Committee:	**Date:**
Planning and Transportation	1 July 2022
Subject: Thavies Inn House 3 - 4 Holborn Circus London EC1N 2HA Demolition of the existing building at 1-6 Holborn Circus (known as Thavies Inn House) and the erection of a ten storey Class E building for office use with Class E retail use at part ground floor level with works to include reinstatement and new pedestrian routes through the site; hard and soft landscaping works including removal and replacement trees within the public highway, and creation of pocket park in Thavies Inn; widening of the footway on St Andrew Street; and other works incidental to the proposed development.	**Public**
Ward: Castle Baynard	**For Decision**
Registered No: 21/00885/FULMAJ	**Registered on:** 22 October 2021
Conservation Area:	**Listed Building:** No

Summary

The proposed development would provide 12,669 sq.m GEA / 12,102 GIA of floorspace, primarily in office use (12,425 sq.m GEA / 11, 873 sq.m GIA), with retail at ground floor 244 sq.m GEA / 229 sq.m GIA).

The proposed building is two nested volumes. The larger 10 storey volume would face out onto Holborn Circus, Fetter Lane and Thavies Inn. The lower volume would step down 2 storeys on St Andrew Street facing towards St Andrew's Church (Grade I Listed). Architecturally the building would express a contemporary reinterpretation of a traditional hierarchy.

The design approach to the site would result in a development appropriate in scale, architectural form, with an attractive palette of materials and integral vertical greening, and quality that would add a level of richness and visual interest to the local townscape.

A package of public realm improvements is proposed as part of the proposed development, including a publicly accessible pocket park located within

Thavies Inn, new through routes, and street trees. The pocket park would comprise a combination of hard and soft landscaping and substantial vegetation would be provided along with public seating and a public cycle parking hub. The existing north-south route would be retained and reimagined, and a new east-west route would be provided from Thavies Inn to New Fetter Lane.

The 11 car parking spaces currently in Thavies Inn Courtyard would not be retained as these would be replaced by the proposed pocket park. Two blue badge holders' bays and adjacent loading bays would be rearranged within the courtyard.

It is proposed that the existing parking bays on St Andrew Street would be relocated further south. The loading bays and the taxi rest area would retain the same capacity, and two pay and display parking bays would be removed. These works would all be subject to a Section 278 agreement.

168 long stay cycle spaces are proposed within the building, at basement level, both accessible via a cycle lift and stairs. A total of 18 showers and 168 lockers would be provided as supporting cycling facilities. 25 Short-stay cycle parking spaces would be accommodated within the public realm proposals. A cycle hub providing 60 cycle parking spaces would be provided in the pocket park.

An objection has been received from the Twentieth Century Society. A letter of support has been received from the Fleet Street Quarter.

The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, and the emerging Local Plan and considering all other material considerations.

The proposed office accommodation supports the aims of Local Plan policy CS1 and the emerging City Plan policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the emerging City Plan.

The proposals would result in the loss of two trees that are the subject of a Tree Preservation Order (TPO). In reaching the decision on whether the proposals are policy compliant the longevity and quality of the existing trees and associated public realm has been carefully weighed against that of the proposed replacement offer. The significant increase in street tree planting, the introduction of the pocket park, the generous public realm to St Andrew Street and the cycle hub are considered to collectively meet the requirements of London Plan G7 as a replacement offer.

The quality and quantum of the green spaces would be a net gain (846 sq.m gain) and would be an enhancement over the existing spaces, linking well to

existing and proposed new routes to create a distinct place which supports pedestrian movement and low carbon transport with the proposed cycle hub accessible to all. In addition, the proposed planting species for trees and wider landscape are more suitable for long term climate resilience, would increase biodiversity and would be disease resilient. This long-term vision would create a series of new attractive, tranquil, flexible and functional spaces making good use of existing land.

The pedestrian experience around the site would significantly improve as a result of the proposals with the significantly enhanced public realm providing attractive, distinctive, and sheltered routes around, and through the site, which would include heritage interpretation. The urban greening both within the public realm and on the building would collectively create a strong and impactful visual greenness which would positively contribute to local townscape. The location of the new tree planting and wider landscaping would be prominent and experienced in all directions and approaches to the building adding value to existing and new pedestrian routes and spaces.

These public spaces would have an overarching compliance with the Mayor's 'Public London Charter and 'Expanding London's Public Realm: Design Guide' and the City's Public Realm SPD and associated Technical Guidance. The proposals encourage pedestrian movement, active travel and support health and wellbeing. In addition, the proposals would support the Destination City vision to bring activity and vibrancy to the Square 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.

The proposed development would preserve City skyline landmarks and skyline features and would comply with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

The proposals have been assessed against Local Plan Policies CS 12, DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1, S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF paragraphs 199-208. There would be no harm to the setting of Hatton Garden Conservation Area and its significance would be preserved. It is considered that the proposal would preserve the settings and the special architectural and historic interest and heritage significance and contribution made by the setting of: St Andrew's Church, the former Vicarage 5-6 St Andrew's Street, City Temple Church and the Statue of the Prince Consort. The proposal would comply with Local Plan Policies CS 12, DM 12.1, emerging City Plan policies S11 and, London Plan Policy HC1.

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 a cycle hub within Thavies Inn is welcome and is considered to be a public benefit and innovative way to contribute to solve the problem of a lack of short-term cycle spaces in the City.

The proposed sustainability strategy responds positively to the aims and policies of the London Plan and the Local Plan, indicating a medium to long term positive Whole Life-Cycle carbon emissions balance compared to the existing building on site while integrating circularity principles. The proposed building would be designed to significantly improve the climate resilience and urban greening of the site and its immediate surroundings. The BREEAM pre-assessment demonstrates that the development is on track to achieve an "outstanding" rating that would ensure that the development makes an exemplar contribution to the sustainability of the City.

The impact of the proposed development on daylight and sunlight levels on the nearby properties and amenity spaces will be negligible.

Overall, it is considered that the proposals would comply with the policies set out in the Development Plan as a whole. Other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached. Subject to the recommendations of this report it is recommended that planning permission be granted.

Recommendation

1. That planning permission be granted for the above proposal in accordance with the details set out in the attached schedule.
2. That you agree in principle that the land affected by the proposal which is currently public highway and land over which the public have right of access may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers be instructed to proceed with arrangements for advertising and making of a Stopping-up Order for the various areas under the delegation arrangements approved by the Court of Common Council.
3. That your Officers be instructed to negotiate the S106 agreement.

APPLICATION DASHBOARD

This dashboard provides a summary of the key metrics for the development and should be read in conjunction with the report as a whole.

Thavies Inn House, Holborn - 21/00885/FULMAJ

TOPIC	INFORMATION			
1. Site Photos	EXISTING		PROPOSED	
				
2. HEIGHT	EXISTING		PROPOSED	
	5 storeys = AOD 32.67m 9 storeys = AOD 49.05m (to top of plant) (not including aerials)		8 storeys = 45.59m 10 storeys = 54.07m	
3. FLOORSPACE GIA (SQM)	USES	EXISTING	PROPOSED	
	Class E (c) Office	4,368 sqm	11,873sqm	(+7,505 sqm)
	Class E (c) Bank	575 sqm	n/a	
	Class E (a)/(b) Retail/Restaurant/Café	255 sqm	229sqm	(-26 sqm)
	Class F1(a) Education:	827 sqm	n/a	
	TOTAL	6,025 sqm	12,102sqm	
			TOTAL UPLIFT:	**6,077sqm (101%)**
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	• c. 300		• c. 750 (if both buildings at full capacity)	
5. VEHICLE / CYCLE PARKING	TYPE	EXISTING	POLICY REQUIREMENT	PROPOSED
	Car parking spaces	11	0	**0**
	Cycle long stay	0	168	**168**
	Cycle short stay	0	25	**85**
	Lockers	0	112	**168**

	Showers	2	17	18

6. HIGHWAY LOSS / GAIN

1. 118sqm proposed to be stopped up
2. 184sqm proposed to be dedicated

GAIN +66sqm

NB. Of the 118sqm proposed to be stopped up, 34sqm is to become Permissive Path.

7. PUBLIC REALM GAIN

1. New 460sqm south-facing pocket park
2. Widening of footpaths (existing 155sqm; proposed 292sqm)
3. Provision of new East-West route through the site (54sqm)
4. Provision of a "Dutch-style" cycle hub (60 cycles; 195sqm)

8. STREET TREES

EXISTING	PROPOSED
• 2 existing London Plane Trees have been **removed** on St Andrew Street	• **4** new trees **proposed** on St Andrew Street (large canopy) • **19** new trees **proposed** in Thavies Inn Courtyard (various species) • 18 new trees on the terraces and roof (various small multi-stem species)

9. SERVICING VEHICLE TRIPS

EXISTING	PROPOSED
• 18 trips per day	• 14 trips per day (Off-site consolidation proposed)

10. RETAINED BUILDING ELEMENTS IN SITU

0 % following detailed site investigations

11. OPERATIONAL CARBON EMISSION SAVINGS

- 48% improvement against Part L 2013 using SAP 10 carbon factors (policy target 35% improvement)

48 %

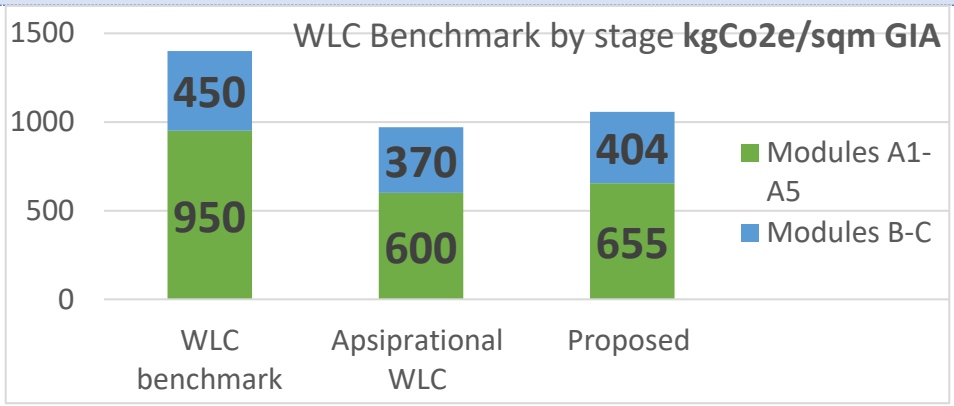
12. OPERATIONAL CARBON EMISSIONS

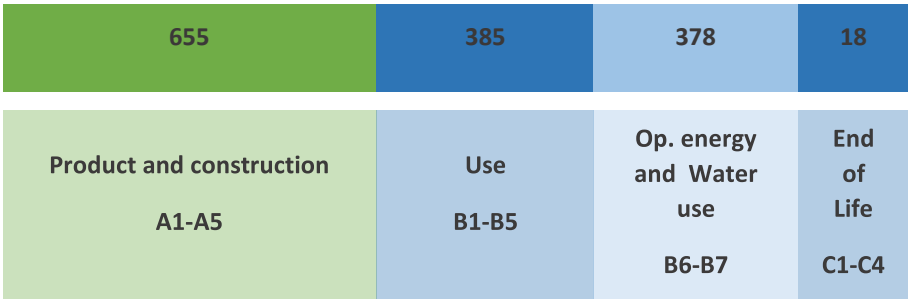
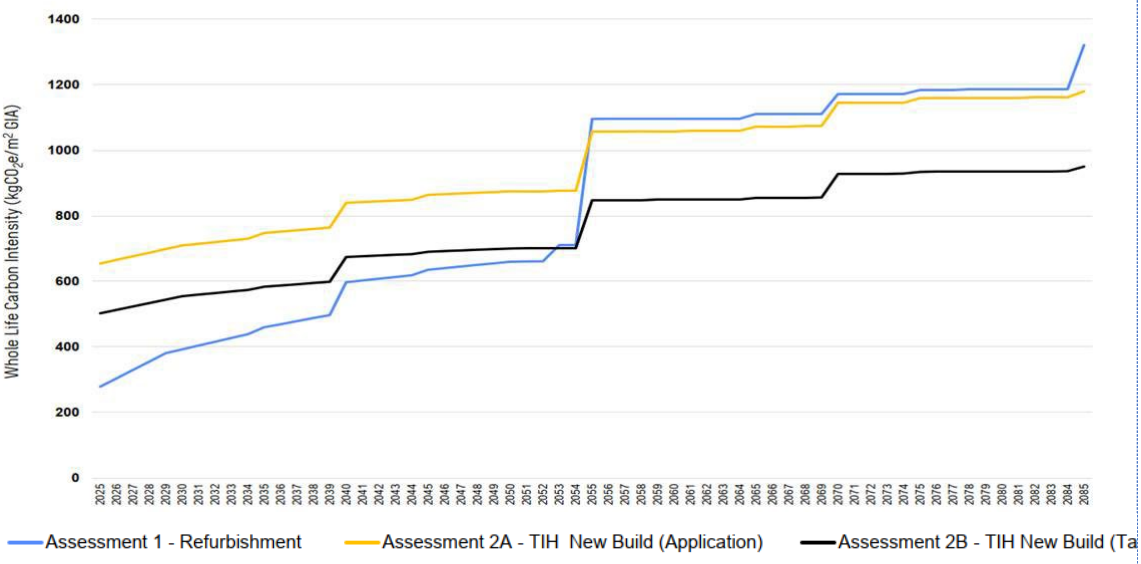
64,220 kgCO2e/annum
5.3 kgCO2e/sqm/annum
318 kgCO2e/sqm over 60 years

(Values from CIBSE TM54 exercise, covers Module B6 only and includes the decarbonisation of the grid)

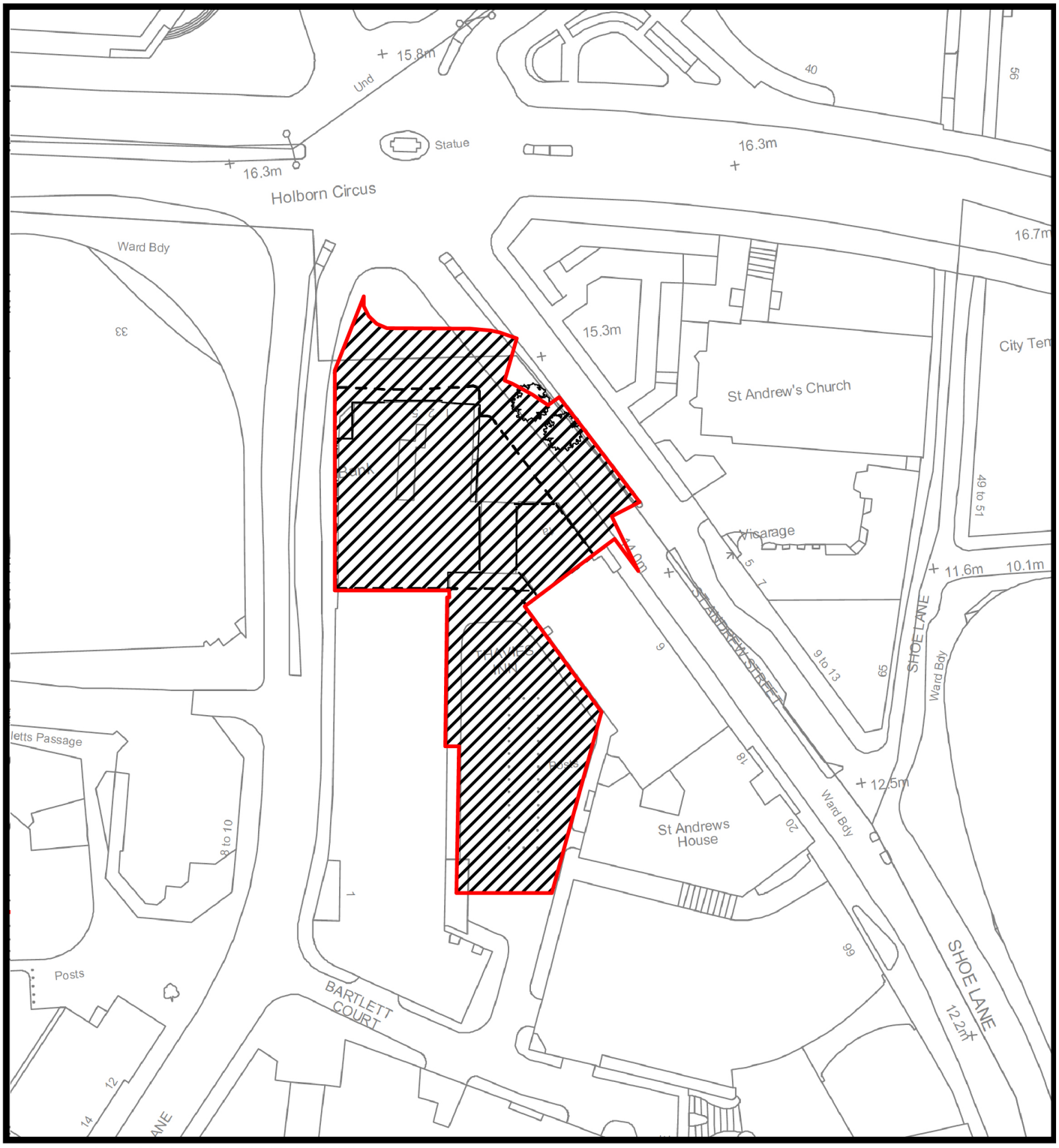
13. EMBODIED CARBON EMISSIONS

PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS



	• TOTAL: **12,814,687** kgCO2e/60 years
14. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCo2e/m 2 GIA)	 • TOTAL: **17,338,671 kgCO2e/60 years** 
15. TARGET BREEAM RATING	• **Outstanding** (policy target Excellent or Outstanding) 
16. URBAN GREENING FACTOR	• **0.316** (policy target 0.3)
17. AIR QUALITY	• Air Quality Neutral (policy target AQN)

Site Location Plan



ADDRESS: Thavies Inn House,
3 Dyer's Building, London EC1N 2JT

CASE No.
21/00885/FULMAJ

SITE LOCATION

LISTED BUILDINGS

CONSERVATION AREA BOUNDARY

CITY OF LONDON BOUNDARY

CITY OF LONDON

DEPARTMENT OF THE BUILT ENVIRONMENT


THAVIES INN
HOUSE

Main Report

Site and Surroundings

1. The application site comprises the land and building bounded by Holborn Circus and St Andrew Street to the north, St Andrew Street to the north-east, New Fetter Lane to the east and Thavies Inn and adjoining buildings to the south. A pedestrian route bisects the site, which links St Andrew Street with Thavies Inn.
2. The site is currently occupied by two conjoined neo-georgian style building elements dating from 1930s (5 storeys) with a later 1950s extension (9 storeys)
3. There are two London Plane ("City managed") trees on the site, which stand on the public highway and are managed by the City. These trees are the subject of a group Tree Preservation Order (TPO).
4. The Site is highly accessible with a Public Transport Accessibility Level of 6b (the highest possible) with Chancery Lane Underground Station located 320m to the west of the Site and Farringdon Station, providing national rail services, 350m to the north. A number of local buses run along Holborn and Fleet Street, situated to the north and south of the Site respectively.
5. The existing building is not a listed building and is not it located within a Conservation Area nor is it a Non-Designated Heritage Asset. The nearest listed buildings are the Grade I Listed Church of St Andrew's, and Grade II Listed Lodge, St Andrew's Court House, Vicarage Wall and Gate piers associated with the Church, situated immediately east of the Site.
6. As defined by the GLA's London View Management Framework (LVMF) the entire Site is under the protected vistas from Primrose Hill, Blackheath Point, and Greenwich Park.

Proposal

7. Planning permission is sought for:

   'Demolition of the existing building at 1-6 Holborn Circus (known as Thavies Inn House) and the erection of a ten storey Class E building for office use with Class E retail use at part ground floor level with works to include reinstatement and new pedestrian routes through the site; hard and soft landscaping works including removal and replacement trees within the public highway, and creation of pocket park in Thavies Inn; and other works incidental to the proposed development.'

8. The proposed development would provide 12,669 sq.m GEA / 12,102 GIA of floorspace, primarily in office use (12,425 sq.m GEA / 11, 873 sq.m GIA), with retail at ground floor 244 sq.m GEA / 229 sq.m GIA).
9. The proposed building is two nested volumes. The larger 10 storey volume would face out onto Holborn Circus, Fetter Lane and Thavies

Inn. The lower volume would step down 2 storeys on St Andrew Street facing towards St Andrew's Church (grade I). Architecturally the building would express a contemporary reinterpretation of a traditional form with a clear hierarchy and a materiality of bronze coloured metal, stone and integrated planting.

10. A package of public realm improvements is proposed as part of the proposed development, including a publicly accessible pocket park located within Thavies Inn, new through routes, and street trees. The pocket park would comprise a combination of hard and soft landscaping and substantial vegetation would be provided along with public seating and a public cycle parking hub. The existing north-south route would be retained and reimagined, and a new east-west route would be provided from Thavies Inn to New Fetter Lane.

11. The 11 car parking spaces currently in Thavies Inn Courtyard would not be retained as these would be replaced by the proposed pocket park. Two blue badge holders' bays and adjacent loading bays would be rearranged within the courtyard.

12. It is proposed that the existing parking bays on St Andrew Street would be relocated further south. The loading bays and the taxi rest area would retain the same capacity, and two pay and display parking bays would be removed. These works would all be subject to a Section 278 agreement.

13. 168 long stay cycle spaces are proposed within the building, at basement level, both accessible via a cycle lift and stairs. A total of 18 showers and 168 lockers would be provided as supporting cycling facilities. 25 Short-stay cycle parking spaces would be accommodated within the public realm proposals. A cycle hub providing 60 cycle parking spaces would be provided in the pocket park.

Consultation

14. The Applicant has 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 stakeholders and local community.

15. A total of three meetings (in addition to subsequent dialogue) were held with St Andrew Holborn Stakeholders, including two virtual presentations and one site visit. Representatives from the Diocese of London and St Andrew Holborn were present, in addition to the Bishop of Fulham. Discussions held include:

    - Initial 'virtual' meeting on 19 April 2021 to present the proposals;
    - Follow-up 'virtual' meeting on 30 June 2021 to discuss design document; and
    - Site visit on 8 July 2021, to consider any potential impact on St Andrew Holborn.

16. The applicant engaged with adjacent commercial building owners who were notified of the proposals and an indicative timeline to submission provided.

17. A presentation was held for Ward Members on 9th June 2021.

18. Following receipt of the application it has been advertised on site and in the press. Copies of all received letters and e-mails making representations are attached in full and appended to this report. A summary of all planning considerations within the representations received, and the consultation responses is set out in the tables below.

19. A total of one representation objecting and one representation in support were received.

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

21. The applicant has provided a detailed response to matters raised in consultee and third-party responses which are available to view on the public website and are listed in the background papers list at the end of this report.

