.

248. It is noted that the net change does not include the cultural and community use trip generation, however this is expected to be significantly below the net reduction in trips when compared to the consented scheme. Overall, the proposed development scheme results in a betterment over the current consented scheme, reducing the predicted trips to the development per day by approximately 1556 trips.

249. The submitted transport assessment indicates that the overall increase in trips across all modes would have a positive impact on the surrounding highway and public transport network capacities.

Public Realm, Security and Hostile Vehicle Mitigation (HVM)

250. A Local Plan 2015 Policy DM3.2, the draft City Plan 2036 Strategic Policy S2 (Safe and Secure City), and Policy SA3 (Designing in Security) set out how appropriate security and safety provision must be incorporated into all development. Policy D11 (Safety, security and resilience to emergency) of the London Plan states development

proposals should include measures to design out crime that, in proportion to the risk, deter terrorism, assist in the detection of terrorist activity and help mitigate its effects.

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

252. The majority of the HVM would be within the façade of the building. HVM would be located on private land to protect the new pedestrian route through the site.

Section 278 Agreement

253. A Section 278 agreement has been secured. The Section 278 agreement would comprise the provision of a new pedestrian crossing on Snow Hill, kerbside traffic order changes on the south side of Snow Hill, a dropped kerb to the new cycling and servicing entrances, and removal of the crossover for the existing servicing bay. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision. This would be secured through the Section 106 agreement.

254. No stopping up of the highway is proposed.

Transportation Conclusion

255. The proposal would accord with the relevant transportation related policies including London Plan policies T5 cycle parking, T6 car parking, T7 deliveries, servicing and construction, and D11 Safety, security and resilience to emergency. It accords with the Local Plan 2015 Policies DM3.2 and DM16.5, and the draft City Plan 2036 Policies AT1 – 5, SA3, VT2, and VT3. The proposal would promote active travel through the excellent provision of the cycle parking and would deliver significant public realm improvements particularly through the introduction of a new north/south route which would facilitate movement to the new Museum of London.

256. The proposal, subject to conditions and S106 is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

The impact of the proposal in terms of environmental sustainability

Circular Economy

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

258. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions according to the GLA Circular Economy Guidance.

259. The existing building was demolished in 2020. The basement box was retained and 95% of previous building materials were recycled.

260. The applicants commit to achieving a low impact building with particular emphasis on material efficiency, durability and low embodied carbon impact materials. The existing single storey basement would be utilised to minimise new piling and for crushed concrete material for the new basement construction. Low maintenance materials are proposed for the facades such as ceramic, recycled glass, aluminium with high recycled content and composite timber and aluminium windows. Building elements such as bathroom pods and plant would be designed for offsite construction. To eliminate waste, measures specific to student accommodation include hard-wearing floor finishes and protection rails and kick plates. The building structure and facades would be designed for flexibility, adaptability and disassembly using mechanical and reversable fixings as well as zoned mechanical and electrical layouts.

261. Further details that address all aspects of circular economy would be confirmed after the detailed design phase. A Detailed Circular Economy Assessment and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm that high aspirations can be achieved have been requested by conditions. The detailed assessment will be required to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Energy and C02 emissions

262. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an overall 64% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

263. The proposed energy demand reduction strategy would reduce the building's operational carbon emissions by 6% compared to a Building Regulations compliant building. This does not meet the minimum of 15% required by London Plan policy for non-domestic development. The building's main energy demand is attributed to the generation of domestic hot water, and this reduces the potential energy savings through efficiency measures proportionally to a small contribution overall. Energy demand reduction from space and water heating is reflected in the subsequent Be Green stage of the GLA's energy hierarchy, and therefore improvements in fabric and energy efficiency measures have limited effects in this case. However, based on the current thermal modelling, the energy strategy limits heat loss to perform well below the international energy performance standard "Passivhaus".

264. Overheating is addressed by incorporating natural ventilation through openable windows in the apartments. However, active cooling would be needed in the non-domestic areas.

265. There is currently no available district heating network close enough to the site, however, the planned extension to Citigen by 2026 would reach the site. The opportunity to connect to this or another future district heating network would be incorporated into the proposed development.

266. Renewable energy technologies are proposed in form of a system of low temperature air source heat pumps, supported by water to water heat pumps for domestic hot water. In addition, a PV panel installation with an area of 116sqm active panels would be installed on the roofs on level 13. These technologies would contribute to carbon emissions savings of 58% compared to a Building Regulations compliant building.

267. Carbon emission savings from unregulated energy uses (e.g. from appliances/cooking) have been estimated using the BRE Domestic Energy Model and an assessment of how unregulated energy use can be reduced through energy efficient appliances and equipment, controls, good management practice etc. This could provide a 25.8% reduction in unregulated carbon emissions over the BRE baseline. Further reductions can be achieved through using energy efficient appliances and equipment in non-residential areas.

268. The site-wide energy strategy demonstrates overall compliance with the London Plan carbon emission reduction targets. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

BREEAM

269. A BREEAM New Construction 2018 pre-assessment has been prepared, targeting an "excellent" rating on the basis of a "full fit-out". The assumptions made as part of the preliminary pre-assessment indicate that the proposals can meet all the mandatory level requirements for the targeted rating including a score of ≥70%. The pre-assessment indicates a score of 73.05% and aims to achieve a high number of credits in the CoL's priority categories of Energy, Water, Pollution and Materials.

270. A higher number of credits in the Energy category in order to target an "outstanding" rating are currently not considered to be achievable, due to the high domestic hot water demand of the development and despite utilising the most efficient technologies to provide hot water and passive measures to optimise the efficiency of the development.

271. Further credits are intended to be targeted in the detailed design and fit-out phases of the development, and in particular, further credits can typically be achieved in the Materials category.

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

Whole Life-Cycle carbon emissions

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

274. The previously existing building on site was demolished in 2020, with the exception of a single storey basement, the walls of which would be re-used. The submitted Whole Life-Cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out below.

Embodied carbon emissions

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	620	1000	GLA Standard
		600	GLA Aspirational
		600	LETI 2020 Design
		350	LETI 2030 Design
A–C (excluding B6-B7)	1145	1500	GLA Standard
		1400	RIBA Business as Usual

		1180	RIBA 2021 Good
		970	RIBA 2025
		900	GLA Aspirational
		750	RIBA 2030
A-C (including B6-B7)	2158		

275. The table demonstrates that the product and construction stage A1-A5 (materials, transport , manufacture, construction) of the development Would result in carbon emissions per sqm. in line with the GLA Aspirational standard. The product, construction and use stages B1-B5 and end of life stage C (excluding operational energy and water use B6 and B7) Would result in carbon emissions per sqm. that reach a level between the GLA's Standard and Aspirational benchmark. There are currently no benchmarks for life-cycle stages A-C including operational energy and water use.

276. These figures would result in overall 44,174 kgCO2 being emitted over a 60-year period. The operational energy makes up 44% of the overall emissions (28% for regulated energy use, 16% for unregulated energy use).

277. Over the proposed building's whole life-cycle, the embodied carbon emissions calculations at planning stage demonstrate a reduced amount of carbon emissions compared to the Greater London Authority's standard benchmark emissions target. It is anticipated that during the detailed design stage further improvements can be achieved, in particular in the product stages A1 – A3 of the building's life-cycle by careful choice of materials and structural optimisation. A detailed Whole Life-Cycle carbon assessment incorporating improvements that can be achieved through the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Urban Greening and Biodiversity

278. Local Plan Policy DM19.2 promotes Urban Greening and Biodiversity, DM 10.2 (Design of green roofs and walls) and 10.3 (Roof gardens and terraces) encourages high quality roof gardens and terraces and emerging Policy OS2 (City Greening) encourage the inclusion of green roofs, gardens and walls.

279. The new development offers opportunities for urban greening and biodiversity on the roof at level 13, as well as including landscaping in the lightwell and at street level. The roof garden would consist of a mixture of green and biosolar roof areas, wildflower meadows, planters and a water feature, providing a diversity of planting.

280. The strategy for the new planting is to provide ecological benefits for local flora and fauna, and in particular target species that are listed in the City of London Biodiversity Action Plan 2016-2020:

- Promote local ecology through the use of native seed and fruit bearing species
- Attract pollinators such as bees and butterflies through the use of flowering, nectar rich species
- Combine natural and ornamental species to enrich the planting mix and promote local biodiversity
- Create new habitats to attract local fauna such as bug hotels, bee bricks and swift boxes and
- Interconnect existing and proposed habitats of the site and its surroundings where possible.

281. At ground level, the Snow Hill edges of the site and the edges of the public route through the site would be softened by vertical climbing planting and pocket planting of natural shady woodland. In addition, the roof of the single storey structure within the lightwell would be landscaped with small tree species arranged to form a multi-layered, robust and shade tolerant landscape.

282. The biodiverse features would provide a green and attractive setting as there are many hard roof surfaces on the existing and surrounding buildings and would result in a net gain in biodiversity to the site.

283. An Urban Greening Factor (UGF) calculation based on the London Plan has been submitted with the application. The UGF for this application has been calculated as 0.37 based on the information provided which does not meet the 0.4 minimum target score recommended in the Mayor of London's London Plan. If the City Plan's scoring metric was used, it would score 0.41 so exceeding by 0.1 of the minimum target score. A condition is recommended to explore the opportunity to increase the urban greening on and around the site during detailed design stage on site to aim to meet a target of 0.4 (in line with the London Plan) and if this is not achievable provide a justification as to why it cannot be met. Details of the quality and maintenance of the proposed urban greening are required by condition.

Climate Change Resilience

Water resources

284. The internal water consumption of the proposed development will be significantly reduced through the use of water efficient fixtures and fittings as well as a leak detection system.

285. The incorporation of a rainwater and greywater collection system for irrigation of landscaping and flushing of back of house toilets

respectively has been confirmed, to suit restricted basement space for collection tanks. Further details are requested by condition.

Flooding

286. The development would incorporate a below ground drainage strategy with geo-cellular storage to control and retain excess surface water run-off until it can infiltrate into the ground naturally, and a green and a blue roof to reduce the volume of runoff and attenuate peak flows. The proposed rainwater harvesting would reduce the likelihood of local flooding.

Heat Stress

287. The sustainability statement outlines measures to prevent overheating by including natural ventilation openings for the domestic units. The passive design provides an appropriate balance between minimising summer heat gain, maximising winter gain and maximising natural daylight. For the non-domestic units active cooling is proposed. These measures will reduce the need for carbon intensive air conditioning for the majority of the development and will help to make the building resilient to higher temperatures and urban heat island effects.

Natural Capital and Pest & Diseases

288. The proposed development will incorporate urban greening and enhance ecological value of the site that would improve significantly on the existing quantity and quality of urban greening in the area, both as public realm enhancement and biodiversity gain overall. This will help to enhance biodiversity providing green routes and small habitats. The details of the landscape planting will be important in ensuring that the plants and habitats created are resilient to hotter dryer summers, warmer wetter winter, more extreme weather events and pests and diseases.

289. Overall, this development includes a range of measures which will improve its resilience to climate change. Details of these measures will determine how effectively the building performs in coming decades, and conditions are attached to seek more detailed modelling and planting plans against the UK Climate Projections UKCP18 to 2080.

Sustainability Conclusion

290. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing.