Consultation Response	
GLA	I note that the application has been referred due to a technical breach of the threshold plane in relation to LVMF views 5A.2 Greenwich Park (Wider Setting Consultation Area) and 6A.1 Blackheath (Wider Setting Consultation Area). I have assessed the details of the application and based on the submitted application material, I consider that there would be no detrimental impact on these views, and therefore conclude that the amendments do not give rise to any new strategic planning issues. Therefore, under article 5(2) of the above Order the Mayor of London does not need to be consulted further on this application. Your Council may, therefore, proceed to determine the application without further reference to the GLA.
Historic England	On the basis of the information available to date, we do not wish to offer any comments. We suggest that you seek the views of your specialist conservation advisers, as relevant. It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

Environment Agency	We have **no objection** to this proposal. However, please consider the following. <u>Advice to applicant</u> Water Resources Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills. We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments. We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.
Natural England	Natural England has no comments to make on this application. Natural England has not assessed this application for impacts on protected species. Natural England has published Standing Advice which you can use to assess impacts on protected species, or you may wish to consult your own ecology services for advice. Natural England and the Forestry Commission have also published standing advice on ancient woodland and veteran trees which you can use to assess any impacts on ancient woodland. <u>Green Infrastructure</u> The proposed development is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity

	enhancement. Natural England would encourage the incorporation of GI into this development.
Thames Water	Thames Water has been unable to determine the Foul Water infrastructure needs of this application and request a condition. With regard to Surface Water network infrastructure capacity Thames Water do not have any objection to the application and agree with the surface water discharge rate. With regard to Water Network and Water Treatment Infrastructure capacity, Thames Water do not have any objection to the application. **Officer response to comments:** A condition relating to foul water capacity and informatives are recommended.
Royal Borough of Greenwich	No objection.
Twentieth Century Society	The Society objects to the application due to the loss of what we consider to be a non-designated heritage asset (NDHA). Thavies Inn House was built in 1939 to designs by Lewis Solomon, Son & Joseph, the successor practice to Lewis Solomon. Lewis Solomon (1848-1928) was an esteemed London-based Jewish architect known for his synagogue designs, as well as shops, warehouses, factories, private houses and flats. Solomon's Soup Kitchen for the Jewish Poor on Brune Street in Shoreditch (1902) is Grade II listed. His son Digby Lewis Solomon (1884-1962) took over the architectural practice of Lewis Solomon & Son in the 1920s, and Morris Joseph (1908/9-1952) joined later as partner. Constructed from red brick with a rusticated stone ground floor, quoins and cornices, Thavies Inn is Neo-Georgian in style. Neo-Georgian was one of the most popular architectural styles in the UK in the first few decades of the 20th century, and continued in use in the post-war period, appearing in the work of Albert E. Richardson, Raymond Erith and Quinlan Terry amongst others. Thavies Inn was erected in the 1930s for office use and was extended in 1955-60 on New Fetter Lane.

	Thavies Inn House is a good example of Neo-Georgian architecture designed by a noted architectural practice. It is of significance locally and should be treated as a non-designated heritage asset. Paragraph 189 of the National Planning Policy Framework (NPPF, 2021) describes heritage assets as “an irreplaceable resource” which “should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations”. The NPPF also advises that “In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” The current application will result in the total loss of a building of local heritage significance. The Architects’ Journal (4 November 2021) quotes the applicant as saying that they have ‘looked extensively at reuse of the existing building’ but that this proved to be ‘impractical’. However, the applicant has not provided evidence of this as part of the application. The Society would welcome a structural survey and/or feasibility study to support this claim. Without such information, we maintain that it would be possible to reuse the existing building. The Twentieth Century Society objects to the proposed full demolition of Thavies Inn House which we consider to be a non-designated heritage asset worthy of preservation. We do not believe the heritage harm caused through its demolition is justified or outweighed by the few public benefits of the new office and retail scheme. For these reasons, we encourage the local planning authority to refuse planning permission. **Officer response to comments:** Please refer to the Sustainability and Heritage sections of the report
City of London Police	At this stage the project team have worked closely with the Police on crime prevention and CT so no outstanding issues.

Lead Local Flood Authority	No objection to the application. Conditions are recommended relating to a detailed design for SuDS and a maintenance plan. **Officer response to comments:** The requested conditions are recommended.
Environmental Health	No objection to the application. Conditions are recommended regarding hours of use of the terrace, prohibiting music, plant noise, demolition and construction environmental management, fume extract arrangements, non-road mobile machinery, ventilation and extraction equipment, sewer vents and contaminated land. **Officer response to comments:** The requested conditions are recommended.

Representations In Support	
Fleet Street Quarter	On behalf of the Fleet Street Quarter (FSQ), a business-led Partnership which represents a number of businesses within the area, we would like to express our support for the planning application for the proposed development of Thavies Inn House. The developers working on the scheme have ensured good engagement with the Partnership, enabling local stakeholders and occupiers the opportunity to understand more on the development sharing a presentation of the scheme. Positioned at the Northern end of the of the FSQ boundary, Holborn Viaduct is a key gateway moment to the district and indeed the City of London. The redevelopment of Thavies Inn House will allow for a more attractive and inviting welcome into the area, supported by it biophilic designs creating a visual pull and intrigue to the area. The scheme features progressive plans that will benefit the streetscape and wayfinding for the area through a revised permeable facade and wider pedestrian routes, that will elevate, regenerate and enhance the footfall in this area. Our Partnership advocates the importance of strong external environments and public realm and its influence in the way we experience and feel about an area; a high-quality public realm can have a direct

	impact in increasing dwell time, local spend and investment. The additionally of the commercial space proposed for hospitality and retail, can strengthening and enrich the local offering, supporting ambitions to reinvigorate and evolve Fleet Street Quarter as leading a vibrant district. While the FSQ area boasts historic architecture and cultural heritage, there is a remarkable deficiency of greenery and green spaces with few places to sit and dwell, and no key 'anchor' public space. The development provides the rare opportunity to create a bespoke and generous green 'oasis' through repurposing an underused car park, creating a pleasant space that encourages people to stay longer and engage with the area. The Fleet Street Quarter Partnership had also identified this our 2021 Area Based Strategy, noting the potential of this underused space, to be repurposed in a more meaningful way. A new public green space adds to the future character of the area, as well as promoting the physical and emotional wellbeing of people who live, work and visit the local area. 2020 reignited our appreciation for green spaces and nature; and with this renewed appreciation for time spent outdoors there will be an increased appetite for outdoor spaces and a green public realm will need to match the future demand of spending more time outdoors. The pandemic has caused a shift in our working habits and if we want to encourage people back to the area, we must adapt the urban environment to meet new expectations. The developers have outlined the potential of cultural activations and interventions that could be achieved through the new spaces created from the revised public realm and park. As well as the FSQ's own cultural ambitions for the area, we feel the proposed development succeeds in supporting the ambitions of The CoL's Draft Local Plan Review 2036 – which sets culture and creativity high on the policy agenda and encourages growth of these sectors. The rise of the cultural sectors has been accompanied by a renewed sense of value and the role culture in our cities, an increase in foreign direct investment to the UK, and a greater appreciation for the complexity and diversity that characterises thriving districts. Creative production and culture in the City are key catalysts to unlock positive and sustainable growth, international competitiveness and aid a post-pandemic recovery.

	We recognise that existing commercial buildings, built by previous generations, often cannot meet the environmental or operational standards required by modern users, and believe when redevelopment is necessary, developers should seek to deliver the highest quality proposal, deploying the principles that ensure maximum benefit to local surroundings and the City. The development team have conducted a high-level sustainability strategy that has considered a whole-life carbon assessment that ensures a longer-term environmental performance and exemplifies the latest in sustainable and healthy design. The proposals must ensure longevity and adaptability through the adoption of Circular Economy and whole life carbon principles, anticipating concerns arising from both the climate crisis and post-pandemic workplace demand. The redevelopment of Thavies Inn House demonstrates a practical and necessary proposals that can invigorate and stimulate the local area, with the potential of reimagined streetscapes, public green spaces and economic prospects that are welcomed and celebrated by the Partnership. We hope the City Corporation will approve this application and continue to support the ongoing regeneration and enhancement of the wider Fleet Street Quarter area.

Policy Context

22. 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.

23. 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

24. 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.

25. There is relevant GLA supplementary planning guidance and other policy in respect of: Accessible London: Achieving an Inclusive Environment SPG (GLA, October 2014), Control of Dust and Emissions during Construction and Demolition SPG (GLA, September 2014), Sustainable Design and Construction (GLA, September 2014), Social Infrastructure GLA May 2015) Culture and Night-Time Economy SPG (GLA, November 2017), London Environment Strategy (GLA, May 2018), London View Management Framework SPG (GLA, March 2012), Cultural Strategy (GLA, 2018); Mayoral CIL 2 Charging Schedule (April 2019),Central Activities Zone (GLA March 2016), Shaping Neighbourhoods: Character and Context (GLA June 2014); London Planning Statement SPG (May 2014); Town Centres SPG (July 2014); Mayor's Transport Strategy (2018) and the Culture 2016 strategy.

26. Relevant City Corporation Guidance and SPDs comprises Air Quality SPD (CoL, July 2017), Archaeology and Development Guidance SPD (CoL, July 2017), City Lighting Strategy (CoL, October 2018) City Transport Strategy (CoL, May 2019), City Waste Strategy 2013-2020 (CoL, January 2014), Protected Views SPD (CoL, January 2012), City of London's Wind Microclimate Guidelines (CoL, 2019), Planning Obligations SPD (CoL, July 2014). Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Cultural Strategy 2018 – 2022 (CoL, and relevant Conservation Area Summaries.

Considerations

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

    - to have regard to the provisions of the development plan, so far as material to the application, local finance considerations so far as material to the application, and to any other material considerations. (Section 70 Town & Country Planning Act 1990);
    - to determine the application in accordance with the development plan unless other material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).

28. 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);

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

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

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

    a) approving development proposals that accord with an up-to-date development plan without delay; or

    b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of date, granting permission unless:

        i) the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or

        ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

32. 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)

33. Paragraph 81 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

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

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

36. 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”.

37. Paragraph 112 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of

people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.

38. Paragraph 113 states that “All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed”.

39. 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.”

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

41. Paragraph 131 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible..’

42. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.

43. Paragraph 154 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When

new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

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

45. 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.

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

    a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

    b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

    c) the desirability of new development making a positive contribution to local character and distinctiveness."

47. 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.

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

    a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

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

49. 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".

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

51. Paragraph 206 of the NPPF states “Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

Considerations in this case

52. In considering this planning application account has to be taken of the environmental information including the statutory and policy framework, the documentation accompanying the application, and the views of both statutory and non-statutory consultees. Comments of statutory consultees should be given great weight.

53. The principal issues in considering this application are:

- The extent to which the proposals comply with the Development Plan.
- The extent to which the proposals comply with the NPPF
- Economic issues
- The appropriateness of the proposed uses
- The removal of the existing 2 x TPO trees and the adequacy of the replacement offer
- The impact and quality of the architecture and urban design
- The impact of the proposals on strategic views
- The impact of the proposals on designated and non-designated heritage assets
- The impact of the proposal on any archaeology beneath the site.
- The quality and value of the cultural contribution
- The accessibility and inclusivity of the development.
- Transport, servicing, cycle parking provision and impact on highways
- The impact of the proposal in terms of energy and sustainability.
- The impact of the proposed development on the amenity of nearby residential occupiers, including noise, overlooking, daylight, sunlight and light pollution.
- The environmental impacts of the proposal including wind microclimate, flood risk, and air quality.
- The outcome of the Health Impact Assessment
- Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010)
- The requirement for financial contributions.

Economic Issues

54. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.

55. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 540,000 people.

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

57. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible, and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that a majority of businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

58. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.

59. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2017 London Labour Market Projections and 2017 London Office Policy Review), that City of London employment will grow by 116,000 from 2016 to 2036, of which approximately 103,000 employees are estimated to be office based. London's rapidly growing

population will create the demand for more employment and for the space required to accommodate it.

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

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

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

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

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

65. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place, and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2036 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening, and a radical transformation of the City's streets in accordance with these expectations. These aims are reflected in the Corporations 'Destination City' vision for the Square mile.

66. The scheme meets the aims of policies in the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2036 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and

employment in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in an additional 6,077 sqm GIA of high quality, flexible Class E office floorspace for the City thus contributing to its attractiveness as a world leading international financial and professional services centre.

Principle of Uses

Loss of Educational Use

67. The proposal would result in the loss of the existing educational use of 827sqm of floorspace (Use Class F1).

68. London Plan Policy S3 states that development proposals should ensure there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need.

69. Adopted Local Plan Policy CS22 indicates at part 4(ii) that existing education facilities, including schools, adult and higher education premises, will be protected and enhanced.

70. Local Plan Policy DM 22.1 resists the loss of social and community facilities unless replacement facilities are provided on-site or within the vicinity which meet the needs of users of the existing facility; or necessary services can be delivered from other facilities without leading to, or increasing, any shortfall in provision; or it has been demonstrated there is no demand for another similar use on site. This policy goes on to require proposals for the loss of such facilities to be accompanied by evidence of lack of need, with loss of facilities only being permitted where it has been demonstrated that the existing floorspace has been actively marketed at reasonable terms for public social and community floorspace. Proposed Submission Draft City Plan 2036 Policy HL5 sets out a similar policy approach to DM 22.1.

71. A marketing report has been submitted in support of the application, which indicates that marketing of the existing educational unit has taken place pre-Covid in 2018-19 and again post-Covid in 2021. This has led to a few specific enquiries but no viewings or negotiations. The marketing agents consider this is because educational occupiers are seeking new Grade A premises in less central locations due to budget considerations, as well as pointing to subdued demand in the educational sector in the wake of the pandemic.

72. In light of the marketing undertaken, the fact that the educational use on the site is a private business rather than a publicly funded institution, the relatively limited scale of the floorspace involved and the fact that Class F1 floorspace is coming forward elsewhere in the City, the loss of the existing educational use is, on balance, considered acceptable.

Proposed Office Accommodation

73. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seeks to ensure that there is sufficient office space to meet demand and encourages the supply of a range of office

accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Policy S4 of the draft City Plan 2036 seeks to ensure that new office floorspace is designed to be flexible to allow adaptation of space for different types and sizes of occupiers and to meet the needs of SME's, start-up companies and those requiring move on accommodation.

74. The application site currently provides 4,368 sq.m GIA of office floorspace. The proposed development would provide 11,873 sq.m GIA of office (Class E) floorspace on the site. This equates to a total uplift in office floorspace across the site of 7,505 sq.m (GIA).

75. The proposed floorplates would allow for flexibility through the creation of easily divisible and flexible space, allowing for a range of tenant sizes including small and medium sized businesses in accordance with Local Plan policy DM1.3, and would provide additional high-quality office floorspace, both in terms of design and sustainability credentials.

76. The Proposed Development does not include the delivery of affordable workspace, but the design and size of the floorplates in the proposed building are inherently suitable for SMEs without any sub-division. The Proposed Development has been designed to be flexible and cater to a variety of SMEs. The building incudes floorplates range from 737 sqm to 925 sqm over 9 floors. The building could therefore accommodate up to 9 SMEs if multi-let. The floorplate would be ideally suited to a SME business employing under 100 staff.

77. The office floorspace is considered to be well designed, flexible office accommodation in a well-considered and sustainable building, further consolidating the nationally significant cluster of economic activity in the City and contributing to its attractiveness as a world leading international financial and business centre. This amount of floorspace would contribute towards meeting the aims of the London Plan for the CAZ and supports the aims of Local Plan policy CS1 and draft City Plan 2036 policy S4.

78. The proposed office accommodation supports the aims of Local Plan policy CS1 and the Proposed Submission Draft City Plan 2036 policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the Proposed Submission Draft City Plan 2036.

<u>Proposed Retail</u>

79. Policy CS20 of Local Plan 2015 seeks to improve the quantity and quality of retailing and the retail environment, promoting the development of the five Principal Shopping Centres and the linkages between them. The site falls within a Retail Link as identified in the Local Plan. Policy DM 20.2 seeks to encourage the provision and resist the loss of retail frontage and floorspace within Retail Links.

80. Likewise Strategic Policy S5 of the Draft City Plan 2036 seeks to improve the quantity and quality of retailing and the retail environment, focusing new retail development in Principle Shopping Centres and encouraging movement between them by enhancing the retail environment along Retail Links. Policy RE2 states within the Retail Links, the net loss of active frontages and floorspace will be resisted, including the loss of retail facilities, and additional retail development will be supported.

81. The application would result in a loss of 575sqm of retail floorspace formerly used as a bank and 255sqm of retail/café/restaurant space with the creation of 229sqm of retail floorspace. While this represents a loss of 601 sqm of retail floorspace, all of the existing retail floorspace could be converted to office use under the new Class E since it is not subject to any restrictive conditions. In addition, the bank use does not currently provide an active retail frontage. Accordingly, the proposal is considered acceptable in land use terms.

Existing trees

82. Paragraph 131 of the NPPF states that 'Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...'

83. Policy G7 of the London Plan (Trees and woodlands) states that development proposals "…should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy."

84. Policy CS19 of the Local Plan (Biodiversity and urban greening) states "Developments should promote biodiversity and contribute to urban greening by incorporating: green roofs and walls, soft landscaping and trees; features for wildlife, such as nesting boxes and beehives; a planting mix which encourages biodiversity; planting which will be resilient to a range of climate conditions;…"

85. Paragraph 3.19.17 states "Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure.

86. Policy OS4 of the Emerging City Plan states that 'The City Corporation will seek to increase the number of trees and their overall canopy cover by: Requiring the retention of existing mature and semi-mature trees and encouraging additional tree planting to be integrated into the design and layout of developments and public realm improvements where appropriate; Protecting trees which are subject to Tree Preservation Orders (TPO) and designating new TPOs where necessary to protect trees of high amenity value; Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value. '

87. There are two London Plane trees on the site, which stand on the public highway and are managed by the City. The trees are approximately 15m and 21m in height. On 22nd February 2022 the Planning and Transportation Committee resolved to make these trees the subject of a group Tree Preservation Order (TPO). The Order was made because:

- the combined impact of both trees as a single group was considered to be of sufficient amenity value to warrant the making of a TPO.
- when looked at as a pair, the trees were considered to be of high amenity value contributing to the character and appearance of the townscape.
- The canopy of these two trees are prominent in views from the east, south and north and hold a significant role in the townscape form of Holborn Circus.
- They also help frame an important view of the Grade 1 listed Church of St Andrew Holborn and visually balance with the churchyard planting, predominantly to the north of the Church.

88. Whilst the Order was made recently the trees have been treated as trees of high amenity value throughout the pre-application and application process. Its should be noted that the Tree Preservation Order has been made but not yet confirmed. Consultation has to be carried out after the initial making of the Order and the City Corporation are required to consider the consultation responses and make a decision whether or not to confirm the order within six months of it being made.

89. Both trees are in fair/good health and, have no external signs of any significant internal weaknesses. It is considered that both trees have a life expectancy of in excess of 40 years. The larger of the two trees has been planted in close proximity to Thavies Inn House and requires regular pruning back on that side, however in regards to its height, this tree has yet to achieve its ultimate height and maximum potential in respect of its impact and amenity value.

90. The larger of the two trees has attained a good height and form and is a good specimen of a London Plane tree. The smaller tree is a younger tree that has a poorer form. It has an asymmetrical crown which is a result of being supressed by its proximity to the building and the larger

tree, and it grows away from the buildings towards the road. The structure and form of the branches are such that it will not achieve the height and stature of the larger tree. However, this should not detract from the fact that the combined amenity provided by these two trees standing side by side, forming a single canopy is high, and their removal would have an impact on the local environment.

91. The Arboricultural Report submitted as part of the planning application states that the larger of the two trees is considered to be a Category B1/B2 tree and the smaller tree is considered to be a Category C1/C2 tree under British Standard 5837 entitled “Trees in Relation to Design, Demolition and Construction”. This Standard details the steps that should be taken to ensure that trees are appropriately and successfully retained when a development takes place by adopting a categorization method used to identify the quality and value (non-fiscal) of the existing tree stock.

92. The architects, Wilkinson Eyre, carried out massing studies to determine if the trees could be retained whilst maintaining an efficient office floorplate. They found that if the trees were retained the floorplate towards St Andrew Street (East) would be severely compromised and effectively would have to mirror the existing floorplate which would affect the deliverability and viability of a redevelopment scheme.

93. As the building requires two escape stairs to comply with current building regulations and occupancy numbers, it meant that the cut back to the east was creating an inefficient and disconnected floorplate. In addition, the resultant physical arrangement of the floor plates would be inefficient, which would affect the viability of the scheme.

94. Viability Consultants at Gerald Eve have carried out a Viability Assessment on behalf of the applicant for the following scenarios:
    1. A scheme which results in the retention of both of the trees;
    2. A scheme which results in the retention of one of the trees; and
    3. The proposed scheme.

95. The Viability Assessment concludes that it is necessary to remove both of the trees in order for the redevelopment of the site to be undertaken by a rational investor. If both of the trees are retained, in the base case, the scheme would produce close to nil profit, which means that a rational investor would not proceed with redeveloping the site. If one tree is retained, the development would produce a 7.4% profit on cost in the base case, however in the downside case, as demonstrated through sensitivity analysis a development could make a loss. Given the risks surrounding development it is considered that a rational developer would not develop the site on this basis.

96. This Viability Assessment has been independently reviewed by Avison Young who have concluded that the profit levels generated by their appraisals of the three scenarios are:

	Profit level	Viable profit level	Within profit level range
Scenario 1	11.05%	15%-17%	No
Scenario 2	16.94%	15%-17%	Yes (pre-sensitivity analysis)
Scenario 3	27.59%	15%-17%	Yes

97. Avison Young state that "Scenario 2 where one tree is retained does produce a profit figure marginally greater than the minimum required. However, we consider the rents adopted by the applicant to be optimistic. Build costs are also rising rapidly. Our sensitivity analysis demonstrates that with a 2.5% reduction in rental value the profit level reduces to a point at which a developer would be unlikely to proceed with the scheme. Alternatively, a 5% increase in construction costs also reduces the profit to an unviable level. Therefore, whilst on paper the scheme appears viable, there are risks that small changes in market conditions will mean Scenario 2 would not proceed particularly given well publicised increases in build costs which are potentially well beyond 5%. Therefore, we do not consider this to be robustly viable when subject to standard sensitivity testing. Our figures confirm that the proposed scheme, Scenario 3, is viable".

98. Paragraph 131 of the NPPF states that existing trees should be retained wherever possible. The Viability Assessment has been submitted in order to demonstrate why this is not possible in this case. Policy G7 of the London Plan states that 'wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees, there should be adequate replacement based on the existing value of the benefits of the trees removed' . The emerging Local Plan places greater weight on the retention of trees but is a material consideration only in the determination of applications, and is not part of the development plan. The harm arising from the loss of the trees will need to be weighed against the replacement offer including new trees and infrastructure proposed in the planning balance.

99. In this case it is considered that a series of public realm proposals and tree planting would offset the loss of the trees, making the proposals policy compliant. The proposals would transform and reimagine the public realm around the footprint of the new building comprising: a proposed new pocket park which would include 19 trees, a landscaped area in the centre of Thavies Inn including a cycle hub for 60 bikes; and the widening of the pavement on St Andrew Street to provide increased public realm and accommodate four new street trees. As part of the planning balance the quantitative and qualitative benefits need to be evaluated and set in the context of a long-term response to climate resilience.

Replacement offer

100. Policy CS19 of the Local Plan states that developments shall '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, by… securing additional publicly accessible open space and pedestrian routes, where practical'

101. At ground level the proposals would provide a series of softer interventions which would include garden beds and trees in appropriate locations to frame movement corridors, buffer vehicle routes and allow pedestrians to dwell. A new pedestrianised raised table across St Andrew Street would provide a safe and legible route into the development and a reimagined Thavies Inn as a public space. The ground floor of the development has been designed to be pedestrian friendly for walking and social interaction; legible with a clear palette of materials which would respond to local context with private and public edges which encourage natural surveillance; and a series of landscape corridors connecting to St Andrew's Churchyard. Key components include:

Proposed trees

102. In total, 23 new trees are proposed which includes four large canopied new street trees on the widened pavement on St Andrew Street); and 19 new trees in the proposed pocket park at the rear of the site, comprising various species of multi-stemmed and single stem species.

103. At the time of planting, the four new street trees on St Andrew Street would be 5.5-6m in height. They are likely to grow to up to 10m in height in this location but could grow to potentially 15m in height.

104. At the time of planting, the single stem trees and multi-stem trees within the Pocket Park would be 5-6m in height with different mature heights ranging from 5-10m in height. Due to a number of factors, such as climate, ongoing irrigation and maintenance it is difficult to give an accurate exact height at maturity.

105. The City of London Tree Strategy SPD explains that whilst there are 70 different species of tree within the City, six of these account for approximately half of all of the City's trees, and one in seven of all trees is a London Plane tree.

106. It is proposed that a variety of tree species are planted which would meet the City's and GLA's aspirations for a climate resilient and biodiverse London. Planting a diverse variety of tree species would mean that the planting scheme would be more resilient to pests and would have greater biodiversity value than the existing street trees. Considering the number of trees proposed, Thavies Inn is a potential new site along the City of London 'Tree Trail'.

107. Tree species have been selected in consideration of the following criteria: Appropriateness to place; aspect and direct sunlight available; biodiversity value; longevity; robustness and resilience for urban sites;

and drought tolerance; tree origin in order to include native species where possible in combination with non-native species that support biodiversity; and intrinsic characteristics and visual qualities to give individuality, identity and atmosphere to the site.

Proposed pocket park

108. At the northern end of Thavies Inn, directly to the south of the development a pocket park is proposed (460 sq.m), which would be accessed from the passageway from St Andrew Street as well as the new connecting route east west to New Fetter Lane. Raised planters are proposed to increase the tree soil volume above the basement and the planters would also provide additional seating. Seasonal planting is proposed with a mix of native and adaptive species suitable for climatic conditions as well as supporting pollinators and providing food for biodiversity.

109. The space would be vibrant with colourful seasonal and climate resilient planting but also active with the café at ground floor spilling out into the area. The pocket park could be used flexibly and has been tested for temporary exhibits and events (to be secured through the recommended condition requiring a cultural plan to be submitted) as well as informally.

110. The pocket park would be enticingly visible through the passageway from St Andrew Street and has been designed in response to the findings of the thermal comfort assessment and sunlight assessment. In terms of thermal comfort, the seating area to the north of the pocket park would be appropriate for use all through the year as an amenity space, and the rest of the pocket park would be appropriate for outside dining during most of the year. On June 21st the pocket park would receive at least two hours of sunlight to 100% of its area and would be very well sunlit. On March 21st, the pocket park would not receive two hours of sunlight to any part but would receive one and a half hours to the northern area, where the seating would be located, and at least one hour to the majority of the space. Due to the north-south orientation of this rear courtyard, this amenity space would receive sunlight during the middle of the day starting around the spring equinox and increasing through the summer months. This will peak in midsummer where access to sunlight would be achieved from 10:00 and 14:00. At the mid-year equinox in March sunlight would be available between 11:30 and 13:30 indicating that through all of the summer months sunlight would reach this space around the middle of the day, when it is likely to be most well used. The proposed Pocket Park would largely experience wind conditions suitable for 'Occasional Sitting' in summer and winter.

111. The proposed pocket park would support wellness and socialisation and would be protected from road noise with a good microclimate. It would be a pleasant and tranquil place to dwell.

Cycle hub

112. The centre of Thavies Inn is private land used for parking. Surrounding this is public highway, and it is from here that the buildings which back onto Thavies Inn are serviced.

113. It is proposed that the parking in the centre of Thavies Inn is removed and replaced with a landscaped area (including trees), which would include a cycle hub (60 spaces) for public use. This cycle parking would not contribute to the development's short term cycle parking but would be an additional public benefit supporting active travel and a low carbon form of transport.

114. The cycle space would sit on a carpet of permeable paving and surface water would drain to a central rain garden which would filter pollutants. Planting comprises multi stem trees and mound planting. The carriageway kerbs and footpath surfacing would be improved with a new high quality natural stone paving palette.

115. Signage around the site, and specifically on the new routes would ensure that the cycle hub is highly visible. The exact location and detailed design of this signage would be secured by condition, through the signage strategy.

Widening of St Andrew Street Pavement

116. It is proposed that the pavement on St Andrew Street is widened by 4.8m, which would provide space for pedestrian movement and the proposed four replacement street trees. A raised table crossing is proposed across St Andrew Street at its western end to link this area of public realm with the Church on the opposite side of the street and improve the safety of pedestrians crossing the road.

117. The proposed street trees would be planted in the ground in this widened footway with rain gardens. The pavement has been designed to slope towards the planting beds surrounding the trees so that these beds can, temporarily hold and then soak in rainwater run-off from the pavement, which would passively irrigate the trees and planting.

118. This widened footway would incorporate a spill out area with fixed street furniture and a delineated zone for tables and chairs for the use of the proposed café/restaurant. Due to the level change between this space and the pavement this would be bordered by linear planters.

119. The existing cafe on St Andrew Street spilled out onto the pavement adjacent to the trees. The proposed offer would be similar in its use but would be a more pleasant place to dwell, as it would be separated from the road and would be more heavily landscaped. In thermal comfort terms both the existing seating and the proposed seating would be suitable for outdoor dining for most of the year.

Conclusion on loss of trees

120. In reaching the decision on whether the proposals are policy compliant the longevity and quality of the existing trees and associated public

realm has been carefully weighed against that of the proposed replacement offer.

121. Through the submission of a Viability Assessment, covering three scenarios (the proposed scheme; a scheme which results in the retention of both of the trees; and a scheme which results in the retention of one of the trees) the applicant has demonstrated that the redevelopment of this site would not be definitively viable without the removal of both trees.

122. The replacement offer of four new street trees on St Andrew Street, the widening of the St Andrew Street pavement, pocket park and cycle hub result in a net gain of public realm (846 sq.m gain) and would be an enhancement over the existing spaces, linking well to the proposed new routes to create a distinct place which supports pedestrian movement and low carbon transport with the proposed cycle hub accessible to all. In addition, the proposed planting species for trees and wider landscape are more suitable for long term climate resilience and encourage increased biodiversity and would also support disease resilience. This long-term vision would create a series of new tranquil, flexible and functional spaces making good use of existing land.

123. The urban greening both within the public realm and on the building would collectively create a strong and impactful visual greenness which would positively contribute to local townscape. The trees would integrate with existing trees within the churchyard and within the public realm. The location of the new tree planting and wider landscaping would be prominent and experienced in all directions and approaches to the building adding value to existing and new pedestrian routes and spaces.

124. Paragraph 131 of the NPPF states that existing trees should be retained wherever possible, and to respond to this the submitted Viability Assessment demonstrates that in order for the redevelopment of this site to be definitively viable the trees need to be removed. The significant increase in street tree planting, the introduction of the pocket park, the generous public realm to St Andrew Street and the cycle hub are considered to be an adequate replacement for the trees, which outweighs their loss. The proposals therefore comply with policy G7 of the London Plan and paragraph 131 of the NPPF.

125. These public spaces would have an overarching compliance with the Mayor's 'Public London Charter and 'Expanding London's Public Realm: Design Guide' and the City's Public Realm SPD and associated Technical Guidance. In addition, the proposals would support the Destination City vision to bring activity and vibrancy to the Square Mile.

126. Details of the new trees, landscaping and public realm and their delivery and maintenance would be secured by condition and S106 Agreement.

Transport and Highways

Public Transport

127. 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 Blackfriars, Chancery Lane and Farringdon underground stations and City Thameslink, Blackfriars and Farringdon national rail stations. The site is close to several bus routes running close by with stops on Fleet Street and Holborn Circus.

Vehicular access

128. 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.

129. The proposed development would be car-free. There are no new Blue Badge spaces provided as part of the development. Two Blue Badge spaces are available on the Thavies Inn public highway, within 50m of the development site. These spaces would be retained but would need to be relocated within Thavies Inn. This would be secured through the S278 agreement.

130. The proposed development would be policy compliant in respect of the proposed car parking arrangement and would represent an improvement on current circumstances as the existing 11 private car parking spaces on Thavies Inn would be removed (to be replaced by cycle parking and landscaping).

Cycling

131. 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.

132. The proposed level of cycle parking is compliant with the London Plan, as is shown in the table below.

London Plan long stay cycle parking	**Proposed long stay cycle parking**	**London Plan short stay cycle parking**	**Proposed short stay cycle parking**
168	168	25	25

133. In addition to the above noted provision, the application proposed as additional 60 short stay cycle spaces centrally located within Thavies Inn.

134. The long stay cycle parking would be located at basement level and be accessed via a lift and staircase from an entrance on New Fetter Lane/Thavies Inn. The access would be inclusive to all users and be able to accommodate the number of arrivals and departures at peak times.

135. A mix of cycle parking would be provided, including; 130 spaces on two tier racks, 10 spaces provided by Sheffield stands, 18 spaces for folding bicycles and 10 spaces for larger adapted cycles.

136. 5% of the cycle parking spaces would be able to accommodate larger adapted cycles and this arrangement would be secured by planning condition in line the London Plan Policy T5 (Cycling), the London Cycling Design Standards 8.2.1, and the draft City Plan 2036.

137. The proposals include 18 showers, and 168 lockers at basement level. 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. The proposed ancillary changing facilities meet the London Plan recommendations.

138. The short-term cycle parking would be located externally on St Andrew Street and Thavies Inn, on new public highway.

139. The applicant would be responsible for promoting the use of the cycle parking spaces through a Section 106 obligation to produce a Cycling Promotion Plan, which would be a cycling focused Travel Plan. The Cycling Promotion Plan would include details of how visitors to the office can access internal cycle parking. It would be submitted to the City for approval in line with London Plan Policy T4 (Assessing and mitigating transport impacts).

Servicing and deliveries

140. Policy DM16.5 of the Local Plan 2015 and the draft City Plan 2036 Policy VT2 require developments to be designed to allow for on-site servicing. London Plan Policy T7 (Deliveries, servicing and construction) 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.

141. Servicing would take place on the public highway on Thavies Inn. The justification for this is the small footprint of the site, the pedestrian routes through the site and the lack of space below ground to provide vehicular lifts to basement level. With appropriate mitigations in place, restricting delivery numbers and timings, the proposed servicing arrangement is considered acceptable.

142. The applicant carried out surveys of the kerbside uses in Thavies Inn prior to the pandemic to demonstrate that the demand generated by the development could be accommodated on-street.

143. The emerging 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.

144. The applicant is proposing to use an off-site consolidation centre in order to reduce the number of deliveries to the development per day. The applicant has agreed to a cap of 14 deliveries per day. A requirement to use off-site consolidation and the cap on daily vehicle numbers will be secured in the Section 106 agreement.

145. The emerging 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 for both parts of the development.

146. To minimise the impact the servicing of the development has on the new public realm within Thavies Inn during daylight hours, the applicant has agreed to cap deliveries in the interpeak periods (1000 – 1200 and 1400 – 1600) to 2 deliveries per hour.

147. The submission of a delivery and servicing plan, further detailing how deliveries would be managed to reduce their impact on the surrounding highway network, would be secured in the Section 106 agreement.

Waste Storage and Collection

148. Waste would be stored at ground floor level, at the rear of the development and collected from Thavies Inn, as it is currently.

Trip Generation and Pedestrian Comfort

149. The Transport Assessment includes an estimation of trip generation for the existing and proposed developments. The proposed development would be expected to result in an increase in approximately 102 trips in the AM peak hour, 130 trips in the PM peak hour and 157 trips in the lunchtime peak.

150. The increase in trips could be accommodated on the surrounding public transport network without unduly impacting pedestrian comfort in the nearby area. The proposed improvements to the public realm, which are discussed in more detail in the S278 section below, would be expected

to result in a benefit to pedestrians visiting the development and travelling through the area.

Section 278 Agreement

151. The applicant will be required to enter into a Section 278 agreement to deliver the public realm improvements in line with London Plan policies T2 and D8. The scope of the S278 agreement will cover St Andrew Street and Thavies Inn.

Stopping Up

152. A stopping up order would be needed to stop up areas of St Andrew Street, New Fetter Lane and Thavies Inn which would be built upon if the development was implemented. The applicant is also proposing to stop up part of St Andrew Street which would be oversailed by the proposed development. In total the applicant is proposed to stop up approximately 118sq.m of public highway.

153. The Court has authorized the Town Clerk to make stopping up orders that are not opposed, and he has delegated this authority to the Executive Director of Environment. Opposed stopping up orders are, however, reported to your Committee to determine.

Adoption of Public Highway

154. The applicant is proposing to dedicate two areas of Thavies Inn for adoption as public highway. A total of 184sq.m of new public highway would be provided. This would enable to delivery of the new public realm on St Andrew Street.

Public Realm, Security and Hostile Vehicle Mitigation (HVM)

155. 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.

156. 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.

157. It is not considered necessary to protect the pavement as a crowded place and therefore the HVM originally proposed on the pavement in front of the main entrance has been removed as this would have obstructed the pavement. Bollards may be necessary within the site at the entrance to the new routes and at the southern of the pocket park. Details of this will be secured by condition.

Construction Logistics

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

Design

Site location and context

159. Holborn Circus is a bustling intersection on the western fringe of the City sharing a boundary with the LB Camden and was created as part of the Holborn Viaduct scheme (1863-9). The Circus was once defined by 19th Century grand buildings with concave curved frontages of which today only the National Provincial Bank at 1 Hatton Garden is the only survivor of this former arrangement. This is a fragmented place which is traffic dominated and poorly defined with building lines set back resulting in an open aspect to the area with little coherent enclosure. Noted architectural historian Nikolaus Pevsner stated the 20th Century rebuilding of the area "has made a broad windswept intersection without strong architectural character."

160. The architecture is of different building periods, materiality, and varying quality. The finer grain of Hatton Garden jewellery quarter rubs shoulders with the congested broad commercial linear Holborn and Holborn Viaduct east/west route and Charterhouse Street leading to Smithfield. New Fetter Lane to the west is narrow and enclosed and is an important north/south route to the legal quarter at Fleet Street. Buildings along this route and to Shoe Lane south of St Andrew Street have larger footprints, are mid-rise, are corporate in feel and are often glassy in nature. St Andrew's Street is a much quieter and more intimate street.

161. The public realm and pedestrian and cycling experience is polluted, noisy and not easy to flow through. There is seating and planting to the peninsular area outside 40 Holborn Viaduct, but this is a little forlorn, enclosed by congested Charterhouse Street and Holborn Viaduct. The award-winning St Andrew's Churchyard redesign has enhanced Holborn Circus and the churchyard has become a place to linger with increased urban greening.

162. Thavies Inn to the south of the site is an underutilised servicing and car park area. There is a pedestrian and vehicular through route to Bartlett Court and stepped alley to Shoe Lane. It is a quiet utilitarian space with little footfall enclosed by anonymous rear elevations from buildings fronting New Fetter Lane, Holborn Circus and St Andrew Street.

Existing buildings

163. The site comprises two conjoined 'Neo-Georgian'-style commercial buildings dating from 1930s (5 storeys) and 1950s (9 storeys). The existing buildings have limited townscape presence and due to the different building periods and heights read as a disjointed mass which

recedes from Holborn Circus. The lower block has an awkward relationship with the taller neighbouring 6 St Andrew Street which results in a prominent and unsightly exposed party wall along with the telecommunication equipment which are experienced in long views south . The ground floor is largely solid and inactive to the north and west with poorly defined entrances and this results in a poor pedestrian experience.

Design Evolution

164. The redevelopment has been refined with a focus to deliver a proposal which is contextual, highly sustainable, biophilic with new pleasant routes and public spaces for sitting. A reduction in massing responds to the context of St Andrew's Church and the LVMF thresholds. There have been iterations of the materiality and articulation of the facades addressing environmental factors including solar shading, light spillage, adjustments to solid/void ratio and there has been rigorous approach to the urban greening both the integral elements on the building and to the public realm. The ground floor plane is pedestrian focussed and was remodelled to include an east/west public route, additional public realm and further urban greening to the pocket park with a focus on climate resilience. The removal of the car park and introduction of the cycle hub in Thavies Inn supports active travel and will add to the vibrancy of the area

165. The site acts as a gateway into the West of the City and the important routes to the south. Through this continued refinement processes the development has been worked to ensure the proposals support the design principles of Local Plan policy DM10.1 and emerging City Plan policy S8 and London Plan policies D3, D4 , and D8 as well as Good Growth policies (GG1-GG6) in particular: making the best use of the land; and delivering increased public realm to create a distinct and attractive place for all.

Height, massing and footprint

166. Buildings heights are broadly consistent in this part of the City as they are covered by LVMF restrictions. The maximum height of the proposed building would be 10 storeys (54.07 m AOD), whilst the existing rear block to be demolished is 9 storeys (45.44m AOD and with plant rises to 50.60m AOD). Overall, the proposed building would be slightly taller than the modern neighbouring 6 St Andrews Street (8 storeys) and to the west the glassy Sainsburys Headquarters 33 Holborn (7 storeys).The height and scale is comparable to the height of St Andrew's Church and the wider prevailing buildings heights, and would sit comfortably in the local context. 6 St Andrew Street (20/00230/FULL) has permission for an extension at eighth and ninth floor levels which would be a similar height to the proposed application.

167. The height and massing have been informed by relevant LVMF restrictions, setting of heritage assets and context. The massing comprises two nested volumes, the larger addressing Holborn Circus and a lower volume addressing St Andrew Street and St Andrew's

Church which incorporates a double height step down creating space for an east facing terrace. Due to its location, it would reveal itself either partially in approaches from the south or more fully in the open aspects from experiences from Hatton Garden, Charterhouse Street and Holborn Viaduct. In all these aspects the height and volume would be a comfortable addition to the established building heights and scale which characterise Holborn Circus and this part of the City and would often be experienced with the taller buildings of New Square as a backdrop.

168. The building line at ground level to the north, west and south would broadly, match the existing. The gentle curve to the northern elevation at pedestrian level and to the oversailing facade allows the development to embrace its location at Holborn Circus and reflect the geometry of the historic building arrangement of the 19th Century when the Circus was more legibly defined by tighter building lines. To the east the building line would be pulled out to occupy the triangular outdoor space and would mend the fragmented street scene increasing enclosure and introducing a more traditional and continuous building line reflective of St Andrew Street. The upper levels of the building footprint would over sail to the north retaining the existing pavement width and a small portion to the south where the pavement width would be widened. This creates a sheltered route along the pavement outside the main entrance with a distinctive stone soffit feature which links through a reinvented passageway to Thavies Inn and the new pocket park. The impacts of this overhang would not be oppressive to either elevation due to the open aspect to the north and generous new pavement width to the east and raised table to the north. These architectural devices together with the public realm changes would positively anchor the building and introduce a human scale to this part of Holborn Circus.

169. Compared to the existing fragmented Neo-Georgian buildings the proposed massing is conceived as a distinct and clearly identifiable volume with a coherent silhouette. The increased height and the enlarged footprint and subsequent massing would have visual prominence and presence delivering a much needed enclosure to this southern aspect of Holborn Circus as well as being deferential to the surrounding heritage assets to the east. The massing, height and footprint would constitute the optimal use of a limited land resource in line with policies CS10 (2) of the Local Plan, emerging policy S8, and policy D3 of the London Plan.

<u>Architecture and urban design</u>

170. Architecturally the development would be elegant, enriching the varied urban character and materiality of the context with a pedestrian and urban greening focus. The building has a traditional tripartite hierarchy composition of base, middle and top ‘attic’ storey, taking cues from the 19th Century building which previously occupied the site.

171. There is a unified approach to all elevations but there is a clarity that Holborn Circus is the primary elevation. At ground the two lower storeys are recessed in plan to Holborn Circus which creates a visual lightness to the volumes above and this glazed and transparent base to the

building is strengthened by the stone framing, overhang, and strong soffit.

172. The Holborn Circus elevation has a large sweeping elevation that flows around the building, expressed in the curved building line and tight radius curved corners. Inserted balconies for planting to the east elevation at 2nd, 4th and 6th floor reinforce the sense of two volumes fronting Holborn Circus and St Andrew Street and breaks up the overall massing. This composition is then balanced by an expressed double storey 'attic' at roof level (levels 08 and 09), which was refined during the design process with additional solidity to reduce light spillage. Overall, the architectural approach provides a familiar and well-proportioned form which has a human scale, and which is legible.

173. The central band of the building is Levels 2 to 7, and the principal expression is a consistent double storey and 3m wide grid, offering an appropriate sense of verticality This is formed by bronze-coloured frames unifying all facades, whilst the unitised glazed system incorporates shadow boxes and openable windows providing modelling and shadow to give depth to the facades. The articulation of theses frames varies according to facade orientation.

174. Urban greening, solar shading and increasing biodiversity is integral to the architecture from levels 2 to 7 and is a response to microclimate conditions. A bronze vertical rod system occupies one side of the bronze framing which has the dual purpose of providing shading and an infrastructure for vertical climbers to grow aligning with S8(5). Vertical climbers contribute to reducing the urban heat island effect and remove particulates. The planting boxes are positioned at alternate floors and contained within the depth of the bronze frame. The quality of the building has been tested without the planting to ensure the architecture has integrity as a standalone piece of design. The planter design, structural loading requirements, and irrigation system has been refined through the process and benchmarked against successful examples in the UK. The climbers are expected to grow to 5-7 m in height. Different climbers are proposed according to the aspect which would avoid a mono culture of planting and provide a diverse palette of colours and more biodiverse habitat.

175. The architectural biophilia has been holistically designed with the public realm. Collectively the overall impact would be visually attractive in the townscape in both long and local views and as an immersive experience as a pedestrian moving through the site. Proposals have considered: microclimate; biodiversity; irrigation; and to ensure delivery and long term success would be supported by a management strategy secured through the S106 agreement. The quality and character of the design would align with Local plan DM10.2 and emerging policies DE2 and S8(9).

176. The narrow elevation to the rear has been designed to complement the Holborn Circus facade as this is an important backdrop to the pocket park incorporating horizontal louvers to address solar gain. The junction

with neighbouring building continues the use of stone to bookmark these interfaces.