291. The proposed development, by way of its central location within London, its opportunities for providing a positive and healthy living environment, and its environmental credentials, would positively contribute to the economic, social and environmental sustainability of the City of London. The proposed sustainability strategy meets, and in some aspects, exceeds current London Plan policies as well as Local Plan policies, and it targets an "excellent" BREEAM assessment rating.

292. The proposals indicate that Whole Life-Cycle Carbon emissions can be significantly reduced, improving on the GLA's standard benchmark. Circular Economy principles can be positively applied to achieve a long term, robust, low carbon, flexible and adaptable development. The building design responds well to climate change resilience by reducing solar gain, incorporating natural ventilation, water saving measures and various opportunities for urban greening and biodiversity, while passive energy saving measures and low energy technologies would be employed to significantly reduce operational carbon emissions beyond London Plan requirements.

Air Quality

293. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2036 states that London Plan carbon emissions and air quality requirements should be met on sites and policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.

294. The application includes an Air Quality Assessment which includes the likely impact of the proposed development on air quality as a result of the construction and operational phases of the development.

295. During demolition and construction dust emissions would increase and would require control through the implementation of good practice mitigation measures contained in the Construction Environmental Management Plans with the inclusion of an Air Quality Dust Management Plan (AQDMP) to be submitted and approved under conditions attached to the planning permission.

296. The development would be car-free and the assessment states that the transport emissions associated with the servicing vehicles would have negligible impact. The assessment concludes that the development would have no significant impacts on local air quality.

297. The suitability of site for the proposed use as student accommodation has been assessed using detailed dispersion modelling. The results of the detailed dispersion modelling show there are not expected to be any

exceedances of the relevant air quality objectives for NO2, PM10 or PM2.5. There are however expected to be exceedances of the WHO guidelines for PM10 and PM2.5 therefore mitigation in the form of F7 filtration is recommended for all air intakes for student bedrooms and an informative has been recommended.

298. The Proposed Development is considered to meet air quality neutral benchmarks with regard to building and transport emissions.

299. The City's Air Quality Officer has no objections and recommends that a condition is applied requiring the submission and approval of an Air Quality Report to 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 the submitted Air Quality Assessment.

300. Subject to the compliance with conditions, the proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2036, policy SI1 of the London Plan which all seek to improve air quality.

Flood Risk and Sustainable Urban Drainage

301. Local Plan 2015 policy CS18 seeks to "reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network". The use of Sustainable Drainage Systems (SuDS) is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2036.

302. The submitted Flood Risk Assessment identifies the site as lying in Flood Zone 1 (an area of very low flood risk) as such it is at a low risk of fluvial and tidal flooding.

303. The proposed drainage strategy includes capturing some runoff from the proposed building using a green roof and blue roof to limit the overall volume of water run-off that needs to be discharged and an attenuation tank below ground level.

304. The proposed surface water strategy for the development is to restrict discharge to 5.0l/s. The reduction in surface water discharge rate creates the requirement for around 110m3 of attenuation. It is proposed that surface water attenuation will be provided in the form of blue/ green roofs at high level. The remaining attenuation is proposed in the form of a below ground attenuation tank which is to be located beneath the basement of the building. It is proposed that surface water from some of the roof areas will drain via gravity at a rate of 2.0l/s to the north of the site into the existing Thames Water sewer in Snow Hill which has some limited capacity. The remainder of the site will be controlled via pumped discharge at 3.0l/s.

305. Thames Water are currently working with the applicants to identify and deliver the off-site water infrastructure needs to serve the development. Thames Water have identified that some capacity exists within the water network to serve 478 student rooms but beyond that, upgrades to the

water network would be required. A condition is recommended that there shall be no occupation beyond the 478th dwelling until confirmation has been provided that either:- all water network upgrades required to accommodate the additional flows to serve the development have been completed; or- a development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.

306. The SuDS strategy has been developed to cope with potential changes in the climate.

307. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, S15, CR2 and CR3 of the draft City Plan 2036 and policies SI12 of the London Plan.

308. The Lead Local Flood Authority and Thames Water have been consulted and recommended conditions to be attached.

Environmental Impact of Proposals on Surrounding Area

309. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2036 Strategic Policy S8 and Policy DE2 requires developments to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

Daylight and Sunlight and Overshadowing

Assessment Context

310. Officers consider that the applicant has completed a comprehensive daylight and sunlight assessment of the potential impact to surrounding residential buildings, open spaces and non-domestic buildings having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (second edition, 2011).

311. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context whilst avoiding overheating, minimising overshadowing, and maximising the usability of outdoor amenity space.

312. The approach indicated by planning policy is that buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings. Local Plan policy DM10.7 states that development which would noticeably reduce the daylight and sunlight to nearby dwellings and open spaces to unacceptable levels, taking into account BRE guidelines, should be resisted. Local Plan Policy DM21.3 seeks to protect the residential environment including daylight and sunlight. The draft City Plan requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate and provides acceptable living standards taking account of its context.

313. Paragraph 3.10.41 of the Local Plan and Policy HS3 of Draft City Plan 2036 states when considering proposed changes to existing lighting levels, the City Corporation will take into account the cumulative effect of development proposals.

314. The BRE guidelines set out the following methodologies for assessing the impact of development on the daylight to existing dwellings:

- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.
- Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

  The BRE Guide recommends compliance with both the VSC and daylight distribution (NSL) guidelines.

315. In the BRE guidelines, sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

- Receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and
- Receives less than 0.8 times its former sunlight hours (as result of a proposed development) during either period; and
- Has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours?

316. To clarify, all three of the above criteria need to be met for there to be a noticeable reduction in the sunlight that can be received (at the centre of the window that has been assessed).

317. The BRE guidelines advises that if the available sunlight hours are both less than 25% ASPH annually and 5% APSH in winter and less than 0.8 times their former value, either over the whole year or just in the winter months (21 September to 21 March) then the occupants of the existing building would notice the loss of sunlight; if the overall/absolute annual loss of sunlight is greater than 4% of APSH, the room may appear colder and less pleasant.

318. Within the BRE Guidance, it states that the methods of assessment can be applied to non-domestic buildings where the occupants have a reasonable expectation to light. In this case it is Officers' view that the impact on nearby places of the worship should be assessed and that nearby hotels can be considered.

Assessment Approach

319. The applicant has provided the following two assessment scenarios for the application:

- The proposed scenario: existing vs. the proposed scheme; and
- The cumulative scenario: existing vs. the proposed scheme and the consented development at The former Snow Hill Police Station (app. ref. 20/00932/FULMAJ).

320. The existing scenario comprises the previous building on the site which was demolished under prior Notification for demolition in 2020 (app. ref. 19/00178/DPAR). This is considered an acceptable approach to determining the existing baseline and a better reflection of the established recent built-up nature of the site.

321. In undertaking assessments a judgement is made as to the level of impact on affected windows and rooms. Where there is a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages are drawn from approaches to environmental impact assessment and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide

whether any losses result in a reduction in amenity which is or is not acceptable.

322. It should be noted that where there are existing low levels of daylight in the baseline figures any change in the measured levels has been generally described in two ways to give a more complete picture. These are:

- Percentage change (10% reduced to 8% = 20% reduction); and
- Actual/Absolute change (10% reduced to 8% = 2% change).

Properties Assessed

323. The following properties and amenity areas have been included within the assessment:

- 10 Hosier Lane (residential);
- 35-37 Cock Lane (residential)
- 32 Cock Lane (residential);
- 8-9 Giltspur Street (residential);
- St Sepulchre's Church including adjoining open Space;
- 5 Snow Hill (consented hotel, app. ref. 20/00932/FULMAJ);
- 15 Old Bailey (consented hotel, app. ref. 18/00124/FULL); and
- Private external amenity spaces at 10 Hosier Lane and 32 Cock Lane.

Daylight Assessment

10 Hosier Lane

324. 10 Hosier Lane is a residential property located to the northeast of the development site. 34 windows serving 30 residential rooms on southern façade of building have been assessed for daylight. Separately, lightwell windows behind the main façade were assessed and would be BRE compliant.

325. The VSC assessment in the proposed scenario demonstrates that 33 of 34 windows would meet the BRE guidelines. One window (W1/F00) would experience a major adverse reduction (percentage change of 62.5%), and this window is located at ground floor beneath an existing building. This has a low existing VSC of 2.4% against a recommended target of 27%. The absolute VSC reduction to this window would be 1.5%, which is considered unlikely to be perceptible.

326. The VSC assessment in the cumulative scenario demonstrates that three windows would not meet BRE guidelines. One window (W1/F00), which is affected in the proposed scenario, would experience a major adverse impact (percentage change of 75%). In addition, a window (W2/F00) at ground floor level and (W1/F01) at first floor level would

experience moderate and minor adverse impacts respectively. The ground floor window is located beneath an existing overhang with low existing daylight levels and would experience an absolute reduction of 0.6%, which is unlikely to be perceptible. The first floor window (W1/F01) would fall marginally short of BRE guidelines (percentage reduction of 21%).

327. The daylight distribution / No Sky Line (NSL) assessment in the proposed scenario demonstrates that 29 of 30 rooms assessed would be BRE compliant. The non BRE compliant room would experience a major adverse impact (percentage reduction of 59.8%) and the room is located beneath an existing overhang.

328. The daylight distribution / NSL assessment in the cumulative scenario demonstrates that 28 of 30 rooms would be BRE compliant. Two rooms would experience major adverse impacts (percentage reductions of 76.7% and 42.6%). These rooms are served by windows (W1/F00 and W2/F00) at ground floor beneath an existing building overhang with low existing levels of daylight.

35-37 Cock Lane

329. 35-37 Cock Lane is a residential property immediately to the north of the development site. A total of 41 windows serving 23 residential rooms on southern façade of the building have been assessed for daylight.

330. The VSC assessment in the proposed scenario, demonstrates that 33 of 41 windows would comply with the BRE guidelines. For the eight windows (serving six rooms) that would not be BRE compliant, these would experience minor adverse impact percentage reductions between 20.3% - 27.6%. Three of the affected rooms would be served by another BRE compliant window.

331. For VSC assessment in the cumulative scenario, an additional window experiences a minor adverse reduction, therefore a total of nine of 41 windows would experience minor adverse impact reductions of between 20.3% - 28.3%.

332. The daylight distribution / NSL assessment in the proposed scenario demonstrates that 10 of 23 rooms (43%) would be BRE compliant. For the 13 rooms that would fall short of BRE guidelines, eight rooms would experience minor adverse impacts. Two rooms would experience moderate adverse impacts (percentage reductions of between 30.6% and 36.3%). Three rooms, located at first (F01/R2 and R4) and second floor (F02/R2), would experience major adverse impacts of between 42% and 45.9%. These rooms are served by windows that would experience negligible to minor adverse reductions in VSC and would retain a residual area of between 34.3% and 40.4% of the total room area from where the sky would be visible.

333. The daylight distribution (NSL) assessment in the cumulative scenario demonstrates 10 of the 23 rooms would be BRE compliant, the same rooms as affected in the proposed scenario, however one room would experience a major adverse impact, whereas it was minor in the proposed scenario.

32 Cock Lane

334. 32 Cock Lane is residential property to the northeast of the development site. A total of 28 windows serving 14 residential rooms on southern façade of building have been assessed for daylight and sunlight.

335. The VSC assessment in the proposed scenario demonstrates that all windows assessed would be BRE compliant.

336. The VSC assessment in the cumulative scenario demonstrates that six of the 28 windows assessed would experience noticeable reductions. Five of those windows would experience minor adverse reductions. The remaining window would experience a moderate adverse reduction, however, this relates to a room (R2/F04) served by two other windows (three in total), one of which is BRE compliant.