177. The architectural palette is simple comprising steel with a bronze-coloured finish and performance glass as well as significant urban greening. Stone features are used to strengthen the base, provide a strong soffit and attractive canopy to the routes and book mark the interfaces with buildings on New Fetter Lane and St Andrew Street. Specifications for materials will maximise the practical ratio of recycled material and will ensure materials are reusable as a part of the materials passport approach secured via a condition. The proposed materiality, design details and intricacies would be secured through conditions including samples and mock ups of the proposed bay and planters.

178. The building layout has been design-led to optimise pedestrian movement and maximise permeability creating inclusive, safe, active, and welcoming new routes, and a widened pavement to St Andrew Street which would collectively reduce conflict with vehicular traffic. The building would be outward facing at ground floor with active edges, new routes and increased permeability which would connect to new well designed green public spaces. The new routes and cycle hub all support active travel and comply with Local Plan policy DM10.1 and Emerging policies S8 (1) (2) (6) and DE2

179. A new east-west pedestrian route is proposed linking Thavies Inn to New Fetter Lane. This would be curated with artwork and also provide attractive glimpse views towards the new pocket park from New Fetter Lane. The existing north-south route to Thavies Inn would be reimagined as a generous arcaded north/south route visually and physically connecting to the new public pocket park and landscaped cycle hub in Thavies Inn. The arcade would be 3990mm wide and could include seating to one side and would be a sheltered covered space with a good microclimate. These routes would enhance local distinctiveness, increase permeability, and reflect the historic character of the City which is defined by a characteristic network of streets, courts, and alleys.

180. The building would further positively engage at street level with active uses wrapping around the base formed by curved glazed facades. The main office entrance facing Holborn Circus would be glazed, legible and inviting. The core and service areas are compact and positioned to the rear of the site reducing any inactive frontages.

181. The triangular portion of the site to the east of the reimagined arcade is proposed to be a double aspect café. A pavement terrace as part of the widened pavement and improved public realm to St Andrew Street would create a public place with a good microclimate and morning sunshine and more trees. The glazed facades to the café and the office lobby would both provide natural surveillance to the north south route and the café glazed façade extends south into Thavies Inn providing a further opportunity for an outdoor spill out area as part of the new pocket park

182. The New Fetter Lane western elevation repeats the modular grid elevation and hierarchy and retains the existing building line whilst

omitting the oversailing canopy. The ground floor would be active and engaging with a glazed base, prominent cycle entrance and the New Fetter Lane entrance to the east/west alley pedestrian route.

183. The roofscape includes PV panels and a biodiverse roof and mechanical plant is integrated into the volume of the building in accordance with Local Plan policy DM 10.1 (6/7) There would be minimal projections at roof level maintaining a strong silhouette which would be clutter free with attractive clean lines. This is a considered response which satisfactorily integrates M&E plant and servicing, in line with policies DM 10.1 (8) of the Local Plan and S8 DE2 of the emerging City Plan.

184. The architecture and public spaces would be celebrated by a sensitive architectural lighting scheme and would provide an appropriate sense of arrival though the public routes during hours of darkness without creating unnecessary light spill. The lighting of the roof terrace would be at low level and discreet. Final details of the comprehensive lighting strategy including colour, scale, intensity, brightness, and street lighting would be secured by condition to ensure the details are in accordance with the City's adopted Lighting Strategy and in accordance with Local Plan DM 10.1 (10) and Emerging Policy S8 (11) and DE2.

185. The design approach to the site would be high quality, elegant and refined and would positively contribute to redefining this part of the City. The development would be appropriate in scale and architectural form, with a subdued palette of materials and exudes a quality that would add a level of richness, softness, and visual interest with an animated ground floor to the local townscape. The final details of the development including urban greening, public realm, artwork, lighting, soffits, planting, infrastructure, entrances, and materials would be secured via condition to ensure a high-quality appearance and finish. The architecture with the public routes, pocket park, cycle park and cultural components would deliver a distinctive and engaging place, enlivening this outer fringe of the City and would build on the positive work of the St Andrews Churchyard public realm.

186. The proposals would comply with policies CS10 and DM10.1 of the Local Plan 2015, emerging policies S8, DE2, and DE3 and London Plan Policies D3 and D8 and the NPPF.

Strategic Views - London Views Management Framework

187. 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 over sailed by the following LVMF Protected Vistas to St Paul's Cathedral :

- LVMF 4A.1 Primrose Hill to St Paul's Cathedral - the development would be within the Landmark Viewing Corridor but would not breach the threshold plane

- LVMF 5A.2 Greenwich Park to St Paul's Cathedral – the development would be in the Wider Setting Consultation Area and would incur a minor breach to the threshold plane, triggering a qualitive assessment (below)
- LVMF 6A.1 from Blackheath Point to St Paul's Cathedral– 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).

LVMF 4A.1 Primrose Hill

188. The site lies within the Landmark Viewing Corridor of the Primrose Hill Protected Vista (London Panorama). After Officer negotiation, the proposed development was reduced in height and the proposal does not breach the threshold that ranges from 54.4m AOD to 54.3m AOD. The highest point 54.07m AOD of the building is a safety rooftop handrail and lift over run within the southwestern part of the site area which would sit below the threshold plane at that point. The overall height to the parapet of the building is 53.17m AOD.

189. The proposed development would not be readily discernible in the view and would integrate with the varied form and layering of the skyline of mixed character. The proposed new building would sit below the threshold of the Viewing Corridor and would also be screened by the larger and taller profile of the recently completed Plumtree Court (Goldman Sachs HQ) to the southeast of the site. There would be no impact on an observer's ability to recognise and appreciate St Paul's as the Strategically Important Landmark (SIL) in the view and the nature of the effect would be neutral.

190. 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 HC4, Local Plan Policy CS13(1) and proposed emerging City Plan policy S13(1).

View 5A.2 – Greenwich Park

191. 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 where this crossed the site. There is a constant consultation threshold plane of 52.4m AOD as the site lies within the vista background and the breach would be 1.67m. The highest point 54.07m AOD of the building is a safety rooftop handrail and lift over run. The overall height to the parapet of the building is 53.17m AOD.

192. The new built form would not be visible from the viewing location due to the screening effect of the drum of the Cathedral itself that directly intervenes between the viewer and the site from the Assessment Point. Even without the screening of the Cathedral itself Plumtree Court

(Goldman Sachs HQ) screens it in the background. Any slither of visibility in the absence of the Golden Sachs Building would be minor and indiscernible form the distance of the viewpoint to the site, even with magnification.

193. 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 SIL, the Monument and Tower Bridge, in the view and the nature of the effect would be neutral.

194. The proposal would be 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.

View 6A.1 – Blackheath Point

195. 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 where this crossed the site. There is a constant consultation threshold plane of 52.4m AOD as the site lies within the vista background and the breach would be 1.67m. The highest point 54.07m AOD of the building is a safety rooftop handrail and lift over run. The overall height to the parapet of the building is 53.17m AOD.

196. The development would be located to the left side of the drum and dome of the Cathedral in this view close to the base of the western towers aligning with the base of the peristyle of the drum. The development would not be readily discernible and would integrate with the existing varied form and character and layered silhouette of the buildings that make up the wider context. The proposed new building would also be screened from view by the Plumtree Court development (Goldman Sachs HQ). Any slither of visibility in the absence of the Golden Sachs Building would be minor and indiscernible form the distance of the viewpoint to the site, even through magnification.

197. 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 SIL. Development in the Wider 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).

198. Being indiscernible due to the distance of and complex layers of back drop, it is considered that the proposed development would accord with the visual management guidance set out in paragraphs 154-156 of the LVMF SPG. The development would not harm the characteristics and composition of the view and is in accordance with London Plan policies HC4, Local Plan policy CS13(1) and emerging City Plan policy S13(1).

Summary of LVMF Impacts

199. There have been no objections from consultees in relation to LVMF impacts, including the GLA.

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

Other Strategic Local Views

St Paul's Cathedral – Views From

201. The proposal would be visible from the Stone and Golden Galleries of St Paul's Cathedral with the vast roof top to the Goldman Sachs building in the foreground. The proposed roof has an uncluttered profile, is modest in scale and there would be glimpses of planting. 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 nearby skyline landmarks of the Waterhouse Building on Holborn or the pinnacle of St Andrews Church Tower Holborn.

202. The proposed development would preserve City skyline landmarks and skyline features and would comply with Local Plan Policy CS 13 and emerging City Plan Policy S13 and guidance contained in the Protected Views SPD.

Monument - Views From

203. A slither of the roofline and the upper most part of the proposed building would be technically visible in views looking northwest towards St Paul's Cathedral. 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(2) and emerging City Plan Policy S13(2) and guidance contained in the Protected Views SPD.

City landmarks and skyline features

204. Policy CS13 (2) seeks to protect and enhance views of City Landmarks and Skyline features as identified in the Protected Views SPD. The proposed scheme would be visible in views of St Andrew's Church Holborn and City Temple (tower) Holborn Viaduct (City Churches with a Skyline Presence). The proposed scheme would be a high quality, modern architectural backdrop to these two designated heritage assets, complementing their silhouettes and blending with existing contemporary buildings which form their backdrops. The development would be in accordance with policy CS 13(2) in this regard.

Heritage

Indirect impacts on the setting of designated heritage assets

St Andrew's Church Holborn (grade I)

Significance and contribution to setting

205. St Andrew's Church is of exceptional significance, being built on the site of a former 15th century church to designs of Sir Christopher Wren. Dating from the 17th century it is English Baroque in style and stone with a copper roof over a seven-bay nave with a north tower visually prominent in views east and west along Holborn and Holborn Viaduct. The Church has historic, architectural, and artistic heritage values which contribute to its significance.

206. Whilst the Church draws its substantive significance from its historic fabric, architectural composition, distinct tower, and plan form, a significant, but lesser, contribution is derived from elements of setting. The setting of the Church has substantially changed over time, from the Victorian re-engineering of the Fleet Valley to the substantive redevelopment post-war in the 20th Century – which has resulted in a dramatically different modern setting which is less urban and enclosed, to one which is more open. This modern townscape condition created a new visual relationship with Holborn Circus, which allows the Church and the tower of St Andrew to enjoy a further emphasised historic and visual land mark statement as seen across the Circus and along the older Holborn/Holborn Viaduct and other feeder streets.

207. The following elements of setting make a moderate contribution to setting. The neighbouring separately listed 19th Century gothic revival former Vicarage and Court House and, wall and gates piers (all grade II) which lie to the south form a courtyard and mutually contribute to each other's significance as a collection of intimate urban ecclesiastical buildings of contrasting styles. Together they enhance an understanding of religious worship from the 17th Century onwards in London. The appreciation of the grouping is most evident in visual experiences at close quarters, from St Andrew Street or the shared internal yard and as a secondary rear elevation from Shoe Lane . The original churchyard was lost in the 19th Century due to redevelopment. There is an older part of the former churchyard to the north of the church and more public

modern gardens to the west/north with seating, trees, and planting. The churchyard/open space gives a defined boundary and prominence to St Andrew's Church and its related functional use as a place for solemn reflection. The churchyard also provides the best place from which to appreciate the church and its architectural quality.

208. There is a positive visual and historic relationship in views east and west with intervisibility between City Temple Church Holborn (1873 grade II) cupola and corner tower and the tower of St Andrew's Church. 54 Farringdon Street (1863-9 grade II) is further east and in the periphery of the setting and forms a pair with 41 of pavilions to Holborn Viaduct. These historic buildings postdate St Andrew's Church but as an enclave support the historic and architectural values and give an understanding of the development of the area in which the church sits.

209. Many of the late 20th and 21st Century large, midrise buildings within the wider setting and particularly within the backdrop of views of St Andrew's Church including the glassy Goldman Sachs Plumtree Court and 55 Holborn Sainsburys Headquarters make no contribution to significance.

210. The development site is located to the south west of St Andrew's Church and forms part of the wider local townscape setting. Like other 20th Century buildings within the setting, Thavies Inn House makes a neutral contribution to significance. The two London Plane trees which are within the development site are attractive contributors to the local townscape and are part of a wider cluster of greenness and trees which surround the Church and this corner of Holborn Circus. This was recognised in the TPO Committee report to Planning and Transportation Committee. The two London Plane trees are of local townscape value and in views west, but the trees have no historic connections which contribute to the significance of St Andrew's Church as a designated heritage asset.

Impact

211. The setting of St Andrew's Church is constantly evolving and already has intervisibility with many backgrounds of contemporary buildings. The immediate and wider townscape setting of St Andrew's Church has been substantially altered but the height and distinctive architectural design of the tower remains a key feature against this backdrop of larger contemporary buildings as well as sky.

212. The proposed redevelopment would introduce a more prominent building to the south with a more confident and interesting form and elevation to Holborn Circus. The visual experience in longer more open views across the Circus from the east, west and north are where the development would be most evident and would be within the wider setting.

213. In views west along Holborn and from Holborn Circus the new development would appear in kinetic views and there would be intervisibility with St Andrews's Church. In these experiences the

development would blend with the existing backdrop layers of taller contemporary back drop buildings. At no point would the development appear above the height of the tower which would retain considerable sky around the upper levels maintaining its visual prominence. In views east from Holborn the development would be to the south and compared to the existing building development would have an increased massing but would integrate with the established wider contemporary townscape setting. Where the development is experienced within the setting it would read as a well-proportioned and articulated form with attractive urban greening and a subdued palette of materials which would maintain the pre-eminence of the Church, reinforced by the stepping down in massing on the western elevation

214. Within all these local views there would be no challenge to the singularity of the tower and the prominence of the church. The materiality of bronze, glazing and stone and urban greening would not compete with and would complement the Church and there would be no erosion of understanding of significance.

215. The more intimate relationship between the parish Church and dependent vicarage would not be undermined by the development. Although an element of the built context of shared views would result in change this would not distract from understanding or appreciation of the heritage significance. Key local views towards the Church and its tower from within the public gardens and also the older churchyard to the north are orientated away from the site. Similarly the important local more public views to the Church and vicarage as a group are orientated away from the site. The development would appear in the back ground experience of Temple Church and St Andrew's Church and the intervisibility of the towers and cupola but again this is already defined by taller background modern development and the visual and historic relationship and ability to appreciate this experience would be preserved.

216. The existing trees contribute to a local verdancy in the urban townscape setting of the Church together with other trees within the churchyard, but the trees do not contribute to heritage significance. There would be a change to setting due to the loss of trees however the proposed new four street trees, increased public realm planting and significant urban greening to the building would retain the overall sense of impactful soft landscaping in the eastward view and the quality of townscape would not be diminished. There would still be a balanced sense of greenness around St Andrew's Church and the contribution of the churchyard to significance would be maintained. The enhancements to the public realm on the western elevation would enable opportunities to enjoy views of St Andrew's Church, the Vicarage, and the Churchyard as a townscape experience.

217. There would be no impact on the ability to appreciate the heritage significance of the listed building either cumulatively or in isolation and the presence and prominence of St Andrew's Church within Holborn

Circus would be preserved. The heritage significance and the elements of setting which contribute to this significance would not be harmed.

Former Vicarage Nos 5 (Lodge) and No 7 (St Andrew's Court House) and Vicarage Wall and Gate piers to the Garden of No 7 (grade II)

Significance and contribution of setting

218. The Former Vicarage and associated blocks date from 1870 and are Gothic revival style in brick to the design of Teulon. The Vicarage partially addresses St Andrews Street, but the Court House is set back framing a courtyard and enclosed by the wall and gate piers and has a rear elevation addressing Shoe Lane.

219. Whilst the Former Vicarage and Court House draw their substantive significance from historic fabric and architectural interest the buildings draw a significant, but lesser, contribution from elements of setting. The setting of the Church has substantially changed over time and key elements of setting which contribute to significance include: group value with St Andrew's Church an urban complex of ecclesiastical buildings reflecting religious worship in London; the Churchyard further reinforces former historic and spiritual associations of the buildings and contributes to significance.

220. Also within the setting are more contemporary buildings which tower over and enclose the Vicarage to the south and have no historic or architectural associations with the designated heritage asset.

221. The site is located to the west of this listed building group and forms part of its local townscape setting that comprises an urban context characterised by variety in terms of scale, types and buildings and mix of uses. The existing building makes a neutral contribution to setting and significance.

222. The two London Plane trees which are on the site are experienced within the setting of the Vicarage in approaches from the north and south. The trees have an attractive canopy and have amenity value within the wider townscape with other street trees. The two plane trees are not contemporary with the Vicarage, Court House, gate piers or wall which form the historic complex of former ecclesiastical buildings. The trees are within the townscape setting but do not have associations with the heritage values and do not contribute to the heritage significance of the designated assets.

Impact Assessment

223. The existing Vicarage and associated buildings already have a mixed urban context which includes taller more contemporary buildings. As the Vicarage complex is opposite the site on the narrow St Andrew's Street there would be little intervisibility between the site and designated heritage asset other than in oblique views north and south as part of a local setting. The more intimate relationship between the parish church and dependent vicarage would not be undermined by the development.

Similarly the important local more public views to church and vicarage as a group are orientated away from the site. The development would not impact on the contribution to significance of the churchyard or St Andrew's Church and these positive elements of setting would continue to contribute to significance and would be preserved.

224. Increased planting, new street trees and changes to the public realm would retain the existing soft edge and intimate and quieter character of St Andrew Street. The development would be glimpsed in views from Plum Tree Court rising above the Shoe Lane elevation but this intervisibility would be momentary in a very channelled view and would not detract from or dominate the visual clarity of this experience of the rear elevation of the former Court House . Where the development is experienced within the setting it would read as a well-proportioned and articulated form with attractive integrated urban greening and a subdued palette of materials.

225. There would be no impact on the ability to appreciate the heritage significance of the listed buildings either cumulatively or in isolation. The heritage significance and the elements of setting which contribute to this significance would not be harmed.

<u>The City Temple, Holborn Viaduct (Grade II)</u>

Significance and Contribution of Setting

226. City Temple is a grade II listed church, designed by Henry Francis Lockwood and dates to 1873. It was extensively reconstructed in 1956 by Seeley and Paget owing to Second World War bomb damage. It has a stone façade and Palladian portico. Internally it comprises the church, a large assembly hall, suite of meeting rooms and ancillary residential accommodation. City Temple has particular historical, architectural, and artistic values that contribute to its significance. The building has high architectural and historic significance as a highly individual interpretation of the Classical style. Its tower is an important landmark feature in views from the west and east along Holborn and Holborn Viaduct.

227. The setting of the listed building comprise the townscape of Holborn Viaduct between the busy junction to the west of Holborn Circus and the 19th century Victorian bridge over Farringdon.

228. Immediately to the west is St Andrew Church which predates Temple Church, but forms a grouping of landmark buildings and together these form distinctive and interesting features on the skyline. The churchyard reinforces the importance of the setting and the status of the historic group. The grade II Vicarage on St Andrew Street and 54 Farringdon Street are contemporary with City Temple Church but are more peripheral. As a collection these elements all contribute visually and provide an understanding of religious development and the townscape evolution of the area which reinforce the values of significance of City Temple.

229. Development along Holborn Viaduct has led to the City Temple being defined by an immediate setting of modern larger developments which are within the setting but do not contribute to significance. These modern developments have no functional, historic, or aesthetic connection to the church and do not enhance the understanding of the particular significance of the listed building.

230. The cluster of trees in the churchyard and street trees at the St Andrew Street junction are positive townscape features in the setting which enclose the historic grouping of the churches as a distinct enclave and express a degree of peace and tranquillity separate to the busy Holborn Viaduct.

231. The existing trees on the development site and Thavies Inn House can just be glimpsed within the setting of the City Temple Church. The two London Plane trees are not contemporary with City Temple Church and whilst of townscape value have no associations with the heritage values and do not contribute to significance.

Impact Assessment

232. The proposed development is located further to the west of the City Temple Church and would make a limited visible change to the westerly setting. The additional height and bulk would not impede on views and legibility of the landmark tower against open sky. The existing local landmark status of the corner tower and frontage of the listed church would not be diminished. The proposal would be seen in the background of the predominant modern elements already in the backdrop setting which read as distinctive elements. The proposed development would have no impact on the elements of setting which contribute to significance intervisibility of the spire of City Temple with tower of the Church of St Andrew, the Churchyard or the more peripheral former Vicarage and Court Buildings.

233. There would be no impact on the ability to appreciate the heritage significance of the listed building either cumulatively or in isolation. The heritage significance and the elements of setting which contribute to it would not be harmed.

<u>Statue of the Prince Consort, Holborn Circus (grade II)</u>

Significance and contribution of setting

234. This is an equestrian statue of Prince Albert by Charles Bacon given by Charles Oppenheim and was unveiled in 1874 and mounted on a plinth placed in the centre of Holborn Circus. The monument has historic and artistic values and is of high significance.

235. The statue was repositioned from Holborn Circus to the High Holborn junction sometime in the 20th Century when the central island was removed from Holborn Circus. The statue is still positioned within the main busy highway on a traffic island, but has a relatively diminutive scale and is visually dominated by much larger scale contemporary

buildings and the busy interchange. However as a memorial it maintains a narrative with the former layout of Holborn Circus.

236. The surrounding townscape has dramatically transformed and is a mixed character of largely contemporary 20th Century developments including the glassy Sainsbury Headquarters and the Seifert development at 120 High Holborn. The historic elements within the wider setting including St Andrews Church, 1 Hatton Garden and Waterhouse Building all provide a connection with the memorial's former status in the 19th century Holborn Circus townscape and are a compatible scale and materiality. Together these form an ensemble of historic elements which whilst disparate sit well together and reflect the areas former grandeur of Holborn Circus. These are all positive elements of setting which contribute to the memorials historic significance. The artistic significance of the memorial is however best appreciated in close proximity rather than distant views.

Impact Assessment

237. The development site is located within the wider setting of the memorial to the south. The development would appear as a background building and would not impact on the memorials existing status, visibility of the memorial or historic links within the Circus or its sense of a western entry from High Holborn. The development would not detract from other elements of setting including the intervisibility with St Andrew's Church and Temple Church which positively contribute to the significance and which are important historic reference points. The artistic significance is best appreciated in close proximity to the memorial. The site is peripheral to the memorial and would have no impact on the ability to appreciate the detail of the statue or the reliefs to the plinth and there would be no impact on the historic or artistic values. The development would have no impact on other elements which positively contribute to the memorials significance. The heritage significance and the elements of setting which contribute to it would not be harmed.

<u>Hatton Garden Conservation Area (LB Camden)</u>

Significance and contribution of setting

238. The existing site is in the much wider setting of the Conservation Area, on the south side of Holborn Circus outside of the boundary and is neutral in contribution and visual presence. The conservation area covers 20 hectares west of Farringdon Road. Its historic character and appearance derives from its many robustly detailed industrial, commercial, and residential buildings of the last centuries combined with an intricate street pattern that is overlaid on undulating topography. The character is related to the history of metal working and other industries and the district of Hatton Garden is well known as a jewellery quarter.

239. The intervisibility of the site with the conservation area is limited to locations along Holborn, Holborn Circus, Charterhouse Street, Hatton Garden and Ely Place. The development would not be observed within the greater majority of the streets and spaces of the conservation

area. The site has no links or legibility or historical or architectural interest with the conservation area. In views out of the conservation area the site is perceived as a part of a wider townscape which has evolved over time and is changing. The Hatton Garden Conservation Area Appraisal and Management Strategy 2017 does not identify any view towards the site as a "key views".

Impact Assessment

240. The development would result in slight change due to the increased massing and visual prominence in the wider setting and some shared views to and from the Conservation Area. Such change would not alter the prevailing characteristics of the townscape to the southern edge that it would not in any way dimmish or detract the understanding or appreciation of the Conservation Area's significance. In views the development would integrate visually in terms of overall scale, form and design as part of the wider street scene addressing the Circus. Within these views the development would read as a well-proportioned and articulated form and there would be glimpses of urban greening. There would be no harm to the ability to appreciate the heritage significance of the Conservation Area. There have been no objections from the LB Camden.

Non-Designated Heritage Assets

241. There are no identified local non designated heritage assets which would be affected by the development.

242. As part of the consultation process the Twentieth Century Society suggest Thavies Inn House should be a non-designated heritage asset. A response to this has been provided by the applicant.

243. The potential architectural and historic values of the existing buildings have been assessed against the Historic England criteria for selecting non- designated heritage assets contained in 'Local Listing: Identifying and Conserving Local Heritage Advice Note 7'. The criteria comprise: assets type ; age; rarity; architectural and artistic interest; group value; archaeological interest; historic interest; and landmark status. The assessment is summarised below.

244. Asset type and rarity: The building is a purpose built commercial building and therefore as a type is prolific in the City of London. In terms of rarity the current commercial buildings on the site are loosely Neo-Georgian in style, a popular building style of the early 20th century which endured until the early post-war period and of which there are many and more superior examples in the City of London.

245. Age: That part of the building addressing Holborn Circus to the north was initially constructed in 1939 in a red-brick neo-Georgian style. Following significant bomb damage to the historic site of Thavies Inn during the Second World War, a taller, plainer portion of an extended Thavies Inn House was constructed to New Fetter Lane (1955-1960). Postwar re-planning and redevelopment of surrounding streets and

spaces created New Fetter Lane (to the west of the Site), cleared sites around Holborn Circus itself, and also provided a car park or service yard on the site of Thavies Inn to the south. The site has been subject to changes and alterations including the prominent and unsightly telecommunications and plant at roof level. The age of the building does not relate to established local characteristics or building traditions.

246. Architectural and artistic interest: The 1939 L-shaped block is a restrained neo-Georgian building in red brick with stone window surrounds, quoins and rusticated base and regular multi-light sash windows. Part of the southern block includes a pitched roof and dormers. The tri-partite archway and permissive path at ground level on St Andrew Street are considered of interest and provide an attractive covered cloister like experience for pedestrians. These lower blocks are of modest interest but are significantly compromised by the larger block to the rear which lacks sophistication and is plain in terms of detailed design. The rear building has also been altered and the grouping visually harmed by prominent telecommunication equipment. Lewis Solomon, Son & Joseph were the architectural practice associated with the 1939 development. Digby Lewis Solomon and Morris Joseph were leading the practice at the time but there are no statutorily listed buildings associated with the practice following the death of the founding more well-known Lewis Solomon in 1928. Thavies Inn House as a grouping has isolated elements of interest but overall the design and aesthetic values are insufficiently distinctive.

247. Group value: Thavies Inn House does not have any clear historic or design relationship with surrounding development and is part of the 20th century piecemeal contemporary transformation of Holborn Circus.

248. Archaeological interest: The building does not provide evidence of past human activity in the locality and below ground archaeology is considered in detail in the next section of the report.

249. Historic interest: Thavies Inn as an historic name originates from the 16th century and the site historically had associations with the Inn of Chancery from this period. The building no longer retains a tangible link to this older history of Thavies Inn other than the survival of the name and the form of a yard space which and the sense of a linking cloister route through the urban block. Both these elements the yard and the link would be retained and reimagined through the redevelopment.

250. Landmark status: There are no identifiable communal or historical association or especially striking aesthetic values which make Thavies Inn House stand out in the local scene.

251. Thavies Inn House has limited architectural and historic values and does not meet the criteria to warrant non-designated heritage asset status. The existing 20th century building on Site makes a neutral, contribution to local townscape.

Conclusion on heritage

252. The proposals are considered to accord with Local Plan Policies CS 12 and 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1, S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF paragraphs 194-208. It is considered that the proposal would preserve the special architectural and historic interest and heritage significance and contribution made by the setting of : St Andrew's Church, the former Vicarage 5-6 St Andrew's Street, City Temple Church and the statue of the Prince Consort. There would be no harm to the significance of the Hatton Garden Conservation Area. Overall, the proposal would comply with Local Plan Policies CS 12, DM 12.1, emerging City Plan policies S11 and, London Plan Policy HC1.

Archaeology

253. 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.

254. The site is in an area of archaeological potential situated outside the Roman and medieval walled City and within the Roman Western Cemetery. In the medieval period the area became settled and increasingly built up. Thavies Inn was an Inn of Chancery attached to Lincoln's Inn by 1422. An Archaeological Desk Based Assessment has been submitted with the application.

255. The existing building dates from 1939, with extensions constructed in the 1950's following war damage and has a basement on the east and west areas of the site. The area below the existing north-south pedestrian route is un-basemented. There is considered to be localised archaeological survival below the eastern basement, with higher potential at the eastern edge. The western basement construction is considered to have removed archaeological remains with the exception of deep cut features such as wells or pits. Map evidence indicates that the southern part of the site, Thavies Inn, was gardens before development in the late 18th century. This area was left open in the post-war rebuilding of the area and there is potential here for survival of remains of earlier buildings and occupation. There is potential for post-medieval remains and Roman remains, including burials, to survive outside the footprint of Thavies Inn House.

256. The proposed development would connect and deepen the existing basement and a small sub-basement would be constructed which would remove all archaeological remains. New piled foundations would also have an impact and remove remains. Proposed landscaping and services outside the proposed basements would disturb and remove remains.

257. The proposals are acceptable in archaeological terms subject to conditions to cover archaeological evaluation, a programme of archaeological work and foundation design.

Cultural Plan

258. Local Plan policies CS11 and DM11.2 and emerging City Plan policy S6 encourage new cultural experiences and art works and requires major development to provide a Cultural Plan. The City of London Cultural Policy seeks to improve the City's public realm, open spaces and gardens to make them more open, distinct, welcoming and culturally vibrant. The site is located close to the south-eastern edge of the City and the proposal incorporates several elements which will improve the cultural enjoyment of the site which support the Destination City and Culture Mile aspirations.

259. The Applicant has submitted a draft Cultural Plan in accordance with emerging City Plan Policy S6 and this includes initial visions for the site which will be secured within a S106 including:

- The installation of artistic collaborations and creative pieces between the two new passageways, on the widened pavement on St Andrew Street and within the proposed pocket park which takes cues from the local heritage which could be temporary or permanent
- The proposed planting, trees and spaces will link into the City's Tree Trail highlighting the benefits for wildlife, pollution and climate resilience and is a resource for all – visitors, workers and residents
- Artist collaboration for the way finding to promote the visibility of the cycle park and the pocket park
- Proposals for the delivery, management and programming for events or temporary exhibits in the proposed pocket park, in support of local community uses and city cultural events such as the Culture Mile. This could include informal events such as a market stalls, food and drink events, screens for key sporting events or events in support of local schools, and these would be curated on an ongoing basis. The space could also contribute to cultural events akin to Clerkenwell Design Week, or the Lumiere light festival.
- Curation of the office lobby to be engaging and active
- Educational opportunities with local school workshops for planting installation and learning about climate resilience

260. The S106 will require the applicant to work with a cultural strategist, timelines and key milestones for delivery for an overall Cultural Strategy and long-term management plan.

Access and Inclusivity

261. 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 emerging City Plan and policy D5 of the London Plan.

262. The main entrance on Holborn Circus consists of two automated curved sliding doors, which is welcomed.

263. The cycle entrance would have a level threshold and access to the basement cycle parking and facilities is via stairs with a trough or lift. The cycle provision includes spaces for adaptive cycles and disabled toilet and shower facilities within both the male and female changing areas.

264. Lift access is available to all floors, and at ground level the secure access points to the lift lobbies would have swing gates. The reception desks would have a clear view of entrances, lift areas and swings gates so that visitors can be assisted if required.

265. The level eight terrace has been designed with a flush finish with the internal office area to ensure universal access.

266. The accessible lift for cycles and the firefighting lift can be used for transfer between basement, lower ground and ground level. A nearby stair provides an alternative to the lifts. Once at ground level, there are secure points to the main office passenger lift lobbies, all of which have swing gates for accessible purposes.

267. At ground level, an accessible toilet is provided in the main lobby to serve visitors to the lobby area. Two accessible toilets are also provided to serve the café/restaurant.

268. The toilets for the office levels are unisex ‘superloos’ with basins within the cubicles and are all already sized appropriately for the ambulant disabled. A single larger unisex, fully accessible toilet is included on every floor.

Sustainability

Circular Economy

269. 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. The Local Plan Policies CS15 and DM 17.2 set out the City’s support for circular economy principles.

270. The applicant has surveyed the existing buildings on site and investigated opportunities to retain whole or part of the existing buildings as part of a feasibility study. The two buildings are of varying ages, architecture and structural systems. Detailed findings are provided in the Energy and Sustainability Statement Part 1, pages 50-54, and are summarised as follows:

Structure and Layout

271. The site is occupied by two connected buildings, one built in 1939 with a later 1950s addition. Bespoke interactions of these past changes have created varied and irregular grids.

272. Current structure of one-way spanning hollow-pot flooring does not allow for flexibility and changes in core positions, nor can it be modified without significant under-slinging of structure (impacting headroom), resulting in large-scale demolition, and undermining any benefit of retention. The project specific considerations of this type of existing structure cannot be compared to an existing building that has a more traditional steel or concrete frame.

273. Any local modifications require significant zones of demolition.

274. The above combined with very poor existing headroom means that full slab demolition would be required to reset inter-storey heights.

275. Poor basement storey height means deepening would be required to fit building services plant (to retain on-floor NIA, reduce need for plant at roof), and with the in-situ foundations that are currently evident on the site, to achieve this requires mass demolition, at a considerable carbon cost.

276. Adding storeys to increase NIA in order to achieve viability, and essentially pay for the expected level of refurbishment intervention to bring Thavies Inn House up to a lettable standard in today's market, is not possible due to limited existing inherent structural loading capacity, which would then require major demolition of foundation elements as per above note.

Plant and Building Services

277. The current typical clear height without any services installations on office floors is 2.675m. BCO (British Council for Offices) 2019 guidance for refurbishments is to achieve a clear height of 2.45-2.8m.

278. 4 no. possible services solutions that would assist in helping the development to reduce operational energy and achieve Net Zero have been tested in this space, and none of those options achieve the clear heights required by BCO, resulting in narrow and uncomfortable working areas.

279. The option to extend the storey heights is not possible for the hollow-pot slabs currently in-situ and would require significant zones of demolition at high carbon costs.

Architecture and Site Vision

280. The current building layout is fragmented, not just because of its internal partitioning but also because of the existing differences in internal levels and stepping within internal spaces, caused by the conglomeration of two buildings of different ages on the site.

281. The facade to all aspects requires a complete overhaul to improve its performance to support a 'fabric first' approach to energy efficiency.

282. Inactive ground-level frontages do not address the surrounding public realm of the building.

Other considerations

283. The existing fire and safely solutions are compromised and would require a major overhaul of structure and layouts – There are carbon & feasibility issues of this as per structures section.

284. Core design is inefficient (as previously noted) and the structural grid does not promote flexibility of use within the current layouts, requiring major demolition and this at high carbon cost.

285. In conclusion of the assessment, it is considered that in this specific case, the constraints and nature of the current structural design mean that a refurbishment scheme would result in a higher whole life carbon intensity over the life-cycle study period than the new development. The only possible refurbishment option would be to retain the structure and majority of the facades in-situ, resulting in a development that does not demonstrate the attributes of a futureproofed sustainable design. In addition, a refurbishment option would not support the key circularity themes such as longevity, adaptability, flexibility and disassembly, and it would not be able to support urban greening, biodiversity, health and well-being.

286. The submitted Circular Economy Statement describes the strategic approach to incorporating circularity principles and actions into the proposed new development, in accordance with the GLA Circular Economy Guidance.

287. The new development will encompass a wide range of circularity principles:

- Specific studies have been undertaken at pre-application stage showing that the development can realise a 100+ year life cycle compared to a traditional 40–60- year life cycle for commercial development.
- Commitment to a comprehensive assessment of removed materials to establish the most appropriate methods for reuse and recycling.
- Facilitating future flexibility and adaptability in the structure and design of the building.
- Targeting onerous and futureproofed performance targets for both embodied carbon and operational energy/carbon of the new development to support low-carbon requirements.

288. 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 expected to demonstrate that the relevant targets set out in the GLA Circular Economy Guidance can be and have been met.

Operational energy strategy and carbon emissions

289. The Energy Statement accompanying the planning application demonstrates that the development has been designed to achieve an

overall 48% reduction in regulated carbon emissions compared with a Building Regulations compliant building.

290. The proposed energy demand reduction strategy aims at exemplar values across the building envelope and high efficiencies for all plant installations. The façade proposal incorporates:

- Openable elements to drive the potential for natural ventilation and night cooling, reducing the potential for overheating and reliance on mechanical cooling
- Minimise solar gains through adjusting glazing specifications to orientation, shading depths and fins as well as through façade greening elements that would also act as a method to filter the air before entering the building.
- Using heat recovery to reduce energy required to heat or cool the building.

291. Further opportunities for efficiency are highlighted by improving the lighting efficiency and introducing demand led ventilation. This would cumulatively reduce the building's operational carbon emissions by 30% compared to a Building Regulations compliant building.

292. The risk of overheating is reduced by incorporating natural ventilation through openable panels supported by mechanical extract from the air handling units.

293. There is currently no available district heating network close enough to the site, however, the opportunity to connect to a future district heating network would be incorporated into the proposed development.

294. In relation to renewable energy technologies, a system of hybrid air source heat pumps with a refrigerant circuit and water circuit for the indoor fan coil units would provide a potential 40% reduction in the required quantity of refrigerant compared to a fully refrigerant based system, therefore lowering the embedded carbon footprint of the scheme.

295. In addition, an installation of 30 PV panels would be installed on the roof. These technologies would contribute carbon emissions savings of 18% compared to a Building Regulations compliant building.

296. 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

297. A BREEAM New Construction 2018 (shell and core) pre-assessment has been prepared, targeting an "outstanding" rating. 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 at least 87.94%. The pre-assessment is on track to achieve a high number of credits in the CoL's priority categories of Energy, Water, Pollution and Materials, as well as the climate resilience credit in the Waste category.

298. 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, Land Use & Ecology and Pollution categories.

299. 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.

WELL v2 Building Standard

300. The WELL standard is a third-party wellness-focused certification scheme, with a ratings level range from silver to platinum. The development design aspires to a "WELL v2 Core Gold" standard as a means of futureproofing the building to deliver a high health and wellbeing performance.

Whole Life-Cycle carbon emissions

301. 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.

302. The submitted qualitative assessment of the existing building as set out in the Circular Economy chapter has been further underpinned by a quantitative assessment of whole life-cycle carbon emissions (embedded and operational carbon emissions) of the proposed redevelopment compared to a refurbishment option. This assessment is considered to be in line with the methodology promoted in the draft Whole Lifecycle Carbon Optioneering Planning Advice Note that is due to go through the public consultation process.

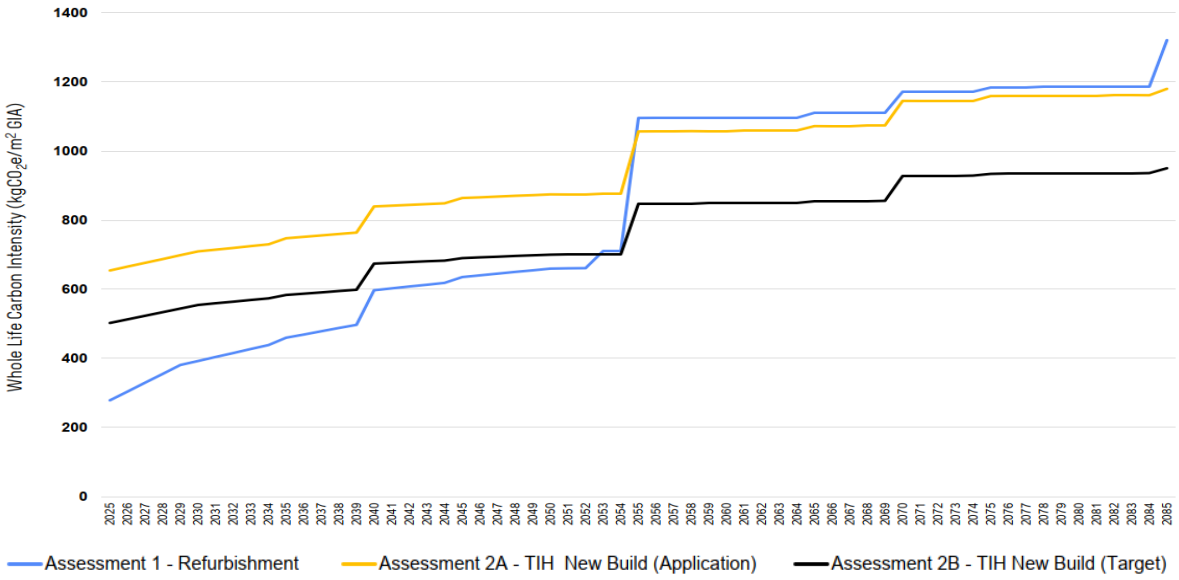
303. The scheme's structural engineers have confirmed that the existing structure would not be capable of adaptation and extension without

significant demolition and remodelling and resulting carbon impacts comparable to new development.

304. Accordingly, the refurbishment option (Assessment 1) is based on the following attributes in order to represent a viable option in terms of interventions that would realise a reasonable balance of embodied and operational carbon emissions:

- Structure (substructure, frame, cores and upper floors): retained in situ, no modifications or extensions
- Roof: new (waterproofing, insulation & finishes)
- Stairs: new
- Facades: opaque elements remain in situ, new windows and insulation + liner walls to inside face
- Internal walls & finishes: new
- Building Services: new
- External Works: existing retained in-situ
- Design life of the building is estimated to be around 30 years before replacement with a more energy efficient building would be required.

305. The new development option has been calculated for two versions – the application scheme (Assessment 2 A), as well as a further refined version that includes anticipated improvements after detailed design development that would be targeted for completion, and these are led by an embodied carbon target of 800 kgCO2e/m2 GIA (Modules A-C) and a base-build energy use intensity target of 45 kWh/m2/year (GIA) - (Assessment 2B). The three options are demonstrated in whole life-cycle carbon emissions over a 60 year life span in the graph below:



306. The results of the assessment show that the refurbishment option (blue line) after 30 years life span would require major intervention equal to redevelopment due to its described structural constraints and to being

unable to demonstrate compliance with a Paris Agreement proof climate change trajectory, and therefore the development would likely to become a stranded asset in climate change action terms. The steep rise in carbon emission would be due to demolition and redevelopment at that time. This option overall would have the highest carbon emissions out of the three assessment schemes despite offering considerably less floorspace (approx. as existing), while failing to provide a development that supports the key circularity principles such as longevity, adaptability, flexibility and disassembly, urban greening, biodiversity, health and well-being in the first half of the 60-year life span.

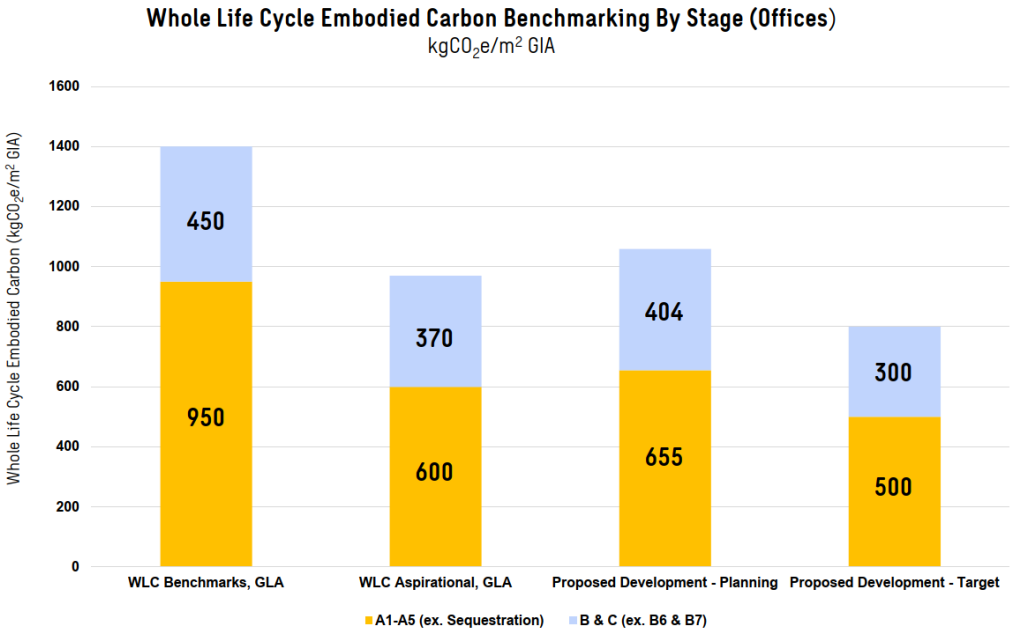
307. The submitted Whole Life-Cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table below. The results include carbon reduction measures such as avoiding suspended ceilings, reduced quantum of refrigerants, material efficiency and considering alternatives to aluminium for the façade cladding. Further improvements are sought during the forthcoming detailed design stage to reach the GLA's Aspirational Benchmark, such as the use of cement replacement products, higher recycled contents of materials, design of the façade systems with the ability to replace secondary components such as sealants and gaskets.

308. Embodied carbon emissions at planning application stage:

Scope	**Proposed Redevelopment**	**Benchmark**	**Benchmark Source**
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	655	1000	GLA Standard
		600	GLA Aspirational
		600	LETI 2020 Design
		350	LETI 2030 Design
A–C (excluding B6-B7)	1059	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)	1,437		

309. These figures would result in overall (including B6 and B7) whole life-cycle carbon emissions of 17,338,671 kgCO2 being emitted over a 60-year period.

310. Relative to the GLA benchmarks only, the emissions can be split into "upfront" (Modules A1-A5) and "in-use and end of life" (Modules B&C excluding B6 and B7, operational energy and water use) stages as follows. The anticipated improvements through the detailed design phases are shown in the column "Proposed Development – Target":



311. This graph shows that, 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

312. 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. The site sits within an area of biodiversity deficiency. The City of London Draft Biodiversity Action Plan 2021 -26 explains that the following species have been selected as target species for the City of London: House Sparrow, Black Redstart, Swift, Peregrine Falcon, Bats, Bumblebees, and Stag Beetles.