337. The NSL assessment in the proposed scenario demonstrates that all but one of 14 rooms would meet BRE criteria. The room which does not meet BRE does so marginally with a percentage reduction of 20.7%, with up to 20% not considered noticeable; it is located beneath an existing overhang and is a bedroom which is considered to be less important within BRE guidelines.

338. The NSL assessment in the cumulative scenario demonstrates that four of 14 rooms fall short of BRE guidelines; two of the rooms would experience minor adverse reductions, one room would experience a moderate adverse impact, and one room would experience a major adverse impact. Three of the four rooms are bedrooms, which are considered to be less important by BRE. For the living / kitchen room, this experiences a minor percentage reduction of 22.5% which would be minimally noticeable.

8-9 Giltspur Street

339. 8 – 9 Giltspur Street is a residential property located to the east of the development site. The assessment demonstrates that the site facing windows would be BRE compliant for daylight in both the proposed and cumulative scenarios.

St Sepulchre's Church

340. St Sepulchre's Church is located to the east of the Site and includes a residential unit. The residential unit, the main church hall and circulation

spaces have been included in the assessment, with 64 windows serving 16 rooms.

341. For VSC in the proposed scenario, 62 of 64 windows demonstrate BRE compliance. The two windows which are not compliant with BRE would experience minor adverse alterations between 20.4% - 21.8% against a target of more than 20% and the Church is served by multiple windows which comply with BRE.

342. For VSC in the cumulative scenario, the same two windows continue to experience minor adverse impacts (between 20.4% - 22.6%).

343. All windows to the residential unit are compliant with BRE for daylight in the proposed and cumulative scenarios.

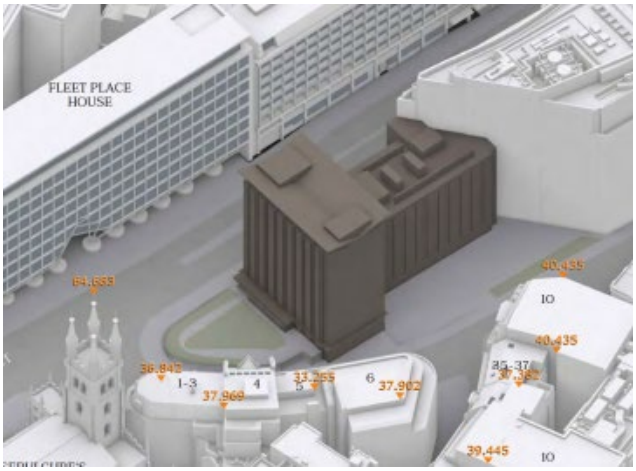
344. For NSL in the proposed scenario and cumulative scenarios, all 16 rooms meet the BRE criteria.

5 Snow Hill

345. Following the grant of permission for change of use and extension for hotel use, 27 windows serving eight rooms on the southern façade were considered relevant for assessment.

346. All 27 windows will fall short of BRE guidelines for VSC. For the NSL assessment one of the eight rooms would comply with BRE guidelines.

347. The reductions experienced are due to the proximity of the application site to the southern façade and the relatively underdeveloped portion of site containing the previous building. Please see image below demonstrating the open area of the previous building at the development site opposite 5 Snow Hill.



15 Old Bailey

348. The site received consent (app. ref. 18/00124/FULL) for change of use to a hotel in September 2018.

349. The VSC assessment for both the proposed and the cumulative scenarios demonstrates that all windows would be BRE compliant.

Daylight Conclusion

350. For 10 Hosier Lane, all but one window is BRE compliant in the proposed scenario. In both the proposed and cumulative scenarios, all moderate adverse and major adverse impacts relate to two ground floor windows beneath an existing building overhang which the BRE Guidelines identifies restricts light entering windows below them.

351. The daylight assessment for 35-37 Cock Lane demonstrates that the majority of windows would be BRE compliant and where there would be noticeable reductions in daylight to windows, these reductions would all be minor in nature in the proposed and cumulative scenarios. A total of 43% of the rooms assessed for daylight distribution would be BRE compliant; where there would be noticeable reductions in the areas of the rooms that have a view of the sky, this can be attributed to the development of the existing site, which is currently underdeveloped, which is particularly the case at its eastern end, which is opposite 35-37 Cock Lane. Furthermore, the retained levels of daylight in the rooms effected would be commensurate with what would be expected in an inner urban area and comparable to the existing levels of daylight distribution in the neighbouring properties at 10 Hosier Lane.

352. For 32 Cock Lane, all windows would be BRE compliant for VSC. One room would experience a minor adverse impact (for NSL) in the proposed scenario and this room is beneath an existing overhang which limits light entering the room beneath the overhang. In the cumulative scenario, additional impacts would be experienced due to the consented hotel which would be located directly opposite the property. Only one window would experience a moderate adverse impact (for VSC) and this room is served by three windows, one of which is BRE compliant. The windows which experience moderate and major impacts for daylight distribution (for NSL) relate to bedrooms, which are considered less important in BRE guidelines.

353. For St Sepulchre's Church, two windows would experience impacts considered to be minor adverse in the proposed and cumulative scenarios which are considered minimally noticeable. The Church is served by multiple windows therefore this impact is considered to be acceptable, and all rooms are BRE compliant when considering daylight distribution (NSL).

354. For the two consented hotels assessed, only 5 Snow Hill would experience reductions beyond BRE, however the reductions are in part due to the underdeveloped nature of the existing application site and hotel use is considered to be of a transitory nature, therefore the impacts are considered acceptable in this context.

355. Overall, the impacts to the surrounding properties for daylight are considered to be acceptable.

Sunlight Assessment

10 Hosier Lane

356. 34 windows serving 30 residential rooms on the southern façade of the building have been assessed for sunlight.

357. The sunlight assessment for the proposed scenario demonstrates that all but three windows assessed would meet the BRE guidelines due to the impact upon their winter sunlight levels, however all three windows would continue to receive between 25% - 57% annual sunlight (against a 25% target).

358. The sunlight assessment in the cumulative scenario demonstrates that nine of 34 windows assessed would not meet BRE guidelines, primarily due to impact upon their winter sunlight levels. Seven of the nine windows would continue to receive annual sunlight levels in excess of the target of 25%. Of the two windows which do not meet BRE guidelines, including the target for annual sunlight, one of the windows (W1/F01), located at first floor level, would retain 21% of annual probable sunlight (against a target of 25%). The remaining window (W1/F00) would experience a major adverse impact to annual sunlight. This window is located at ground floor level below an existing building overhang, which can restrict sunlight to any windows below and the window currently receives low levels of annual probable sunlight (8% APSH) and would experience an absolute reduction of 5% APSH, which is marginally above the 4% threshold set by the BRE guidelines.

35-37 Cock Lane

359. 39 windows serving 23 residential rooms on the southern façade of the building have been assessed for sunlight.

360. The sunlight assessment for the proposed scenario demonstrates that 16 out of the 39 windows assessed would meet BRE guidelines. Of the 23 remaining windows that would fall short of BRE guidance, 17 windows would retain annual sunlight levels of 25% (the target level) and above. The remaining six windows would retain between 19%-24% annual sunlight which can be considered reasonable for a city centre location, particularly at first floor level. Both the major adverse impacts to annual sunlight relate to one room at first floor level (F1/R01), which is served by two windows (W1/F01 and W2/F01) with an average retained annual level of sunlight of 21% APSH against the BRE annual target of 25%.

361. In the cumulative scenario, the same number of windows (23) would not meet BRE guidelines for sunlight with the major adverse impacts to annual sunlight to two windows serving one room, as in the proposed scenario, and these windows would continue to retain an average annual level of sunlight of 21% against the BRE target of 25%. 16 of the 23 windows that would not meet BRE guidelines would retain annual sunlight levels of 25% (the target level) and above, and for the seven

windows that would not meet BRE guidelines and the target for annual sunlight, these windows would retain between 19-24% annual sunlight against the BRE annual target of 25%.

32 Cock Lane

362. For the APSH assessment in the proposed scenario, all relevant windows are BRE compliant.

363. In the cumulative scenario, five windows would not meet BRE guidelines and the most significant losses would be primarily experienced as losses of winter sunlight, and all windows would retain annual sunlight of 40% and above (against a target of 25%).

8-9 Giltspur Street

364. The assessment demonstrates that the site facing windows would be BRE compliant for sunlight in both the proposed and cumulative scenarios.

St Sepulchre Church

365. For the APSH assessment in the proposed scenario and in the cumulative scenario, all 42 windows relevant for assessment demonstrate BRE compliance.

5 Snow Hill

366. Six out of 23 windows assessed would meet BRE guidelines. For the 17 windows that fall short of BRE, 10 windows would maintain annual daylight of 18% or more (against a target of 25%) and 10 windows would meet or exceed the target for winter sunlight.

Sunlight Conclusion

367. For the residential properties, the majority of windows assessed are BRE compliant for sunlight.

368. For 10 Hosier Lane, all but three windows are BRE compliant in the proposed scenario however these three windows retain annual sunlight of at least the target level set by BRE. In the cumulative scenario, nine windows would not meet BRE however eight windows would receive 21% annual sunlight and above (against a target of 25%) and the only major adverse impact to annual sunlight relates to a ground floor window beneath an existing building overhang which restricts available light.

369. For 35-37 Cock Lane, 23 of 39 windows would not meet BRE in the proposed and cumulative scenarios. The majority of the 23 windows would retain the target level for annual sunlight (25%) and above in the proposed and cumulative scenarios. The windows which would not meet BRE guidelines and the target for annual sunlight in the proposed scenario (six) and the cumulative scenario (seven), these windows would retain between 19-24% annual sunlight which can be considered

reasonable for a city centre location, particularly at first floor level. Therefore, the impacts are considered acceptable in the inner city context.

370. For 32 Cock Lane, all windows would meet BRE guidelines in the proposed scenario, and although five windows would not be BRE compliant in the cumulative scenario, these windows would retain 40% and above for annual sunlight (against a 25% target).

371. All windows in the proposed and cumulative scenarios are BRE compliant for 8-9 Giltspur Street and St Selpulchre's Church.

372. For the consented hotels, the only windows which do not meet BRE guidelines are located at 5 Snow Hill, however the impact is considered to be acceptable in this case due to the transitory nature of hotel occupancy.

373. Overall, it is considered that an acceptable level of sunlight would be retained by the surrounding properties that have been assessed and that all the impacts on sunlight are considered to be acceptable.

Overshadowing

374. The BRE guidelines suggest that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21st March. If as a result of the proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

375. The potential overshadowing impacts of the proposed development has been assessed for the open space at St Sepulchre's Church and the external private amenity spaces at 10 Hosier Lane and 32 Cock Lane.

Open Space at St Sepulchre's Church

376. The Church is surrounded by a designated open space, and the part directly facing the site has been assessed. The assessment demonstrates that the open space will be BRE compliant in the proposed and cumulative scenarios with no change to sunlight hours.

Private amenity spaces at 10 Hosier Lane and 32 Cock Lane

377. There are existing private amenity spaces located at 10 Hosier Lane and 32 Cock Lane at the upper levels. The assessment for overshadowing demonstrates that all amenity spaces assessed would maintain very similar levels of sunlight in the proposed and cumulative scenario with percentage losses of up to 1%.

Overshadowing Conclusion

378. The assessments demonstrate that existing levels of sunlight will largely be retained, which is considered acceptable.

Radiance Assessment

379. A Radiance Assessment has been submitted by the Applicant to complement the daylight analysis contained in the submitted daylight and sunlight assessment for the development.

380. A Radiance Assessment is a lighting simulation tool that measures the individual 'daylight factors' at a number of given points (usually based on a grid) within a room (or defined space). This method of assessment takes into account the total glazed area to a room, the transmittance quality of the glazing, the total area of the room's internal surfaces, including ceilings and floors, and their reflectance values (which may be actual or reasonably assumed). The radiance method of assessment also takes into account the quantum of light reflected off external surfaces, including the ground and nearby buildings.

381. Whilst there is currently no established guidance regarding what constitutes a 'noticeable' or 'significant' change in daylight when using the Radiance methodology, radiance-based assessments can draw upon the BRE's recommended Average Daylight Factor (ADF) target values, which recommend an ADF of 5% or more if no supplementary electric lighting is to be used within a room, or 2% or more if supplementary electric lighting is provided. The BRE guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens.

382. Radiance assessment results are presented as either floor plans / 3D room diagrams colour rendered to illustrate the individual daylight factors within a room, which range between 0% and 5%. The colour rendering can be supplemented by grey-scale images which represent a Human Visual Response (HVR) that correlates with a person's subjective impression of light within a room. In addition, the average value of the individual daylight factors within a room can be expressed as an ADF percentage for the room as a whole.

383. It should be noted that the Radiance Assessment undertaken is not meant to replace the submitted daylight and sunlight assessment, but to provide a further way to illustrate daylight changes within habitable rooms in the neighbouring residential properties.

384. The Radiance Assessment submitted for this development is based upon the 14 most noticeably affected habitable rooms in the proposed scenario within the surrounding residential properties, which are located within 10 Hosier Lane and 35-37 Cock Lane. Non-residential properties have not been included.

385. The majority of the habitable rooms assessed show minimal and immaterial changes in their individual daylight factors. This corroborates the daylight findings in the daylight and sunlight assessment that the loss of light is primarily due to the low absolute levels of daylight in the existing scenario, which can exacerbate any relative percentage loss.

386. The most noticeable change in daylight factors is illustrated in the images for a habitable room on the first floor of 35-37 Cock Lane (F01/R1), where the modest daylight ingress near the windows would be slightly reduced in the proposed scenario. This is reflected in the minor adverse reductions in daylight to the windows serving this room (windows W1/F01 and W2/F02) and the minor adverse reductions in daylight distribution within the room (26% reduction in NSL), in the proposed scenario.

387. It is however considered unlikely that the changes illustrated by the radiance assessment would lead to any different use of the habitable rooms tested, or any meaningful increase in then use of supplementary artificial lighting.

388. It can be concluded that the Radiance Assessment carried out, and the testing of the most affected neighbouring residential rooms, indicate that the changes in light at 10 Hosier Lane and 35-37 Cock Lane are unlikely to affect the use of the rooms, and would not require any significant additional use of electric lighting.

Previously consented scheme

389. The previously consented scheme (app. ref. 19/01038/FULMAJ) proposed a building height and massing similar to the current application. Overall, the impact of the previous proposal on the neighbouring residential properties was considered to be acceptable within the context of the BRE guidelines and the inner-city location.

390. The proposed scheme and the consented scheme demonstrate broadly similar impacts in terms of daylight and sunlight (without the cumulative scenario).

Daylight, Sunlight and Overshadowing Conclusion

391. Taking into account the BRE Guidance and the site's location within a dense urban environment, it is considered that the proposal would not result in an unacceptable impact on the existing properties and would not noticeably reduce the daylight and sunlight to nearby dwellings or open spaces to unacceptable levels.

392. As such, the impact on daylight and sunlight as a result of the proposed development is considered to be in accordance with Local Plan Policies DM10.7 and DM21.3, Policy DE8 of the draft City Plan 2036 and London Plan policy D6(d).

Wind

393. Computational Fluid testing has taken place to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site.

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

395. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance - if conditions become unsafe or unsuitable for the intended use as a result of the development. If wind conditions become windier but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.

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

397. The following scenarios were tested:

- Baseline: The site (as existing) with the existing surrounds.
- Proposed Site, Existing Surrounds: The completed and operational development with the existing surrounds.

Existing Baseline Scenario

398. There are no safety or distress exceedances anywhere within the site or surrounding area.

399. Winter conditions range between frequent sitting, occasional sitting and standing. Summer conditions range between frequent sitting and occasional sitting.

400. As conditions do not exceed standing anywhere within the study area, all building entrances are suitable for the intended use.

401. As conditions do not exceed standing anywhere within the study area, all bus stops are suitable for the intended use.

402. The existing ground level seating areas are all suitable for a mixture of frequent sitting and occasional sitting in the winter and for frequent sitting in the summer. This is suitable for the intended use.

403. There are no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling.

Proposed Scenario

404. With the proposed development in place, the wind conditions would not exceed standing anywhere within the study area, and so all building entrances would be suitable for the intended use.

405. With the proposed development in place, the wind conditions would not exceed standing anywhere within the study area, and so all bus stops will be suitable for the intended use.

406. With the proposed development in place, the existing ground level seating areas would all be suitable for a mixture of frequent sitting and occasional sitting in the winter and for frequent sitting in the summer. This is suitable for the intended use.

407. The covered walkway through the development would be suitable for a mixture of occasional sitting and frequent sitting in summer and winter. This would be suitable for the intended use.

408. The proposed seating on the steps at the northern end of the walkway would be suitable for frequent sitting in winter or summer. This would be suitable for the intended use.

409. There would be no safety exceedances on any roadways, and all change in conditions are gradual, so conditions are expected to be suitable for cycling.

410. The proposed roof terraces would be suitable for standing in winter with some small regions suitable for walking (it should be noted that these are mainly located within planted areas, so would not be accessible to users). The roof terrace would be suitable for a mixture of standing and occasional sitting in summer and would be suitable for the intended use. (The terrace areas have been tested without landscaping, and as such these represent worst-case conditions. It is reasonable to expect that the inclusion of planting will create pockets which are suitable for frequent sitting in their direct proximity).

Wind Microclimate Conclusion

411. In conclusion, with the proposed development in place, where wind conditions become windier at ground level and on the roof terrace they remain suitable for the intended uses in the proposed and so no additional mitigation above that proposed is required. The details of the proposed mitigation measures will be secured by condition and will be required to be maintained throughout the life of the building.

412. A Wind Audit would be secured in the S106 Agreement which would require, if requested by the City Corporation, a post-completion audit to assess and compare the results of the Wind Tunnel Test against the results of wind speed assessments carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects not identified in the submitted CFD Wind Assessment prepared by GIA (dated 20 August 2021), and if any

material adverse impacts are realised, mitigation measure would need to be explored and implemented.

Thermal Comfort

413. London Plan Policy D8 and D9 and Draft City Plan 2036 Policy S8 indicates that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Draft City Plan Strategic Policy S12 requires developers to take account of the potential microclimate and thermal comfort impacts from tall building development at an early stage in the design process. Draft City Plan Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.

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

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

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

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

416. Four configurations have been assessed including; the existing site with existing surrounding buildings, the proposed development with the existing surrounding buildings and the proposed development with consented cumulative surrounding buildings and proposed development with consented and unconsented cumulative surrounding buildings.

417. Sensitive receptors with a 400m radius of the existing Site and Proposed Development have been considered in the assessment. At ground level, all entrances have been considered and would require short-term thermal comfort conditions or better to be considered acceptable for their intended use.

418. Both the landscaping and the wind mitigation measures considered during the wind microclimate assessments have been included in the study.

419. The following scenarios were tested:

- Baseline: The site (as existing) with the existing surrounds.
- Proposed Site, Existing Surrounds: The completed and operational development with the existing surrounds.

Existing Baseline Conditions

420. Thermal conditions are suitable for all season use across the majority of the study area, with regions suitable for seasonal use along Farringdon Street to the west, and Old Bailey and Giltspur Street to the east. There is a small region of short-term suitability within the roadway of Farringdon Street.

421. All building entrances (which are required to be suitable for short term use) will be suitable for the intended use

422. As conditions are suitable for seasonal use (at worst) along all pavements, all bus stops (which are required to be suitable for short term use) will be suitable for the intended use.

423. The existing ground level seating areas are all suitable for all season use. This is suitable for the intended use. It is apparent that the least

favourable conditions occur during winter, when wind chill is the main driver of thermal discomfort.

Proposed Scenario Conditions

424. Thermal comfort conditions for the area around Farringdon Street to the west and Old Bailey and Giltspur Street to the east remain broadly the same as in the existing scenario. The short-term suitability within the roadway of Farringdon Street remains unchanged in the proposed scenario.
425. Some small regions which are suitable for seasonal use (rather than all-season use for the baseline) have been introduced in Snow Hill to the east of the development, and Holborn Viaduct to the south of the development. These regions are limited to the roadways, and as such people would not be expected to dwell in these spaces.
426. All building entrances (which are required to be suitable for short term use) would be suitable for the intended use.
427. All bus stops (which are required to be suitable for short term use) would be suitable for the intended use.
428. The existing ground level seating areas are all suitable for all season use, which would be appropriate conditions for the intended use.
429. The proposed seating on the steps at the northern end of the pedestrian route through would be suitable for all season use, which would be appropriate conditions for the intended use.
430. The proposed rooftop terrace would be suitable for all-season use, with some localised regions of seasonal use, which would be appropriate conditions for the intended use.

Thermal Comfort Conclusion

431. All ground level conditions are suitable for the intended use, and no adverse impacts due to thermal comfort are expected. This applies to all roadways, thoroughfares, building entrances (both existing and proposed), covered walkways and seating areas. Conditions for the roof terrace are suitable for their intended use and no adverse impacts due to thermal comfort are expected.

Noise and Disturbance

432. London Plan Policy D14 aims to avoid significant adverse noise impacts on health and quality of life, and Local Plan Policies DM3.5 and DM15.7, seeks to ensure that operational noise does not adversely affect neighbours. Policies S1 and HL3 of the Draft City Plan requires that

noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.

433. The impact of the proposed development in terms of noise associated with the operational stage would be negligible. The street level and external cultural and community as well as the roof terrace amenity uses are all appropriate and in keeping with the area. The proposed plant equipment is to be located internally at basement level or higher up the building.

434. The proposed publicly accessible rooftop terrace would be open free of charge to the public Monday – Sunday between the hours of 10am-6pm. Officers are satisfied that the proposed free public access hours of use of the rooftop terrace (which would be secured via the S106 agreement) would ensure the use would not give rise to detrimental noise and disturbance to surrounding dwellings. The rooftop management plan would also include the management and dispersal of visitors so as to minimise the noise and disturbance to nearby occupiers. Outside the free public access hours the ground floor cultural uses would expand to the roof terrace but the hours of such use would be controlled by condition. Conditions would also prohibit amplified music on the roof terrace.