313. The new development would integrate a wide range of measures for urban greening and biodiversity:

- Raingardens designed as flush garden beds lining the edge perimeter of St Andrews Street to attenuate storm water and for passive irrigation of trees and other planting
- Bio-retention rain garden in the centre of the courtyard to take surface water runoff from the street and removing polluting suspended solids through filtration and vegetation trapping organic and mineral particles
- Raised garden beds in the St Andrews Street frontage with a mix of native and adaptive species suitable for the local climate conditions and with focus on pollinator and food sources supporting biodiversity
- Tree planting of 33 mixed species ranging from multi-stems to 4 no. semi-mature single stem trees along St Andrews Street
- Vertical façade greening (climbers) to provide solar shading and remove pollutants from the air, to include automatic irrigation.
- Intensive green roofs on levels 02, 04, 06, 08 and roof level with a range of soil depths of 450-1,000mm to support diverse planting with drought resistance.
- Extensive green roof at top roof level with a substrate layer of 100-200mm and a biodiverse mix of sedum and wildflowers, bird/bat boxes, log and sand piles to encourage habitats for a variety of species.

314. Passive and manual irrigation would be encouraged, automatic irrigation only provided where unavoidable. The proposals are described as climate positive, using certified timber, cement-free concrete products and local materials, peat free soils and biodiverse log piles from existing, removed trees.

315. Further details of the quality and maintenance of the proposed urban greening are required by condition and a condition is recommended requiring the application to monitor and share biodiversity data with City of London and Greenspace Information for Greater London.

316. The Urban Greening Factor (UGF) is calculated at 0.355 using the Local Plan methodology, which exceeds the emerging City Plan's UGF target score of 0.3 as a minimum. The following table summarises the development's Urban Greening Factor:

Surface Cover Type	CoL Factor	Area	Output
Intensive green roof	0.9	206	185.4
Standard trees in connected tree its	0.9	284	255.6
Extensive green roof	0.8	309	247.2
Flower-rich perennial planting	0.7	77	53.9
Rain gardens	0.7	40	28
Green wall	0.6	338	202.8
Permeable paving	0.1	756	75.6
Sealed surface	0	2130	0
		Total Output sqm	1048.5
		Application area sqm	2947
		Total Score	0.355

Climate Change Resilience

Water resources

317. The internal water consumption of the proposed development will be reduced through the efficiency and leak detection measures by at least 40% compared to the baseline benchmark (British Standard - equivalent to 3no BREEAM water credits).

318. The intended incorporation of a rainwater and greywater collection would contribute to saving potable water overall. Final details are requested by condition.

Flooding

319. The development aims for achieving greenfield runoff rates via Sustainable Drainage Systems. The intention is to incorporate a coupled grey water recovery and rainwater harvesting system, and an area in the basement has been dedicated to a accommodate the tank. Blue roofs at

roof level and level 8 terrace with an 80sqm attenuation volume are also proposed. Further works to filter and attenuate water through raingardens are proposed on the public realm in the courtyard and St Andrews Street. The proposed rainwater harvesting would reduce the likelihood of local flooding. The Lead Local Flood Authority have recommended a condition requiring details of the SuDS components and measures to prevent flooding, and a condition requiring details of the maintenance of the SuDS system.

Heat Stress

320. The sustainability statement outlines measures to prevent overheating, including natural ventilation openings, shading through fins and façade greening. These measures will reduce the need for mechanical ventilation and will help to make the building resilient to higher temperatures and urban heat island effects.

Natural Capital and Pest & Diseases

321. 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.
322. 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.

Conclusion

323. 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.
324. 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 compares positively with the aims and policies of the London Plan and the Local Plan, and the development targets an “outstanding” BREEAM assessment rating.

325. 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.

Environmental Impact of Proposals on Surrounding Area

326. 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 Overshadowing

Assessment Context

327. An assessment of the impact of the proposed development on the daylight and sunlight received by surrounding residential buildings and public amenity spaces, has been submitted in support of the application. The effects of the development have been assessed having regard to the recommendations in BRE Report 209, Site Layout Planning for Daylight and Sunlight: A guide to good practice (second edition, 2011).

328. Policy DM10.7 of the Local Plan seeks 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 BRE guidelines. Policy DE8 of the emerging City Plan 2036 requires development proposals to demonstrate that daylight and sunlight available to nearby dwellings and open spaces is appropriate for its context and provides acceptable living standards, taking account of the BRE guidelines.

329. The BRE guidance advises that numerical values are not to be rigidly applied but recognise the specific circumstances of each case. This is acknowledged in the supporting text to policy DM10.7 which states that "The Building Research Establishment (BRE) has issued guidelines that set out several methods of assessing changes in daylight and sunlight arising from new developments. The City Corporation will apply these methods, consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations".

Daylight

330. Regarding daylighting, the vertical sky component (VSC) and daylight distribution tests have been applied. The VSC test measures the amount of skylight available at the centre of a window on the external plane of the window wall. The BRE guidelines state that a window which achieves a VSC of 27% or more is considered to provide good levels of light. If with the proposed development in place the figure is both less than 27% and reduced by 20% (0.8 times its former value) or more than the existing level, the loss would be noticeable.

331. As the VSC calculation does not account for the size of the window being tested, the size of the room that it lights or whether there are multiple windows serving a room, the BRE guidelines recommend that the results should be read in conjunction with those of a second test - daylight distribution. The daylight distribution test, also referred to as the No Sky Line test (NSL), calculates the areas of a working plane inside a room (usually 0.85m above the finished floor level) that would or would not have a direct view of the sky. The BRE guidelines state that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% (0.8 times its former value) or more, the loss would be noticeable.

332. In addition, the Applicant has undertaken and submitted supplementary Radiance Assessments.

333. 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.

334. Whilst there is currently no established guidance regarding what constitutes a ‘noticeable’ or ‘significant’ change in daylight when using the BRE guidelines Radiance methodology, the radiance-based assessments can draw upon the BRE’s recommended Average Daylight Factor (ADF) target values. Radiance assessment results are presented as colour rendered images to illustrate the individual daylight factors within room. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment submitted in line with BRE Guidelines, which is the methodology established within the development plan/policy framework.

335. The Average Daylight Factor (ADF) assessment is a measure 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 can be calculated a number of ways, but the most commonly used methodology is the formula set out in the BRE guidelines. This formula 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.

336. The BRE Guidelines 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 guidelines recommend the following minimum ADF values for residential properties: 1% for bedrooms, 1.5% for living rooms and 2% for kitchens

Sunlight

337. Regarding sunlight, the BRE guidance recommends that all main living rooms of dwellings should be checked if they have a window facing within 90 degrees of due south. The available sunlight is measured in terms of the percentage of annual probable sunlight hours (APSH) at the centre point of the window. Probable sunlight hours are defined as "the long-term average of the total number of hours during a year in which direct sunlight reaches the unobstructed ground (when clouds are taken into account)". Sunlighting of a dwelling may be adversely affected if the centre of the window:

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

338. To clarify, all three of the above criteria need to be met for there to be an adverse impact in sunlight terms.

Daylight and Sunlight Assessment

<u>The Lodge</u>

339. This is a single storey building with no windows facing towards the site.

<u>Vicarage, St Andrew Street</u>

340. The Vicarage is a mixed use building situated to the east of the application site, on the opposite side of St Andrew Street. The building is L-shaped, and the residential accommodation is situated on the first and second floors of the eastern arm, shown to the left of the red line in the image below:

341. There are eight habitable residential rooms within this building. All of the windows in these rooms would meet the target values set out within the BRE Guidelines when considering daylight in VSC terms.

342. Of the eight habitable rooms, seven would meet the target values set out in the BRE Guidance for daylight distribution (NSL). One bedroom on the second floor (Room R3, Window W3) would retain 74% of its existing area able to see sky. However, the BRE Guidelines at paragraph 2.2.8 state in relation to daylight distribution, “bedrooms should also be analysed although they are less important.” This being the case the VSC results should be given primacy.

343. Radiance diagrams have been provided. The ADF results show that all habitable rooms will retain at least 94% of the daylight achieved currently.

344. All windows within this property serving habitable space meet the target values set out within the BRE Guidelines when considering sunlight.

St Andrew’s Church

345. St Andrew’s Church is situated to the east of the application site, on the opposite side of St Andrew Street.

346. The main space within the Church is currently well daylit and would continue to be. All windows to this space would meet the recommendations within the BRE

347. There is another smaller space within the Church, which is believed to accommodate ancillary uses. This space meets the recommendations within the BRE Guidance.

City Temple

348. City Temple is located to the east of the application site, behind St Andrew's Church and the Vicarage, on the opposite side of Shoe Lane. The building is primarily a place of worship but part of the sixth floor has been converted into residential use.

349. The proposed building would fall under the 25 degree angle from the centre of the windows of the residential rooms in City Temple and, therefore, the proposed scheme would meet the recommendations within the BRE Guidelines for daylight and sunlight.

BR 209 Site layout planning for daylight and sunlight: A guide to good practice. New guidelines published 10 June 2022

350. The Building Research Establishment (BRE) publish guidelines that are used as a guide to planning authorities to determine the acceptability of the impacts of a proposal on neighbouring daylight and sunlight at planning as well as the daylight and sunlight that will be available to new residents within any new dwellings proposed. These Guidelines are called BR 209 Site layout planning for daylight and sunlight: A guide to good practice. The BRE issued new Guidelines on 10 June 2022. These superseded the previous guidelines from 2011 and introduce alternative testing criteria for internal daylight and sunlight following BS EN 17037. The new criteria for internal daylight has altered, the Average Daylight Factor (ADF), No Sky Line (NSL) and Annual Probable Sunlight Hours (APSH) tests have been replaced by new tests, for Daylight Factor (DF), Spatial Daylight Autonomy (SDA) and Sunlight Exposure (SE). The new more sophisticated tests are climate and location based and includes variables including internal surface reflectance, ratio of frame to window sizes, glass transmittance, and the reflectivity of the external surfaces around the site. The criteria and analysis for the impact of a proposal on the neighbouring buildings is largely unaltered as is the analysis of the sunlight available to amenity spaces within and around the proposal. As the development at Thavies Inn does not include new internal residential accommodation the current analysis of daylight and sunlight continues to meet the guidelines.

Conclusion

351. The impact of the proposed development on daylight and sunlight levels on the nearby properties and amenity spaces will be negligible.

Overshadowing

352. 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.

353. Analysis of the impacts of the proposed development on the sunlight available to neighbouring amenity spaces has been undertaken. The amenity spaces around St Andrew's Church as well as those to the front of 40 Holborn Viaduct and 120 Holborn will meet the BRE Guidelines and will remain very well sunlit.

Overshadowing Conclusion

354. The submitted sun on ground assessment demonstrates that the nearby residential and public opens spaces would not be adversely affected by the proposed development, and would accord with the criteria set out in the BRE Guidelines.

Light Pollution

355. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity. A condition is recommended requiring the submission of a lighting strategy, which would include details of internal lighting levels, controls and management measures to minimise light spill.

Overlooking

356. There would be no direct overlooking of neighbouring residential properties.

Wind Microclimate

Streets

357. The off-site results for the proposed development indicate that the wind conditions would be suitable for their intended use, with a negligible difference of conditions between the existing site and proposed development. For both summer and winter seasons, New Fetter Lane would experience wind conditions suitable for 'Standing', while St Andrew Street would experience conditions suitable for 'Occasional Sitting' for both summer and winter seasons.

Pocket Park

358. The proposed Pocket Park would largely experience wind conditions suitable for 'Occasional Sitting' in summer and winter – indicating that the proposals would have a negligible impact on the surroundings compared to the existing site. The wind conditions for the landscape features in this area would be suitable for their intended use. There would be no unacceptable wind (annual) distress regions around the site or immediate surroundings. An existing region of unacceptable wind conditions is observed on Bartlett Court due to the Context surroundings.

Entrances

359. In both Winter and Summer, the wind conditions around the entrances of the proposed building would be suitable for their intended use. There would be no unacceptable wind (annual) distress regions around the entrances.

Private Terraces

360. In both Winter and Summer, the private terraces would experience wind conditions suitable for 'Frequent Sitting' and 'Occasional Sitting'. There would no unacceptable wind (annual) distress regions on the terraces.

Thermal Comfort Assessment

361. 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.

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

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

Usage Category	% of hours with Acceptable UTCI	Description
All Season	≥90% in each season	Appropriate for use all year round (e.g. parks)
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
Short Term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round
Short Term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
Transient	≤25% in winter OR ≤50% in any other season.	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

364. The public street level, routes through the development, private terraces and proposed pocket park have been assessed for all hours in a year between 8:00 am and 8:00 pm (GMT), as specified by the City of London Thermal Comfort Guidelines. This analysis was conducted for three configurations: Existing site with existing surroundings, proposed development with existing surroundings and proposed development with consented (future) schemes in the surroundings.

Existing Baseline Conditions

365. The adjacent streets to Thavies Inn, namely St Andrew Street (east), Bartlett Court (south), New Fetter Lane (west), and Holborn A40 Junction (north) experience fairly low exposure to sunlight due to the surrounding buildings. The thermal comfort results therefore follow a closer relation to the local wind velocities.

366. Overall, for the majority of the time across the year the thermal conditions are comfortable for pedestrians. The resulting year-round comfort grades are largely of 'Seasonal' (such as St Andrew Street and Holborn A40 Junction) and 'Short-term' (such as New Fetter Lane) - indicating conditions suitable for outdoor dining on the former, and infrequent (short stay) uses for the latter.

367. The existing route through Thavies Inn, accessed from St Andrew Street, and pavements circumventing the internal court experiences conditions

suitable for all season use (such as park or equivalent amenity spaces). The central region of the court (currently used for vehicle parking) experiences some adverse wind conditions in winter resulting in and overall comfort grade of 'Seasonal'.

Proposed development with existing surroundings and proposed development with consented (future) schemes in the surroundings

Public Street Level

368. In both scenarios, overall, for the majority of the time across the year the thermal conditions are comfortable for pedestrians. The resulting year-round comfort grades for Holborn A40 Junction and St Andrew Street show 'Seasonal' conditions - suitable for uses such as outdoor dining, and New Fetter Lane showing 'Short term' conditions - indicating conditions suitable for infrequent (short stay) uses.

Routes through the Proposed Development

369. The proposed routes through the proposed development are sheltered from the sunlight. Therefore, the thermal conditions become more dependent on the local wind velocities in each season. In both scenarios, overall, for the majority of the time across the year the thermal conditions are comfortable for pedestrians. The resulting year-round comfort grades are 'All Season' and 'Seasonal' - indicating conditions suitable for a public amenity space or for outdoor dining.

Private terraces

370. Roof terrace spaces typically experience greater exposure to sunlight and wind velocities than at street-level.

371. In both scenarios, the resulting year-round comfort grades are 'Seasonal' for the terrace on the north-east elevation - indicating conditions suitable for outdoor dining, and 'Short-term Seasonal' for the roof terrace - indicating conditions suitable for infrequent sedentary uses.

Pocket Park

372. The submitted wind microclimate report demonstrates that the northern part of the Pocket Park, which includes area of seating would experience low wind velocities. This, combined with the additional shading from the proposed development and neighbouring buildings, results in an overall 'All-season' comfort grade.

373. Other seating areas in the Pocket Park, such as the integrated benches in the raised planters are located in the central region of the Pocket Park. These areas would experience slightly elevated wind velocities in winter. This results in an overall 'Seasonal' comfort grade.

374. The remaining southern area of the Pocket Park has been designated as short cycle parking and planting. Downdraft from the surrounding buildings results in slightly increased wind velocities in winter, resulting in an overall 'Seasonal' comfort grade.

375. In both scenarios, overall, for the majority of the time across the year the thermal conditions are comfortable for pedestrians. The resulting year-

round comfort grades are 'All Season' and 'Seasonal' - indicating conditions suitable for a public amenity space or outdoor dining respectively.

Thermal Comfort Conclusion

376. It is considered that the thermal comfort in and around the site, would be acceptable in accordance London Plan Policy D8, Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

Noise and Vibration

377. The submitted Environmental Statement includes an assessment of the impact from noise and vibration on the surrounding area, including noise and vibration from the enabling works, demolition and construction; noise from the proposed development during operation; and noise associated with increases in road traffic, which could be attributed to the development.

378. Generally, in City redevelopment schemes most noise and vibration issues occur during demolition and early construction phases. Noise and vibration mitigation, including control over working hours and types of equipment to be used, would be included in a Construction Management Plan to be approved by condition.

379. The proposed development includes mechanical plant which would be located at level 9 and basement level 2. To ensure that noise from plant is adequately closed and minimised conditions are required related to plant noise and vibration.

380. Deliveries would take place from Thavies Inn, as existing, but through consolidation the number of deliveries would decrease. The development would therefore have a negligible impact in terms of noise associated with unloading.

Air Quality

381. 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.

382. The proposed energy strategy for the development will include air source heat pumps and the provision of PV panels at roof level and therefore no gas or CHP boilers are proposed to minimise emissions. However, it is intended that standby generators will be used for life safety purposes, and these are to be tested monthly for a duration of less than one hour. Typically, they are operated with diesel fuel, but a condition is

recommended requiring details of the generator including the power supply to be submitted and approved prior to installation.

383. A ventilation strategy is proposed which includes mechanical ventilation with inlets located at roof level. These should not be located near to the generator flues. Any roof garden and terrace areas should also take into account when locating flue outlets.

384. The development meets the transport benchmark for the Air Quality Neutral Assessment.

Health Impact Assessment

385. Policy HL9 of the Proposed Submission City Plan 2036 advises applicants of major developments to assess the potential impacts their development may have on the health and well-being of the City's communities. The applicant has submitted a HIA in conjunction with the revised scheme which has been based on the NHS Healthy Urban Development Unit criteria, with adaptions to take into account the particular circumstances of the City. Policy GG3 of the London Plan, and TfL's Healthy Streets Indicators are also relevant. The Assessment concludes that the development would contribute towards positive health outcomes.

386. Positive impacts include:

- Access to open space and nature, through the provision of the pocket park and significant improvements to the public realm on St Andrew Street, including hard and soft landscaping which would provide space for relaxation and deliver associated health benefits.
- Accessibility and active travel - Users of the Proposed Development will be expected and encouraged to travel to the Site on foot, by public transport, or by cycle.
- Social cohesion and inclusive design - Inclusive design elements have been considered and incorporated throughout the design of the proposed development. Both the internal and external areas have been designed to be accessible to those with reduced mobility, wheelchair users and pushchairs. There are flat or gently sloping paths along the key pedestrian routes through the Site, and internally there is lift access to all floors, including the basement.
- Climate change - Sustainable design practices have been integrated throughout the Proposed Development. A key aspect in the design aspirations that has important health benefits is the provision of fresh air through opening windows, a feature that has become increasingly desirable in the wake of the pandemic.

387. The main potential adverse health impacts associated with the Proposed Development are during the demolition and construction phases, particularly in noise and dust generation and temporary disruption to pedestrian footways. The construction logistics plan outlines that any diverted footpaths will be fully accessible to wheelchair users and pushchairs, and this will be reviewed for each stage of construction. During construction, there will be numerous measures in place to reduce the impacts of construction traffic, including restricting delivery times,

requiring drivers to use the preferred routes and avoiding peak traffic periods.

388. Any potential negative impacts identified in the Assessment would be mitigated by the requirements of relevant conditions and S106 obligations. A condition is recommended requiring details of measures to prevent jumping or falling from the development.

Equality Impact

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

389. 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.

390. 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

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

392. 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.

393. The application includes an Equalities Assessment that considers the eight categories of people with protected characteristics, with only two assessed as relevant to this application; age and disability. The assessment concluded that the proposed development would have a positive/neutral impact on these two protected characteristics, due to the extensive elements promoting inclusivity that have been incorporated in the design of the proposed development. Matters relevant to equalities are discussed in more detail above in the sections on the Health Impact Assessment and Access and Inclusivity. It is considered that the submitted Equalities Assessment satisfactorily considers equalities issues.

Human Rights Act 1998

394. 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").

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

396. As set out above, it is the view of officers that there would be no infringement of Article 9 of the ECHR, and in particular there would no infringement of the freedom to manifest religion or belief in worship, teaching, practice and observance.

CIL and Planning Obligations

397. 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.

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

399. Since 1st April 2019 Mayoral CIL 2 has applied and the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

400. 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	£1,121,945	£1,077,067	£44,878

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	£455,775	£432,986	£22,789
City Planning Obligations			
Affordable Housing	£303,850	£300,812	£3,038
Local, Training, Skills and Job Brokerage	£182,310	£180,487	£1,823
Carbon Reduction Shortfall (*as designed*) ***Not indexed***	£206,340	£206,340	£0
Section 278 (Evaluation and Design) ***Not indexed***	£50,000	£50,000	£0
S106 Monitoring Charge	£3,250	£0	£3,250
Total liability in accordance with the City of London's policies	**£1,201,525**	**£1,170,625**	**£30,900**

City's Planning Obligations

401. The obligations set out below are required in accordance with the City's SPD. They are necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy.

- Highway Reparation and other Highways Obligations
- *(incl. Highways Schedule of Condition Survey, site access, obtaining consents, licences etc)*
- Local Procurement Strategy
- Local Training, Skills and Job Brokerage Strategy (*Demolition &*

Construction)

- Delivery and Servicing Management Plan (*including Consolidation*)
- Cycling Promotion Plan
- Construction Monitoring Costs
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Utility Connections
- Section 278 Agreement/Section 38 Agreement to secure the dedication of land as highway
- Cultural Plan
- Public Routes (*Specification & Access*)
- Pocket Park (Specification and maintenance)

402. 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.

403. The scope of the s278 agreement may include, but is not limited to, improving crossings and the surrounding footway/carriageway to accommodate increased pedestrian and cyclist movements; the planting of street trees; St Andrew Street raised table crossing; Pocket Park & Cycle hub; and footway widening of St Andrew Street.

Conclusion

404. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, and the emerging Local Plan and considering all other material considerations.

405. The proposed office accommodation supports the aims of Local Plan policy CS1 and the emerging City Plan policy S4 and would provide flexible office floorplates for workers which are designed to meet the needs of a wide range of potential occupiers, in accordance with Policy DM1.3 in the adopted Local Plan and Policy OF1 in the emerging City Plan.

406. In reaching the decision on whether the proposals are policy compliant the longevity and quality of the existing trees and associated public realm has been carefully weighed against that of the proposed replacement offer.

407. The proposed development would result in the loss of two London Plane trees which are subject to a Tree Preservation Order (which is made but not yet confirmed). The significant increase in street tree planting, the introduction of the pocket park, the generous public realm to St Andrew Street and the cycle hub are considered to be strong public benefits which collectively would be policy compliant. The quality and quantum

of the green spaces would be a net gain (846 sq.m gain) and would be an enhancement over the existing spaces, linking well to the proposed new routes to create a distinct place which supports pedestrian movement and low carbon transport with the proposed cycle hub accessible to all. In addition, the proposed planting species for trees and wider landscape are more suitable for long term climate resilience and encourage increased biodiversity and would also support disease resilience. This long-term vision would create a series of new tranquil, flexible and functional spaces making good use of existing land.