435. The proposed student accommodation has the potential to increase pedestrian movements around the site at a range of times and therefore potential for noise and disturbance to neighbouring properties. The applicant has submitted a Student Management Plan with the application, the details of which would be secured by the S106 agreement. The on site management, restricting loitering outside the building would ensure any potential disturbance would be mitigated. Mitigation measures proposed can be summarised as follows:

- Building would be managed by on-site team.
- Management team would be on duty from 0900 – 1700 Monday-Sunday with 24 hour supervision provided by support staff
- Overnight security staff and retained resident student wardens and night wardens
- Visible on-duty staff at main entrance reception desk.
- Noise and disturbance generated by groups loitering outside the site would be enforced against under the terms of student residents' individual tenancy agreements.
- Move-In Strategy staggered over three weekends
- Where necessary, liaison with the City Police, Transport for London, The City Corporation highways management and local residents.
- Form an ongoing Community Liaison Group

436. In regard to noise from plant, an acoustic report has been submitted with the application. This indicates that plant could be operated without detrimentally impacting on neighbouring properties in respect of noise and disturbance. Conditions have been included with the recommendation.

437. The conditions and S106 agreement would ensure that the development should not detrimentally impact on residential amenity in respect of noise and disturbance.

438. Overall, the Proposed Development complies London Plan Policy D14 which aims to avoid significant adverse noise impacts on health and quality of life, and Local Plan Policies DM3.5 and DM15.7, which seeks to ensure that operational noise does not adversely affect neighbours. The Proposed Development also accords with Policies S1 and HL3 of the Draft City Plan which requires that noise does not adversely affect nearby land uses, supporting a healthy and inclusive City.

Fire Safety

439. Policy D12 of the London Plan seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.

440. The application is accompanied by a fire safety statement which demonstrates how the development would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel.

441. The Health and Safety Executive (HSE) were consulted and reviewed the submitted Fire Strategy. In their initial response HSE raised concerns that there would be the need for an additional firefighting lift to serve the west core of the building for safe travel distances in the event of a fire. The applicants have amended the scheme and included an additional firefighting lift within the west core of the building and both firefighting cores within the building will serve all levels above first floor. As a result of this additional firefighting lift, the maximum travel distance from the firefighting cores to reach an apartment door will be approximately 30m. HSE have confirmed that this acceptable.

442. HSE also commented on other matters relating to location of disabled refuges, the connection between the firefighting core and the loading bay, the location of the smoke shaft. The applicant has confirmed these issues will be resolved at detailed design stage and HSE are satisfied as these would be subject to approval under a separate regulatory procedure.

443. The proposed development would meet the requirements of Policy D12 of the London Plan.

Health Impact Assessment

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

445. The proposed development was satisfactorily assessed against 23 criteria relevant to the proposed development and the City of London.

446. The Assessment concludes that the development would have an overall positive impact on health. Positive impacts include:

- Provision of new jobs associated with the development
- Provision of a free publicly accessible roof garden
- Provision of a high-quality public realm route through which would improve connectivity and permeability, as well as enhancing the attractiveness of the physical environment;
- Inclusivity and accessibility as placemaking priority areas;
- A car free building minimising vehicle travelling to the site along with cycle parking to support active travel
- Building and landscape design also providing an enhanced environment for workers and site users as well as the wider public through an attractive public realm, greening measures and active travel measures; and

447. Potential negative impacts identified would need to be mitigated during the construction and operational phases, for example by:

- Implementation of a Delivery and Service Plan (DSP) to ensure sustainable modes and operation of freight;
- Implementation of a Construction Environmental Management Plan (CEMP) including dust, noise and vibration and hours of construction works;
- Implementation of a Construction Logistics Plan (CLP) to minimise the environmental and road traffic related impacts of the demolition and construction;
- Secure local employment and training initiatives via planning obligations
- An Air Quality and Management Plan to minimise the impact of dust at the construction phase; and
- The requirement for a Student Accommodation Management Plan to minimise noise at the operational stage.

448. Potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations.

Public Sector Equalities Duty

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

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

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

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

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

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

454. The Applicants have held a range of meetings with stakeholders and the following stakeholders are considered to be relevant in the context of the Equalities Act:

- Local Ward Members
- Nearby residents
- Holy Sepulchre Church
- Museum of London

455. As set out in the submitted Statement of Community Involvement (SCI), the consultation process included a targeted programme, which sought to understand the needs of the local community and identify opportunities for partnership and facilitation particularly in relation to part of the public benefits of the project.

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

457. In addition the proposed development has been assessed against policy GG1 of the New London Plan and would be considered to support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face.

Human Rights Act 1998

458. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR").

459. Insofar at the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) or right to enjoyment of property (Protocol 1, Article 1) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country, and proportionate.

460. In respect of the freedom of worship (Article 9 of the ECHR), as set out above, there would no infringement of the freedom to manifest religion or belief in worship, teaching, practice and observance.

CIL and Planning Obligations

461. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.

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

463. From 1st April 2019 Mayoral CIL 2 (MCIL2) supersedes the Mayor of London's CIL and associated section 106 planning obligations charging schedule. This change removes the Mayors planning obligations for Crossrail contributions. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

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

MCIL2

Liability in accordance with the Mayor of London's policies	Contribution (excl. indexation)	Forwarded to the Mayor	City's charge for administration and monitoring
MCIL2 payable	£1,787,920	£1,716,403	£71,517

City CIL and S106 Planning Obligations

Liability in accordance with the City of London's policies	Contribution (excl. indexation)	Available for allocation	Retained for administration and monitoring
City CIL	£1,676,175	£1,592,366	£83,809
City Planning Obligations			
Local, Training, Skills and Job Brokerage	£670,470	£663,765	£6,705
Carbon Reduction Shortfall (*as designed*) ***Not indexed***	£611,610	£611,610	£0
Section 278 (Evaluation and Design) ***Not indexed***	£50,000	£50,000	£0
S106 Monitoring Charge	£4,250	£0	£4,250
Total liability in accordance with the City of London's policies	**£3,012,505**	**£2,917,742**	**£94,763**

City's Planning Obligations

465. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning

terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Provision of 230 affordable rooms (35% of overall total)
- Plan showing the room size and occupancy level between the non-affordable and affordable rooms will be equivalent and a plan should be provided to show the designated affordable rooms within the development to ensure policy compliance.
- Higher Education Institution nominations agreement
- Student Accommodation Management Plan (to include detailed plans showing the kitchenette/cooking facilities layout to ensure sufficient space for food preparation)
- The commitment to secure the flexible temporary use of the site during vacation period for ancillary uses
- Highway Reparation and other Highways Obligations
- *(incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)*
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition & Construction & End Use*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (including Cycling Promotion Plan)
- Construction Monitoring Costs
- Carbon Offsetting
- Utility Connections
- Section 278 Agreement (*CoL*)
- Public Route (*Specification & Access*)
- Public Realm (*Specification & Management Plan*)
- Publicly accessible roof terrace (*Access & Management Plan*)
- Cultural Implementation Strategy / Cultural Plan
- Television Interference Survey
- 'Be Seen' GLA Energy Performance Monitoring

466. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement. The scope of the s278 agreement may include, but is not limited to, a new pedestrian crossing on Snow Hill, kerbside traffic order changes on the south side of Snow Hill, a dropped kerb to the new cycling and servicing entrances, and removal of the crossover for the

existing servicing bay. The Section 278 works would be in line with the 10 Healthy Streets indicators, the City of London Transport Strategy and City of London's Public Realm vision.

Monitoring and Administrative Costs

467. A 10 year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.

468. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

Site Specific Mitigation

469. The City will use CIL to mitigate the impact of development and provide the infrastructure necessary for the wider area. However, in some circumstances, it may be necessary additionally to seek site specific mitigation to ensure that a development is acceptable in planning terms. Other matters requiring mitigation are yet to be fully scoped.

Conclusion

470. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the development plan (i.e. the London Plan and 2015 Local Plan) and relevant policies and guidance, SPDs and SPGs, relevant advice including the NPPF, the draft Local Plan and considering all other material considerations.

471. The scheme delivers a high-quality development for student accommodation with a cultural use and a free publicly accessible roof garden within the City's Culture Mile. Whilst there would be a loss of office floorspace on the site, this is not existing office accommodation, and further, in terms of total permitted floorspace, it would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. The student accommodation and community spaces will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for 7 days per week, and contribute towards meeting Local Plan housing targets. This wider range of activity would contribute towards the City Corporation's ambitions for a City of Culture and Commerce and align with the City Corporation's ambitions for a post Covid City. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2036.

472. The provision of student accommodation in a highly accessible location is supported in strategic and local planning terms. The provision of purpose-built student accommodation in this mixed-use development will not prejudice the business function of the City, will not result in an excessive concentration of student housing, is not considered to have an adverse impact on residential amenity and will not involve the loss of permanent residential accommodation.

473. Whilst officers are concerned about the low level of light to some of the student bedrooms, in reviewing the amenity and breakout spaces and study areas would also have the option of various types of amenity, break out and study areas ranging from smaller hubs on levels 2-5 and a larger social amenity hub at lower ground and first floor level, along with the use of the publicly accessible roof terrace, on balance it is considered that the overall quality of the student accommodation is considered to be acceptable having regard to the specific requirements of LSE.

474. The purpose-built student accommodation would be considered and acceptable and would accord with London Plan Policy H15, Local Plan Policy DM21.7 and Draft City Plan Policy HS6.

475. The scheme delivers significant public realm enhancements including a new pedestrian route linking City Thameslink Station to the new Museum of London Snow Hill Entrance.

476. The Proposed Development comprises a 543 sqm of publicly accessible rooftop terrace, providing a new piece of elevated public realm for city's visitors, workers, residents and student occupants.

477. The design approach to the site would result in a development appropriate in scale, architectural form, innovative use of materials, and quality that would add a level of richness and visual interest to the local townscape. The accessible roof terrace would enhance the visitor experience and elevate public views of the rich heritage of the Townscape looking east. The public route would create a new engaging experience that would harness and contribute the emerging vibrancy of the Smithfield market area wider Culture Mile. The proposals comply Local Plan Policies CS10 and DM10.1, emerging City Plan Policy S8 and DE2, and London Plan D3 and paragraphs 130 and 132 of the NPPF.

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

479. The proposals have been assessed against Local Plan Policies CS 12, DM 12.1, draft City Plan 2036 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs 199-208. There would be no harm to the setting of Smithfield Conservation Area and Newgate Street

and their character and appearance would be preserved. It is considered that the proposal would preserve buildings, the settings and the special architectural and historic interest and heritage significance and contribution made by setting of : No 5 Snow Hill (Grade (2), 4 Snow Hill (Grade 2), Church of St Sepulchre with Newgate (Grade 1), Old Bailey Central Criminal Court (Grade II*), Holborn Viaduct Bridge (grade II), 1-8 Holborn Viaduct, 15 Old Bailey (Grade 2); Smithfield Market (Poultry Market) (Grade 2); and The Viaduct Tavern (126 Newgate Street) (Grade 2) It is considered there would be no harm to the significance of identified non-designated heritage assets 1 Snow Hill, 10 Snow Hill, the Engine House and the Red House, West Smithfield. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1, draft City Plan 2036 policies S11 and, HE1 Publication London Plan Policy HC1.

480. The building would be designed to high sustainability standards, incorporating a significant element of integrated urban greening, climate resilience, targeting BREEAM 'Outstanding' and adopting Circular Economy principles and Whole Life Carbon principles. Dedicated areas of planting and greening would be incorporated into the development through urban greening on the roof significantly increasing the biodiversity on site.

481. The scheme benefits from high levels of public transport accessibility, would be car-free and would promote cycling and walking as healthy modes of travel. The provision of both long stay and short stay cycle spaces would meet the requirements of the London Plan. Access for cyclists would be via two prominent cycle parking entrances at ground level off Snow Hill, with short stay cycle parking provided at ground floor within the site boundary.

482. The service area for both the cultural and community use and student accommodation is proposed at lower ground floor level. Delivery traffic and service vehicles would access the servicing yard via Snow Hill. There would be 19 deliveries per day, which would be consolidated and restrictions on timings of deliveries have been recommended during 0700 – 1000, 1200 – 1400, 1600 – 1900 and no night time servicing between the hours of 2300 on one day and 0700 on the following day to protect the amenity of nearby residential occupiers.

483. For the surrounding residential properties in respect of daylight, the majority of windows assessed are BRE compliant. For 10 Hosier Lane, all but one window is BRE compliant in the proposed scenario. The daylight assessment for 35-37 Cock Lane demonstrates that the majority of windows would be BRE compliant and where there would be noticeable reductions in daylight to windows, these reductions would all be minor in nature. Where there would be noticeable reductions, this can be attributed to the development of the existing site, which is currently underdeveloped, which is particularly the case at its eastern end, which is opposite 35-37 Cock Lane. For 32 Cock Lane, all windows would be BRE compliant for VSC. For St Selpulchre's Church, two windows would experience impacts considered to be minor adverse and would be

considered minimally noticeable. The Church is served by multiple windows which remain unaffected, and all rooms are BRE compliant when considering daylight distribution (NSL). 5 Snow Hill would experience reductions beyond BRE, however, a hotel use is considered to be of a transitory nature, therefore the impacts are considered acceptable in this context. Overall, the impacts to the surrounding properties for daylight are considered to be acceptable.

484. For the surrounding residential properties in respect of sunlight, the majority of windows assessed are BRE compliant. For 10 Hosier Lane, all but three windows are BRE compliant in the proposed scenario. For 35-37 Cock Lane, 23 of 39 windows would not meet BRE guidelines in the proposed scenario and majority of these windows would retain the target level for annual sunlight (25%) and above. The windows which would not meet BRE guidelines and the target for annual sunlight, would retain between 19-24% annual sunlight which can be considered reasonable for a city centre location, particularly at first floor level. All windows in the proposed scenario are BRE compliant for 32 Cock Lane, 8-9 Giltspur Street and St Selpulchre's Church.

485. The submitted sun on ground assessments demonstrate that existing levels of sunlight to nearby residential and public amenity spaces will largely be retained therefore impacts are considered acceptable.

486. Taking into account the BRE Guidance and the site's location within a dense urban environment, it is considered that the proposal would not result in an unacceptable impact on the existing properties and would not noticeably reduce the daylight and sunlight to nearby dwellings or open spaces to unacceptable levels. As such, the impact on daylight and sunlight as a result of the proposed development is considered to be in accordance with Local Plan Policies DM10.7 and DM21.3, Policy DE8 of the draft City Plan 2036 and London Plan policy D6(d).

487. There are no unacceptable adverse built development, construction or operational impacts anticipated for the proposed development and use, including cumulative impacts, and the recommendation is subject to conditions to mitigate impacts to surrounding uses, including the requirement to provide deconstruction and construction logistics plans, a scheme of protective works, a student accommodation management plan, a rooftop terrace management plan and relevant environmental health conditions including relating to noise. Therefore it is considered the proposed development complies with Local Plan Policies CS1, DM1.1, DM1.5, DM15.7, DM21.1, DM 21.7, and draft City Plan Policies HL3, S24, and SB1 regarding impact on amenity.

488. Therefore overall, it is considered that the proposed student accommodation use would not prejudice the primary business function of the City; would contribute to the balance and mix of uses in the immediate locality; and would not result in unacceptable adverse impacts on the amenity of neighbouring properties.

489. The proposals are considered to be in accordance with the development plan.

490. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

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

Background Papers:

Submission documents

- Planning Application Form and Ownership Certificate, prepared by DP9 Ltd;
- CIL Additional Information Form, prepared by DP9 Ltd;
- Existing & Proposed Drawings (see Drawing Register), prepared by Stiff + Trevillion;
- Design and Access Statement, including inclusive design, security strategy and landscape section, prepared by Stiff + Trevillion and JCLA;
- Air Quality Assessment, prepared by Hoare Lea;
- Statement of Community Involvement, prepared by Kanda;
- Daylight and Sunlight Assessment, prepared by GIA;
- Daylight & Sunlight Internal Daylight and Sunlight Report, Prepared by GIA, dated January 2022,
- Radiance Assessment, prepared by GIA;
- Energy Assessment Report, prepared by Meinhardt;
- Sustainability Statement, prepared by Hodkinson;
- Circular Economy Statement, prepared by Hodkinson;
- Whole Life Carbon Assessment, prepared by Hodkinson, dated 7 December 2021 (v.3)
- Ecological Report prepared by Tyler Grange;

- Fire Statement, prepared by Jensen Hughes, dated January 2022
- Updated Holborn Viaduct Fire Statement Form, prepared by Jensen Hughes dated 19 January 2022
- Noise Assessment, prepared by 24 Acoustics;
- Townscape, Visual Impact and Heritage Assessment, prepared by Peter Stewart Consultancy;
- Archaeological Desk Based Assessment, prepared by MOLA;
- Transport Assessment, prepared by Pell Frischmann;
- Framework Travel Plan, prepared by Pell Frischmann;
- Delivery and Servicing Plan, prepared by Pell Frischmann;
- Draft Construction Logistics Plan, prepared by McGee;
- Wind Microclimate Assessment Report, prepared by GIA;
- Thermal Comfort Assessment, prepared by GIA;
- Flood Risk Assessment, prepared by Meinhardt;
- Below Ground Drainage Strategy, prepared by Meinhardt;
- Cultural and Community Strategy, prepared by Dominvs Group
- Cultural and Community Strategy Addendum, prepared by Dominvs Group
- Student Needs Assessment, prepared by JLL
- Student Accommodation Management Plan, prepared by Dominvs Group

Response to Comments

HSE

- Updated Holborn Viaduct Fire Statement Form, dated 1 October 2021
- Jensen Hughes Response to HSE, dated 22 October 2021
    - Holborn Viaduct Fire Statement Form Rev A, dated 22 October 2021
- Jensen Hughes Response to HSE, dated 11 January 2022
- Jensen Hughes Response to HSE, dated 14 January 2022
- Updated Holborn Viaduct Fire Statement Form, dated 19 January 2022
- Updated Fire Safety Statement, prepared by Jensen Hughes dated January 2022

The City

- Pell Frischmann Response to CoL Transport Comments Note, dated 7 October 2021
- Proudlock Associates Response to Access Comments Note, dated 4 November 2021
- DP9 Delivery of Office Development Note, dated 6 November 2021
- Cushman & Wakefield Office Market Report, dated November 2021
- GIA Updated Daylight, Sunlight & Overshadowing Report, dated 18 November 2021
- Cultural and Community Strategy Addendum, dated December 2021
- Healthy Urban Planning Checklist, prepared by Hodkinson, dated December 2021
- TP Bennett Amenity Provision Note, dated 9 December 2021
    - TP Bennett Amenity Areas Concept Design Overview, dated 8 December 2021
- DP9 Amended Design Cover Letter, dated 17 December
- Amended Daylight & Sunlight Internal Daylight and Sunlight Report, prepared by GIA, dated 17 December 2021
- Amended Landscape Plans and Urban Greening Factor Calculations, prepared by JCLA
    - Roof Level Plan (ref. HV158.07.RFP rev P02)
    - Roof Level Planting Plan (ref. HV158.08.RPP rev P02)
    - Roof Terrace Section (ref. HV158.09.RTS rev P02)
    - Urban Greening Factor A (ref. HV158.10.UGA rev P02)
        - Urban Greening Factor B (ref. HV158.11.UGB rev P02)
    - Urban Greening Factor Calculation, dated 3 December 2021 (rev P02)
- DP9 Internal Daylight Note, dated 14 January 2022
    - GIA Supplementary Daylight Note, dated 13 January 2022
- LSE Letter of Support, dated 20 January 2022
- Updated drawings as per drawing register dated 19 January 2022
- Updated are schedule dated 20 January 2022 (rev A17A).

- 61-65 Holborn Viaduct Internal Daylight Detailed Note, prepared by GIA, dated 21 January 2022

GLA

- Holborn Viaduct GLA Response Summary Table, dated 17 December 2021.
- Citicape House GLA Consultation Post Stage 1 – Energy Memo V2
- Be Seen Reporting Spreadsheet
- Holborn Viaduct Carbon Emission Reporting
- Holborn Viaduct GLA WLC Memo V3
- GLA WLC Assessment Template V3
- Whole Life Carbon Assessment, prepared by Hodkinson, dated 7 December 2021 (v.3)

Letter London School of Economics dated 20 January 2022

Consultee Comments:

Letter GLA Stage 1 dated 15 November 2021

Email GLA dated 19 January 2022

Letters Health and Safety Executive dated 29/11/2021, 11/01/2022 and 14/01/2022

APPENDIX B

London Plan Policies

Policy GG1 (Building strong and inclusive communities)
Policy GG2 (Making the best use of land)
Policy GG3 (Creating a healthy city)
Policy GG5 (Growing a good economy)
GG6 (Increasing efficiency and resilience)
Policy SD4 (The Central Activities Zone (CAZ))
Policy SD5 (Offices, other strategic functions and residential development in the CAZ)
Policy D3 (Optimising site capacity through the design-led approach)
Policy D4 (Delivering good design)
Policy D5 (Inclusive Design)
Policy D8 (Public Realm)
Policy D11 (Safety, security and resilience to emergency)
Policy D12 (Fire Safety)
Policy D14 (Noise)
Policy H15 (Purpose Built Student Accommodation)
Policy S1 (Developing London's social infrastructure)
Policy E11 (Skills and opportunities for all)
Policy HC1 (Heritage conservation and growth)
Policy HC3 (Strategic and Local Views)
Policy HC4 (London View Management Framework)
Policy HC5 (Supporting London's Culture and Creative Industries)
Policy G1 (Green infrastructure)
Policy G4 (Open space)
Policy G5 (Urban greening)
Policy G6 (Biodiversity and access to nature)
Policy SI1 (Improving air quality)
Policy SI2 (Minimising greenhouse gas emissions)
Policy SI3 (Energy infrastructure)
Policy SI4 (Managing heat risk)
Policy SI7 (Reducing waste and supporting the circular economy)
Policy SI13 (Sustainable drainage)
Policy SI12 (Flood risk management)
Policy SI13 (Sustainable drainage)
Policy T1 (Strategic approach to transport)
Policy T2 (Healthy streets)
Policy T3 (Transport capacity, connectivity and safeguarding)
Policy T4 (Assessing and mitigating transport impacts)
Policy T5 (Cycling)
Policy T6 (Car parking)
Policy T7 (Deliveries, servicing and construction)

London Plan Supplementary Planning Guidance

Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014);
Central Activities Zone SPG (GLA, March 2017);
Character and Context SPG (GLA, June 2014);

Circular Economy Statement Guidance (GLA, April 2020 – draft)
Control of Dust and Emissions during Construction and Demolition SPG (GLA, September
2014);
Culture and Night-Time Economy SPG (GLA, November 2017);
Energy Planning Guidance (GLA, April 2020);
London Environment Strategy (GLA, May 2018);
London View Management Framework SPG (GLA, March 2012);
Public London Charter (GLA, March 2020 – draft);
Sustainable Design and Construction SPG (GLA, April 2014).