408. The urban greening both within the public realm and on the building would collectively create a strong and impactful visual greenness which would positively contribute to local townscape. The location of the new tree planting and wider landscaping would be prominent and experienced in all directions and approaches to the building adding value to existing and new pedestrian routes and spaces

409. These public spaces would have an overarching compliance with the Mayor's 'Public London Charter and 'Expanding London's Public Realm: Design Guide' and the City's Public Realm SPD and associated Technical Guidance. In addition, the proposals would support the Destination City vision to bring activity and vibrancy to the Square Mile.

410. The design approach to the site would result in a development appropriate in scale, architectural form, with an attractive palette of materials and integral vertical greening, and quality that would add a level of richness and visual interest to the local townscape. The pedestrian experience around the site would significantly improve as a result of the proposals with the significantly enhanced public realm providing attractive, distinctive, and sheltered routes around, and through the site, which would include heritage interpretation and support active travel of the area. 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.

411. The design approach to the site would be high quality, elegant and refined and would positively contribute to redefining this part of the City. The development would be appropriate in scale and architectural form, with a subdued palette of materials and exudes a quality that would add a level of richness, softness, and visual interest with an animated ground floor to the local townscape. The final details of the development including urban greening, public realm, artwork, lighting, soffits, planting, infrastructure, entrances, and materials would be secured via condition to ensure a high-quality appearance and finish. The architecture with the public routes, pocket park, cycle park and cultural components would deliver a distinctive and engaging place, enlivening this outer fringe of the City and would build on the positive work of the St Andrews Churchyard public realm.

412. 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

413. The proposed development would preserve City skyline landmarks and skyline features and would comply with Local Plan Policy CS 13 and draft City Plan Policy S13 and guidance contained in the Protected Views SPD.

414. The proposals have been assessed against Local Plan Policies CS 12, DM 12.1, emerging City Plan policies S11 and HE1, London Plan Policy HC1, S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF paragraphs 199-208. There would be no harm to the setting of Hatton Garden Conservation Area and significance would be preserved. It is considered that the proposal would preserve the settings and the special architectural and historic interest and heritage significance and contribution made by the setting of :St Andrew's Church, the former Vicarage 5-6 St Andrew's Street, City Temple Church and the Statue of the Prince Consort. The proposal would comply with Local Plan Policies CS 12, DM 12.1, emerging City Plan policies S11 and, London Plan Policy HC1.

415. 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 a cycle hub within Thavies Inn is welcome and is considered to be a public benefit and innovative way to contribute to solve the problem of a lack of short-term cycle spaces in the City.

416. The proposed sustainability strategy responds positively to the aims and policies of the London Plan and the Local Plan, indicating a medium to long term positive Whole Life-Cycle carbon emissions balance compared to the existing building on site while integrating circularity principles. The proposed building would be designed to significantly improve the climate resilience and urban greening of the site and its immediate surroundings. The BREEAM pre-assessment demonstrates that the development is on track to achieve an "outstanding" rating that would ensure that the development makes an exemplar contribution to the sustainability of the City.

417. The impact of the proposed development on daylight and sunlight levels on the nearby properties and amenity spaces will be negligible.

418. Overall, it is considered that the proposals would comply with the policies set out in the Development Plan as a whole. Other material considerations also indicate that planning permission should be granted as set out in the recommendation and the schedules attached. Subject to the recommendations of this report it is recommended that planning permission be granted.

Background Papers

Consultation responses

Internal

Memo, Environmental Health, 5th November 2021

Memo, Air Quality Officer, 10th November 2021

Memo, Lead Local Flood Authority, 1st December 2021

External

Email, City of London Police, 2nd November 2021

Letter, Historic England, 4th November 2021

Email, Natural England, 18th November 2021

Email, Thames Water, 19th November 2021

Letter, London Borough of Tower Hamlets, 24th March 2022

Letter, GLA, 14th April 2022

Letter, Royal Borough of Greenwich, 4th May 2022

Letter, Environment Agency, 21st June 2022

Representations

Letter, Twentieth Century Society, 29th November 2021

Letter, Fleet Street Quarter, 24th January 2022

Application Submission Documents

Radiance Analysis, Waldrams, 10th August 2021

Security Needs Assessment, Sweco, 10th August 2021

Daylight and Sunlight Report, Waldrams, 25th August 2021

Planning Report: Acoustics, Sweco, 27th August 2021

Air Quality Impact Assessment, Sweco, 31st August 2021

Drainage Strategy, aktII, August 2021

Fire Safety Strategy, Sweco, August 2021

Outdoor Thermal Comfort Assessment, aktII, August 2021

Wind Microclimate Assessment, aktII, August 2021

Equality Impact Assessment, Buro Happold, 8th September 2021

Health Impact Assessment, Buro Happold, 8th September 2021

Arboricultural Report, Tim Moya Associates, September 2021

Archaeological Desk Based Assessment, MOLA, September 2021

Construction Logistics Plan, Momentum, September 2021

Culture Plan, Wilkinson Eyre, September 2021

Energy Assessment and Sustainability Statement, Sweco, September 2021

Design and Access Statement, Wilkinson Eyre, September 2021

Transport Assessment, Momentum, September 2021

Built Heritage and Townscape Statement, Turley, October 2021

Town Planning Statement, Gerald Eve, October 2021

Response to CoL on Access Issues, Wilkinson Eyre, 17th December 2021

Response to CoL Transport Queries, Momentum, 20th December 2021

Overshadowing Assessment, Waldrams, 25th January 2022

SME/Affordable Workspace – Executive Summary, Gerald Eve, January 2022

Removal of Existing Trees – Overview Summary, Gerald Eve, January 2022

Visual Impact Assessment: Addendum to Built Heritage and Townscape Statement, Turley, February 2022

Reuse & Refurbishment Statement - Executive Summary, Sweco, 3rd March 2022

Visual Impact Assessment: Addendum to Built Heritage and Townscape Statement, Turley, March 2022

Response to Objection Letter from Twentieth Century Society, Turley and Gerald Eve

Site Specific Financial Viability Assessment, Gerald Eve, March 2022

Financial Viability Review, Avison Young, June 2022

Catherine Evans
City of London Corporation
Guildhall
London, EC2P 2EJ

Sent by email: PLNComments@cityoflondon.gov.uk

29 November 2021

Dear Catherine Evans

21/00885/FULMAJ - Thavies Inn House, 3-4 Holborn Circus, London, EC1N 2HA

The Twentieth Century Society has been notified of the above planning application to demolish 1-6 Holborn Circus (known as Thavies Inn House) and erect a 10 storey building for office and retail use. The Society objects to the application due to the loss of what we consider to be a non-designated heritage asset (NDHA).

Thavies Inn House was built in 1939 to designs by Lewis Solomon, Son & Joseph, the successor practice to Lewis Solomon. Lewis Solomon (1848-1928) was an esteemed London-based Jewish architect known for his synagogue designs, as well as shops, warehouses, factories, private houses and flats. Solomon's Soup Kitchen for the Jewish Poor on Brune Street in Shoreditch (1902) is Grade II listed. His son Digby Lewis Solomon (1884-1962) took over the architectural practice of Lewis Solomon & Son in the 1920s, and Morris Joseph (1908/9-1952) joined later as partner. Constructed from red brick with a rusticated stone ground floor, quoins and cornices, Thavies Inn is Neo-Georgian in style. Neo-Georgian was one of the most popular architectural styles in the UK in the first few decades of the 20th century, and continued in use in the post-war period, appearing in the work of Albert E. Richardson, Raymond Erith and Quinlan Terry amongst others. Thavies Inn was erected in the 1930s for office use and was extended in 1955-60 on New Fetter Lane.

Thavies Inn House is a good example of Neo-Georgian architecture designed by a noted architectural practice. It is of significance locally and should be treated as a non-designated heritage asset.

Paragraph 189 of the National Planning Policy Framework (NPPF, 2021) describes heritage assets as "an irreplaceable resource" which "should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations". The NPPF also advises that "In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

The current application will result in the total loss of a building of local heritage significance. The Architects' Journal (4 November 2021) quotes the applicant as saying

that they have ‘looked extensively at reuse of the existing building’ but that this proved to be ‘impractical’. However, the applicant has not provided evidence of this as part of the application. The Society would welcome a structural survey and/or feasibility study to support this claim. Without such information, we maintain that it would be possible to reuse the existing building.

The Twentieth Century Society objects to the proposed full demolition of Thavies Inn House which we consider to be a non-designated heritage asset worthy of preservation. We do not believe the heritage harm caused through its demolition is justified or outweighed by the few public benefits of the new office and retail scheme. For these reasons, we encourage the local planning authority to refuse planning permission.

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

Yours sincerely,

Coco Whittaker
Caseworker
Twentieth Century Society

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

Dear Sir or Madam,

Planning Application: 21/00885/FULMAJ

1-6 Holborn Circus (known as Thavies Inn House)

On behalf of the Fleet Street Quarter (FSQ), a business-led Partnership which represents a number of businesses within the area, we would like to express our support for the planning application for the proposed development of Thavies Inn House

The developers working on the scheme have ensured good engagement with the Partnership, enabling local stakeholders and occupiers the opportunity to understand more on the development sharing a presentation of the scheme

Positioned at the Northern end of the of the FSQ boundary, Holborn Viaduct is a key gateway moment to the district and indeed the City of London. The redevelopment of Thavies Inn House will allow for a more attractive and inviting welcome into the area, supported by it biophilic designs creating a visual pull and intrigue to the area. The scheme features progressive plans that will benefit the streetscape and wayfinding for the area through a revised permeable facade and wider pedestrian routes, that will elevate, regenerate and enhance the footfall in this area. Our Partnership advocates the importance of strong external environments and public realm and its influence in the way we experience and feel about an area; a high-quality public realm can have a direct impact in increasing dwell time, local spend and investment. The additionally of the commercial space proposed for hospitality and retail, can strengthening and enrich the local offering, supporting ambitions to reinvigorate and evolve Fleet Street Quarter as leading a vibrant district.

While the FSQ area boasts historic architecture and cultural heritage, there is a remarkable deficiency of greenery and green spaces with few places to sit and dwell, and no key 'anchor' public space. The development provides the rare opportunity to create a bespoke and generous green 'oasis' through repurposing an underused car park, creating a pleasant space that encourages people to stay longer and engage with the area. The Fleet Street Quarter Partnership had also identified this our 2021 Area Based Strategy, noting the potential of this underused space, to be repurposed in a more meaningful way. A new public green space adds to the future character of the area, as well as promoting the physical and emotional wellbeing of people who live, work and visit the local area. 2020 reignited our appreciation for green spaces and nature; and with this renewed appreciation for time spent outdoors there will be an increased appetite for outdoor spaces and a green public realm will need to match the future demand of spending more time outdoors. The pandemic has caused a shift in our working habits and if we want to encourage people back to the area, we must adapt the urban environment to meet new expectations.

The developers have outlined the potential of cultural activations and interventions that could be achieved through the new spaces created from the revised public realm and park. As well as the FSQ's own cultural ambitions for the area, we feel the proposed development succeeds in supporting the ambitions of The CoL's Draft Local Plan Review 2036 – which sets culture and creativity high on the policy agenda and encourages growth of these sectors. The rise of the cultural sectors has been accompanied by a renewed sense of value and the role culture in our cities, an increase in foreign direct investment to the UK, and a greater appreciation for the complexity and

diversity that characterises thriving districts. Creative production and culture in the City are key catalysts to unlock positive and sustainable growth, international competitiveness and aid a post-pandemic recovery.

We recognise that existing commercial buildings, built by previous generations, often cannot meet the environmental or operational standards required by modern users, and believe when redevelopment is necessary, developers should seek to deliver the highest quality proposal, deploying the principles that ensure maximum benefit to local surroundings and the City. The development team have conducted a high-level sustainability strategy that has considered a whole-life carbon assessment that ensures a longer-term environmental performance and exemplifies the latest in sustainable and healthy design. The proposals must ensure longevity and adaptability through the adoption of Circular Economy and whole life carbon principles, anticipating concerns arising from both the climate crisis and post-pandemic workplace demand.

The redevelopment of Thavies Inn House demonstrates a practical and necessary proposals that can invigorate and stimulate the local area, with the potential of reimagined streetscapes, public green spaces and economic prospects that are welcomed and celebrated by the Partnership. We hope the City Corporation will approve this application and continue to support the ongoing regeneration and enhancement of the wider Fleet Street Quarter area

Kind Regards,

Martha Grekos

Chair, FSQ Public Realm & Environment Steering Group

Fleet Street Quarter Partnership

Committee:	Dated:
Planning and Transportation	**22nd February 2022**
Subject: Thavies Inn House, 3 - 4 Holborn Circus, London EC1N 2HA To make a group Tree Preservation Order (TPOs) on the London Plane Trees *(Platanus x acerifolia)* situated on the public highway on St Andrew Street, to the front of Thavies Inn House	**Public**
Ward: Castle Baynard	**For Decision**
Registered No:	**Registered on:**
Conservation Area: No	**Listed Building:** No

Summary

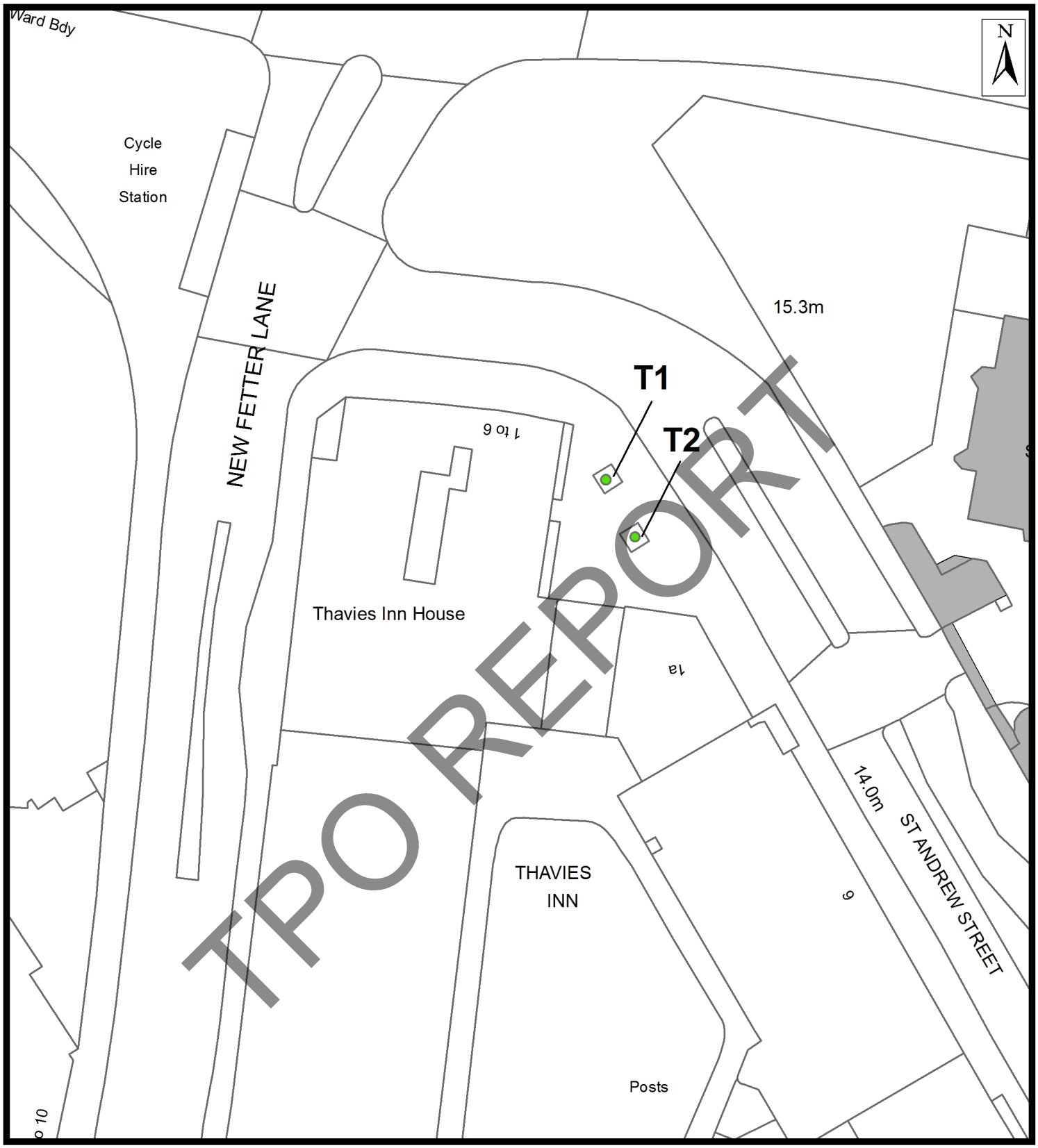
It is proposed that the two London Plane trees (T1 and T2) *(Platanus x acerifolia)* situated on the footway of the Public Highway on St Andrew Street, to the front of Thavies Inn House are made the subject of a group TPO. This is in recognition of their high amenity value. The Public Highway where the trees stand would form part of the Thavies Inn House development site and the trees are therefore considered to be vulnerable. A group TPO would provide an appropriate management framework.

The trees, which are circa 75 years old are considered to be of high amenity value, enhancing the townscape, whilst providing a public and potential biodiversity resource. Their removal would have a negative impact on the local amenity and its enjoyment by the public. As such it is considered that the trees meet the necessary criteria in terms of what trees can be made the subject of a Tree Preservation Order.

It is considered to be expedient to make the Tree Preservation Order. If these trees are the subject of a group TPO the City can insist on their replacement should they be lost.

The City Gardens Manager has inspected the trees.

Tree Location Plan



ADDRESS:

Thaives Inn House, 3-4 Holborn Circus,
London EC1N 2HA

KEY

Tree location **T1**

CITY OF LONDON

ENVIRONMENT DEPARTMENT


REAL FRESH
COFFEE
Coffees • Burritos • Fresh Juice • Salads • Fruit Smoothies • Hand-made Sandwiches
S INN HOUSE

Report

Site and Surroundings

1. Thavies Inn House lies adjacent to Holborn Circus and is bounded by St Andrew Street to the east, New Fetter Lane to the west and Thavies Inn and adjoining buildings to the south. Two London Plane trees are located adjacent to the building on the St Andrew Street footway which is adopted Public Highway.

2. The site is not located within a Conservation Area.

Proposal

3. To make a group Tree Preservation Order (TPOs) on the London Plane Trees *(Platanus x acerifolia)* situated on the public highway on St Andrew Street, to the front of Thavies Inn House

Background

4. A planning application has been submitted to redevelop Thavies Inn House. The proposals include the stopping up and development of this part of St Andrew Street and subsequently the loss of the two London Plane Trees.

Relevant Legislation and Guidance

5. Under section 198 of the Town and Country Planning Act 1990, the Local Planning Authority (LPA) has the power to make a Tree Preservation Order if it appears to them to be 'expedient in the interests of amenity' to make provision for the preservation of trees in their area.

6. National Planning Practice Guidance sets out guidance for the implementation of the Tree Preservation Order system. The Planning Practice Guidance on Tree Preservation Orders states that when deciding whether an Order is appropriate, LPAs are advised to take into consideration:

   - what 'amenity' means in practice and what to consider when assessing amenity value,
   - what 'expedient' means in practice,
   - what trees can be protected and how they can be identified.

7. Before making or confirming an Order the LPA should be able to show that protection would bring a reasonable degree of public benefit in the present or future. The PPG states that Local Planning Authorities may make Orders in relation to land that they own

8. Amenity is not defined in law, so the LPA must exercise judgment when deciding whether it is within their power to make an Order. Orders should be used to protect selected trees if their removal would have a significant negative impact on the local environment and its enjoyment by the public.

9. Authorities are advised to take into account:

1) Visibility

- The extent to which the trees can be seen by the public. This will inform the assessment as to whether the impact on the local environment is significant. The trees, or at least part of them, should normally be visible from a public place, such as a road or footpath, or accessible by the public. However, this alone is not sufficient to warrant an Order.

2) Individual, collective and wider impact. Reference should be made to:

- Size and form
- Future potential as an amenity
- Rarity, cultural or historic value
- Contribution to, and relationship with, the landscape; and
- Contribution to the character or appearance of a conservation area

3) Other factors to consider:

- Importance to nature conservation
- Response to climate change.
  These factor alone would not warrant making an Order.

Expediency

10. LPAs are advised that although some trees may merit protection on amenity grounds it may not be expedient to make them the subject of an Order. For example, trees under good arboricultural management. However, it may be expedient to make an Order if it is believed that there is a risk of trees being felled, pruned or damaged in ways which would have a significant impact on the amenity of the area. There does not need to be an immediate risk. In some cases the LPA may believe that certain trees are at risk as a result of development pressures and in the interest of amenity may consider it expedient to make an Order. Other sources of risk with significant amenity value could include changes in property ownership. Intensions to fell trees are not always known in advance, so it may sometimes be appropriate to proactively make Orders as a precaution.

What trees can be protected and how they can be identified

11. An Order can be used to protect individual trees, trees within an area and groups of trees and the trees can be of any size or species. Where a tree is on Crown land authorities can make an Order without the consent of the appropriate Crown body, however the matter should be discussed with that body prior to making the Order. Suitable candidates for Tree Preservation Orders can be identified using the factors listed above.

Tree Preservation Order Procedure

12. The making of a Tree Preservation Order is essentially a two-stage process.

    - The first stage is the making of the Order by the LPA. The Order will come into effect on the day it is made and notice of the making of the Order must be given in accordance with the Town and Country Planning (Tree Preservation) (England) Regulations 2012. This requires, that persons interested in the land affected by the Order are notified and given the opportunity to submit objections and/or representations on the Order before confirmation.

    - The second stage of the process is the confirmation of the Order by the LPA. The provisional effect lasts six months unless the local planning authority either confirms the Order, (with or without modifications), or decides not to confirm it (before the expiry of the six month period). Where objections and representations are made, the LPA is required to take them into consideration before making a decision.

13. The making of a TPO does not preclude a tree from being removed in the future. The TPO ensures that an applicant must seek permission to prune or remove trees from the Local Planning Authority before commencing works. A TPO will ensure that the amenity value of the protected tree(s) is acknowledged and given appropriate weight when considering a planning application affecting a protected tree. Any approved planning permissions for developments which requires the felling or pruning of protected trees override any applicable TPOs.

Compensation

14. Section 203 of the Town and Country Planning Act 1990 provides that a Tree Preservation Order may make provision for the payment by the LPA of certain compensation in respect of loss and damages incurred by the refusal of consent required by the Tree Preservation Order. Similar provisions apply generally to Tree Preservation Orders made post 2012 pursuant to Regulation 24(4)(b) & (d) of the Town and Country Planning (Tree Preservation) (England) Regulations 2012. (Compensation is generally payable for loss or damage incurred in consequence of refusal of consent to remove or reduce protected trees. Compensation is not payable for loss of development value of the land.)

Policy

15. 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 A to this report

16. 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.

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

18. The City of London Local Plan, adopted January 2015, seeks to protect the amenity value of trees and retain and plant more trees wherever practicable. (Core Strategy Policy CS19: Open Spaces and Recreation)

19. The City of London Tree Strategy Supplementary Planning Document, adopted May 2012, seeks to:

    - Objective 1
      To protect, manage and enhance the existing tree stock in its environment, in accordance with good arboricultural practice.

    - Objective 2
      To safeguard trees which are subject to Tree Preservation Orders and create new Tree Preservation Orders, including trees in conservation areas, when considered expedient to do so.

20. Section 72 of the Planning (Listed Building and Conservation) Act 1990 provides that in the exercise, with respect to any buildings or other land in a conservation area, of any functions under the planning Acts, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area. In this case this is not relevant as the premises do not lie within a conservation area.

21. The PPG states that if trees merit protection in their own right, LPAs should make them the subject of individual TPOs. The group category should only be used to protect groups of trees where the value of the group merits protection.

Arboricultural Advice and Assessment

22. The City Gardens Manager has inspected the trees at the site from ground level and is of the opinion that the combined impact of both trees as a single group is of sufficient amenity value to warrant the making of a TPO.

23. The trees in question (T1 & T2 on the attached plan) when looked at as a pair, are together considered to be of high amenity value and contribute to the character and appearance of the townscape.

24. The canopy of these two trees are prominent in views from the east, south and north and hold a significant role in the townscape form of Holborn Circus. They also help frame an important view of the Grade 1 listed Church of St Andrew Holborn and visually balance with the churchyard planting, predominantly to the north of the Church.

25. In considering the future potential of the trees regard should be had to the potential for growth and whether they have room to grow unchecked by pruning; whether they will be able to achieve/maintain a full crown size and whether they

will continue to offer a reasonable degree of amenity value for the public in the future. An initial assessment suggests that the trees appear to be in fair/good health and should therefore continue to grow. T1 has been planted in close proximity to Thavies Inn House and requires regular pruning back on that side, however in regards to its height, this tree has yet to achieve its ultimate height and maximum potential in respect of its impact and amenity value. Both trees are in fair/good health and, have no external signs of any significant internal weaknesses. The City Gardens Manager considers that both trees have a life expectancy of in excess of 40 years.

26. T1 tree has attained a good height and form and is a good specimen of a *Platanus x acerfolia.* T2 is a smaller, younger tree that has a poorer form. It has an asymmetrical crown which is a result of being supressed by T1, it grows away from the buildings towards the road. The structure and form of the branches as such that it will not achieve the height and stature of T1. However this should not detract from the fact that the combined amenity provided by these two trees standing side by side, forming a single canopy is high, and their removal would have a significant impact on the local environment.

27. The Arboricultural Report submitted as part of the planning application referred to at paragraph 4 of this report states that the larger of the two trees (T1) is considered to be a Category B1/B2 tree and the smaller tree (T2) is considered to be a Category C1/C2 tree under British Standard 5837 entitled "Trees in Relation to Design, Demolition and Construction". This Standard details the steps that should be taken to ensure that trees are appropriately and successfully retained when a development takes place by adopting a categorization method used to identify the quality and value (non fiscal) of the existing tree stock. This facilitates informed decisions as to which trees should be removed or retained in the event of development taking place. This is a different assessment to that applicable when considering if a tree or trees warrant protection by virtue of a TPO; '*that it is expedient in the interests of amenity to make provision for the preservation of trees or woodlands in their area'*. Government guidance advises that if it is expedient, TPOs should be served on trees and woodlands where their removal would have a significant negative impact on the enjoyment of the local landscape by the public.

28. In terms of climate change mature trees play a significant part in climate change resilience. Trees in cities convert large amounts of carbon dioxide to replenish our oxygen levels, filter out harmful air borne particles, provide shade and reduce water and air temperatures. They are also important to nature conservation helping to conserve and preserve wildlife providing for example nesting sites to a range of wildlife.

Expediency

29. A planning application has been submitted to redevelop Thavies Inn House which would result in the removal of the two London Plane trees.

30. The redevelopment scheme has been the subject of extensive pre-application discussions, which have taken place over approximately the last three years. When evaluating and negotiating the scheme Officers have had regard to the

high amenity value of the two London Plane trees. In discussion with the applicant the principle that (were permission to be granted and the trees to be removed), appropriate tree replacement would be required, has been promoted by the authority and acknowledged by the applicant. However, the outcome of the planning application, nor, if approved, the terms of any planning conditions, cannot be prejudged. Any change in ownership of the application site (and potential change in approach of any new owner/applicant) is outside the control of the authority. In the light of the known development pressure on the trees it is considered expedient to make the TPO to ensure the amenity value of the trees is formally acknowledged and appropriately protected.

Recommendation

31. For the above reasons T1 and T2 are considered to be of high amenity value as a group of trees in that they enhance the quality of the townscape. Their removal would have a negative impact on the local environment and its enjoyment by the public. As such it is considered that the trees meet the necessary criteria for a group TPO and it would be expedient to make a group Tree Preservation Order in respect of two London Plane trees, (numbered T1 and T2 on the attached plan), as a public benefit would follow from the serving of the Order.

32. It is further recommended that the Comptroller and City Solicitor be instructed to serve a copy of the Order on persons interested in the land affected by the Orders in accordance with Regulation 5(1) of the Town and Country Planning (Tree Preservations) (England) Regulations 2012.

Appendix A

Relevant London Plan Policies

Policy G7 (Trees and Woodlands) states that **"**London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees."

Relevant Draft City Plan 2036 Policies

OS2 City Greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk

Relevant Local Plan Policies

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.

APPENDIX B

Relevant London Plan Policies

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

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

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

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

Policy SD4 (The Central Activities Zone (CAZ)) states that "the nationally and internationally significant office functions of the CAZ should be supported and enhanced by all stakeholders, including the intensification and provision of sufficient space to meet demand for a range of types and sizes of occupier and rental values"
Policy SD5 (Offices, other strategic functions and residential development in the CAZ) states that "offices and other CAZ strategic functions are to be given greater weight relative to new residential development."

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

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

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

minimise intrusive lighting infrastructure and reduce light pollution."

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

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

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

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

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

Policy E2 (Providing suitable business space) states that Boroughs should seek to "support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand." The policy also states that "development proposals for new B Use Class business floorspace greater than 2,500 sqm (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises."

Policy E3 (Affordable workspace) outlines the requirement for affordable workspace. It is noted that leases or transfers of space to workspace

providers should be at rates that allow providers to manage effective workspace with submarket rents

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

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

Policy HC2 (World Heritage Sites) requires that "development proposals in World Heritage Sites and their settings, including any buffer zones, should conserve, promote and enhance their Outstanding Universal Value, including the authenticity, integrity and significance of their attributes, and support their management and protection. In particular, they should not compromise the ability to appreciate their Outstanding Universal Value, or the authenticity and integrity of their attributes." The policy also states that "development proposals with the potential to affect World Heritage Sites or their settings should be supported by Heritage Impact Assessments. Where development proposals may contribute to a cumulative impact on a World Heritage Site or its setting, this should be clearly illustrated and assessed in the Heritage Impact Assessment."

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

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

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

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

Policy GS (Urban greening) states that "major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating

measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage."

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

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

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

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

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

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

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

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

Policy TI (Strategic approach to transport) highlights that development "should make the most effective use of land, reflecting its connectivity and accessibility by existing and future public transport, walking and cycling

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

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

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

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

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

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

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

Relevant GLA Supplementary Planning Guidance (SPG):

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

Relevant Draft City Plan 2036 Policies

S1 Healthy and inclusive city

HL1 Inclusive buildings and spaces

HL2 Air quality

HL3 Noise and light pollution

HL4 Contaminated land and water quality

HL6 Public toilets

HL9 Health Impact Assessments

S2 Safe and Secure City

SA1 Crowded Places

SA3 Designing in security

HS3 Residential environment

S4 Offices

OF1 Office development

S5 Retailing

RE2 Retail links

S6 Culture, Visitors and the Night -time Economy

CV2 Provision of Visitor Facilities

CV5 Public Art

S7 Smart Infrastructure and Utilities

S8 Design
DE1 Sustainability requirements
DE2 New development
DE3 Public realm
DE5 Terraces and viewing galleries
DE6 Shopfronts
DE8 Daylight and sunlight
DE9 Lighting
S9 Vehicular transport and servicing
VT1 The impacts of development on transport
VT2 Freight and servicing
VT3 Vehicle Parking
S10 Active travel and healthy streets
AT1 Pedestrian movement
AT2 Active travel including cycling
AT3 Cycle parking
S11 Historic environment
HE1 Managing change to heritage assets
HE2 Ancient monuments and archaeology
HE3 Setting of the Tower of London World Heritage Site
S13 Protected Views
S14 Open spaces and green infrastructure
OS1 Protection and Provision of Open Spaces
OS2 City greening
OS3 Biodiversity
OS4 Trees
S15 Climate resilience and flood risk
CR1 Overheating and Urban Heat Island effect
CR3 Sustainable drainage systems (SuDS)
S16 Circular economy and waste
CE1 Zero Waste City
S21 City Cluster
S27 Planning contributions

Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)

Air Quality SPD (July 2017);

Archaeology and Development Guidance SPD (July 2017);

City Lighting Strategy (October 2018);

City Transport Strategy (May 2019);

City Waste Strategy 2013-2020 (January 2014);

Protected Views SPD (January 2012);

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

Planning Obligations SPD (July 2014);

Open Space Strategy (2016);

Office Use SPD (2015);

City Public Realm (2016);

Cultural Strategy 2018 – 2022 (2018).

Relevant Local Plan Policies

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.

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.

DM1.2 Protection of large office sites

To promote the assembly and development of sites for large office schemes in appropriate locations. The City Corporation will:

a) assist developers in identifying large sites where large floorplate buildings may be appropriate;
b) invoke compulsory purchase powers, where appropriate and necessary, to assemble large sites;
c) ensure that where large sites are developed with smaller buildings, the design and mix of uses provides flexibility for potential future site re-amalgamation;
d) resist development and land uses in and around potential large sites that would jeopardise their future assembly, development and operation, unless there is no realistic prospect of the site coming forward for redevelopment during the Plan period.

DM1.3 Small and medium business units

To promote small and medium sized businesses in the City by encouraging:

a) new accommodation suitable for small and medium sized businesses or occupiers;
b) office designs which are flexible and adaptable to allow for sub-division to create small and medium sized business units;
c) continued use of existing small and medium sized units which meet occupier needs.

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.

CS20 Improve retail facilities

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

DM2.1 Infrastructure provision

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

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

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

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

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

CS3 Ensure security from crime/terrorism

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

DM3.2 Security measures

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

a) building-related security measures, including those related to the servicing of the building, to be located within the development's boundaries;

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

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.

CS12 Conserve or enhance heritage assets

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

DM12.1 Change affecting heritage assets

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

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

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

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

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

DM12.2 Development in conservation areas

1. Development in conservation areas will only be permitted if it preserves and enhances the character or appearance of the conservation area.

2. The loss of heritage assets that make a positive contribution to the character or appearance of a conservation area will be resisted.

3. Where permission is granted for the demolition of a building in a conservation area, conditions will be imposed preventing demolition commencing prior to the approval of detailed plans of any replacement building, and ensuring that the developer has secured the implementation of the construction of the replacement building.

DM12.4 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.

DM15.2 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.

DM15.5 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.

DM18.1 Development in Flood Risk Area

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

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

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

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

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

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

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

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

DM18.2 Sustainable drainage systems

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

2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and

other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.

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

DM18.3 Flood protection and climate

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

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

CS19 Improve open space and biodiversity

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

DM19.1 Additional open space

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

2. New open space should:

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

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

DM19.2 Biodiversity and urban greening

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

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

CS20 Improve retail facilities

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

DM20.2 Retail links

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

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.

SCHEDULE

APPLICATION: **21/00885/FULMAJ**

Thavies Inn House 3 - 4 Holborn Circus London

Demolition of the existing building at 1-6 Holborn Circus (known as Thavies Inn House) and the erection of a ten storey Class E building for office use with Class E retail use at part ground floor level with works to include reinstatement and new pedestrian routes through the site; hard and soft landscaping works including removal and replacement trees within the public highway, and creation of pocket park in Thavies Inn; widening of the footway on St Andrew Street; and other works incidental to the proposed development.

CONDITIONS

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

2 Prior to any stripping-out or demolition of the existing building, an updated material audit of the building shall be submitted to and approved in writing by the Local Planning Authority to understand the value of it as a material bank, establishing what can be retained and what can be re-used either on-site, in the first instance, re-used off-site or recycled, with the presumption that as little waste as possible is generated and the development shall be carried out in accordance with the approved details.
REASON : To ensure that the Local Planning Authority can be satisfied that the proposed development will be designed to promote circular economy principles to reduce waste and encourage recycling, reducing impact on virgin resources in accordance with the following policies in the Development Plan and the draft Development Plans: Draft London Plan ; GG5, GG6, D3, SI 7, SI 8 - Local Plan; CS17, DM 17.2 - Draft City Plan 2036; S16, CEW 1.These details are required prior to demolition and construction work commencing in order to establish the extent of recycling and minimised waste from the time that demolition and construction start.

3 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: Publication 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.

4 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's Standard Benchmark and setting out further opportunities to achieve the GLA's Aspirational Benchmark 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 GLA and the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2, DM 17.2. 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.

5 Before any works including demolition are begun a site survey and survey of highway and other land at the perimeter of the site shall be carried out and details must be submitted to and approved in writing by the local planning authority indicating the proposed finished floor levels at basement and ground floor levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces. The development shall be carried out in accordance with the approved survey unless otherwise agreed in writing by the local planning authority.
REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required

prior to commencement in order that a record is made of the conditions prior to changes caused by the development and that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

6 Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction 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 demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.
REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

7 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.

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

any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution). REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that development starts.

9 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.

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

11 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.

12 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.

13 a) No works except demolition to basement slab level shall take place before a Climate Change Resilience Sustainability Statement (CCRSS) has been 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.
(b) 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 buildings. 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.

14 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.

15 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.

16 Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems, to include details and locations of tanks and how the collected water will be used, shall be submitted to and approved in writing by the local planning authority.
REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. 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.

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

commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).
REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

18 Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems including blue roofs, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.43 litres per second, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 80m3;
(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.

19 Before the shell and core is complete the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
(a) A Lifetime Maintenance Plan for the SuDS system to include:
- A full description of how the system would work, it's aims and objectives and the flow control arrangements;
- A Maintenance Inspection Checklist/Log;
- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.
REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

20 Notwithstanding the details shown on the drawings, before any works thereby affected are begun, details of measures to prevent jumping or falling from the development 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.

21 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the Class E use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the Class E use takes place.
REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

22 Prior to the installation of any generator, a report shall be submitted to show what alternatives have been considered including a secondary electrical power supply, battery backup or alternatively fuelled generators such as gas fired or hydrogen. The details of the proposed generator shall be submitted for approval. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life threatening emergency and for the testing necessary to meet that purpose and shall not be used at any other time.
REASON: In order to ensure that the generator does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2019 and the London Plan policy 7.14B.

23 Details of the following aspects of the proposed green roofs and green facade planting shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun.

(a) position;
(b) size;
(c) construction;
(d) type of planting;
(e) planting irrigation;
(f) maintenance regime; and
(g)contribution to biodiversity and rainwater attenuation.

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.

24 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.

25 All hard and soft landscaping on the ground, on the building elevations, terraces and roofs 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.

The scheme should include the following details:
(a) Irrigation, including provision for harvesting rainwater run-off from road ground and roof surfaces to supplement irrigation;
(b) Soil including details of the type and depths of soil and substrates;
(c) Species and selection of trees including details of its their age, growing habit, girth of trunk, how many times transplanted, root development and contribution to enhance biodiversity;
(d) Planting pit size and construction, tree guards;
(e) Details of all soft landscaping including species and contribution to enhance biodiversity;
(f) Seating;
(g) Paving materials; and
(h) maintenance plans for all proposed landscaping.

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 and to achieve environmental benefits in accordance with the following policies of the Local Plan: DM10.1, DM10.2, DM10.3, DM10.4, DM19.1, DM19.2.

26 Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036

27 (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.

28 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.

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

30 A post construction BREEAM assessment demonstrating that a minimum target rating of '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) 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.

31 Within 6 months of completion details of climate change resilience measures 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.

32 Prior to the occupation of any part of the building, the land between the existing building lines and the face of the proposed new building shall be brought up to street level, paved and drained in accordance with details to be submitted to and approved in writing by the Local Planning Authority and shall not be fenced or otherwise enclosed or obstructed.
REASON: To ensure compliance with building lines and to ensure a satisfactory treatment at ground level in accordance with the following policies of the Local Plan: DM10.1, DM10.8, DM16.2.

33 Prior to occupation of the building the following details relating to signage shall be submitted to and approved in writing by the Local Planning Authority and all signage placed on the development site shall be in accordance with the approved details:
(a) A Signage strategy for the retail units within the development shall be submitted; and
(b) A Signage strategy relating to the pocket park and cycle park shall be submitted.

All signage relating to the pocket park (as approved in the signage strategy) must be erected and in place on the development site prior to occupation of the building.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5, DM10.8, DM12.1, DM12.2 and DM15.7.

34 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.

35 No development shall be occupied until confirmation has been provided that either:-
1. Foul water 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 Foul water 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.

36 (a) Within 6 months prior to implementation, a draft Cultural Plan shall be submitted to and approved in writing by the Local Planning Authority. Details should include i) contextual analysis of the existing cultural landscape; ii) Cultural Vision responding to contextual analysis and options outlined in the Thavies Inn House Cultural Plan prepared by Wilkinson Eyre dated September 2021and other proposals as appropriate; iii) success criteria and review stages; iv) timeline of the implementation of cultural deliverables from occupation onwards; v)

details of the proposal including, but not limited to, how it will be serviced, managed, resourced, procured, maintained, monitored, hours of access, addressing equalities and inclusivity considerations. The draft Cultural Plan shall include details of the activation of the ground floor lobby area.
(b) 6 months prior to occupation a final Cultural Plan shall be submitted to and approved in writing by the Local Planning Authority.
The development shall be implemented in accordance with the approved Cultural Plan.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure cultural enhancements are delivered in accordance with the following policies of the Local Plan: CS11, DM11.1, DM11.2 and policies S6 CV1, CV2, CV4, CV5 of the Draft Local Plan 2036

37 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

38 All combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants and must be located away from ventilation intakes and accessible roof gardens and terraces.
REASON: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and in accordance with the following policy of the Local Plan: DM15.6 and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10, in accordance with the City of London Air Quality Strategy 2015 and the Local Plan DM15.6.

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

40 Notwithstanding the details shown on the approved plans, before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority

and all works pursuant to this consent shall be carried out in accordance with the approved details and shall retained thereafter:
(a) particulars and samples panels and mock ups of the materials to be used on all external faces of the building to be inspected on site including glazing with shadow boxes; stonework; metalwork; fins; planters and rods;
(b) details of the proposed external elevations including the routes through details of new fenestration and entrances at all levels;
(c) details of proposed ground floor elevations including plinth;
(d) details of all ground floor entrance;
(e) details of soffits and junctions with the main facade;
(f) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, fire escapes and other excrescences at roof level.;
(g) ductwork to serve the development;
(h) details of louvers ventilation and air-conditioning for the development;
(i) details of all ground level surfaces including materials to be used and interfaces with the building, neighbouring buildings and highway;
(j) details of external surfaces within the site boundary including landscaping;
(k) details of planting, pv panels and lift roof over run at roof terrace level;
(l) details of interior fit our proposals for office lobby reception and identification of curated spaces for exhibition/artwork;
(m) lighting proposal to the public amenity space, including roof terrace, and lobby;
(n) typical bay details for each level including parapet and all junction details and relationship of facade to floor plates;
(o) details of all integrated planters on the buildings and rod details;
(p) details of the new passages and routes including integrated artwork and lighting;
(q) details of security measures.
REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory internal and external appearance in accordance with the following policies of the Local Plan: DM12.3.

41 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.

42 Unless otherwise approved by the LPA no plant or telecommunications equipment shall be installed on the exterior of the building, including any plant or telecommunications equipment permitted by the Town & Country Planning (General Permitted Development) Order 2015 or in any provisions in any statutory instrument revoking and re-enacting that Order with or without modification.

REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

43 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 168 long stay pedal cycle spaces, and a minimum of 25 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.

44 A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.
REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy T5 cycling, emerging City Plan policy 6.3.24.

45 Unless otherwise agreed in writing by the Local Planning Authority a minimum of 18 showers and 168 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.
REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

46 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.

47 No amplified or other music shall be played on the external balconies or roof terrace.
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.

48 The roof terraces on levels 8 and 10, and external balconies on levels 2, 4 and 6 hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 08:00 on the following day and not at

any time on Sundays or Bank Holidays, other than in the case of emergency.
REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

49 At all times when not being used for cleaning or maintenance the window cleaning gantries, cradles and other similar equipment shall be garaged within the enclosure(s) shown on the approved drawings.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.

50 The areas shown on the approved drawings as offices and retail use and as set out in Condition 51 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).
REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed in the Environmental Statement and that public benefits within the development are secured for the life of the development.

51 The development shall provide:
- 11,873 sq.m. (GIA) of office floorspace (Class E); and
- 229 sq.m. (GIA) retail use (Class E).
REASON: To ensure the development is carried out in accordance with the approved plans.

52 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:
Location plan and dwg nos:
01557.10-WEA-RF-A-0004 Rev 3
01557.10-WEA-B2-A-0998 Rev 5
01557.10-WEA-B1-A-0999 Rev 7
01557.10-WEA-00-A-1000 Rev 9
01557.10-WEA-01-A-1010 Rev 9
01557.10-WEA-02-A-1020 Rev 8
01557.10-WEA-03-A-1030 Rev 6
01557.10-WEA-04-A-1040 Rev 6
01557.10-WEA-05-A-1050 Rev 7
01557.10-WEA-06-A-1060 Rev 5
01557.10-WEA-07-A-1070 Rev 7
01557.10-WEA-08-A-1080 Rev 7
01557.10-WEA-09-A-1090 Rev 7
01557.10-WEA-RF-A-1100 Rev 8
01557.10-WEA-N-A-2001 Rev 6
01557.10-WEA-S-A-2002 Rev 6

01557.10-WEA-E-A-2003 Rev 7
01557.10-WEA-W-A-2004 Rev 6
01557.10-WEA-W-A-2005 Rev 5
01557.10-WEA-N-A-2006 Rev 5
01557.10-WEA-E-A-2007 Rev 5
01557.10-WEA-AA-A-3001 Rev 5
01557.10-WEA-BB-A-3002 Rev 5
01557.10-WEA-C, DD, E-A-3003 Rev 4
01557.10-WEA-FF-A-4001 Rev 1
01557.10-WEA-GG-A-4002 Rev 1
01557.10-WEA-HH-A-4003 Rev 1
01557.10-WEA-II,JJ-A-4004 Rev 1
01557.10-WEA-KK,LL-A-4007 Rev 1

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 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. You are advised to read Thames Water's 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 pipes or other structures.https://developers.thameswater.co.uk/Developing-a-large-site/Planning-yourdevelopment/
Working-near-or-diverting-our-pipes. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 0093921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer

Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

3 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. You will be expected to demonstrate what measures you will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk . Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholsesale; Business customers; Groundwater discharges section.

4 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. You should take account of this minimum pressure in the design of the proposed development.

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