Local Plan Supplementary Planning Guidance

Air Quality SPD (CoL, July 2017);
Archaeology and Development Guidance SPD (CoL, July 2017);
City Lighting Strategy (CoL, October 2018);
City Public Realm SPD (CoL, July 2016);
City Transport Strategy (November 2018 – draft);
City Waste Strategy 2013-2020 (CoL, January 2014);
Open Space Strategy SPD (CoL, January 2015);
Protected Views SPD (CoL, January 2012).
Planning Advice Notes on Sunlight
City of London Wind Guidelines (2019)
City of London Thermal Comfort Guidelines (2020)

Draft City Plan Policies

Policy S1 (Healthy and inclusive City)
Policy HL1 (Inclusive buildings and spaces)
Policy HL2 (Air quality)
Policy HL3 (Noise and light pollution)
Policy HL5 (Location and protection of social and community facilities)
Policy HL9 (Health Impact Assessment (HIA))
Policy S2 (Safe and Secure City)
Policy SA1 (Crowded places)
Policy SA3 (Designing in security)
Policy S4 (Offices)
Policy OF1 (Office development)
Policy OF2 (Protection of Existing Office Floorspace)
Policy S7 (Smart Infrastructure and Utilities)
Policy IN2 (Infrastructure Capacity)
Policy DE1 (Sustainability Standards)
Policy DE2 (New development)
Policy DE3 (Public realm)
Policy DE4 (Pedestrian permeability)
Policy DE5 (Terraces and Viewing Galleries)
Policy DE6 (Shopfronts)
Policy DE8 (Daylight and sunlight)
Policy VT1 (The impacts of development on transport)
Policy VT2 (Freight and Servicing)
Policy VT3 (Vehicle Parking)

Policy S10 (Active Travel and Healthy Streets)
Policy AT1 (Pedestrian Movement)
Policy AT2 (Active Travel including Cycling)
Policy AT3 (Cycle Parking)
Policy S11 (Historic Environment)
Policy HE1 (Managing Change to Heritage Assets)
Policy HE2 (Ancient Monuments and Archaeology)
Policy SB1: Culture Mile Impacts
Policy S13 (Protected Views)
Policy S14 (Open Spaces and Green Infrastructure)
Policy S23 (Smithfield and Barbican)
Policy S24: Culture Mile Implementation
Policy OS1 (Protection and provision of open spaces)
Policy OS2 (City Greening)
Policy OS3 (Biodiversity)
Policy S15 (Climate Resilience and Flood Risk)
Policy CR1 (Overheating and Urban Heat Island Effect)
Policy CR2 (Flood Risk)
Policy CR3 (Sustainable drainage systems (SuDS))
Policy S16 (Circular Economy and Waste)
Policy CE1 (Zero Waste City)

Relevant Local Plan Policies

CS1 Provide additional offices

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

DM1.1 Protection of office accommodation

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

a) prejudicing the primary business function of the City;
b) jeopardising the future assembly and delivery of large office development sites;
c) removing existing stock for which there is demand in the office market or long term viable need;
d) introducing uses that adversely affect the existing beneficial mix of commercial uses.

DM1.5 Mixed uses in commercial areas

To encourage a mix of commercial uses within office developments which contribute to the City's economy and character and provide support services for its businesses, workers and residents.

CS2 Facilitate utilities infrastructure

To co-ordinate and facilitate infrastructure planning and delivery to ensure that the functioning and growth of the City's business, resident, student and visitor communities is not limited by provision of utilities and telecommunications infrastructure.

DM2.1 Infrastructure provision

1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.

2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:

a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
b) reasonable gas and water supply considering the need to conserve natural resources;
c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.

3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.

4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

CS3 Ensure security from crime/terrorism

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

DM3.1 Self-containment in mixed uses

Where feasible, proposals for mixed use developments must provide independent primary and secondary access points, ensuring that the proposed uses are separate and self-contained.

DM3.2 Security measures

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

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

DM3.4 Traffic management

To require developers to reach agreement with the City Corporation and TfL on the design and implementation of traffic management and highways security measures, including addressing the management of service vehicles, by:

a) consulting the City Corporation on all matters relating to servicing;
b) restricting motor vehicle access, where required;
c) implementing public realm enhancement and pedestrianisation schemes, where appropriate;
d) using traffic calming, where feasible, to limit the opportunity for hostile vehicle approach.

DM3.5 Night-time entertainment

1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:

a) the amenity of residents and other noise-sensitive uses;
b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.

2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS4 Seek planning contributions

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

CS5 Meet challenges facing North of City

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

CS10 Promote high quality environment

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

DM10.1 New development

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

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

f)the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
i)there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
j)the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
k) there is provision of amenity space, where appropriate;
l)there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

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

DM10.3 Roof gardens and terraces

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

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

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

DM10.4 Environmental enhancement

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

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

DM10.7 Daylight and sunlight

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

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

DM10.8 Access and inclusive design

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

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

CS11 Encourage art, heritage and culture

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

DM11.1 Visitor, Arts and Cultural

1) To resist the loss of existing visitor, arts and cultural facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the City's communities; or
b) they can be delivered from other facilities without leading to or increasing any shortfall in provision, and it has been demonstrated that there is no demand for another similar use on the site; or
c) it has been demonstrated that there is no realistic prospect of the premises being used for a similar purpose in the foreseeable future.

2) Proposals resulting in the loss of visitor, arts and cultural facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floorspace has been actively marketed as a visitor, arts or cultural facility at reasonable terms.

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

1. To sustain and enhance heritage assets, their settings and significance.

2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.

3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.

4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.

5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

DM12.4 Archaeology

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.

2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.

3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

CS13 Protect/enhance significant views

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

CS15 Creation of sustainable development

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

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.

2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:

a) BREEAM or Code for Sustainable Homes pre-assessment;
b) an energy statement in line with London Plan requirements;
c) demonstration of climate change resilience measures.

3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.

5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.

2. For all major development energy assessments must be submitted with the application demonstrating:

a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.

2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered

3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

4. Other low and zero carbon technologies must be evaluated. Non combustion based technologies should be prioritised in order to avoid adverse impacts on air quality.

DM15.4 Offsetting carbon emissions

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated on-site will need to be offset using "allowable solutions".

2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.

3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

DM15.5 Climate change resilience

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.

2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

DM15.6 Air quality

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.

2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.

3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).

4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.

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

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

DM15.7 Noise and light pollution

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

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

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

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

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

DM15.8 Contaminated land

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

CS16 Improving transport and travel

To build on the City's strategic central London position and good transport infrastructure to further improve the sustainability and efficiency of travel in, to, from and through the City.

DM16.1 Transport impacts of development

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:

a) road dangers;
b) pedestrian environment and movement;
c) cycling infrastructure provision;
d) public transport;
e) the street network.

2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

DM16.2 Pedestrian movement

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

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

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

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

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

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

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

DM16.3 Cycle parking

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

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

DM16.4 Encouraging active travel

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

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

DM16.5 Parking and servicing standards

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

2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

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

4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the

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

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

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

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

CS17 Minimising and managing waste

To support City businesses, residents and visitors in making sustainable choices regarding the minimisation, transport and management of their waste, capitalising on the City's riverside location for sustainable waste transfer and eliminating reliance on landfill for municipal solid waste (MSW).

DM17.1 Provision for waste

1. Waste facilities must be integrated into the design of buildings, wherever feasible, and allow for the separate storage and collection of recyclable materials, including compostable material.

2. On-site waste management, through techniques such as recyclate sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

New development should be designed to minimise the impact of deconstruction and construction waste on the environment through:

a) reuse of existing structures;
b) building design which minimises wastage and makes use of recycled materials;
c) recycling of deconstruction waste for reuse on site where feasible;
d) transport of waste and construction materials by rail or river wherever practicable;
e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

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

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

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

DM18.3 Flood protection and climate

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

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

CS19 Improve open space and biodiversity

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

DM19.1 Additional open space

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

2. New open space should:

a) be publicly accessible where feasible; this may be achieved through a legal agreement;
b) provide a high quality environment;

c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
d) have regard to biodiversity and the creation of green corridors;
e) have regard to acoustic design to minimise noise and create tranquil spaces.

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

DM19.2 Biodiversity and urban greening

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

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

CS21 Protect and provide housing

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

DM21.3 Residential environment

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

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

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

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

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

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

DM21.5 Housing quality standards

All new housing must be designed to a standard that facilitates the health and well-being of occupants, and:

a) takes account of the London Plan's space standards and complies with the London Plan's Density Matrix standards;
b) provides acceptable daylight to dwellings commensurate with a city centre location;
c) meets standards for Secured by Design certification;
d) maximises opportunities for providing open and leisure space for residents.

DM21.7 Student housing and hostels

1. Proposals for new student accommodation and hostels will be refused where it would:

a) prejudice the primary business function of the City;
b) result in the loss of office buildings or sites, contrary to policy DM 1.1;
c) result in an excessive concentration of student housing and/or hostels;
d) have an adverse impact on the residential amenity of the area;
e) involve the loss of permanent residential accommodation.

2. Proposals for student housing must be supported by identified further or higher educational institutions operating in the Central Activities Zone and provide accommodation for their own students.

3. Self-contained student housing will be expected to contribute to the supply of affordable housing in accordance with Policy CS21.

4. The loss of existing student housing and hostels will be resisted unless:

a) the accommodation is required to meet residential needs as part of a published strategy by a local service provider;
b) it is vacant and has been actively marketed as student or hostel accommodation at reasonable terms and there is no demand from another organisation for a hostel in that location.

CS22 Maximise community facilities

To maximise opportunities for the City's residential and working communities to access suitable health, social and educational facilities and opportunities, while fostering cohesive communities and healthy lifestyles.

DM22.1 Social and community facilities

1. To resist the loss of social and community facilities unless:

a) replacement facilities are provided on-site or within the vicinity which meet the needs of the users of the existing facility; or
b) necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or
c) it has been demonstrated that there is no demand for another similar use on site.

2. Proposals for the redevelopment or change of use of social and community facilities must be accompanied by evidence of the lack of need for those facilities. Loss of facilities will only be permitted where it has been demonstrated that the existing floor space has been actively marketed at reasonable terms for public social and community floorspace.

3. The development of new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:

a) where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;
b) in locations which are convenient to the communities they serve;
c) in or near identified residential areas, providing their amenity is safeguarded;
d) as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.

4. Developments that result in additional need for social and community facilities will be required to provide the necessary facilities or contribute towards enhancing existing facilities to enable them to meet identified need.

SCHEDULE

APPLICATION: **21/00781/FULMAJ**

61 - 65 Holborn Viaduct London EC1A 2FD

Redevelopment of the site for a new building comprising two basement levels, lower ground, ground plus 12 upper floors including purpose built student accommodation and associated amenity space (Sui Generis), flexible cultural / community use at part ground and lower ground floor levels (Sui Generis), a publicly accessible roof terrace, a pedestrian route through the site, hard and soft landscaping, together with ancillary plant and servicing; and associated enabling works.

CONDITIONS

1 The development hereby permitted shall be begun before the expiration of three years from the date of this permission.
REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

2 There shall be no demolition or 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.

3 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.

4 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.

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

6 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, rainwater pipework, flow control devices, 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 110m3;
(b) Full details of measures to be taken to prevent flooding (of the site or caused by the site) during the course of the construction works.
(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

7 Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

8 No works except demolition to basement slab level shall take place until the developer has secured the implementation of a programme of archaeological work to be carried out in accordance with a written scheme of investigation which has been submitted to and approved in writing by the Local Planning Authority. This shall include all on site work, including details of any temporary works which may have an impact on the archaeology of the site and all off site work such as the analysis, publication and archiving of the results. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.
REASON: In order to allow an opportunity for investigations to be made in an area where remains of archaeological interest are

understood to exist in accordance with the following policy of the Local Plan: DM12.4.

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

10 Prior to the commencement of the development a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.
REASON : To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

11 Prior to the commencement of the development a detailed Whole Life Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's aspirational benchmarks set out in the GLA's Whole Life-Cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life cycle of the development and provide calculations in line with the Mayor of London's guidance on Whole Life Cycle Carbon Assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life cycle of the development.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London

Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.

12 Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions for addressing such risks. The CCRSS will demonstrate that the potential for resilience and adaptation measures (including but not limited to solar shading to prevent solar gain; high thermal mass of building fabric to moderate temperature fluctuations; cool roofs to prevent overheating; urban greening; rainwater attenuation and drainage; flood risk mitigation; biodiversity protection; passive ventilation and heat recovery and air quality assessment to ensure building services do not contribute to worsening photochemical smog) has been considered and appropriate measures incorporated in the design of the building. The CCRSS shall also demonstrate how the development will be operated and managed to ensure the identified measures are maintained for the life of the development. The development shall be carried out in accordance with the approved CCRSS and operated & managed in accordance with the approved CCRSS for the life of the development.
REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation

13 Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.
REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

14 No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.
REASON: Ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

15 No development other than demolition shall begin until details of such measures as are necessary within the site to resist structural damage and to protect the approved building and the new public realm within the site, from an attack with a road vehicle or road vehicle borne explosive device, have been submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun. The development shall be carried out in accordance with the approved details.
REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

16 Prior to the commencement of development a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved

survey unless otherwise agreed in writing by the local planning authority.
REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

17 Before any works hereby permitted are begun additional details and information in respect of the following shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) particulars and samples of the materials to be used on all external faces of the building including external ground, internal courtyard elevations, soffits, public route, roof terrace and upper level surfaces.
(b) Sample panels of patterned terracotta, patterned granite shall be built, agreed on-site and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.
(c) details of the proposed new internal courtyard and external facade(s) including typical bay
(d) details and materials of the fenestration of the development

(e) details of exterior upper / lower ground floor elevations, public roof terrace access, internal courtyard elevations including artwork, signage, detail design of soffits, handrails and balustrades and lighting of these;
(f) details of the ground floor entrance(s) including balustrades, canopies, step and threshold
(g) details for student residential, servicing, public lift, cultural spaces where they apply.
(h) details of junctions with adjoining premises;
(i) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level;
(j) details of plant and ductwork to serve ventilation and air-conditioning the sui generis use(s);
(k) details of all ground level and public route walkway surfaces including materials to be used; external surfaces within the site boundary including hard and soft landscaping
(l) details of the arrangements for the provision of refuse storage and collection facilities within the curtilage, including thresholds of the site to serve each part of the development.

(m) full details of the Cultural spaces external entrances and internal design including all elevations, fenestration, planters, seating, lighting, signage and any infrastructure required to deliver the proposed use
(n) Details of site-wide signage strategy for all uses encompassed in the development
(o) details of the integration of M&E in all external and semi-external public elevations at ground or roof garden level
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1 and CS12

18 All unbuilt surfaces, forming part of the development including the ground floor public realm, pedestrian route through and rooftop terrace, shall be treated in accordance with a landscaping scheme to be submitted to and approved in writing by the Local Planning Authority before any landscaping works are commenced. All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within 5 years of completion of the development shall be replaced with trees and shrubs of similar size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.
REASON: In the interests of visual amenity in accordance with the following policies of the Local Plan: DM10.1, DM19.2.

19 Details of the position and size of the green/blue roof(s), the type of planting and the contribution of the green/blue roof(s) to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

20 Prior to implementation, details shall be submitted to and approved in writing by the local planning authority to demonstrate that a opportunities have been explored to achieve a target of 0.4 urban greening factor and if not achievable provide a justification as to why a higher UGF could not be achieved. The development shall be carried out in accordance with those approved details and a minimum urban greening factor target of 0.37 shall be maintained for the life of the

development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

21 Details of the rainwater harvesting and greywater collection systems, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority.
REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5

22 All ecological data gathered to support this application and gathered as part of ongoing monitoring to inform management, shall be submitted to the relevant Local Environmental Records Centre (LERC) currently Greenspace Information for Greater London (www.gigl.org.uk).
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

23 The development shall be designed to allow for the retro-fit of heat exchanger rooms to connect into a district heating network if this becomes available during the lifetime of the development.
REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.4.

24 Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.

25 Before any works thereby affected are begun details of measures to prevent jumping or falling from the development (including the publicly accessible roof terrace) shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in

place prior to occupation and remain in situ for the lifetime of the development.
REASON: In the interests of safety in accordance with the following polices of the draft City Plan 2036: DE2 and DE5.

26 The roof terraces hereby permitted shall not be used or accessed between the hours of 23.00 on one day and 07:00 on the following day 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

27 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.

28 No amplified or other music shall be played in the premises outside the following times 07:00 to 23:00
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.

29 No live or recorded music shall be played that it can be heard outside the premises or within any residential or other premises in the building.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

30 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

31 (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.

32 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.

33 Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used so that the noise level in the bedrooms does not exceed NR30 attributable to the proposed cultural and community use of the ground floor level. The development pursuant to this permission shall be carried out in accordance with the approved scheme and so maintained thereafter.
REASON: To protect the amenities of residential occupiers in the building in accordance with the following policies of the Local Plan: DM21.3, DM21.5.

34 All residential premises in the development shall be designed and constructed to attain the following internal noise levels:
Bedrooms- 30dB LAeq,T* and 45dB LAmax
Living rooms- 30dB LAeq, T*
*T- Night-time 8 hours between 23:00-07:00 and daytime 16 hours between 07:00-23:00.
A test shall be carried out after completion but prior to occupation to show that the criteria above have been met and the results must be submitted to and approved in writing by the Local Planning Authority prior to occupation of any part of the building.
REASON: To ensure that the occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3 and D21.5.

35 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: 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.

36 No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

37 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

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

39 A minimum of 10% of the hotel bedrooms shall be wheelchair accessible, comprising 9% designed for independent use and 1% for assisted use as set out in the Access Statement.

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

40 All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.
REASON: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3

41 Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the building sufficient to accommodate a minimum of 494 long stay pedal cycle spaces, and a minimum of 32 short stay pedal cycle spaces. The cycle parking provided on the site must remain ancillary to the use of the building and must be available at all times throughout the life of the building for the sole use of the occupiers thereof and their visitors without charge to the individual end users of the parking.
REASON: To ensure provision is made for cycle parking and that the cycle parking remains ancillary to the use of the building and to assist in reducing demand for public cycle parking in accordance with the following policy of the Local Plan: DM16.3.

42 A minimum of 5% of the long stay cycle spaces shall be accessible for adapted cycles.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, ItP London Plan policy T5 cycling B, emerging City Plan policy 6.3.24.

43 Unless otherwise agreed a clear unobstructed minimum headroom of 5m must be maintained for the life of the building in the refuse skip collection area as shown on the approved drawings and a clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.

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

45 Goods, including fuel, delivered or collected by vehicles (excluding cycles and motorcycles) arriving at or departing from the building shall

not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

46 Facilities must be provided and maintained for the life of the development so that vehicles may enter and leave the building by driving in a forward direction.
REASON: To ensure satisfactory servicing facilities and in the interests of public safety in accordance with the following policy of the Local Plan: DM16.5.

47 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.
REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

48 The refuse collection and storage facilities shown on the drawings hereby approved shall be provided and maintained throughout the life of the building for the use of all the occupiers.
REASON: To ensure the satisfactory servicing of the building in accordance with the following policy of the Local Plan: DM17.1.

49 The car parking space suitable for use by disabled people shall be provided on the premises in accordance with the drawings hereby approved and shall be maintained throughout the life of the building and be readily available for use by disabled occupiers and visitors.
REASON: To ensure provision of suitable parking for disabled people in accordance with the following policies of the Local Plan: DM16.5, draft Local Plan 2036: 6.13D and 6A.2 and London Plan: T6.5.

50 No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.
REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

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

52 The pass doors shown adjacent to or near the to the main entrance on the drawings hereby approved shall remain unlocked and available for use at all times when the adjacent revolving doors are unlocked.
REASON: In order to ensure that disabled people are not discriminated against and to comply with the following policy of the Local Plan: DM10.8.

53 The loading and unloading areas at basement level must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.
REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.

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

55 Once the building construction is completed and prior to the development being occupied (or, if earlier, prior to the development being handed over to a new owner or proposed occupier) a post-completion Circular Economy report shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.
REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.

56 Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied (or if earlier, prior to the development being handed over to a new owner or proposed occupier,) the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority . The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

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

57 A post construction BREEAM assessment demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.

58 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: CS18, DM18.2 and DM18.3.

59 No development shall be occupied until confirmation has been provided that either :-
1. Capacity exists off site to serve the development; or
2. A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan; or
3. All wastewater network upgrades required to accommodate the additional flows from the development have been completed.
REASON: Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The developer can request information to support the discharge of this condition by visiting the Thames Water website at thameswater.co.uk/preplanning. Should the Local Planning Authority consider the above recommendation inappropriate or are unable to include it in the decision notice, it is important that the Local Planning Authority liaises with Thames Water Development Planning

Department (telephone 0203 577 9998) prior to the planning application approval.

60 There shall be no occupation beyond the 478th dwelling until confirmation has been provided that either:-
1. All water network upgrades required to accommodate the additional flows to serve the development have been completed; or
2. A development and infrastructure phasing plan has been agreed with Thames Water to allow additional development to be occupied. Where a development and infrastructure phasing plan is agreed no occupation of those additional dwellings shall take place other than in accordance with the agreed development and infrastructure phasing plan.
REASON: The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.

61 The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission: Site Location Plan, ST-PR[02]097 Rev 1, ST-PR[02]098 Rev 2, ST-PR[02]099 Rev 4, ST-PR[02]100 Rev 4, ST-PR[02]101 Rev 6, ST-PR[02]102 Rev 5, ST-PR[02]103 Rev 5, ST-PR[02]106 Rev 2, ST-PR[02]111 Rev 5, ST-PR[02]112 Rev 5, ST-PR[02]113 Rev 4, ST-PR[03]001 Rev 3, ST-PR[03]002 Rev 3, ST-PR[03]003 Rev 3, ST-PR[03]004 Rev 3, ST-PR[03]005 Rev 3, ST-PR[03]006 Rev 3, ST-PR[03]007 Rev 3, ST-PR[03]008 Rev 3, ST-PR[03]009 Rev 3, ST-PR[04]001 Rev 3, ST-PR[04]002 Rev 3
REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.

INFORMATIVES

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

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

a full pre application advice service has been offered;

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

2 It is recommended you consider mitigation in the form of F7 filtration for all air intakes for student bedrooms.

3 The proposed development is located within 15 metres of Thames Waters underground assets and as such, the development could cause the assets to fail if appropriate measures are not taken. Please read our guide 'working near our assets' to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB