

Committee:	Date:
Planning and Transportation Sub-Committee	22 November 2022
<p>Subject:</p> <p>Poultry Market And General Market And The Annexe Buildings West Smithfield London EC1A 9PS</p> <p>General Market</p> <p>Partial demolition, repair, refurbishment and extension of the existing building known as the General Market at 43 Farringdon Street on the basement, ground, first and roof levels; creation of a new entrance structure on West Poultry Avenue (and associated refurbishment of the existing canopy over West Poultry Avenue) with new facades to West Smithfield and Charterhouse Street; new entrances on the corner of Farringdon Street and Charterhouse Street; Change of use to provide a museum and ancillary uses and areas, together with a flexible retail, restaurant, drinking establishment and leisure (gym) use for the perimeter 'houses'.</p> <p>Poultry Market</p> <p>Partial demolition, repair, refurbishment and alteration of the existing building known as the Poultry Market, Charterhouse Street at basement, ground and first levels; change of use to a museum and ancillary uses and areas.</p> <p>Annexe Site (Red House, Iron Mountain, Fish Market and Engine House)</p> <p>Partial demolition, refurbishment and extension of the existing buildings known as the Annexe Site at 25 Snow Hill and 29 Smithfield Street at basement, ground, first, second and third levels; creation of a triple height canopy above a public realm space; change of use to a flexible museum, offices, retail, restaurant, drinking establishment, events and functions use. Refurbishment of and minor alterations to the existing building known as the Engine House at West Smithfield at basement and ground levels; Change of use to</p>	Public

<p>a flexible retail and museum use.</p> <p>(The proposal would provide 32,864sq.m of Museum floorspace (Class D1), 4,079 sq.m of flexible A1/A2/A3/A4/B1/D1 & D2 floorspace, 2,377sq.m of flexible B1/D1 floorspace, 870sq.m of flexible A3/A4/D1 & D2 floorspace, 18sq.m of flexible A1/D1 floorspace and 82sq.m of flexible A1/A3/A4/D1 floorspace.)</p> <p>This application is accompanied by an Environmental Statement. Copies of the Environmental Statement from Gerald Eve LLP, One Fitzroy, 6 Mortimer Street, London, W1T 3JJ</p>	
Ward: Farringdon Without	For Decision
Registered No: 19/01343/FULEIA	Registered on: 19 December 2019
Conservation Area: Smithfield	Listed Building: Grade II

For information: this report also covers considerations under application reference 19/01344/LBC, which is an application for listed building consent in relation to the following works to the Poultry Market (see also separate report attached for recommendations and conditions in relation to this listed building consent) :

Part demolition, repair, and refurbishment of the building known at the Poultry Market, Charterhouse Street at ground, first and basement levels, associated with a change of use of the building to provide a museum and ancillary uses and areas; including: works associated with an entrance structure on West Poultry Avenue; internal alterations including creation of a part new first floor; fabric removal and refurbishment on all floors; replacement glazing; facade cleaning and other facade repair; levelling of ground floor; works of repair to the roof; installation of new heating and cooling equipment; new M&E services; repurposing of the south service bay and associated infill structure; remodelling of the north service bay; internal decoration; replacement balustrade; and other associated works as shown on the submitted plans and drawings.

Summary

The application site covers an area of approximately 2 hectares. It is bounded by Charterhouse Street to the north, East Poultry Avenue to the east, Farringdon Street to the west and West Smithfield, Smithfield Street and Snow Hill to the south. West Poultry Avenue is contained within the site.

The proposal relates to the westernmost buildings of the Smithfield Market complex including the General Market, the grade II listed Poultry Market and the Annexe Site which comprises the Fish Market, the Red House, the Iron Mountain facility and the Engine House.

The market uses on the General Market and Annexe sites ceased approximately 30 years ago. The Poultry Market is currently in use as a market selling meat products.

Smithfield is an area of the City renowned for its diversity and rich mix of uses including the functioning meat market, residential, retail, St Barts hospital and offices. The site is within the Smithfield Conservation Area.

The site has previously been the subject of two planning applications rejected by the Secretary of State following Public Inquiries in 2007 and 2014. In 2019 applications for planning permission and listed building consent were submitted for the re-location of the Museum of London to the General Market and the Poultry Market and the use of the Annexe site for flexible retail, office and leisure uses. The Museum aspires to become a world class attraction and seeks to optimise visitor experience. Constraints within the current site are preventing this vision from being realised. Members of the Planning and Transportation Committee resolved to grant planning permission and listed building consent for the scheme on the 23 June 2020.

Owing to a delay in the Museum of London being granted an interest in the site to enable them to enter into a section 106 agreement which will bind the land, and a period of uncertainty about the timing during which vacant possession of the market could be achieved, planning permission and listed building consent have not been issued and the stage 2 referral process has not started. This report seeks to revisit the Museum of London scheme to include updates to the 2019 submission to reflect:

- Minor alterations to the design of the scheme
- Changes to material considerations since the applications were considered in 2020.
- Updates to the Environmental Statement and supporting documents to account for changes in the locality since the applications were considered in 2020.
- Review of all survey methodologies and data to ensure that the conclusions drawn in the application documentation are still robust
- The inclusion of a sequential test within the retail statement

- The heads of terms and conditions have been revised in the light of the City's interest in the site.

The Local Planning Authority has undertaken another round of consultation on the scheme. In response to which twelve letters of support were received. One holding objection has been received from the Smithfield Market Traders Association expressing concern over the impact that the proposal would have on the functioning of the Markets. Historic Buildings and Places have expressed concern over some of the proposed works to the Red House. SAVE support the proposal whilst considering that elements of the design of the scheme need further consideration. One representation has been received from a local resident raising concern over the impact of construction work at the site and the implications that this has on traffic associated with the Market. The representations and associated considerations are detailed in the main body of the report.

It is acknowledged that changing the use of the Poultry Market would cause some diminishment to the capacity of Smithfield Market through the loss of 32 trading units, all be it only 17 units are currently in use for trading purposes. This would be contrary to certain policies in the Local Plan 2015 and the draft City Plan 2040 which support the continued presence of Smithfield Market. Notwithstanding, the East and West Markets are where the majority of market traders and trading units are located and therefore the main part of the market would continue to function under the proposal.

The proposed scheme has been designed to co-exist alongside the operational meat market. Careful consideration has been given to delivery and servicing movements, the package of S278 works and the potential impact of construction works on market function.

The scheme has been submitted in the context of the draft City Plan 2040 which supports the re-location of the Museum to Smithfield acknowledging that in the long term the Corporation has taken the in principle decision to consolidate its markets and move them to a site in Dagenham.

On balance the updated proposal is supported as it would revive the buildings and surrounding public realm. It would align with future aspirations for Smithfield regarding the Culture Mile and the City's wider aspirations to ensure that the City thrives on commerce and culture. A strategic development would be secured that offers significant social, economic and environmental benefits including job creation, tourism and income generation, securing a visitor attraction that is accessible and inclusive for all telling the story of London and gives the public the ability to access and appreciate some of the most historically significant buildings in London.

The scheme is driven by conservation and enhancement of the existing buildings which would be repaired and renewed in accordance with best conservation practice. Transforming the market buildings into a world class museum and flexible retail/office use would inevitably require change. While this has been dealt with in a careful and skilful way, there is inevitably some

harm to historic fabric through the remodelling of interiors in the instance of the Poultry Market and through the alteration of the historic fabric to accommodate the new uses. The harm to the significance of the Poultry Market and the Smithfield Conservation Area, is considered to be less than substantial and outweighed by the public benefits of the scheme. The harm to the non-designated heritage assets is outweighed by good design and the benefits of the scheme. Overall, the scheme is an exceptional and world class example of the sensitive restoration and re-use of historic buildings whilst maximising economic and socially inclusive public access.

The scheme would still have exemplary environmental and sustainability credentials, especially given that the works are proposed within the constraints of the existing buildings. Circular economy principles would be adopted, there would be a connection to Citigen, new solar panels and an increase in greening. SUDS principles are proposed, and the development would not unduly impact on air quality.

Subject to conditions and securing certain matters through the S.106 agreement and through S278 of the Highways Act the scheme would be policy compliant in respect of its approach to car parking, long stay cycle parking for the General Market and the Poultry Market, coach drop off, taxi drop off and servicing arrangements.

Overall, it is considered that the proposal represents an exceptional opportunity to sensitively revive an underutilised area of Smithfield into a new destination that would be accessible for all and have substantial economic, environmental, cultural and social benefits. The proposal is considered to accord with the development plan when considered as a whole. In addition, other material considerations, including the National Planning Policy Framework, the draft City Plan 2040 also indicate that planning permission should be granted.

Recommendations

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

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

(b) planning obligations and other agreements being entered into (or given unilaterally by the City Corporation as landowner) under Section 106 of the Town & Country Planning Act 1990 (and ancillary powers) in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed and a commitment has been given by the City Corporation as landowner that it will comply with the

obligations in connection with the development and that it will ensure that the obligations are binding on any future purchaser or development partner;



(2) That your officers be instructed to negotiate and secure the planning obligations through an agreement or unilateral undertaking as detailed in this report;

(3) That it is noted in principle that land affected by the building which is currently public highway and highway over which the public have a right of access, including West Poultry Avenue may be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed under delegated authority with arrangements for advertising and making of a stopping-up order for the various areas, to the extent that such stopping-up order is unopposed . If there were to be any unresolved objections to the stopping-up order, a report would be taken to the Planning and Transportation Committee for decision;

(4) That your Officers be authorised to provide the information required by regulation 29 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (information to be provided to the developer post determination of the application), and to inform the public and the Secretary of State as required by regulation 30 of those regulations.

APPLICATION DASHBOARD for the **Museum of London, West Smithfield**

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

TOPIC	INFORMATION				
1. SITE PHOTOS	EXISTING	PROPOSED			
					
2. HEIGHT	EXISTING	PROPOSED			
	<p>General Market: 3 storeys with another storey at Hart’s corner = AOD 26.683m (At Hart’s corner) Poultry Market: 2 storeys = AOD 25.56m (Monitor roof), 34.5 (Dome) Fish Market: 2 storeys = AOD 26.837 (Parapet) Red House: Existing floor removed = AOD 30.435 (main existing parapet)</p> <p>Engine House: 1 storey = AOD 17.934m (Main parapet-exclude chimney) Iron Mountain: 1 storey = AOD 20.13 (To parapet)</p>	<p>General Market: As per existing Poultry Market: As per existing Fish Market: As per existing Red House: 4 storeys = AOD 29.573m (extension) AOD 30.435 (main existing parapet) Engine House: 1 storey = AOD 18.145m (exclude chimney) Canopy to public Realm on Iron Mountain = AOD 30.442m</p>			
3. FLOORSPACE GEA (SQM)	Floor space existing and proposed				
	GEA	Total existing	Sui Generis Existing	Commercial use existing	Class A4 (Bar) existing
	Annexe (Fish Market, Red House, Iron Mountain)	3,643		3,643	
	Engine House (& Historic Basement Vaults)	922		922	
	General Market	20,580	20,580		
	Poultry Market (Inc WPA)	21,608	21,126		482
	TOTAL	46,753	41,706	4,565	482

	GEA	Class (Museum) D1 proposed	Flexible A1/A2/A3/A4/B1/D1/D2 proposed	Flexible B1/D1 proposed	Flexible A1/A3/A4/D1 proposed	Flexible A1/D1 proposed	Flexible A3/A4/D1/D2 proposed	Total proposed
	Annexe (Fish Market, Red House, Iron Mountain)		2610	2721	101		25	5457
	Engine House (& Historic Basement Vaults)					23	992	1015
	General Market	13385	2019					15404
	Poultry Market (Inc WPA)	21161						21161
	TOTAL	34546	4629	2721	101	23	1017	43037
4. EMPLOYMENT NUMBERS	EXISTING				PROPOSED			
	<ul style="list-style-type: none">Poultry Market (as at 2019/20 baseline) – circa 20Security and maintenance – circa 20Existing core museum (relocation of jobs and economic activity) – 229TOTAL = circa 269				<ul style="list-style-type: none">New core museum – 252Other museum related employment (retail, F&B, programming) – 107Houses – 80Annexe Buildings – 253 <p>TOTAL = circa 692</p>			
5. VEHICLE / CYCLE PARKING	TYPE	EXISTING		POLICY REQUIREMENT		PROPOSED		
	Car parking spaces	0		0		0		
	Cycle long stay	0		146		134		
	Cycle short stay	0		662		330		
	Lockers	0		146		134		
	Showers	0		15		17		
6. HIGHWAY LOSS / GAIN	1. 1,511 sqm proposed to be stopped up (related to West Poultry Avenue, pedestrian rights to be secured over new curated route by condition)							
7. PUBLIC REALM GAIN	<ul style="list-style-type: none">Public forecourts by the North and South main Museum entrances on West Poultry AvenueWidened existing pavements along Poultry Market North and South elevations to enhance pedestrian comfortCovered public Realm on Iron Mountain site as part of the Annexe							
8. STREET TREES	EXISTING				PROPOSED			
	<ul style="list-style-type: none">None existing				<ul style="list-style-type: none">None proposed			
9. SERVICING VEHICLE TRIPS	EXISTING				PROPOSED			
	<ul style="list-style-type: none">Poultry Market only, variable trips predominantly over night				<ul style="list-style-type: none">82 SERVICING TRIPS combined across the development			

10. RETAINED BUILDING ELEMENTS IN SITU

From the initial May 2020 planning documentation, the following figures were gathered from engineering feasibility studies, workshops and design stage reports. These are target values provided as estimates where appropriate, and thus do not cover all building elements. See more detail in the Circular Economy Section of the report.

Level of retention by volume of the original substructure and superstructure:

	Poultry Market	General Market	(Annexe) Fish Market	(Annexe) Red House
Substructure	75%	45%	100%	70%
Superstructure	60-65%	25-45%	90% (original steelwork) 50% (timber floors)	70%

In addition to the above, all site salvaged brick will be reused on site.

11. OPERATIONAL CARBON EMISSION SAVINGS

- 72% improvement against Baseline building (representative of the existing building conditions) using SAP 2012 carbon factors (policy target 35% improvement)



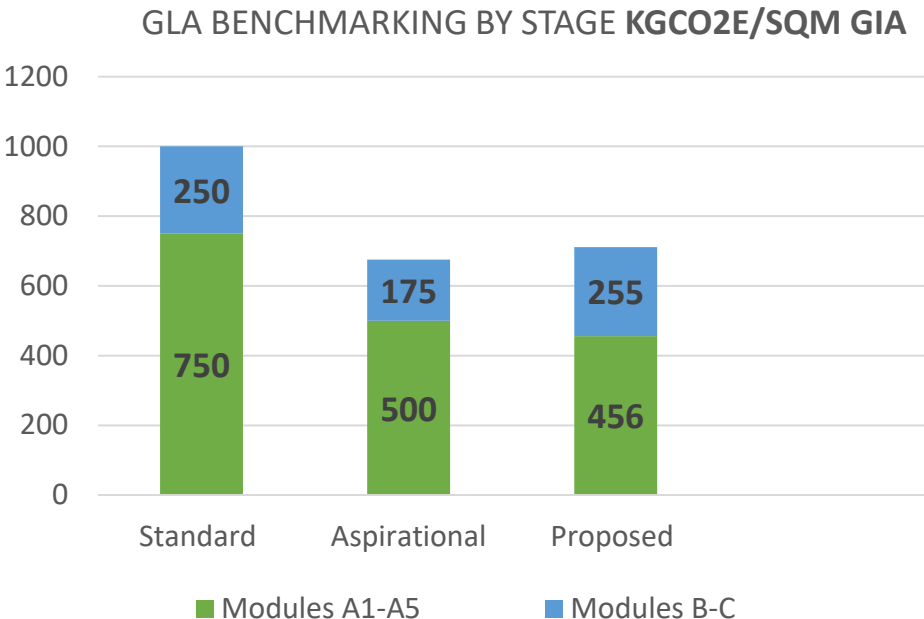
12. OPERATIONAL CARBON EMISSIONS

1,619,209.00	kgCO ₂ e/annum
40.18	kgCO ₂ e/sqm/annum
2,411.00	kgCO ₂ e/sqm over 60 years

(Based on current status of electricity grid)

13. EMBODIED CARBON EMISSIONS

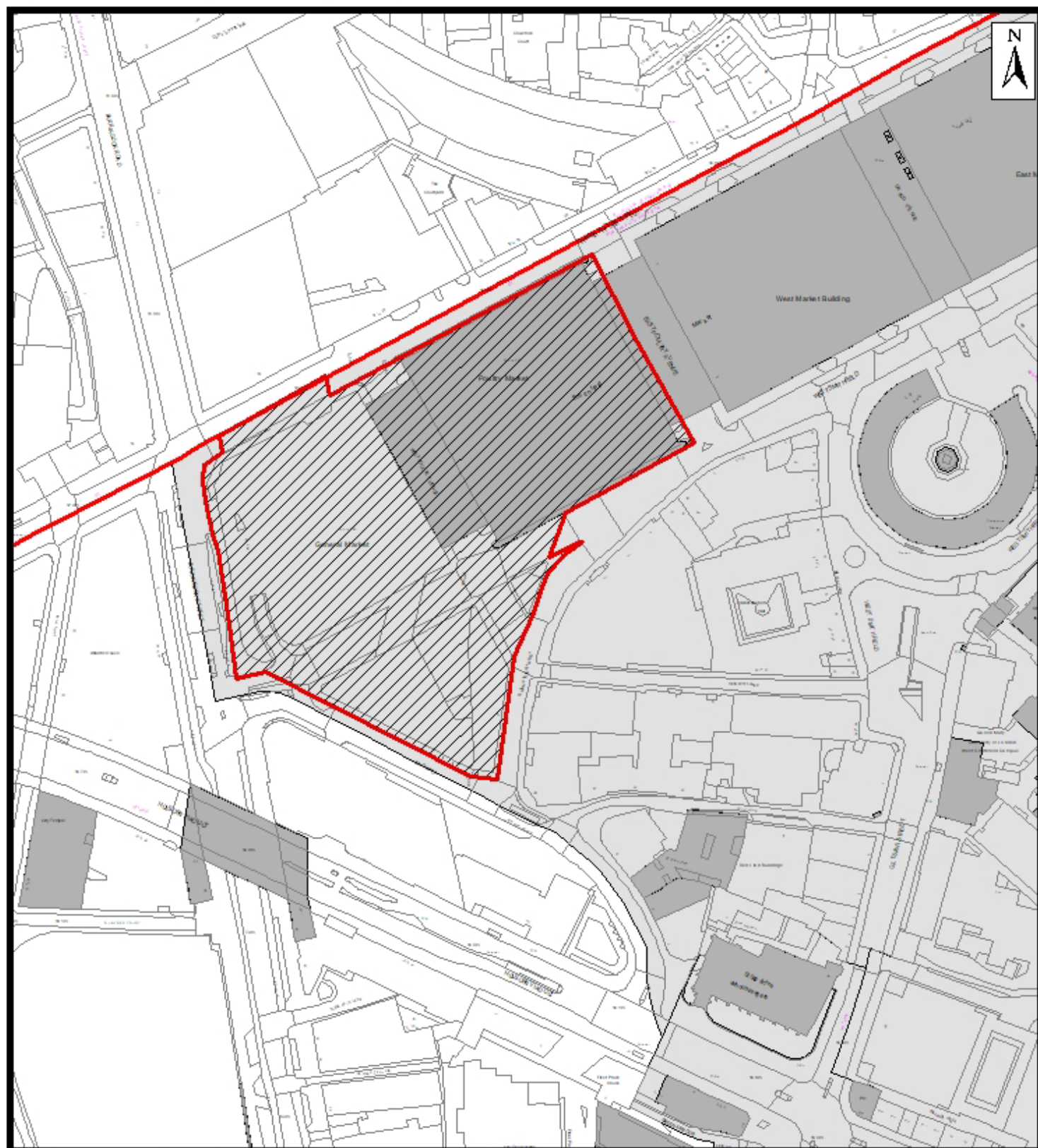
PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS



TOTAL: 28,664 tonnesCO2eq/60 years

14. WHOLE LIFE CYCLE CARBON EMISSIONS (kgCO₂e/m² GIA)	<div data-bbox="413 210 1463 573"> <table border="1"> <thead> <tr> <th>Category</th> <th>Value</th> </tr> </thead> <tbody> <tr> <td>Product and construction (A1-A5)</td> <td>456</td> </tr> <tr> <td>Use (B1-B5)</td> <td>220</td> </tr> <tr> <td>Op. energy and Water use (B6-B7)</td> <td>2,237</td> </tr> <tr> <td>End of Life (C1-C4)</td> <td>63</td> </tr> </tbody> </table> </div> <p>TOTAL: 118,800 tonnesCO₂eq/60 years (based on current status of electricity grid)</p>	Category	Value	Product and construction (A1-A5)	456	Use (B1-B5)	220	Op. energy and Water use (B6-B7)	2,237	End of Life (C1-C4)	63
Category	Value										
Product and construction (A1-A5)	456										
Use (B1-B5)	220										
Op. energy and Water use (B6-B7)	2,237										
End of Life (C1-C4)	63										
15. TARGET BREEAM RATING	<p>Three assessments will be carried out across the whole development to cover the various uses of the site and the target of each of them is reported below:</p> <ul style="list-style-type: none"> BREEAM RFO 2014 Fully Fitted assessment for the main museum <div data-bbox="467 826 1254 902"> </div> BREEAM NC+RFO 2014 Bespoke assessment for the Red House covering shell and core <div data-bbox="472 976 1259 1052"> </div> BREEAM RFO 2014 Shell only assessment for the retail spaces in the Annexe <div data-bbox="472 1133 1259 1209"> </div> 										
16. URBAN GREENING FACTOR	<ul style="list-style-type: none"> 0.04 (Policy target 0.3) The opportunity for greening the site are constrained by the limited amount of external space and the constraints of the Conservation area, where existing roofs with low structural capabilities are to be retained. Proposals have been developed to integrate greenery wherever possible, including on the roof of the General Market, Engine House and Red House. These proposals improve the current condition of lack of greenery of the existing buildings and surrounding streets. 										
17. AIR QUALITY	<p>Air Quality Neutral for building emissions. All-electric building in day-to-day operation</p>										

Site Location Plan



© Crown copyright and database rights 2022 OS 100023243

ADDRESS:

Poultry Market, General Market and The Annexe Buildings, West Smithfield

CASE No.

19/01343/FULEIA



SITE LOCATION



LISTED BUILDINGS



CONSERVATION AREA BOUNDARY



CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT

Aerial View taken 2019



Proposed Aerial View



View of General Market from Holborn Viaduct taken 2019



View of General Market from Holborn Viaduct Proposed



Hart's Corner 2019



Hart's Corner Proposed



West Poultry Avenue from Charterhouse Street 2019



West Poultry Avenue from Charterhouse Street Proposed



Red House and Engine House looking west along West Smithfield 2019



Red House and Engine House looking west along West Smithfield



Snow Hill looking North along Smithfield Street 2019



Snow Hill looking North along Smithfield Street Proposed



Poultry Market looking west along Charterhouse Street 2019



Poultry Market looking west along Charterhouse Street Proposed



Main Report

Environmental Statement

1. The application is for EIA development and is accompanied by an Environmental Statement (ES). The ES is a means of drawing together, in a systematic way, an assessment of a project's likely significant environmental effects. This is to ensure that the importance of the predicted effects and the scope for reducing them are properly understood by the public and the competent authority before it makes its decision.
2. The Local Planning Authority must take the Environmental Statement into consideration in reaching its decision as well as comments made by the consultation bodies and any representations from members of the public about environmental issues as required by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.
3. The duties imposed by regulation 26 of the EIA Regulations require the local planning authority to undertake the following steps:
 - (a) To examine the environmental information;
 - (b) To reach a reasoned conclusion on the significant effects of the proposed development on the environment, taking into account the examination referred to at (a) above, and where appropriate, their own supplementary examination;
 - (c) To integrate that conclusion into the decision as to whether planning permission is to be granted; and
 - (d) If planning permission or subsequent consent is to be granted, consider whether it is appropriate to impose monitoring measures.
4. The local planning authority must not grant planning permission unless satisfied that the reasoned conclusion referred to at paragraph 3(b) above is up to date.
5. The draft statement attached to this report at Appendix A sets out the conclusions reached on the matters identified in regulation 26. It is the view of the officers that the reasoned conclusions set out in the statement are up to date.
6. Representations made by anybody required by the EIA Regulations to be invited to make representations and any representations duly made by any other person about the environmental effects of the development also forms part of the environmental information before your Committee.
7. The Environmental Statement is available online together with the application, drawings, relevant policy documents and the representations received in respect of the application.
8. Additional environmental information was requested, published and consulted upon under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 in May 2020. The additional information is also available online along with any further representations received in conjunction with the information.

Site

9. The application site covers an area of approximately 2 hectares. Charterhouse Street is to the north, East Poultry Avenue to the east, Farringdon Street to the west and West Smithfield, Smithfield Street and Snow Hill to the south. West Poultry Avenue is contained within the site.
10. The proposal relates to the westernmost buildings of the Smithfield Market complex as set out below. The City of London Corporation owns the buildings to which the application relates, and the East and West Market buildings to the East of the site. The Corporation is responsible for the management of the markets.

The General Market Building

11. The General Market Building (20,580 sq.m GEA) dates from 1883 and was designed by Sir Horace Jones. It is red brick, with Portland stone detailing. Parts of the building were rebuilt in the 1950s following bomb damage.
12. The building is two to three storeys in height plus a basement, part basement mezzanine and part lower ground floor. It was constructed with decks spanning the railway tracks and sidings below the site. Access to the railway is provided at basement level. The basement is accessed via a ramp off Snow Hill in the south west corner of the site.
13. The General Market is linked to the Annexe Market to the south by a steel frame canopy and is linked to the grade II listed Poultry Market to the east via a concrete canopy.
14. The interior broadly comprises a central market hall originally used as a wholesale market with former retail units around the perimeter that open onto the street (referred to in this report as the Houses). The market use ceased approximately 30 years ago. Up until more recently, the basement was temporarily being occupied by the Crossrail and Network Rail in association with the redevelopment at Farringdon Street Station. This use has ceased and the building is now vacant.
15. Works have recently been undertaken to stabilise, upgrade and prevent any further deterioration of the building. Further details are set out in the planning history section of this report.
16. The General Market is considered to be a non designated heritage asset.

The Poultry Market Building

17. The Poultry Market (21,608 sq.m GEA) dates from 1961-1963 by T P Bennett and Son with structural engineers Ove Arup and Partners (Jack Zunz, job engineer). It is grade II listed and renowned for its vast shell concrete, copper clad dome roof and 'pop architecture' exterior.
18. Square in plan form, internally the building comprises a central double height market hall with stalls at ground floor level. Loading bays flank the north and south sides of the hall. Offices surround the perimeter of the market hall at first floor level. Cold stores, back of house areas and a bar (Oriole Bar, Use Class A4, 482 sq.m GEA formerly the Cock Tavern) are located at basement and basement mezzanine levels.

19. The building is currently operational in its original market use (Sui Generis, 21,126 sq.m GEA, with the exception of the Oriole Bar) and forms part of the London Central Markets complex selling meat products. It accommodates 32 trading units and facilities that support the function of the markets including maintenance and tradesmen workshops, maintenance and cleaners' stores, maintenance offices, animal bi-products facility, bin storage and washing facilities, waste collection pallets and packaging.

The Annexe Site

20. This element of the site comprises four buildings (4,565 sq.m GEA):

The Fish Market – dates from 1886 and was designed by Sir Horace Jones. Originally built as a fish market, it was converted to meat sales in 1899 and is now vacant. The building has basement, ground, first and second floor levels. It is characterised by its triangular market hall and red brick exterior with Classical Portland Stone detailing.

The Red House – dates from 1899 and was designed by Reeves and Styche as a Victorian cold store. It spans basement, ground, first, second and third floor levels. Similarly to the Annexe and General Markets the building is red brick with Portland Stone dressings. The building is in a poor state of repair. Historically scaffolding has been erected to protect the north-east elevation of the building whose internal structure has become unstable.

Iron Mountain – dates from 1961 and comprises a warehouse that was constructed over the railway line. It was built as a storage facility that was linked to the Red House and the basement vaults via a lift and staircase.

The Engine House – believed to date from around 1898 and comprises basement and ground floor level. It was primarily built as a public convenience but is now vacant.

Site context

21. The site is within Smithfield which is known for its diverse rich mix of uses including residential uses, the functioning meat market, cultural uses, offices, retail and St Bartholomew's Hospital.
22. The administrative boundaries of the London Boroughs of Islington and Camden are immediately to the north and northwest of the site.
23. The site is well connected to public transport. Farringdon, Chancery Lane and Barbican underground stations are close to the site. Thameslink rail services are available from nearby Farringdon and City Thameslink stations. Farringdon is now served by the Elizabeth Line. There are several bus stops within walking distance.
24. The site is also well served by strategic cycling infrastructure. Cycle Superhighway 6, a segregated north-south route from King's Cross to Elephant and Castle passes directly outside the site along Farringdon Street. There are cycle hire docking stations in close proximity to the site.

25. The site is within the Central Activities Zone (CAZ) and the Barbican/Smithfield/Farringdon specialist cluster of activity as identified by the London Plan 2021. According to the Local Plan the site is within the North of the City Key Place Area and within the emerging City Plan 2040 the site is within the Smithfield and Barbican Key Area of Change and the Culture Mile. These designations support development in the Smithfield area appropriate to its character. They recognise that the area contains a special concentration of artistic, cultural and creative uses that contribute towards the capital's international and national role. The clusters of activity must be supported and sustained.
26. The site is within the Smithfield Conservation Area. It is within the setting of the Charterhouse Conservation Area which is in the London Borough of Islington and the Hatton Garden Conservation Area which is in the London Borough of Camden.
27. The site is within the setting of the following listed buildings: the Central London Markets (grade II*); the Rotunda (grade II); Farringdon Street Bridge (grade II); 51-53 Charterhouse Street (grade II); 67-77 Charterhouse Street (grade II), 79-83 Charterhouse Street (grade II) and the Holborn Viaduct bridge (grade II).
28. Part of the site is within the St Paul's Heights Policy Area. The site is within the following views of the London View Management Framework (LVMF):
 - 2A.1 (London Panorama: Parliament Hill): Landmark Viewing Corridor and Wider Setting Area;
 - 3A.1 (London Panorama: Kenwood): Landmark Viewing Corridor and Wider Setting Area;
 - 4A.1 (London Panorama: Primrose Hill): Wider Setting Area;
 - 5A.2 (London Panorama: Greenwich Park): Wider Setting Area (background) and;
 - 6A.1 (London Panorama: Blackheath Point): Wider Setting Area (background).

Relevant Planning History

29. In May 2004 applications for planning permission and conservation area consent (LPA refs: 04/00537/FULEIA and 0400536/CAC) were made to redevelop the General Market (43 Farringdon Street), the Annex Market (25 Snow Hill) and the Engine House (29 Smithfield Street) for office (Use Class B1), retail (Use Class A1,A2,A3) and leisure uses (Use Class D2). An application for listed building consent was submitted to dismantle the canopy between 43 Farringdon Street and the Poultry Market building (Ref: 04/00663/LBC). These applications were withdrawn in May 2006.
30. The Secretary of state for Culture, Media and Sport listed the Red House cold store Grade II in March 2005 following requests from several bodies and individuals including SAVE Britain's Heritage

(SAVE). In June 2006 the applicant for the aforementioned applications requested that the listing of the Red House be reconsidered. The Red House was delisted in 2008. Applications were made for Certificates of Immunity from listing for the other buildings on the application site and Certificates were granted in respect of the General Market (43 Farringdon Street), the Annex Market (25 Snow Hill) and the Engine House (29 Smithfield Street) on 15 December 2005.

31. Subsequent to the listing of the Red House, in August 2005, applications for planning permission, conservation area consent and listed building consent (herein referred to as the 2005 applications) were made for the redevelopment of the General Market for office (Use Class B1) and retail use (Use Class A1, A2, A3, A4 and A5) (43 Farringdon Street) (LPA Refs: 05/00768/FULEIA, 05/00760/CAC and 05/00770/LBC).
32. In May 2006 the City's Planning and Transportation Committee resolved to grant planning permission for the 2005 applications subject to conditions and a Section 106 Agreement. However, in June 2006 the Secretary of State called the applications in and issued an Article 14 Direction preventing the City from determining any application for similar development on the site until a decision on the 2005 applications had been issued.
33. Further applications were submitted in February 2007 (herein referred to as the 2007 applications) for planning permission, conservation area consent and listed building consent (LPA refs. 07/00172/FULEIA, 07/00168/LBC and 07/00161/CAC) for the demolition and redevelopment of the General Market, partial demolition and partial retention of the Annex Market, refurbishment and alteration of the Red House and Engine House and dismantling of the canopy between the Poultry Market and General Market. The scheme proposed redevelopment for office (Use Class B1) and retail use (Use Classes A1, A2, A3, A4 and A5).
34. On the 23 April 2007 the City concluded that save for the Article 14 Direction, it would have granted planning permission for the 2007 applications subject to conditions and a Section 106 Agreement. On 27 April 2007 the Secretary of State called in the 2007 applications. The 2005 applications were withdrawn on 2 May 2007.
35. An inspector held an Inquiry in the autumn of 2007 and the Secretary of State issued her decision on 6 August 2008 which was to refuse planning permission, conservation area consent and listed building consent for the 2007 applications.
36. The Secretary of State concluded that the scheme would result in harm to the Smithfield Conservation Area and the setting of the adjacent listed buildings and should therefore be refused. She noted that the buildings and tunnel lids beneath the site were in a poor state of repair which was in part due to neglect and therefore less weight should be given to the costs of repair in terms of the viability of any re-use scheme.

37. On the 12th February 2013 applications for planning permission, conservation area consent and listed building consent (LPA refs. 13/00150/FULEIA, 13/00155/LBC and 13/00156/CAC, herein referred to as the 2013 applications) were submitted for the partial demolition and redevelopment of the General Market and the Annex site for offices (Use Class B1) and retail use (Use Class A1, A2 and A3).
38. On the 16th July 2013 the Planning and Transportation Committee resolved to grant listed building consent, conservation area consent and planning permission for the 2013 applications subject to conditions and the entering of a S.106 agreement. On the 24th July 2013 the Secretary of State directed the City not to grant permission without authorisation, while consideration was given to whether the application should be referred to the Secretary of State for determination. The 2013 applications were called in by the Secretary of State on the 3rd September 2013.
39. An Inquiry was held in 2014 and the Secretary of State agreed with the Inspector's recommendations in that the 2013 applications should be refused. This was given the harm that would be caused to the significance of the relevant designated and non-designated heritage assets.
40. On the 30th December 2016 planning permission (ref. 16/01077/FULL) and listed building consent (ref.16/01078/LBC) was granted for works to the Poultry Market including replacement of the existing copper and asphalt roofs.
41. In December 2019 applications for planning permission and listed building consent were submitted to the Local Planning Authority for the relocation of the Museum of London to the General Market and the Poultry Market and the change of use/alteration of the Annexe site. Members resolved to grant planning permission and listed building consent for the works on the 23 June 2020 subject to the recommendations contained within the reports. Owing to a delay in the Museum of London being granted an interest in the site to enable them to enter into a section 106 agreement which will bind the land, and a period of uncertainty about the timing during which vacant possession of the market could be achieved the permissions have not been issued and the stage 2 referral process has not started.
42. Notwithstanding the above, applications for works to upgrade and futureproof the General Market were approved on the 8 January 2021 (ref. 20/00789/FULL), 28 May 2021 (ref. 21/00183/CLOPD) and 27 January 2022 (ref. 21/00800/FULL). In February 2021 planning permission was granted for works associated with the strengthening of the tunnel lids below the General Market site (ref. 19/01215/FULL and as amended by non-material amendment application reference 21/00674/NMA granted on the 26 October 2021).
43. These approvals are consistent with the details in the Museum of London scheme. Elements of the permitted works commenced in 2021/2022 and the works are still ongoing. Notwithstanding, none of the approved

works have been built out in full at this stage.

Planning Proposal

Site/Scheme Update

44. This report seeks to revisit the Museum of London scheme to include updates to application submission (plans, Environmental Statement and supporting documents, herein referred to as the 2022 updates) to reflect:
- Minor alterations to the design of the scheme following: additional survey work, development of the Mechanical Electrical and Plumbing (MEP) strategy and further design refinement from the applicant. Such alterations include minor reconfiguration of layouts, roof plant and minor alterations to the external appearance of the buildings.
 - Changes to the development plan and to material considerations since the scheme was last considered in 2020. This includes, publishing of the London Plan 2021, adoption of the City of London Planning Obligations Supplementary Planning Document 2021 and City of London Thermal Comfort Guidelines 2020, updates to the NPPF 2021. As a result of which the following additional documentation has been submitted to support the submission: Outdoor Thermal Comfort Assessment, Fire Statement, Circular Economy Report (the 2022 report is more comprehensive than the Circular Economy Statement submitted in 2019), Whole Life Carbon Assessment, Health Impact Assessment, Equalities Impact Assessment and Cultural Statement.
 - Updates to the Environmental Statement and supporting documents to account for changes to the locality since the scheme was last considered including the grant of planning permission for development on adjacent sites and the completion of surrounding development schemes, resulting in revisions to baselines and cumulative assessments. For example, since 2019 planning permission has been granted for development of Snow Hill Police Station at 5 Snow Hill and 14 – 21 Holborn Viaduct and 32-33 and 34-35 Farringdon Street both of which are in close proximity to the application site.
 - Review of all survey methodologies and data to ensure that conclusions drawn in the application documentation are still robust since the 2019 applications were considered by Planning and Transportation Committee in May 2020. For example, the daylight and sunlight assessment has been updated to include assessment of the impact of the application scheme on the student accommodation recently consented at 65 Holborn Viaduct.
 - A sequential test has been included in the updated retail assessment.
 - The heads of terms and conditions have been revised in the light of the City's interest in the site. Further details in respect of this matter are set out in the CIL and Planning Obligations section of this report.

45. Further details on the 2022 updates are set out in the relevant sections of this report. As part of the updates, regard has been given to the impact of the planning permissions and lawful development certificate approved in 2021 and 2022 to upgrade and futureproof the General Market (details set out in the Planning History section of this report). As these works are consistent with works proposed in this application scheme and on the basis that they have been implemented but not completed, they are not considered to materially impact on the baseline as originally set in 2019.
46. The Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 came into force on the 1 September 2020. The regulations revise the use classes. Paragraph 4 of the Regulations states that applications submitted before the 1 September 2020 should be considered in accordance with the use classes order that applied on the 31 August 2020. Given that these applications were originally submitted in 2019 reference will be maintained throughout the report and considerations to The Town and Country Planning (Use Classes) Order 1987 as it applied on 31 August 2020.
47. Notwithstanding the 2022 updates, the proposed development still comprises a mixed-use scheme that is centred around the re-location of the Museum of London to the General Market and Poultry Market from its existing premises at London Wall. The two buildings would be connected by a new entrance enclosure formed over West Poultry Avenue. A mix of supporting flexible uses would be provided on the Annexe site and in the General Market houses (the former retail units around the perimeter of the General Market).
48. Before detailing the proposed works and updates, the following sections of this report provide the background on why the Museum wants to relocate from London Wall and their vision for the Smithfield site.

The Museum of London's Proposed Move to Smithfield

Reasons for Re-location

49. The Museum's current London Wall site is constrained by:
 - The internal configuration of the existing building. Long narrow corridors and small rooms that make typical museum activity e.g. object movement and exhibition set up difficult.
 - A disproportionate ratio of back of house areas versus publicly accessible space. Approximately 60% of the current museum is back of house space.
 - The limited size and poor configuration of the temporary exhibition space (525 sq.m, which can only accommodate one temporary exhibition).
 - The limited size (130 sq.m) of the retail space.
 - A limited capacity to accommodate school parties (15 – 20 school groups per day).
 - A lack of street level presence.

- A lack of space to accommodate increasing visitor numbers. The Museum of London has attracted increasing visitor numbers in recent years with an excess of 700,000 visitors reported for 2019/2020.
50. These limiting factors are preventing the museum from realising its aspiration to become a world class museum space and visitor attraction.
 51. The application site would provide the Museum with the capacity to attract an average of two million visitors per year. It would lend itself to providing space that could be used flexibly and tailored towards the Museum's activities, all within the context of historically significant buildings.
 52. The appeal of the application site is not just down to the physical offer of the market buildings. The cultural aspirations for this part of Smithfield as set out in the Draft City Plan 2040 and the Culture Mile Look and Feel Strategy 2018, the site's proximity to public transport links and the sites rich history are all factors that significantly enhance its appeal as a place to offer a world class visitor experience and showcase the Museum's collections. (Transport, cultural aspirations for Smithfield and site history are elaborated on further into the report).
 53. The Museum have considered reconfiguring their existing site. This was discounted as it would not give the museum the floor area required to accommodate anticipated future visitor numbers and it would not address accessibility constraints caused by a lack of street level presence. Consideration has also been given to the demolition of the existing London Wall building and its redevelopment but was discounted.
 54. Alternative sites have not been considered for re-location. This is given that the emerging City Plan 2040 supports the re-location of the Museum to Smithfield should the markets relocate. In the event that the Central Markets do not relocate the Museum scheme has been designed so that it can function alongside the operational market. This is set out in further detail under the considerations section of the report.

The Vision

55. The ambition is to create a new world class Museum in the heart of the capital. A Museum for London for the 21st century, bringing the historic market buildings back to life and forming an integral part of the Culture Mile. The scheme aspires to:
 - Transform the existing General Market and Poultry Market into the new Museum of London. The buildings would enable the Museum to draw 2 million visitors per year, improve accessibility, organise major exhibitions and large events, increase income generation and improve access to the collections on site, including the seven million objects from the London Collection.
 - Sensitively upgrade the performance of the historic fabric in order to satisfy the environmental qualities needed for Museum purposes.

- Celebrate the historic qualities of all existing fabric by making them integral to the arrangement of functions and a part of the storey telling undertaken by the Museum.
 - Enable the spaces to facilitate a Museum of the 21st Century, which is more outward looking, flexible and integrated into its surrounding context and community.
 - Convert the Annexe collection of buildings from former derelict storage, loading and market spaces into flexible accommodation that can be compatible with the activities of the adjacent Museum and act as a public destination in its own right.
 - Act as a gateway and catalyst for the City of London's proposed Culture Mile project.
56. The scheme would provide the Museum with balanced, rationalised space that is publicly accessible and tailored towards the Museum's activities. It would enable the Museum to host major exhibitions, offer diverse and flexible programming and the ability to display internationally renowned collections in modern, well designed galleries. Such an offer is key to achieve Government Indemnity Scheme (GIS) conditions so that galleries can accommodate international loans.
57. The ability to provide more temporary exhibition space (1,150 sqm) would bring the Museum on par with other London museums and galleries that typically have two or more temporary exhibition spaces. Temporary exhibition spaces are becoming increasingly essential for museums and galleries as a way of generating income, building brand awareness and attracting new audiences whilst also retaining repeat visitation through a dynamic and relevant offer.
58. A world class learning centre would be provided which would increase the Museum's capacity to accommodate school parties and would enable the Museum to achieve its strategic goal of engaging every school child in London. An average of 30 UK and overseas school groups could be accommodated per day and a maximum of 40 groups could be accommodated during peak periods.
59. The Museum would have multiple entrances to fulfil its aspiration to ensure that it is porous and accessible to the public day and night. West Poultry Avenue would be the principle entrance to the Museum accessed from Charterhouse Street or West Smithfield. At this stage, the Museum envisages West Poultry Avenue could be open between 7am to midnight and sometimes closed for operational reasons, private functions (this space is an important part of the Museum's offer) and for security or safety reasons (note this is a curated space and would need to be managed accordingly). The applicant has confirmed that West Poultry Avenue would be open for people to pass freely through apart from when events are on and when security is heightened. Full details of the use and management of West Poultry Avenue would be provided in the access management plan secured by condition. This would also include scope to review as to whether enhanced access beyond the envisaged opening hours could be provided in the future.

60. Visitors could also access the Museum from Hart's Corner and West Smithfield during opening hours (potential core hours would be 09.00 to 18.00) with the possibility of opening hours being extended to midnight on Fridays and Saturdays. Visitors attending events and programming would use the Buyers Walk entrance on East Poultry Avenue. There would be the potential to use this as more of a main entrance in the future in order to link this site with proposals for the market site to the east should these come forward. School arrivals would have a dedicated entrance into the Poultry Market at the West Smithfield end of West Poultry Avenue. The Lecture Theatre would have a dedicated entrance into the Poultry Market off the West Smithfield end of East Poultry Avenue.
61. It is intended that the Museum's multiple entrances and shopfronts, with collections behind, would activate the surrounding streets. This would be supplemented through the potential for ground floor retail, café and restaurant uses enlivening the buildings and the surrounding public realm. The removal of the Iron Mountain structure provides the opportunity to create a new civic destination that could be used for a variety of uses to create a vibrant social offering. The space would connect to the public realm and the Museum of London. The planning application documentation refers to wider public realm works for Smithfield that are being developed by the City and Hawkins\Brown. These are not for consideration under this planning application.
62. As part of the Museum's aspiration to enliven the area and expand its audiences, greater consideration is being given to how engagement with Londoners could take place outside of the traditional 10am – 6pm opening hours. The Museum may be open some evenings and it is intended that a number of spaces within the General Market and Poultry Market would be used for public programming and events outside of Museum opening hours. Large programmed events with an expected number of attendees between 250 and 600 people, would occur approximately 60 times per year and would take place on the ground floor of the General Market and on the first floor of the Poultry Market. Smaller scale programmed events for between 75 and 150 people would take place within dedicated public programming areas, learning and events spaces within the Poultry Market. It is currently expected that there would be approximately 75 daytime events and 50 evening events per year such as talks, receptions, dinners, conferences, art installations and exhibition openings in these spaces.
63. The Museum of London is intending to close its current London Wall site to the public in December 2022. However, it would remain open for Museum administration, collections and public event space until the new Smithfield site would open to the public in mid 2026. The Museum of London Docklands site would be open throughout the construction period and would operate with an enhanced programme.

The proposed works

Planning Permission

64. This section of the report sets out the works that are required in order to deliver the scheme. Planning permission is sought for the following works under application reference 19/01343/FULEIA:

General Market

65. The conversion of the General Market and six houses to a museum (basement and ground floor plus first and second floor of the tenant houses), Use Class D1, (12,326 sq.m GIA).
66. The basement would comprise a permanent gallery, plant, loading bay, waste store and back of house areas. The basement mezzanine would provide areas for the tenant houses, a commercial cellar and circulatory space. At lower ground floor level there would be a commercial bar, areas for the tenant houses and plant. The ground floor would provide gallery space, space for public engagement, a commercial restaurant, café, shop, space for education and learning and a waste store for the tenant houses.
67. The remaining six tenant houses would be converted (basement, basement mezzanine, lower ground, ground, first and second floors) to flexible shop (Use Class A1), financial and professional service (Use Class A2), restaurant and café (Use Class A3), drinking establishment (Use Class A4), office (Use Class B1), non-residential institution (Use Class D1) and assembly and leisure (Use Class D2) uses (1715 sq.m GIA).
68. Partial demolition, repair, refurbishment and extension works associated with the change of use are proposed, comprising:
- Formation of a new enclosure over West Poultry Avenue that would incorporate a mesh LED screen and entrance doors;
 - Installation of replacement windows;
 - New louvres and louvred doors;
 - Shopfront alterations to include provision of Museum Vitrines;
 - Alterations at roof level including remodelling of the inner crust roof to accommodate photovoltaic panels; new double glazing to the oculus; provision of new green and brown roof, provision of new roof plant, installation of lift overruns, installation of a maintenance handrail, formation of a new area of glazed roof;
 - Repair works including to the bricks, roof level and refurbishment of the canopy linking the General Market to the Annex Market.
69. As part of the 2022 update to the application minor revisions have been made to the proposed General Market layout and external appearance (alteration of staircases, ramps, entrances, partitions, shopfronts, dormer windows) and to the plant and photovoltaic panel configuration at roof level. Further survey work has established more precise details of site levels.

Poultry Market

70. The conversion of the Poultry Market to a museum (Use Class D1, 20,538 sq.m GIA (including West Poultry Avenue), basement, basement mezzanine, ground and first floors). Temporary gallery space would be provided at ground floor level with publicly accessible space for events and exhibits at first floor level. Staff offices and laboratory research would be provided at first floor level. A collection store, curated store and support space would be provided at basement level.
71. Demolition, repair and refurbishment works are proposed to accommodate the change of use including:
- Removal of the plantroom and staircase enclosures at roof level;
 - Removal of glazing and the installation of replacement glazing;
 - The removal of shutters and the installation of replacement shutters;
 - The widening of entrances on West Poultry Avenue;
 - Removal of the brickwork to the West Poultry Avenue canopy and the formation of a new enclosure over West Poultry Avenue that would incorporate a mesh LED screen and entrance doors, installation of replacement glazing;
 - Repairs to the interior and exterior including the brickwork and hexagonal glass block wall.
 - (Note that the external cladding of the Poultry Market roof is covered by separate applications for planning permission (ref. 16/01077/FULL) and listed building consent (ref. 16/01078/LBC).
72. As part of the 2022 updates minor revisions have been made to the design of the Poultry Market including internal layout, the external appearance and the materials to the entrance enclosure over West Poultry Avenue.

Annexe Site

73. Works including:
- Conversion of part basement vaults, part ground floor of the Red House and part ground floor of the Engine House to flexible restaurant and café (Use Class A3), drinking establishment (Use Class A4), non-residential institution (Use Class D1) and assembly and leisure use (Class D2) (870 sq.m GIA).
 - Conversion of the Annex Market (ground, first and second floor to flexible shop (Use Class A1), financial and professional service (Use Class A2) restaurant and café (Use Class A3), drinking establishment (Use Class A4), office (Use Class B1), non-residential institution (Use Class D1) and assembly and leisure use (Class D2) (2364 sq.m GIA)
 - Conversion and extension (556 sq.m GIA) of the Red House to provide flexible office (Use Class B1) and non-residential

institution use (Use Class D1, across part ground, first, second, third and roof level 2377 sq.m GIA).

- Conversion of part ground floor of the Annex Market to flexible shop (Use Class A1), restaurant and café (Use Class A3), drinking establishment (Use Class A4) and non-residential institution use (Use Class D1) (82 sq.m GIA).
- Conversion of part of the Engine House to flexible shop (Use Class A1) and non-residential institution use (Use Class D1) (18 sq.m GIA).
- The addition of a glazed two storey extension to the southern part of the Red House with an associated lift over run.
- Formation of two new roof terraces.
- Removal of the Iron Mountain structure and its replacement with a new covered external space.
- Refurbishment and alteration to the external facades including the formation of new windows, sliding gates and entrances.

74. As part of the 2022 update revisions have been made to the layout (doors, staircases), floorspace areas (an area of A1/A2/A3/A4/B1/D1/D2 use is no longer proposed at first floor level and second floor level), lift overruns, the roof design and external appearance through alteration of window and door openings.

Listed Building Consent

75. This report also deals with the application for listed building consent reference 19/01344/LBC relating to the following works to the Poultry Market:

- Demolition, repair and refurbishment works to accommodate the change of use including:
- Removal of the plantroom and staircase enclosures at roof level;
- Removal of glazing and the installation of replacement glazing;
- The removal of shutters and the installation of replacement shutters;
- The widening of entrances on West Poultry Avenue;
- Removal of the brickwork to the West Poultry Avenue canopy and the formation of a new enclosure over West Poultry Avenue that would incorporate a mesh LED screen and entrance doors, installation of replacement glazing;
- Repairs to the interior and exterior including the brickwork and hexagonal glass block wall.
- Removal of areas of floor slab, plantrooms, staircases, lifts, internal market structures;
- The application of an acoustic render to the roof;

- Alteration and remodelling of the interior and the loading bays to provide gallery space to include the insertion of a new first floor gallery structure, new lifts, staircases, ramps, back of house areas, lecture theatres, space for education and research and servicing areas.

Consultations

2022 Update

76. An addendum to the Statement of Community Involvement has been submitted as part of the 2022 update. This sets out an update on the ongoing engagement that has taken place since the application was considered by committee in 2020 and it includes details of activities that have taken place to inform stakeholders of the changes that form part of the 2022 update:

Ongoing Engagement (June 2020 – July 2022)

- The Museum of London has continued to present its plans at its current London Wall site.
- The consultation website that was used to engage people between 2015 – 2019 has remained live to provide people with information and to allow them to engage with the project team.
- A New Museum digital community was launched to further enhance dialogue with interested stakeholders and act as a platform for digital engagement.
- The Museum continues to engage with a broader cross-section of stakeholders through meetings of its Access and Family panels, Creative Partner workshops and participation in events such as Open House festival in September 2021 and the London Festival of Architecture in June 2022.

Consultation around planning application changes (June – July 2022)

- Emails were sent to Common Councillors.
- The consultation website was updated with information about the revisions and progress made on site to date.
- On 1 July 2022 a letter was sent via Royal Mail to residents and businesses within 500 m of the site (6,000 addresses in total) advising them of the scheme update.
- Display boards at the London Wall site have been updated.

77. Following receipt of the updated 2022 documents, the Local Planning Authority has advertised the applications for planning permission and listed building consent on site and in the press and a full re-consultation exercise has been undertaken.

78. 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.

79. Copies of all received letters and emails making representations are attached in full and appended to this report (two letters of support were received in the period between the 23 June 2020 Planning and Transportation Committee and the submission of the 2022 update, they are included in the table below). A summary of the 2022 consultation responses received are set out in the table below.

Representations	
12 letters of support	<p>The changes do not materially alter the overall vision of the Museum of London which was approved by the Planning and Transportation Committee in June 2020. The changes are designed to ensure that the Museum of London is continuing to create an exemplar museum when it comes to performance and sustainability by responding to the latest planning and environmental policies.</p> <p>The collections and education it would provide are of great importance to Londoners and visitors coming to London from abroad.</p> <p>The Farringdon area is changing and this derelict site has been there too long. The proposals are exemplary and will bring life and animation back to these redundant buildings. The beautiful market buildings will be transformed into a spectacular museum.</p> <p>Existing and new public transport links will help with visitors to the area, increasing footfall for existing businesses.</p> <p>New amenities would improve the area for those working, living in or visiting the area.</p>
1 letter of objection from Knight Frank on behalf of the SMTA	<p>The position remains unchanged from 2019 and therefore lodge a 'holding objection' to enable the SMTA time to understand the nature of the changes and implication on the Markets. They consider that they have not been appropriately consulted on the changes made to the application proposals.</p> <p>As set out in 2019, the SMTA have significant concerns about the Museum proposals which will impact the commercial operations of the historic markets, putting jobs and livelihoods at risk and potentially giving rise to health and safety problems during the development phases and longer term as an incongruous mix of uses is created in what has been a carefully operated and</p>

	<p>managed market trading complex for hundreds of years. This does not just affect the SMTA it affects 1,000s of customers and supply chain businesses who are reliant upon the efficient operation of the market. It is also coming at a time when many of these businesses are struggling to recover from the impact of the pandemic and loss of footfall/visitor numbers in central London.</p> <p>Issues raised previously have not been addressed. There has been no dialogue with the market traders or their advisors in regard to this re-consultation and the details therein.</p> <p>Response to comments: The impact of the scheme on the markets is covered in the 'Loss of the Markets' and 'Impact of the proposed highway and transportation arrangements on the adjacent market use' sections of this report.</p> <p>The applicant has confirmed that there has not been detailed consultation with the SMTA on the 2022 update. This was due to sensitivities in negotiations between the SMTA and the City of London.</p>
<p>1 letter of representation from a local resident</p>	<p>Loss of the market loading bays caused by works at the new Museum of London is intensifying illegal use of the double yellow lines along 4 – 8 West Smithfield opposite the Central Market by large Refrigerated Heavy Goods Vehicles (RHGVs). Regularly, parking and idling RHGVs go into “defrost” mode where the level of nuisance is extreme for a sustained period. The situation is a clear breach of the Environmental Protection Act 1990.</p> <p>The abuse of double yellow lines is preventable if effective traffic management is in place to cope with the reduced number of market loading bays. Post Christmas 2020 was an excellent example of the Market's traffic management where extra resource was deployed to proactively control loss of loading bays due to a series of incidents causing damage to the market buildings. It is imperative for a similar solution to be part of the proposed traffic management.</p> <p>The matter has been discussed with the Market Superintendent who gave assurance that the problem would be dealt with by himself. However, after a short time of improvement the problem has returned.</p>

	<p>The use of the double lines for loading for a prolonged period causes congestion. The situation occurs as early as 2-3 pm, peaks at 4am and eases at 6 am.</p> <p>Response to comments: The matters raised are addressed in the Transportation, Construction Logistics section of the report.</p>
Network Rail	<p>Comments from the 18 June 2020 still apply. It is requested that the applicant/developer engages Network Rail's Asset Protection and Optimisation (ASPRO) team prior to works commencing. This would allow the ASPRO team to review details of the proposal to ensure that the works can be completed without any risk to the operational railway.</p> <p>Response to comments: The applicant has been advised of the matters raised by Network Rail.</p>
Historic Buildings and Places	<p>Concerns remain in respect of proposals for the Red House which harm its historic appearance.</p> <p>No objection is raised to the proposed change of use, the interior alterations, or the extension. Key concern continues to be the treatment of the main historic elevations to Smithfield Street and West Smithfield.</p> <p>The decorative blind arched façade is an important and prominent architectural feature that contributes to the character of the Victorian market buildings while reflecting its past use as a refrigeration facility. The opening of the blind arches is excessive and the changes are harmful to the building. More modest openings should be considered in order to allow light in.</p> <p>Unnecessary changes are proposed to the lower Smithfield Street elevation. Relocation of the doors do not achieve any benefit other than introduce an element of symmetry in every second bay. Objection also to the changes to the Snow Hill end bay. This corresponds with the bin store and it is not clear as to why the existing stone door and window formation cannot be retained and adapted with ventilation grills rather than replaced with a full height opening.</p> <p>Response to comments: The matters raised are covered in the Design and Heritage sections of the report.</p>

<p>SAVE</p>	<p>Re-emphasizing of support for this ‘great visionary project’, additional comments and observations made.</p> <p>Cocoa Rooms – suggest revisiting the treatment of the shopfront to a more traditional design instead of the large pane of glass as currently proposed.</p> <p>RESPONSE TO COMMENTS: The proposed shopfront to the Coca Rooms is considered a simple, elegant treatment that will provide maximum visibility into the important interior.</p> <p>Reiteration of importance of preserving existing historic fabric and woodwork and establishing consistent framework for shopfront treatments around the building. The submitted drawings are not sufficiently detailed in this respect.</p> <p>RESPONSE TO COMMENTS: These details are to be reserved via condition.</p> <p>Cocoa Room interiors not sufficiently detailed on drawings and sufficient justification not provided for loss of the timber room adjacent to the staircase</p> <p>RESPONSE TO COMMENTS: The interiors of the General Market, as an unlisted building, are beyond the scope of this application.</p> <p>Accuracy of the verified view of the Engine House and Red House are queried.</p> <p>RESPONSE TO COMMENTS: The proposed drawings incorporate all proposed changes and form a basis on which to satisfactorily assess the scheme. The verified views are helpful aids which allow the broad townscape impacts of the scheme to be appraised.</p> <p>Concern that the General Market roof works are insufficiently detailed and justified and that plant equipment has not been sufficiently ‘designed-in’</p> <p>RESPONSE TO COMMENTS: Consideration is given to the design matters raised in the Design and Heritage section of the report.</p> <p>Poultry Market – suggest revisiting elements of the proposed design including the ground floor works and the temporary gallery works.</p> <p>RESPONSE TO COMMENTS: Noted.</p> <p>Suggestion that the steel frames of the signage proposals be clearly shown on the drawings.</p> <p>RESPONSE TO COMMENTS: These details will be reserved via condition.</p>
-------------	--

Thames Water	<p>Guidance is given in respect of working near sewers and connection to sewers.</p> <p>With regard to surface water drainage, if the sequential approach to disposal of surface water is followed then there would be no objection. Where disposal is proposed into a public sewer prior approval will be required.</p> <p>Guidance is given in respect of kitchens in commercial hot food premises and removal of grease and disposal of fats, oils and grease.</p> <p>On the basis of information provided Thames Water would have no objection to the application in respect of the water network and water treatment infrastructure capacity.</p> <p>Guidance is given in respect of working near water mains and water assets.</p> <p>Response to Comments: The applicant has been advised of the matters raised by Thames Water.</p>
Natural England	No objection, the proposed development would not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.
Lead Local Flood Authority	<p>Two conditions are recommended covering SUDS, measures to prevent flooding and discharge rates.</p> <p>Response to Comments: The recommended conditions have been included in the conditions schedule.</p>
London Underground/DLR Infrastructure Protection	No comment on application as submitted.
Planning Casework Unit	No comment on the Environmental Statement.
Transport for London, Crossrail Safeguarding	No comment.
GLA	The applicant and Local Planning Authority have been in discussion with the GLA regarding the 2022 update. The GLA have advised that their stage 1 letter remains relevant and any outstanding matters will be dealt with at Stage 2.

2019 Applications

80. Representations submitted in conjunction with the application in 2019/2020 are still a relevant consideration where they have not been withdrawn or superseded (details of the representations received in 2020 are listed in Appendix B of this report. Copies of the relevant representations are appended to this report and they are also available to view at <https://www.planning2.cityoflondon.gov.uk/online-applications/> using application reference 19/01343/FULEIA).
81. Following receipt of the original submission in 2019 the applications were advertised on site and in the press and were consulted upon twice, including under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. A summary of the representations received, and the consultation responses is set out in the table below:

Representations	
63 Letters of Support	<ul style="list-style-type: none">• The proposal would transform, innovate and breathe new life into these historic buildings and the local environment. It has been developed sensitively to respect the original buildings while giving a modern aspect.• The market would be transformed into a vibrant culturally active and desirable environment for Londoners to enjoy, visitors to explore and residents to live near.• The proposal represents a fitting tribute to London. London requires a first class Museum devoted to its history and life. It will capture the social, economic and cultural history of the greatest city in the world.• Allowing for the provision of retail, office and food and drink areas would benefit the economy, the diversity of the site and its environs. The use of the houses would reanimate the area.• The proposal can act as a catalyst for broader regeneration, particularly for the Farringdon area.• The current museum is difficult to access, with an uninspiring exterior. A new building is long overdue. The new site would offer space and experiences and cultural opportunities that the present museum simply could not accommodate.• Access on the proposed site has been well thought through with emphasis on access via public transport.

	<ul style="list-style-type: none"> • The proposal would be a key part of the Culture Mile. • The Museum would be a great learning tool and the experience for schools would be enhanced. More people would be able to learn about London and see more of the Museum's extraordinary collections. • The Museum's plans to reach audiences of all ages, to engage visitors and work in partnership with organisations to support the artists of London is ambitious, exciting and timely. • Realising the ambitious new plan for the museum is an important act of hope, development and wellbeing for the local community, business, education, environment as well as distinctive identity and tourism for the City. At this time of crisis governments around the world should invest in their cultural provision to help shape the future.
Two letters of representation from members of the public	<p>Two letters of representation have been received which note the following points:</p> <ul style="list-style-type: none"> - The proposed uses and retention of the building is welcome. - It is a shame that Harts Corner and the turret are not to be reinstated. - Careful consideration should be given to signage. - Originally the shopfronts to the General Market were carefully considered in terms of rhythm, symmetry, fenestration and entrances being carefully related to the storeys above. Unfortunately, this does not appear to be recognised in the proposals which is disappointing. - Disappointment with the insertion of first floor windows into the east elevation of the Red House. The replacement of the blind arcading with windows changes the industrial character of the building. It is queried whether the offices could get their light from a glass roof where the terrace is proposed. <p>RESPONSE TO COMMENTS: An assessment of the design of the proposal is contained within the Design and Heritage section of this report.</p>
Consultation Responses	
Historic England	<p>The proposals are strongly supported. The design indicates a deep understanding of the buildings and the conserve as found ethos is to be commended.</p> <p>The interventions to the former Cold Store (Red House) are well considered. Opening the blind arches of the</p>

	<p>former Cold Store's principal elevation is regrettable, however, it is understood that providing natural light is a pre-requisite for a long term sustainable use of this building and the minor harm would be outweighed by securing a new use and repairing the building.</p> <p>The proposed approach could serve as a template for best practice, conservation-led regeneration for redundant heritage sites in London, particularly those with a predominantly industrial past.</p> <p>RESPONSE TO COMMENTS: Consideration is given to the impact that the proposal would have on the Red House under the Design and Heritage Considerations section of the report.</p>
The Victorian Society	<p>The proposals are supported. The Museum of London's proposals would prompt crucial repair works to the buildings and ensure their revitalisation.</p> <p>We are generally content with the proposed shopfront strategy, but note the importance of a management plan to ensure that the quality and sensitivity of the shopfronts is maintained in the long term.</p> <p>Whilst we are in favour of the awnings, it is important that they are retractable so that they mimic what would have been in place historically. Careful consideration should be given to the awning material.</p> <p>A management strategy should be used for the signage and letters.</p> <p>The blind windows on the façade of the Red House are an important architectural feature of the façade that allude to its past as a refrigeration house. We understand the need to bring light in but consider the opening up of the central four bays for windows would have a harmful impact on the building. We have asked for further exploration as to how more light could be brought in so that more of the blind windows could be retained.</p> <p>The brick circulation enclosure on the roof would be damaging to the symmetry of the Red House façade and efforts should be made to conceal it behind the central parapet.</p> <p>The predominantly glazed extension to the Red House would be incongruous with the otherwise muscular architecture below. Further alterations should be made to the design of the extension.</p>

	RESPONSE TO COMMENTS: Consideration is given to the design matters raised in the Design and Heritage section of the report.
Environment Agency	Specific advice relevant to this site has not been provided due to Environment Agency resourcing issues. Resources are concentrating on high risk proposals. Notwithstanding, the applicant is advised to review the National Planning Policy Framework, National Planning Policy Guidance, Environment Agency Guidance and British Standards when considering risks to groundwater and surface waters from contamination.
London Underground	No comment on the application in its current form. Should any piling, foundation or public realm works be proposed in conjunction with the Poultry Market. London Underground Infrastructure Protection should be consulted.
City of London Police	The developer and architect should liaise with the City Police Design out Crime and Counter terrorism security advisory team on an ongoing basis re this project.
Thames Water	<p>The development is within 15 metres of a strategic sewer. No piling should take place until further details have been provided to Thames Water. There are public sewers in close proximity to the site. Works should minimise impact on sewers. Kitchens serving hot food should be fitted with grease traps. The developer should follow the sequential approach to the disposal of surface water.</p> <p>RESPONSE TO COMMENTS: Conditions and informatives have been included to cover matters raised by Thames Water.</p>
Ministry of Housing, Communities and Local Government	Made no comment on the environmental statement.
Natural England	No comment and directs to standing advice in order to assess potential impacts on protected species.
Smithfield Market Tenant's Association (SMTA)	<p>Two representations were received from the SMTA:</p> <p>Representation 1</p> <p>There is disappointment that positive communications have not been maintained between the applicant and the SMTA. The application pre-supposes that the Market will move and the tenants will vacate, which is not the case as the Tenants have long term leases with the right to renew. The SMTA has the following eight matters of concern about the application:</p>

	<p>1. Prematurity of the application – While the relocation of aspects of the Market operations has been proposed, no such arrangements have been discussed or agreed with the Traders. Alternative servicing management arrangement or other associated infrastructure has not been catered for in this proposal.</p> <ul style="list-style-type: none"> - The rationale for the relocation is underpinned by emerging policy that carry little weight. As such the proposals must be considered premature. - The application is prejudicial to the comprehensive refurbishment of the Smithfield Market complex. - There is uncertainty around the wider developments required to facilitate this development e.g. reuse of the Museum's existing premises and the long term destination of the Markets. - A sequential test has not been carried out regarding the relocation of the museum and no alternative sites have been looked at. <p>RESPONSE TO COMMENTS: The applicant has submitted a statement setting out the consultation that has been undertaken with the SMTA to date, this is at appendix C of this report. Details of the re-location of the Market operations, servicing management details and the use of the site are addressed in the principle of development and highways and transportation sections of the report. Paragraph 50 of the NPPF states that refusal of planning permission on grounds of prematurity will seldom be justified where a draft plan has yet to be submitted for examination. A pre-submission draft of the City Plan 2040 has been published, but the plan has not yet been submitted for examination. In any event it is the view of officers that granting planning permission for this application would not prejudice the outcome of the plan making process. The requirement to provide a sequential test is addressed in the land use considerations section of the report and a sequential test has been submitted as part of the 2022 update.</p> <ul style="list-style-type: none"> - Excessive degree of flexibility within what is supposed to be a detailed planning application – The wide variety of use classes proposed make it impossible to assess the impacts of the development in terms of employment density, visitor numbers, servicing arrangements, BREEAM, noise, air quality etc.
--	---

	<ul style="list-style-type: none"> - The submission is reliant upon provisions in Part 3, Class V, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 which is unusual in the context of a detailed planning application. It is not considered that use class changes from A1, A2, A3, A4 or B1 can be considered in the context of part V if that is the intention of the applicant. - Flexible uses are proposed which make it difficult to assess the development impact or demonstrate that it would provide sufficient provisions for servicing, waste storage and cycle parking. - The site is not within a locally identified Town Centre, Principal Shopping Area or retail Link as a result a sequential test should be provided. Justification should be provided as to why one has not been included. - The servicing arrangements proposed for each building are questionable. <p>RESPONSE TO COMMENTS: The applicant has submitted additional information relating to the proposed servicing arrangements and the approach taken with regard to the flexible uses. The information was publicised and consulted upon on the 5th May 2020. The proposed servicing arrangements are assessed in the Highway and Transportation sections of this report. The adequacy of the ES and whether it assesses the likely significant effect of the full range of uses what would be permitted should planning permission be granted, is set out in appendix A of this report. A sequential test has been provided as part of the 2022 update.</p> <ul style="list-style-type: none"> - There is a lack of clarity about important servicing, management, security and environmental impacts which make it impossible to robustly assess the planning application - The public realm strategy and servicing and management arrangements are not sufficiently detailed to show how they would impact on the operation of the Market. - The stopping up of West Poultry Avenue would detrimentally impact upon the continued function of the surrounding markets.
--	---

	<ul style="list-style-type: none"> - Security arrangements including counter terrorism measures are not sufficiently detailed. - Accessible parking should be detailed as part of the application and not left to the S278 agreement. - Departure from evening events has not been considered in terms of vehicle numbers. - The implications of the proposed traffic movements on market trading has not been assessed. - Footway improvements should be proposed as part of the planning application. <p>RESPONSE TO COMMENTS: The applicant has submitted further information in respect of highway and transportation matters. The acceptability of the proposed arrangements are assessed in the Highway and Transportation section of this report.</p> <ul style="list-style-type: none"> - A piecemeal approach which undermines the integrity and heritage of the Smithfield Market entity and future intentions to re-accommodate the Market. - The Market buildings are viewed as a whole and a comprehensive approach should be taken to the planning of this site. - Lack of comprehension is not confined to the separation of the buildings, it extends to the longer term uncertainty about the future of Smithfield Market and the businesses that trade there. <p>RESPONSE TO COMMENTS: Issues relating to the development of the site and the future of the Markets are considered in the Principle of development section of this report.</p> <ul style="list-style-type: none"> - The extent of the red line boundary does not include the full extent of the buildings, structures and heritage assets that will be impacted by the proposed development. - Underground tunnels and basements exist that extend into the red line of the site but the impact on these structures has not been assessed. <p>RESPONSE TO COMMENTS: The applicant has submitted a note from their lawyers detailing why it is</p>
--	--

	<p>considered that the red line boundary is sufficient, namely that it identifies the area in respect of which permission for development is sought. The Local Planning Authority accepts the position of the red line as indicated in the site location plan.</p> <ul style="list-style-type: none"> - Impacts upon employment, trading businesses and supply chain linkages have not been properly considered and the future viability of the Market Trader business, their suppliers and their customers are at risk. - The application does not consider the context of disruption and disturbance that will occur when the Poultry Market traders are displaced from the site and the impacts upon market trading during construction and operation of the Museum development when there could be servicing and operational conflicts. - The SMTA request that further information is made available in order to understand potential impacts upon trading. This will be critical to comply with its Public Sector Equality Duty. <p>RESPONSE TO COMMENTS: These matters have been considered in the Principle of Development and Highways and Transportation sections of this report.</p> <ul style="list-style-type: none"> - New environmental information. - There are gaps in the Environmental Impact Assessment and the missing information should be requested as soon as possible. <p>RESPONSE TO COMMENTS: An Environmental Statement addendum has been provided and was re-consulted upon in 2020 under regulation 25 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. The adequacy of the ES and whether it assesses the likely significant effect of the full range of uses what would be permitted should planning permission be granted, is set out in appendix A of this report. The ES and additional information are considered to provide adequate information.</p> <ul style="list-style-type: none"> - Implications for the Markets - The Markets have a long history in Smithfield any change of use would require the "Aid and Authority of Parliament". Furthermore, the Traders have long
--	--

	<p>leases which are capable of being renewed. The Poultry Market is not surplus to requirement – it is an active market that accounts for 30% volume of trade.</p> <p>RESPONSE TO COMMENTS: Issues around the use of the site are considered in the Principle of Development section of this report.</p> <p>Representation 2 Representation 2 was received days prior to the 23 June 2020 Planning and Transportation Committee meeting where the application scheme was considered. It reiterated that the consideration of servicing arrangements, public realm and potential conflict with Market operations remain a critical concern.</p> <p>The SMTA wanted it on record that the Market Superintendent was not a member of the SMTA. Discussions on details and design developments should have been held directly with the SMTA.</p> <p>It was requested that the application be deferred so that the Applicant could properly engage with the SMTA.</p>
The Greater London Authority	<p>Whilst the principle of the application is strongly supported, the application does not yet fully comply with the London Plan and the Mayor's Intend to Publish London Plan for the following reasons:</p> <ul style="list-style-type: none"> - Further information is needed to demonstrate that the proposal would not undermine the functioning of the Market. - Further discussion is needed with regard to the design and location of the cycle parking. <p>The relocation of the supporting facilities should be secured through a planning mechanism.</p> <p>RESPONSE TO COMMENTS: These matters are addressed in the Principle of development and the Highways and Transportation sections of this report.</p>
Transport for London	<p>All Legible London signs within walking distance would need to be updated to include the new Museum and TfL would support new wayfinding for pedestrians, ideally Legible London, being provided within the museum itself. The contribution to Legible London signs would need to be secured through the section 106 agreement.</p> <p>The applicant is required to enter into a S278 agreement with TfL for improvements to the pedestrian crossing</p>

	<p>across Snow Hill/West Smithfield as it is not currently signal controlled.</p> <p>Provision of exact amounts of cycle parking should be secured by condition. Prior to determination TfL request that further information be provided to clarify the aisle widths between the rows of cycle parking, the exact space between the racks proposed, rack type proposed, ceiling heights in cycle parking areas, confirmation that doors to cycle parking areas would be automated and close behind cyclists to avoid security risk, information on fob control and how cycle parking would managed/accessed and confirmation cyclists don't need to pass through more than two sets of doors to access the cycle parking area.</p> <p>Assurance is required that policy compliant short stay cycle parking would be installed on the highway within walking distance prior to completion of the proposed development and the opening of the Museum.</p> <p>Further clarification is required on the Pedestrian Comfort Level methodology. Clarification is required as to whether trip generation from future schemes has been included in calculations where relevant.</p> <p>Further discussion is needed with TfL on the proposed pavement widening.</p> <p>A Road Safety Audit needs to be carried out.</p> <p>TfL should be consulted on any local S278 works.</p> <p>The Deliveries and Servicing Plan (DSP) must be secured and discharged in consultation with TfL.</p> <p>RESPONSE TO COMMENTS: A Road Safety Audit has been submitted and consulted upon. The remaining matters are dealt with under the Highways and Transportation sections of the report.</p>
Twentieth Century Society	<p>The Society is supportive of the principle of conversion and the broad scope of the plans. It is understood that a degree of change is necessary for public access to be viable on a long-term basis. It is encouraging that a future for West Smithfield could be secured.</p> <p>The loss of ability to perceive the roof's full span from the ground floor is one aspect of the proposal that will cause harm to the building's significance.</p>

	<p>The Society is concerned about the possible replacement of the clerestory glazing in the market hall. Efforts should be made to retain the glazing due to its high significance.</p> <p>RESPONSE TO COMMENTS: These matters are addressed in the Design and Heritage sections of this report.</p>
SAVE Britain's Heritage	<p>SAVE support the scheme that will transform the existing buildings into a new destination. The discovery of the Lockhart Cocoa Rooms is significant and the approach to retain these rooms is welcomed. Emphasis is placed on the re-use of as much of the existing material as possible.</p>
City of London Conservation Area Advisory Committee	<p>Members objected to the addition of a green roof to the market and the treatment of the former entrance, specifically the proposed towers and the lettering, expressing concern over the impact on the Conservation Area. The committee welcomed the approach to the shopfronts but objected to the design of the canopies. A more traditional, retractable canopy would be appropriate to the Conservation Area.</p> <p>RESPONSE TO COMMENTS: Issues around the design of the proposal area assessed in the Design and Heritage section of this report.</p>
London Borough of Camden	<p>Raises no objection.</p>
Crossrail Limited	<p>The implications of the Crossrail proposals have been considered and Crossrail Limited does not wish to make any comment on the application as submitted.</p>
Network Rail	<p>No objection to the proposal. Ongoing liaison has taken place between the applicant and Network Rail. Advice is given with regard to future maintenance, drainage, plant and materials, scaffolding, piling, fencing, lighting, noise and vibration and vehicle incursion so as to maintain the safe operation of the railway and protect Network Rail's Infrastructure. Conditions and requirements for engineering works in the vicinity of the tunnels are specified.</p> <p>RESPONSE TO COMMENTS: The matters raised are covered by conditions and informatives.</p>
City Heritage Society	<p>The care taken over the shop fronts and the retention of the Phoenix columns and the roof structure of the General Market is welcomed. It is disappointing that the dome over the turret at the west end of the Smithfield elevation would not be reinstated. Harts Corner could be enhanced by a visible slate roof and ornate dormers to echo the rest of the street elevations. Objection is raised to the proposed illuminated lettering.</p>

	<p>RESPONSE TO COMMENTS: Design matters are considered under the Design and Heritage section of this report.</p>
London and Middlesex Archaeological Society	<p>The scheme proposes a number of heritage related benefits. The Society is supportive of the principle of conversion and broad scope of the plans. The amendments to the Poultry Market would constitute less than substantial harm which is outweighed by the substantial public benefits of the scheme. The Society does not consider that the scheme would harm the significance of the Smithfield Conservation Area or the setting of the nearby listed buildings.</p>
CoL Open Spaces	<p>No observations.</p>
CoL Air Quality Officer	<p>The proposed development will be car free with only service vehicles and a small number of coaches each day and heating will be through a connection to the Citigen District heating network. This is welcomed as therefore the operational development will have minimal impacts on the local air quality. The development also meets the air quality neutral benchmarks.</p> <p>For the construction phase the air quality assessment states that for half the construction period there will be >50 HGV's per day. Please could further clarification be given on this number of vehicles and the duration of the construction period?</p> <p>RESPONSE TO COMMENTS: Demolition and construction management plans and deconstruction and construction logistics plans would be required by condition. These would cover vehicle numbers and seek to reduce vehicle movements.</p>
Lead Local Flood Authority	<p>Recommends SUDS related conditions.</p> <p>RESPONSE TO COMMENTS: The recommended conditions have been included in the schedule of conditions.</p>
CoL Environmental Health Officer	<p>Recommends conditions relating to plant, extraction systems, sewer vents and schemes of protection during construction and demolition.</p> <p>RESPONSE TO COMMENTS: The recommended conditions have been included in the schedule of conditions.</p>
CoL Superintendent	<p>Access routes, roads and loading bays around the Market are critical to its safe and efficient operation. The current proposals strike a reasonable and proportionate balance between the proposed Museum construction and operational works, and the continuing and unhindered operation of the Market, which must remain paramount at all times.</p>

	The plans are subject to the Museum Project obtaining satisfactory full possession of the Poultry Market. Should this not occur and the Market continues to operate from the ground floor of the Poultry Market, the plans and proposals will need further referral and submission.
--	---

Policy Context

82. When the scheme was considered in 2020 the development plan consisted of the London Plan 2016 and the City of London Local Plan 2015. The then Draft London Plan was at an advanced stage and could be afforded some weight. The draft City Plan 2036 was a material consideration alongside the adopted Local Plan. Government Guidance was contained in the National Planning Policy Framework (NPPF) 2019 and the Planning Practice Guidance.
83. The policy context has changed since 2020. The development plan now 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 D to this report.
84. The City of London has prepared a draft plan, the City Plan (now 2040 not 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). The Draft City Plan Policies that are most relevant to the consideration of this case are set out in Appendix D to this report.
85. Government Guidance is contained in the National Planning Policy Framework (2021) and the Planning Practice Guidance (PPG) which is amended from time to time.
86. 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.
87. 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, May 2021). Open Space Strategy (COL 2016), Office Use (CoL 2015), City Public Realm (CoL 2016), Culture Mile Strategy (2018); Cultural Strategy 2018 – 2022 (CoL, Thermal Comfort Guidelines (CoL, 2020) and relevant Conservation Area Summaries.

Considerations

88. This section of the report sets out the relevant considerations, the majority of which are the same as when the scheme was considered in 2020.

Wider legislation

Equality Act 2010

89. The Committee is required to have regard to its obligations under the Equality Act 2010. 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.
90. The relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.
91. 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.
92. This application has been assessed against the Equality Act 2010 and any equality impacts identified. The assessment is appended to this report at appendix E.

The Metropolitan Meat and Poultry Markets Act 1860 and other Private and Local Acts governing the Smithfield Markets

93. Smithfield Markets are regulated by a series of Acts of Parliament. Among those Acts of Parliament are the Metropolitan Meat and Poultry Act 1860 and the London Central Markets Act 1875. Section 21 of the 1875 Act provides that the markets established under the 1860 act and the 1875 Act shall be designated collectively as London Central Markets. The City of London Corporation is required to make provision for the operation of a market at Smithfield unless the relevant legislation is amended or revoked by Act of Parliament. To this end, the City Corporation is due to submit a Private Bill in November 2022 to obtain the necessary parliamentary approval to relocate the operational

markets to a new site in Dagenham Dock and to allow the Smithfield site to be used for non-market purposes.

94. Importantly, however, the extent of market provision which it is necessary to make available, including whether this should include the Poultry Market is a matter for the discretion of the City of London as market authority acting reasonably. This this end Section 25 of the 1875 Act empowers the City Corporation to "... appropriate and use for any purpose, any lands acquired by them for purposes of the London Central Markets, or any of them, but not required to be retained by them for those purposes". As such if a surplus resolution comes into effect then this will have the effect of removing the restrictions from the Poultry Market part of the site and in those circumstances the development under consideration will not be reliant on the passage of a Bill.
95. On 13 July 2022 the Markets Board resolved that subject to the completion of all Deeds of Surrender for leases within the Poultry Market and suitable alternative arrangements being made for relocation of services provided to the East and West Markets from the Poultry Markets (save for the three first floor plant rooms containing cooling towers and related apparatus), that the Poultry Market is no longer required to be retained for market purposes and can be disposed of or used for other purposes. Delegated authority was given to the Town Clerk (in consultation with the Chairman and Deputy Chairman of Markets Board) to determine when the provisos have been met and when the recommendation comes into effect.
96. Normally private or local acts are not material planning considerations. If a private or local Act imposes a potential impediment to the delivery of a scheme however, that factor may in some limited circumstances be a material consideration to be taken into account when determining a planning application. In particular, such an impediment can be relevant if weight is given in the planning balance to the early delivery of a scheme and the preference of a site over other available sites. In this case it is anticipated that any impediment imposed by the 1860 Act would be overcome by a surplus resolution coming into effect following surrender of the leases. Otherwise, legislative changes contained in the Bill which the City Corporation intend to promote could also overcome any impediments.
97. As the planning system operates as a separate and self-contained code, and the grant of planning permission will not override the provisions of the relevant local Acts, there is no need for these impediments to be overcome prior to the grant of planning permission.

Human Rights Act

98. Under Section 6 of the Human Rights Act 1998, the Local Planning Authority must ensure that, as a "public authority", it does not act in a way which is incompatible with a "Convention right", i.e. a right set out in the European Convention on Human Rights, such incompatible action being unlawful.
99. Article 8 of the European Convention states that everyone has the right

to respect for his private and family life, his home and his correspondence.

100. Article 1 of Protocol 1 provides that every natural and legal person (including corporate bodies) is entitled to peaceful enjoyment of his possessions.
101. These are not absolute but qualified rights which must be balanced against the broader interests of society as a whole including its economic wellbeing, and against the rights and freedoms of others.
102. These are not absolute but qualified rights which must be balanced against the broader interests of society as a whole including its economic wellbeing, and against the rights and freedoms of others.
103. These rights could be infringed, for example, by a planning decision where that planning permission will result (with sufficient severity) in the loss of sunlight and daylight, privacy or result in noise and disturbance (including through traffic movements). Subject to appropriate conditions being attached to the permission, including to manage events, deliveries and servicing of the development, and the use of the development, it is not considered that any such infringement will occur here.
104. If the planning permission was to impact on the ability of the retained parts of the meat market in the East and West market to operate, this could also be considered to interfere with the peaceful enjoyment of the trader's possessions. As such the ability of the East and West markets to continue to operate and to co-exist with the development has carefully been considered. Subject to conditions is not considered that there will be any significant impact on the operation of the retained part of the market.
105. Notwithstanding the above, and that officers do not believe that the development will result in an infringement of the above rights, if the alternative view was taken, then the City would need to weigh the balance between any convention rights which may be infringed on the one hand and the public interest, including the interests of the economic well-being of the country in the proposed redevelopment and the right of the applicant and landowner to seek to develop their own property, on the other. It is the view of officers that any infringement of Article 8 rights which may arise as a result of the development proposed, such as adverse impacts on the amenity of those living or working in the area (and as considered below) would be necessary in the interests of the economic wellbeing of the country and proportionate. Officers also consider that any such interference with Article 1 Protocol 1 rights as could occur, including impacts on the current use of the Poultry Market and consequential impact on the Smithfield meat market as a whole (as considered below), would be proportionate and in the public interest.

Statutory Duties

106. 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).

107. 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);
108. In considering whether to grant planning permission for development within a conservation area special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area (S.72(1) Planning (Listed Buildings and Conservation Areas) Act 1990. When considering the impact of proposed development on a conservation area it is the entirety of the proposal which is in issue.
109. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides that in considering whether to grant listed building consent for any works the local planning authority shall 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.

NPPF

110. The NPPF states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”.
111. Paragraph 10 states that “So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development”. That presumption is set out at paragraph 11:
112. 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.
113. It states at paragraph 8 that achieving sustainable development has

three overarching objectives, being economic, social and environmental.

114. 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)
115. Paragraph 87 states that Local Planning Authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.
116. Chapter 8 of the NPPF states the planning policies and decisions should aim to achieve healthy, inclusive and safe places.
117. 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”.
118. 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”.
119. 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”.
120. Chapter 14 of the NPPF relates to climate change, flooding and coastal change. Paragraph 155 states that new developments should increase the use and supply of renewable and low carbon energy and heat through measures including renewable and low carbon energy sources and identifying opportunities to draw energy supply from decentralised supply systems.
121. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 194 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.

122. 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."
123. 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."
124. Paragraph 200 of the NPPF states "Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
 - a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
 - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."
125. Paragraph 202 of the NPPF states "Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use." When carrying out that balancing exercise in a case where there is harm to the significance of a listed building, considerable importance and weight should be given to the desirability of preserving the building or its setting. When carrying out the balancing exercise in a case where there is harm to the significance of a conservation area, considerable importance and weight should be given the desirability of preserving or enhancing the character or appearance of the conservation area.
126. Paragraph 203 states "The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement

will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”

Considerations in this case

127. In considering this planning application account has to be taken of the environmental information including the Environmental Statement and the documentation accompanying the application (both now incorporating the 2022 update), the statutory and policy framework and the views of both statutory and non-statutory consultees.
128. There are policies in the Development Plan which support the proposal and others which do not including policies CS5(10), CS12 (1), DM12.1(1), DM12.2 (1) and DM12.3(2) of the Local Plan, draft City Plan 2040 policies S25(2) S11(1), HE1(1) and OS2 (2.2) and London Plan policy HC1.
129. It is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
130. The principal over-arching issues in considering this 2022 application update are:
 - The extent to which the proposals comply with Government policy advice (NPPF).
 - The extent to which the proposals comply with the relevant policies of the Development Plan.

The principal issues in considering this application are:

- The Principle of Development – including the loss of market use, the provision of a museum, the provision of a range of flexible uses and a sequential test analysis.
- The impact of the development in design and heritage terms including impact on the designated and non-designated heritage assets.
- The impact of the proposal on Strategic Views.
- The impact of the proposal on any archaeology beneath the site.
- The accessibility and inclusivity of the development.
- The impact of the proposal in highway and transportation terms.
- The impact of the proposal in terms of energy and sustainability.
- The Environmental Impact of the proposals on the surrounding area.
- The impact of the proposal on Flood Risk
- The impact of the proposal on Air Quality
- The impact of the proposal on amenity.
- The impact of the proposal on health and wellbeing
- Fire safety
- The requirement for financial contributions and planning obligations
- Duties under the Equality Act 2010
- The Human Rights Act 1998 (considered above)

Principle of Development

131. Considerations around the principle of development remain largely as per the considerations set out when the scheme was considered in 2020.

132. Smithfield is recognised as an area of the City that has its own unique character. It is steeped in history and contains a diverse range of uses including commercial offices, retail, market, cultural, hospital and residential. The Elizabeth Line with a station entrance on Lindsey Street and one at Farringdon makes Smithfield one of the most accessible areas of London.
133. The site is within the following land use designations:
- The Central Activities Zone (CAZ)** as identified by the London Plan 2021. This is the vibrant heart and globally-iconic core of London where its rich mix of strategic functions and local uses should be supported as set out in policy SD4 of the London Plan 2021. Cultural institutions play an important role in the CAZ. The London Plan 2021 notes that the CAZ contains important specialist clusters of activity which contribute towards the capital's international and national roles. The Barbican/Smithfield/Farringdon area is identified as a specialist cluster where the arts, culture and creativity are to be promoted and sustained.
134. **The North of the City, Key Place Area** as identified by policy CS5 of the Local Plan 2015. This recognises the impacts and benefits Crossrail will have upon this part of the City and its potential to capitalise on its mixed-use character and improved public transport. It recognises and supports the continued presence of Smithfield Market and promotes the further improvement of the Barbican area as a cultural quarter of London-wide, national and international significance.
135. **The Smithfield and Barbican as a Key Area of Change** as identified by the draft City Plan 2040. This acknowledges that the area will undergo significant change with the delivery of the Culture Mile initiative, including the proposed relocation of the Museum to Smithfield. Smithfield Market may move from its current location as part of a wider programme to consolidate the City's wholesale markets onto a new site, and the opening of the Elizabeth Line would increase public transport provision in the area.
136. As a result of these designations careful consideration needs to be given to the proposed mix of uses and the impact that they would have on the Smithfield area. An assessment of the acceptability of each of the proposed uses in policy terms is set out below, with an overall conclusion of the acceptability of the proposal in land use terms at the end of this section:

Loss of market uses (Sui Generis)

137. Policy CS5 of the Local Plan supports the long term presence of Smithfield Market, the reasoned justification notes that the General Market building is no longer used by meat traders. Since the adoption of the Local Plan, the City Corporation has taken an in principle decision to consolidate its wholesale markets (Smithfield, Billingsgate and New Spitalfields) onto a single site. Policy S25 of the draft City Plan 2040 recognises this change in intent and supports the continued presence of the Markets in the Smithfield area in the short to medium term, pending further preparatory work on the markets consolidation programme.

Policy E4 of the London Plan 2021 seeks to maintain efficient wholesale markets to meet long term wholesale needs and policy E9 supports London's markets in their full variety. These policies recognise the important role that wholesale markets play in London's economy by distributing fresh produce.

138. As part of the assessment of the scheme in 2020 it was concluded that the proposal would have an adverse impact on the existing use of the Poultry Market and that this was a material consideration which weighed against the grant of planning permission. It was considered that the proposal was contrary to policy CS5 of the adopted Local Plan. In their stage 1 letter the GLA deemed that further information was needed to demonstrate that the proposal would not undermine the functioning of the Market. The SMTA objected to the scheme.
139. Circumstances in respect of the future of the markets have changed further since the scheme was considered in 2020.
140. It was noted previously that with regard to the longer term vision for Smithfield Market, in April 2019, the Court of Common Council decided to progress with a new site for the City's markets in Dagenham Dock. The site is the former Barking Reach Power Station and is owned by the City of London Corporation. At the time when this scheme was originally considered in 2020 an outline planning application to "create a new 21st century food centre for the UK, London and the South East" had been submitted to Barking and Dagenham Council for consideration on the 18th May 2020. The application was therefore pending consideration when this scheme was considered in 2020. Outline planning permission has since been granted (on the 2 March 2022). It is anticipated that reserved matters will be dealt with when the detailed design has been finalised. This is still likely to be 2 years away with completion of the project estimated to be in 2029.
141. When this scheme was considered in 2020, it was reported that the City was working towards submitting a Private Bill to Parliament in November 2020 to provide the necessary parliamentary approval to relocate the Markets. Members were advised that the Property and Markets Committee would need to declare the buildings surplus to market requirements in order for them to be used in alternative ways. Proposals were being explored for the future potential uses of the East and West Markets should the market buildings be released.
142. The Private Bill was delayed and it is now anticipated that it will be submitted in November 2022. The resolution deeming the Poultry Market surplus to requirements was agreed by the Markets Board on 13 July 2022, but does not take effect until the Deeds of Surrender have been signed for the existing Poultry Market leases by existing tenants and suitable arrangements have been made for relocation of services supporting the East and West Markets. Further details on the supporting services are set out below. The grant of planning permission would not authorise any development in breach of the provisions of the relevant Acts which govern the market.

143. In the consideration of this scheme in 2020 it was acknowledged that the General Market and Annexe site have been vacant for approximately 30 years (with the exception of the temporary use of the General Market in conjunction with Crossrail works) and are in urgent need of repair. The Poultry Market however, remains a functional market building. The desirability of retaining the existing use was and still is a material planning consideration.
144. As per the considerations set out in 2020, there are still facilities within the Poultry Market that support the function of the East and West Markets these include maintenance and tradesmen workshops, maintenance and cleaners stores, maintenance offices, animal bi-products facility, bin storage and washing facilities, waste collection pallets and packaging. The City as landlord and manager of the markets has been investigating the re-location of these facilities as part of the market's consolidation programme. Following the consolidation of these facilities the East and West Markets could function independently and would not be dependent on any facilities within the Poultry Market.
145. When the scheme was considered at Planning and Transportation Committee in June 2020, Members requested that the planning permission be subject to a Grampian condition which would require relocation of the supporting facilities before the works in respect of the Poultry Market commence. The Grampian condition has been included within the conditions schedule as this is still relevant. Notwithstanding, plans have progressed in respect of the relocation of the supporting facilities and further clarity has been provided on the measures that would be put in place, as is set out in the table below.

Use	Existing location	Relocation Site	Detail
Market maintenance office, lockers and welfare facilities	Poultry Market	79-83 Charterhouse Street	The facilities are being relocated to CoLC's premises at 79-83 Charterhouse Street, which is in very close proximity to the Market. These facilities are newly created and offer staff and welfare rooms on the ground and first floors.
Maintenance stores & workshops	Poultry Market	Smithfield Car Park	These facilities are being relocated to the vaulted areas in basement of the East and West Market. The new workshops and stores will be adequately fitted to provide suitable facilities to continue providing this service.
Forklift storage/charging (CoLC equipment only)	Poultry Market	79-83 Charterhouse Street	Provision will be made in the East and West market to store/ charge CoLC equipment.

Tenant forklifts/pumper trucks		Tenant premises	Market traders have confirmed their own equipment can be accommodated within their premises in the East and West Market buildings.
Waste area	Poultry Market	Daily collection currently under scope and option decisions	All waste will be collected from the market site. Collections will be sufficiently frequent to reduce/remove the need for storage. At peak times of the year, this is likely to mean daily collections. This is considered a satisfactory and more sanitary arrangement for market operations than existing practices.
ABP Refrigeration Unit	Poultry Market	Refrigerated and ventilated ABP facility provided on Grand Avenue East	<p>Clear out / clean Grand Avenue East and fit out with refrigerated and ventilated ABP facility. Provide one small office for Environmental Health Officer paperwork and compliance control.</p> <p>ABP facility to provide walk-in area for weighing, dyeing and storage facilities, as well as necessary washdown/drainage services. Odour proof facility with 2 entry/exit points and associated roller shutters and lock-offs along with damage protection systems.</p> <p>ABP staff to relocate to welfare facilities on ground floor of 79 -83 Charterhouse Street</p>
Stalls	Poultry Market	N/A	Use of stalls for active face-to-face trading between buyers and sellers is low level and generally limited to peak periods, mainly Christmas and Easter. Stall holders who also have premises at the East & West Market will continue to carry out face-to-face sales

			from there. A small minority may cease trading.
Break-up and consolidation	Poultry Market (covered ways)	East and West Market or off-site	Pallets are received by traders and the contents broken up into smaller quantities for sale from stalls (mainly at stalls at the East & West Market) or for direct despatch to customers. To the extent this activity relates to some meat for sale from the East & West Markets, this activity will take place from duplicate premises or alternative businesses at the East & West Markets. To the extent this activity relates to meat for direct despatch to customers it does not require face-to-face trading and the activity is not therefore dependent on market premises. All produce lines in the Poultry Market are also offered in the East & West Markets.
Storage use by traders	Poultry Market	East and West Market or off-site	Significant areas of the let stalls are used for storage. To the extent this activity relates to storage of meat for sale from the East & West Markets, this activity will take place from East & West Markets from existing premises. However, some traders are moving bulk pallet operations off-site to other locations. To the extent this activity relates to some meat for direct despatch to customers it does not require face-to-face trading and the activity is not therefore dependent on market premises.
Cooling Towers	Poultry Market	N/A - remaining at Poultry Market	The three 1 st floor plant rooms containing the condenser cooling towers and related apparatus are not included in the surplus resolution. Access rights will be reserved.

146. In terms of occupation of the Poultry Market, it was reported in 2020 that there are currently nine traders that have leases within the Poultry Market. The traders own multiple units, resulting in 17 of the trading units being occupied.
147. The Market Superintendent advised in 2019 that only three traders in the Poultry Market opened their shop fronts for trade, this has been a declining number over recent years. Even in peak trade times of Easter and Christmas the number only reaches about six traders. Some traders use their shops as stores to support their business in East and West Markets and many have signs in their shops directing potential customers to the other Markets. Most traders in the Poultry Market use both their ground floor and sub-basement mezzanine areas to store products for onward distribution, for the majority this is for existing customers who never come to the Market.
148. The report that was put forward to declare the Poultry Market surplus to requirements (13 July 2022) has provided further clarity on the operation of the Poultry market units of which there are 32 in total:
- 17 are market stalls let to traders;
 - 1 is a storage unit let to a market refrigeration contractor;
 - 5 are vacant
 - 6 are used by the Corporation for stores, workshops and the ABP Facility (supporting facilities to be relocated)
 - 3 are communal fork-lift/pumper truck charging facilities (supporting facilities to be relocated)
149. It is understood that it is still the case that nine traders have leases within the Poultry Market and that the traders own multiple units resulting in 17 of the trading units being occupied. Six of the nine traders also have units within the East and West Markets.
150. The surplus report notes that the use of stalls for active face to face trading between buyers and sellers in the Poultry Market is low and generally limited to peak periods mainly Christmas and Easter. Stall holders who also have premises at the East and West Market will continue to carry out face to face sales from there. A small minority may cease trading.
151. To accord with adopted Local Plan 2015 and emerging City Plan 2040 policy, it would need to be demonstrated that there is potential to satisfactorily relocate the market trading currently occurring within the Poultry Market to elsewhere in the area, enabling the traders to continue their business activity whilst enabling the re-use of the building for the Museum of London.
152. Since the consideration of the scheme in 2020, the City of London Corporation as land owner has continued dialogue with the traders as tenants. It is anticipated that the traders would receive compensation and agreement could be reached so that vacant possession of the Poultry Market could be achieved in 2024.

153. Consideration has been given to the impact that the loss of the Poultry Market would have on Smithfield Meat Market as whole. The proposal would result in the loss of 9 traders and 32 trading units, of which 17 are occupied, 5 are vacant and 10 are used for supporting facilities. The remaining 47 units in the East and West Markets that are occupied by 27 traders (traders own multiple units) would continue to function under the proposal.
154. Notwithstanding, the ability of the East and West markets to continue to function, overall in the light of the loss of the market use and displacement of trade in respect of the Poultry Market site, the proposal would be contrary to policy CS5 of the Local Plan which supports the continued presence of Smithfield Market and policy S25(2) of the draft City Plan 2040 which seeks to support the continued presence of Smithfield Market in the short to medium term, while the aspirations of a potential move to Barking and Dagenham as part of the wider markets consolidation programme are being realised.
155. The adverse impact on the existing use of the Poultry Market is a material consideration which weighs against the grant of planning permission. The implications that this has on decision taking is set out in the conclusion of this report.

Provision of Museum Use within the General Market and the Poultry Market (Class D1)

156. The policy considerations in respect of a Museum Use within the General Market and the Poultry Market remain largely as per those set out in the 2020 committee report.
157. The draft City Plan 2040 (policies S24 and S25) supports the principle of relocating the Museum of London to Smithfield. Policy S23 of the draft City Plan 2040 seeks to ensure that future alternative uses of the listed market buildings are appropriate to their status if the existing market uses are relocated.
158. The Mayor of London's Culture Strategy December 2018 'Culture for all Londoners' supports the relocation of the Museum of London to Smithfield. The Mayor has committed £70 million to create a landmark museum to utilise the historic market buildings and provide the museum with a larger premises to fulfil its ambitions.
159. The support for the Museum's relocation is on the basis that it would secure a long- term sustainable future for the vacant market buildings on the site and would address ambitions in the adopted and draft Local Plans for further cultural and visitor activity in the Smithfield area. A key part of which is the realisation of the Culture Mile.
160. The Culture Mile Look and Feel Strategy November 2018 sets out how the Culture Mile will be a thriving new home for contemporary culture in the ancient heart of London. It stretches just under a mile from Farringdon to Moorgate and includes the Barbican, Guildhall School of Music and Drama, London Symphony Orchestra and the Museum of London. The aspiration to deliver the Culture Mile initiative is primarily supported by policies S6, S23 and S24 of the draft City Plan 20406, The

City of London Cultural Strategy 2018-2022 and the Mayor of London's Culture Strategy December 2018 'Culture for all Londoners'.

161. There is a growing desire to deliver a City of commerce and culture, recognising the important role of cultural activity in delivering an economic and socially prosperous city. This is supported by policy CS11 of the Local Plan, policy S6 of the draft City Plan 2040 and the wider cultural aspirations of the London Plan London Plan 2021 (policies HC5 and HC6). The City of London Cultural Strategy 2018 -2022 and the Mayor of London's Culture Strategy December 2018 'Culture for all Londoners' place huge importance on the role that culture can play in growth for London. London's creative economy now employs one in six Londoners and contributes £47 bn to the economy. Culture not only benefits the economy, it has a beneficial impact on people's wellbeing, quality of life and has an ability to create a sense of place and community.
162. The submitted Environmental Statement notes that as cultural institutions, museums can play an important role in placemaking, re-activating urban areas, the ability to draw national and international tourism and promote civic pride. They have the potential to provide equal opportunities for cultural participation which has the potential to remove barriers between different communities and enables re-integration of those experiencing social isolation.
163. Locating the proposed museum use in Smithfield would support the City's aspirations regarding access to culture, the future vision for Smithfield and the desire to unlock the creative potential of the Culture Mile. In accordance with policy S6 of the draft City Plan 2040, a Cultural Plan has been submitted in support of the application. Delivery of the Plan and further details in respect of matters such as a meanwhile use strategy, programming of the Iron Mountain site and signage would be secured by condition.
164. The scheme would deliver wider social, economic and environmental benefits. Such benefits in this instance would include the draw of an average of 2 million visitors per year which would boost national and international tourism. It is estimated that the museum would generate an additional 1,707 jobs through direct employment within the museum, supply chains and visitor expenditure in the locality and it would generate approximately £755 million of additional Gross Value Added (defined as "the measure of the value of goods and services produced in an area, industry or sector of an economy").
165. Social benefits include the Museum of London's commitment to work with local communities in the development and operation of the new museum. This is exemplified through some of the initiatives and projects that the museum is working on including:
 - The Smithfield Project – working with local communities to help shape plans for the content of the museum to ensure that it is relevant to local people.
 - Audience panels – representing teachers, families, young people

and people with access needs would advise and provide feedback on the development of the new museum.

- Co-curated exhibitions – Community participation would be embedded in the design of new galleries.
- New Museum School Traineeships – For two consecutive years the museum has hosted a year-long placement for a trainee as part of the New Museum School Scheme. The aim is to develop heritage leaders from cultural and socio economic backgrounds under represented in the museum sector.
- St Barts – Conversations are continuing with St Barts hospital around exploring opportunities to offer respite and opportunities to experience the arts and culture for patients and staff.
- Schools and learning – the intention is to double the number of children that the museum engages with to 200,000 per year. This includes working with schools in disadvantaged areas and those that do not tend to visit the museum.
- Wellbeing – Promoting the wellbeing of local communities who face barriers to cultural experiences (e.g. because of poverty or low educational attainment), looked after children and care leavers and older people living with loneliness through programmes including volunteering, apprenticeships, work experience, create courses, drop in clubs, Arts Award projects and skills development programmes.
- Accessibility – The museum would feature enhanced access for people with disabilities. There would be tailored tours, sessions and resources for people living with dementia and families with autism spectrum conditions.

166. The proposed museum land use would result in heritage and environmental benefits as the museum would sensitively revive the market buildings and this underutilised part of Smithfield giving the area a new identity and allowing the historic significance of the buildings to be appreciated. This would act as a catalyst to unlock the potential for further cultural projects to be realised in the area particularly in terms of freeing up the existing London Wall site and the potential for linkage with any future scheme for the repurposing of the East and West Markets. Notwithstanding, future aspirations for the East and West Markets, the proposed museum use has been designed so that its operation would not compromise the operation of the East and West markets as a wholesale market. Both uses could co-exist.
167. The scheme would align with the City's ambitions and direction of travel set out in the recent Destination City and London Re-charged agendas which seek to ensure that the City is a compelling, seven day a week destination.
168. The proposal is compliant with the element of policy CS5 which supports further enhancing the distinctive character of Smithfield by retaining a range of buildings suitable for accommodating a mix of uses and with

CS11 of the Local Plan, which supports visitor arts and cultural uses, and policies S24 and S6 of the draft City Plan 2040 and policies HC5 and HC6 of the London Plan 2021 which set out aspirations for culture, Smithfield and the Culture Mile and policy SD4 of the London Plan 2021 which support a rich mix of uses in the CAZ including the cultural role of the Barbican/Smithfield/Farringdon specialist cluster of activity. The proposal would be compliant with bullet point four of policy S25 of the draft City Plan that relates to the re-location of the Museum of London to Smithfield. It would accord with the aspirations set out in the Culture Mile Look and Feel Strategy 2018, the Mayor and City of London's Culture Strategies which are material considerations.

Office Use (Class B1)

169. The office use policy considerations remain largely the same as those set out in the 2019 applications.
170. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan 2021 seek 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 sub-division to meet the needs of such businesses. Similar policy objectives are carried forward into policies S4 and OF1 of the emerging City Plan 2040.
171. The application is principally concerned with the development of new museum space, but also seeks permission for flexible use of a variety of spaces in the Annexe Building and Engine House and in spaces around the General Market. Depending on the end use, there is potential for office provision on site ranging from 2,377 sq.m (GIA) flexible B1 or D1 floorspace to 4,079 sq.m (GIA) of flexible A1/A2/A3/A4/B1/D1 & D2. This offers potential to deliver a variety of smaller and flexible office spaces more suited to meet the needs of SMEs, start-ups and creative businesses. This potential would complement the variety of the local area and accords with office policy set out in the Local Plan 2015, emerging City Plan 2040 and the London Plan 2021.

Gym Use (Class D2)

172. The policy considerations in respect of gym use remain largely the same as those set out when the scheme was considered in 2020.
173. Local Plan 2015 policy DM19.3, draft City Plan 2040 policy HL7 and London Plan policy S5 encourage the provision of new sports and recreational facilities where they provide flexible space to accommodate a range of different uses/users and are accessible to all.
174. The proposal could potentially provide a maximum of 4,949 sq.m (GIA) of class D2 floorspace across the Annexe site and six houses on the General Market site. The applicant has confirmed that the D2 use would be a gym.

175. The potential inclusion of the gym use would be beneficial for the health and well-being of the City's communities and would accord with the aforementioned policies in the Local Plan 2015, draft City Plan 2040 and the London Plan 2021 which seek to provide new sports and recreational facilities.

Flexible retail uses (A1/A2/A3/A4)

176. The policy considerations in respect of retail uses remain largely the same those considered in 2020.
177. The site is not within a designated Principal Shopping Centre (PSC) or Retail Link as defined in adopted Local Plan 2015 policy DM20.1. Elsewhere in the City, Local Plan policy DM20.3 seeks to maintain existing retail uses and promotes active frontages. The draft City Plan 2040, Policy RE2, extends the City's Retail Links to include West Smithfield and parts of Farringdon Street adjacent to the proposed development and the supporting text highlights Farringdon/Culture Mile as one of two areas in the City that should be a priority for new retail floorspace outside the PSCs. The proposed uses are intended to be flexible with 7,426 sqm of GIA allocated to A1-A4, B1 and D1/D2 space. The current Museum of London site only has approximately 130sq.m of retail space so this uplift would enable the development to attract more visitors to the site and surrounding area.
178. An updated Retail Assessment by Colliers has been submitted, setting out the context to retail in this area of the City. Updated sections of the report include UK Online Expenditure and Growth Forecasts, policy context, Elizabeth Line impact and proposed floorspace figures. A new section has been added to the report covering the sequential test, further details of which is set out in the section below. The retail offer would include cafes, and shops and bars (Class A1 to A4). It is proposed that the units located on the perimeter of the General Market would be home to a mix of uses, including retail. In addition, the Engine House and part of the Annexe Building, would be occupied by several retailers and the Red House would include a retail unit at ground floor.
179. The creation of active frontages opening onto surrounding streets is welcome and would enhance activity and vibrancy in this area. The provision of additional retail floorspace as part of the development would meet the objectives of adopted Policy DM20.3 and draft Policy RE2 and would offset the loss of the existing A4 use in the Poultry Market. The proposed retail provision would help to enliven the public realm at street level, while having limited impact on other retail centres in the City of London, Islington and Camden. The retail provision would draw in trade from established centres, with the closest, Farringdon, experiencing a projected trade draw equivalent to 11.6% of current overall turnover, spread across 35 retail operators. Other areas in Islington and the City would experience a smaller level of trade draw. There would be no significant adverse impact on town centre vitality and viability. There would be no significant adverse impact on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal.

180. The impact of the proposed retail uses would be tempered by the fact that 56% of current visits to the Museum of London are annual or one-off visits and therefore the majority of retail visits will be from visitors from outside of the local areas. Given that the proposed retail use is intended to be flexible and the mix of retail, office and leisure uses is uncertain at present, the level of retail impact is considered to be acceptable. There would be no conflict with adopted Local Plan 2015 policy DM20.3 or draft City Plan 2040 Policy RE2, which allow retail outside of the PSC's where it would help form an active frontage, provide amenity to City workers, residents and visitors and enhance vibrancy. The proposal would be compliant with London Plan 2021 Policy E9 which seeks to support a successful, competitive and diverse retail sector.

Sequential Test

181. The sequential test set out at paragraph 87 of the NPPF applies to planning applications for main town centre uses. The definition of main town centre uses in the Glossary to the NPPF is broad and includes retail, leisure, entertainment, offices, arts, culture and tourism development (including museums). The NPPF (at paragraph 90) states that where an application fails to satisfy the sequential test, it should be refused. Paragraph 11 of the Planning Practice Guidance on Town Centres and Retail states that it is for the applicant to demonstrate compliance with the sequential test and that failure to undertake a sequential assessment could in itself constitute a reason for refusing permission. Paragraph 11 also states that the application of the test will need to be proportionate and appropriate for the given proposal. The adopted Local Plan (policy CS20 (2)) applies the sequential test to retail development in the City, but does not specifically apply the test to other main town centre uses. The City defines town centres as the Principal Shopping Centres. Compared to traditional town centres, the City's PSCs are limited in terms of scale and size, and simply focused on retail frontage and retail accommodation.
182. When the scheme was considered in 2020 the Smithfield Market Tenants' Association pointed out that no sequential assessment had been undertaken. At that time it was the view of officers that a balanced approach needed to be taken to the requirement for a sequential test, having regard to the City's PSCs. The failure to undertake a sequential assessment was a breach of national planning policy and could constitute a reason for refusing planning permission. However, officers took the view that despite the fact that national policy indicates that where an application fails the sequential test it should be refused, there are particular circumstances in this case and that the benefits of the scheme outweigh the breach of national policy. The particular factors which justified a departure from the NPPF policy approach included: regenerating a site which (in part) has been unused for approximately 30 years; the fact that emerging City Plan 2040 policy (Policies S23, S24 and S25) support the proposed relocation of the Museum of London to Smithfield; and the fact that emerging City Plan Policy S5 designates West Smithfield as a retail link, suitable for town centre uses; the fact that Barbican/Smithfield/Farringdon is identified, in the now London Plan

2021 as a specialist cluster within the CAZ; and the fact that the site is highly accessible by public transport which will improve further with the opening of the Elizabeth Line.

183. Notwithstanding officer views in relation to the 2020 considerations of this scheme, an updated Retail Impact Assessment has been undertaken by the applicant which incorporates a sequential test.
184. Given the limited supply of sizeable development plots across the City, the sequential test has analysed planning application data from across the City, identifying 50 applications and considering whether any of these would offer a suitable alternative site for a development of the approximate scale of the current museum application and for the proposed level of retail floorspace within that development. The sequential test has identified only 1 site, at Devonshire Square, of a comparable size to the development proposed for the Museum of London. This site is an extension to an existing office development and the applicant concludes that it is not comparable to the proposed Museum site, nor a suitable alternative site. It is also outside of an established PSC, so would not meet the requirements within adopted planning policy.
185. Looking specifically at the non-museum space in the proposed Museum development, the retail study has considered the availability of suitable alternative sites which could accommodate the scale of non-museum floorspace proposed. The largest application identified relates to a site of 813 sqm at the Royal Exchange within the Cheapside PSC. This site could accommodate only 16% of the proposed retail floorspace and is therefore not considered to be a suitable alternative.
186. In conclusion, the sequential test has considered the availability of suitable sites within the City's PSCs and other sites outside of the PSCs that are of a comparable size to accommodate the non-museum uses proposed in the Museum of London development. This test has demonstrated that there is no suitable alternative site within either the PSCs or elsewhere in the City and it is considered to have met the requirements of national, London and City of London planning policy.

Retail Impact

187. The Retail Impact Assessment found the retail offer within the proposed development would be generally complementary to the City's existing retail offer and would not directly compete with the type of retailing found in the existing PSCs within and outside the City. The proposed new retail floorspace represents quite a small percentage (12.5%) of the overall planned development. The majority (85%) of the trade anticipated would be drawn from areas not immediate to the study areas nearby including within the London Borough of Islington and London Borough of Camden. It is envisaged most of the trade would come from a wide geography of places across not just Greater London but also across the wider South-East of England and further afield. This would thereby dilute the impact on any one centre and reflects the accessibility of the site to a range of commuters and visitors, particularly via Farringdon Station.

188. It is expected there will be limited impact to trading performance to occupiers located in the study areas in neighbouring boroughs or elsewhere in the City of London. As set out above the majority (85%) of the trade anticipated in West Smithfield development would be drawn from further afield. The trade diversion assumptions based on future supply ratio for the study areas within the London Borough of Islington found that there would *“...be a total a total of £3m of trade diversion to the scheme...”* with none of the *“...identified study areas witnessing an impact of greater than 15%”*. However, it is acknowledged that the Farringdon area would *“...witness a trade diversion of £1m which would represent 11.6% of total turnover in the area at present”*.
189. In addition, *“Analysis of the estimated net commercial retail and leisure floorspace provision indicates that the planned retail/leisure provision at the new museum site is significantly smaller than 7 out of 10 nearby study area locations...”*. The closest study area to the site with a significant retail offer is Historic Clerkenwell and the report considers that *“The comparatively small scale of the planned retail/leisure officer at the new museum site is unlikely to have significant impact on visitor behaviours (i.e. switch visits from Historic Clerkenwell to the new museum site)”*.
190. In addition, the Farringdon study area *“...is dominated by leisure (food & beverage, leisure activities) with 68.4% of space being attributed to this category.”* and Cheapside has *“...42% of space being attributed to retail occupiers”*. The impact study does recognise that there will be some trade diversion, albeit not so significant as to have a substantial impact on the vitality and viability of these areas.
191. The demand from the Museum of London is anticipated to be the highest from national and independent gifting operators, together with restaurants, take-aways, coffee and bars. The West Smithfield site is considered to have a clear undersupply of retail uses to meet the current and expected local demand.
192. In summary, it is considered that the scheme complies with the sequential and retail impact tests set out in adopted retail policies, would not have any significant adverse impact on existing retail centres and is fully in line with the Local Plan and draft Local Plan 2040.
193. growth area by occupiers. It is possible that there would be a beneficial impact on existing retailers who may gain new trade if the proposed development attracts a wider catchment population.
194. The proposed development is outside of any of the City's Principal Shopping Centres and, in accordance with the NPPF, the London Plan and the City of London Local Plan, a sequential test is required to demonstrate that there is no other suitable site within or adjacent to the PSCs to accommodate the scale of retail or town centre development proposed.
195. The updated retail impact assessment addresses this requirement, looking at the availability of suitable sites for a development of the approximate scale of the current museum application and for the

proposed level of retail floorspace within that development.

Conclusion concerning the land use principles

196. The proposed flexible retail, office and leisure uses around the perimeter of the General Market and on the Annexe site would add to the rich mix and diversity of uses that characterise the Smithfield area in accordance with the provisions of the Local Plan 2015, the draft City Plan 2040 and the London Plan 2021.
197. The use of the General Market as a Museum is considered acceptable in planning terms given that the market uses on this site ceased approximately 30 years ago. A new museum on the site would revive the building and the wider area in accordance with the Local Plan and emerging City Plan's aspirations for the Smithfield area.
198. Regarding the use of the Poultry Market consideration has been given to the impact of the proposal on the Poultry Market traders and the implications around the policy stance concerning the protection of the market function. It is concluded that there would be some diminishment of market function as a result of the proposal. However, the majority of trading units and traders operate from the East and West Markets, and their operations could continue under the proposal subject to the satisfactory relocation of the supporting facilities. The majority of the market site would therefore continue to function as a result of the proposal.
199. The impact on the Market has been considered alongside the ambitions set out in the emerging City Plan 2040, for the re-location of the Museum to the market site and the consolidation of the City's markets to a site in Dagenham.
200. Although the loss of the existing market facilities in the Poultry Market causes the proposal to conflict with Local Plan 2015 policy CS5(10), the extent and significance of the breach is minor as the facilities which support the use of the East and West Markets can be relocated, and the number of actively used units which will be lost is limited. It is anticipated that dialogue will continue between the City of London Corporation, as the landlord and the traders as tenants regarding their future and any potential compensation.
201. The key social, environmental and economic public benefits of the proposal, upon which this conclusion is reached, are considered to be as follows (the weight to be given to these benefits in the overall planning balance is considered in the conclusions section of this report):
 - Securing a strategic development that would provide land uses which support the growth of the economy at City of London and Greater London level through the generation of employment (anticipated creation of 1707 additional jobs), increased spending in the locality boosting local businesses (£755 million GVA) and an increase in national and international tourism through the attraction of an average of 2 million visitors per year. This in turn would have a positive impact on the national economy.

- Allowing the Museum of London, an internationally renowned visitor attraction, to remain in the City of London and realise its full potential and commitment to an enhanced visitor offer through the provision of increased gallery space and exhibits which would allow more people to engage with and learn more about the seven million objects within the London Collection than ever before.
- Provision of enhanced learning space which would allow the Museum to fulfil its aspirations to engage with more schools and reach every school child within London.
- Provision of a world class Museum and visitor attraction that would deliver on the fundamental aims of the Cultural Mile and cultural aspirations for Smithfield. The scheme would revive this area of West Smithfield and give it a new identity and sense of place. It would act as a catalyst for the realisation of a cultural destination of international renown in this part of the City.
- Securing a new dedicated long-term occupier for the General Market and Poultry Market which would breathe new life into the buildings and carefully restore them providing them with a long-term sustainable use.
- Giving the wider public access to historically significant areas of the market buildings, enabling the potential to understand and appreciate the strong heritage of the buildings and the wider Smithfield area, and their importance to Londoners and the Nation.
- Provision of public access to the basement of the General Market which would allow appreciation of the relationship between the building and the live railway running beneath the site.
- Securing a development that is environmentally responsible in that it would seek to reduce carbon emissions and reduce waste through the re-use of as much of the existing material on site as possible through the adoption of circular economy principles.
- The Museum of London's commitment to ensure that the museum is a cultural institution that is socially inclusive and accessible to all facilitated by the design of the building and the museum's ongoing engagement with local communities and stakeholders through its Smithfield programme.
- Giving the Museum of London the ability to expand its programmes around the promotion of well-being with surrounding communities and stakeholders, including those with disabilities and Autism.

202. An additional benefit of this scheme is that it is considered to constitute 'Good Growth'. This is growth that is socially and economically inclusive and environmentally sustainable, a concept that underpins all policies in the Intend to Publish London Plan. The proposal would accord with the ambitions of objectives GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a

healthy city) and GG5 (Growing a good economy) of the London Plan 2021. This is on the basis that the scheme would be accessible, would re-use the existing buildings and adopt circular economy principles, promote and support London's rich heritage and cultural assets and seeks to foster inclusivity of local communities and wider London in its design and through the day to day work of the Museum of London.

203. The scheme also accords with strategic objectives (3, 4 and 5) of the Local Plan 2015 which seek to: promote a high quality of architecture and street scene appropriate to the City's position at the historic core of London, complementing and integrating the City's heritage assets and supporting the continued development of the City as a cultural destination for its own communities and visitors; ensure that the City of London remains at the forefront of action in response to climate change and ensure the provision of inclusive facilities and services that meet the high expectations of the City's business, resident, student and visitor communities.

Design and Heritage

204. The design and heritage sections of the report set out the relevant policy considerations and assess the implications of the 2022 design updates.

Urban Design: Overview

205. Local Plan Policies CS10, DM10.1, draft City Plan 2036 policies S8 and DE 2, London Plan 2021 Policies D1 and D3, and NPPF paras 126 and 130 seek high-quality new development of an appropriate height, scale, massing, bulk, grain, material and detail, having regard for the character and appearance of the area. The proposed scheme is considered to be an exemplar of a sensitive restoration of historic buildings whilst adding contemporary insertions to enable the buildings to evolve and thrive as an inclusive public cultural institution.
206. The design of the new Museum is driven by the conservation and enhancement of the Victorian General and Annexe Market buildings and the post-war, grade II listed Poultry Market. Throughout, the buildings would be sensitively repaired and renewed to best conservation practice. New interventions would respect the sensitivity of these heritage assets, employing high-quality materials to complement their existing architectural character and that of the wider Smithfield Conservation Area.
207. Significant amounts of localised demolition are required within the General Market and Poultry Market in order to meet the Museum's requirements. In mitigation, as much of the buildings' existing fabric as possible would be reused in the new Museum. Initial proposals involve reusing meat hooks as flexible lighting rigs, cast iron columns and beams for temporary exhibition galleries, the re-use of swan-neck stall luminaires and even re-using sound slates from the roof to be removed for repairs made elsewhere. Final details would be secured via condition. In this, the Museum would be an exemplary reconciliation of heritage conservation and environmental sustainability.
208. The most significant alterations to the exterior of the General Market are

the new shopfronts. Local Plan policies and the Culture Mile Strategies seek active street level building frontages which are well-designed, inviting for the public to use, capable if necessary of providing shelter and shade, are appropriately lit and configured for passive surveillance and, above all, contribute to a vibrant public realm.

209. The proposal's strategy is to celebrate the rich grain and diversity of the perimeter Outer Crust 'Houses' of the General Market as complementary to the Museum offer and culturally enriching by retaining and restoring the architectural framework of the original 'Houses'. Historic shopfronts would be retained and restored. Where shopfronts are lost or modern and not of merit, a contemporary addition is proposed including 'Museum windows': glass sheets with horizontal bands of prismatic interlayer offering glimpses of the museum and its exceptional interior including the fine tilework of the Cocoa Rooms. In other instances, where such views are not possible, Museum vitrines of backlit cast glass would allow for dynamic display and curation of cultural content. New awnings are proposed over the shopfronts on the General Market, referencing original features of the building.
210. Gantry structures mounting lettering would be installed to elevations on Farringdon Street, Charterhouse Street and West Smithfield, including above the main Museum entrances on West Poultry Avenue. In a contemporary twist on the existing architectural ornamentation, these would be a canvas for curated creative expression and would artistically signify the presence of the Museum. Further details of the lettering and a strategy for its curation would be set out in the required Cultural Plan.
211. West Poultry Avenue would be enclosed and reborn as a north/south route within the Museum complex and a central focal point with access to WCs and other public facilities. This new gathering place would be curated by the Museum as a reimaged London Street, with Thames aggregate and archaeological fragments from the Museum's collection cast into the floor surface. The street would remain open to the public at certain times as set out earlier in the report as a natural extension of the public realm of surrounding streets. Above, the brickwork panels of the existing Poultry Market canopy would be replaced by lightweight signage and displays for the new Museum. Where the previous (2019) scheme proposed steel portals at each entrance, the current (2022) scheme proposes cast concrete portals incorporating archaeological fragments as per the proposed floor surface. Details would be secured via condition.
212. Of the new architectural additions, the most prominent would be those proposed for the Annexe Market. Here, the proposed Iron Mountain canopy would complement and connect the Red House and the Fish Market, enclosing a new public space and revealing new views of their restored elevations. The canopy comprises a slender steel lattice frame and would read as a contemporary interpretation of the roof structures and canopies which characterise Smithfield Market.
213. New openings would be formed in the blind main elevation of the Red House, of an appropriately scaled, design and materials, and comprising

an appropriate response to the need for natural light required by the new uses within the building. An extension above the lower Smithfield Street elevation of Red House would be of an appropriate scale, restrained design, proportion and materials, relating harmoniously with the original building. In a change from the previous (2019) scheme, the proposed lift overrun atop the main elevation would slightly increase in size but remain subservient to the main elevation. Additional minor design refinements to the extension and the detailing of the Snow Hill bay are also proposed.

214. The Fish Market would be sensitively repaired and conserved and, in a change from the previous (2019) scheme, would incorporate a reduced number of proposed window openings, thereby preserving more of its historic fabric. The Engine House would be repaired and stabilised to maintain its patina of age and repurposed as an entrance to the exceptional brickwork caverns below. In a change from the previous (2019) scheme, it would incorporate a small lift overrun now required to facilitate access to these spaces.
215. The Poultry Market would be comprehensively remodelled internally, with a new Gallery structure providing new curatorial storage and temporary exhibition space. New administrative and curatorial facilities would be provided at basement and first floor levels, with public access secured to some of the behind-the-scenes curatorial activities. Throughout, the building's post-war architectural character would be respected and enhanced and the unique spectacle of its shell dome revealed and enhanced from newly created viewing-points.
216. The scheme overall is considered to be a very successful and sensitive weaving together of Victorian, Twentieth Century and contemporary architecture, informed throughout by this area's local distinctiveness; as an exemplary, high-profile instance of reuse and retrofit, the scheme would have at its heart the highest standards of sustainability. Across the complex, the proposed Museum would optimise permeability, pedestrian priority, microclimatic conditions, active frontages, green infrastructure, inclusivity, and high-quality, integrated, beautiful and holistic design. As such, the scheme is considered to be in accordance with all respective parts of Local Plan Policies CS10, DM10.1, draft City Plan 2036 policies S8 and DE 2, London Plan 2021 Policies D1 and D3 and NPPF paras 126 and 130.

Visitor Experience and new Public Realm

217. Local Plan policies CS19 and DM19.1, draft City Plan 2036 policies S8(3 and 5), OS1, S14 and D3 and London Plan 2021 Policies D3, D8 and G4, seek to increase the quality, quantity and accessibility of public open space, including new streets and routes in places, such as the Museum site, where there is a deficiency of open space and significant pressure on the streets. As an essentially public building, the scheme has very successfully maximized public access throughout in a permeable, inclusive, diverse and logical manner.
218. The scheme provides a permeable network of public routes and spaces through the buildings as an open and inclusive public building relevant

to all Londoners. Entrances to and circulation through the proposed Museum would reflect the existing permeability of the market complex to create a more open and dynamic arrival experience built around a clear hierarchy of principal, secondary and occasional tertiary entrances. Consequently, the experience of Museum visitors and other users would be vastly more multi-dimensional compared with other more traditionally configured attractions.

219. The proposal would result in a significant increase in public realm for London, centred around the former General Market Hall and Poultry Market – envisioned as a flexible civic space for curated events, gatherings and “*alternate interpretations of London’s past, present and future*”. This would allow, for the first time in thirty years, the potential for the wider public to appreciate the outstanding interiors. The scheme offers a dynamic journey through a rich diversity of exceptional and unique spaces from the impressive vaults, the civic grandeur of the General Market beneath the cupola and the civic scale of the space under the exceptional shell dome roof of the Poultry Market.
220. Importantly, the proposal would not prejudice and would celebrate the major enclosed east-west pedestrianised route through the sequence of market buildings between the Central London Markets and the General Markets, via the respective main avenue (‘Buyers Walk’) through the heart of the complex and running parallel and offering a complementary experience to the outdoor ‘Culture Spine’ identified in the Culture Mile ‘Look and Feel’ Strategy.
221. The surrounding streets and pavements would be enhanced (via S278 agreement) to facilitate visitor movement and a small wedge-shaped space between the Red House and the Engine House, which would become covered public realm space.
222. The proposal would deliver and maximise a significant offer of new, welcoming, convenient, inclusive and attractive open and covered spaces for all, including at the upper levels of the Poultry Market, opening up new aspects and appreciations of the City and London’s heritage to a more diverse audience than ever before. The scheme would have pedestrian priority and permeability at its heart. This is in accordance with all relevant parts of Local Plan policies CS19 and DM 19.1, draft City Plan 2036 Policies S8(3 and 5), OS1, S14 and D3 and London Plan 2021 Policies D3, D8 and G4.

Lighting

223. Local Plan Policy DM10.1, draft City Plan 2036 policies HL3, S8(11) and DE9 and Intend to Publish London Plan Policy D8 seek lighting sensitively incorporated into new development and holistic enhancements overall to the pedestrian experience.
224. A Museum Lighting Strategy is included in the Design and Access Statement, demonstrating how lighting is integral to the concept and translated into the architectural approach. The lighting scheme would deliver a sense of nocturnal arrival to a series of well-illuminated buildings. Street lighting would harmonise and be incidental to this

approach, of an appropriate siting, form, scale, uniformity and colour temperature.

- 225. Gantry structures attached to the buildings at a higher level would allow for the evolving display of artistic expression which can reflect a theme or narrative, creating moments after dark to draw attention and spark debate. Similarly, contemporary expressions in the new shopfronts seek to experiment with illumination while allowing the inside light to spill out and engage with the street – creating ‘portals’ for moments of interaction with the Museum interior and diverse range of artistic expressions from the ‘Houses’.
- 226. There is an intention to include street lighting at a higher level with spotlights to focus light where it is needed from an ambient, functional perspective, and being subservient to the architectural lighting but at a height to illuminate street-based cultural programming. This would facilitate the ambition of 360-degree curation and the overarching aims of the Culture Mile Look and Feel Strategy.
- 227. The architecture would be celebrated by a sensitive architectural lighting scheme, bespoke to each building but still creating an overall coherence. Final details of the comprehensive lighting strategy would be secured by condition and would be tied in to the Cultural Plan.
- 228. The proposal would deliver lighting which is integral to the design process, mitigates unwanted light spill and which reinforces and builds on the character of the site in accordance with the spatial lighting aspirations of the Lighting Strategy, in accordance with Local Plan policy DM 10.1, draft City Plan 2036 policies S8(11) and DE9 and London Plan 2021 policy D8.

Heritage

- 229. Local Plan policies CS12, DM12.1, DM12.2, DM12.3, draft City Plan 2036 policies S11 and HE 1 and London Plan 2021 Policy HC1, seek to conserve the significance of heritage assets, identify opportunities for their enhancement, improve access to and interpretation of them whilst encouraging beneficial use consistent with their conservation and enhancement.
- 230. This section of the report sets out the significance of the relevant heritage assets and assesses the impact of the proposal on that significance, before reaching a conclusion in respect of the impact of the scheme in heritage terms.

Smithfield Conservation Area

- 231. The Smithfield Conservation Area SPD (adopted 2012) summarises the character and appearance of the area as deriving from its two-millennia established history, reflected in the incremental evolution of its built forms and street pattern and the juxtapositions of its townscape, the presence of ancient, still-functioning institutions including the markets, its rich associations with notable figures and organisations and the high quality of its architecture, cultural significance, heritage assets, archaeology and open space.

232. In common with the Inspector and Secretary of State (SOS) in the 2014 decision letter and Inspector's Report relating to the previous called-in application, the Poultry, General and Fish Market, and associated Red House and Engine House, are all considered to contribute strongly to the Conservation Area, both individually as non-designated heritage assets, and collectively as part of a shared setting. That shared setting, of a contiguous architectural sequence of related markets, is the largest and one of the finest wholesale market complexes not only in Britain, but Europe, with related semi-industrial uses clustering around it. Despite representing a millennia of market use on the site the built fabric is largely the product of the Victorian age, a potent symbol of its civic ambition, architectural, engineering and urban planning prowess, and the transformation of London into the capital of the first industrialised nation on earth. Their coherent age and architecture are unique, and this is recognised as a fundamental part of Area 3, 'the Smithfield Market Complex', identified in the SPD as a distinct character area in the Conservation Area. The post-war Poultry Market has a complimentary presence within the Victorian complex as a later age's expression of those same civic ambitions and prowess in architecture, engineering and urban planning.
233. The previous Inspector/SOS considered that the relatively small-scale buildings, eclectic mix of uses and iconic Victorian market buildings give a strong sense of place with a distinctive character and identity at the heart of the significance of the Conservation Area (IR para 400), and contribute significantly to the cultural identity of London. The group of market buildings and the associated activities were deemed the single defining characteristic (IR para 405) – and it was the internal market halls which, although not visible, which generate the activity key to the area's lively character, all completed by Sir Horace Jones, with the exception of the Poultry Market which, although architecturally distinct, was deemed not to undermine the unity of the group
234. The proposal is to retain, sensitively restore and re-purpose West Poultry Avenue, the Poultry, General and Fish Markets, and associated Red House and Engine House, as a unified group, enhancing their intrinsic architectural and civic qualities. Sensitive new interventions such as the proposed Iron Mountain canopy and extension to the Red House would build on those relevant essential qualities identified in the SPD: of an area which evolved incrementally, a rich townscape with great integrity, diversity, contrasts, public open spaces and recognisable uses and activities. This would conserve the buildings' contributions to that identified character, appearance and significance of the Conservation Area.
235. The character and significance of the Conservation Area derives not only from its built forms but also from their associated land uses and activities. This deeper sense of place can be multi-layered, sometimes contested and often misunderstood, recognised in section 7 of the SPD. Since the markets were constructed, they have been transformed in response to changing socio-economic conditions: from trading live meat to dead, from railway transportation to that by road. The proposed Museum use

is the latest in a series of transformations; importantly, it would maintain their public function as places of cultural exchange and consumption.

236. Local Plan Policy DM 12.3(2) provides that consent for the alteration or change of use of a listed building will only be granted where it would not detract from its special interest, character and significance or its setting.
237. Historically, Smithfield has been the focus of public gathering and events and cultural significance and the area continues to be characterised by a mixture of eclectic, ever-changing uses and activities, of which the market uses are but one distinctive element. Within this dynamic context the proposed use of and the associated alterations to the market buildings would be highly active and characterful and so align with the historical character of the wider area. As such, the proposed changes of use are considered to harmonise with and preserve the character, appearance and significance of the conservation area.
238. Transforming the former markets into a world-leading Museum for the 21st century inevitably requires material change. This has been handled with skill and care but does involve some interventions that would result in some harm from the loss and alteration of fabric. Furthermore, the proposal is not just to provide a Museum and other space, but to do so to exemplary environmental, social and cultural standards. Where harmful intervention is proposed, it is supported by clear and convincing justification.
239. The proposed alterations to the Poultry Market would have a minor impact on the conservation area as a whole. The transformation of West Poultry Avenue would announce the Museum in a suitably understated way without overpowering the market buildings or their wider setting. The street's permanent enclosure would dilute sightlines through it, but this would be balanced by the new views of the concrete canopy structure and upper elevation of the General Market obtained through the removal of the brickwork panels to the canopies. Alterations to the prominent loading bay entrances and the East Poultry Avenue elevation would follow the building's existing architectural and material language and would not affect the building's standing in the conservation area. The curatorial lift overrun on the north elevation would not be visible from street level and would be in the tradition of ad-hoc plant structures previously found among the monitor roofs.
240. Taken as a whole, the Poultry Market proposals would preserve the overarching qualities of identified views 1, 3 and 27 in the Smithfield Conservation Area SPD and of the relationship between all the Smithfield Market buildings when seen from Charterhouse Street and West Smithfield. The Poultry Market proposals would preserve the character, appearance and significance of the conservation area.
241. In common with the previous Inspector, it is considered that the General Market is integral to the market complex and makes a strong contribution to the Smithfield Conservation Area (para 11 of the decision letter). Externally, the original architecture of Horace Jones's French Renaissance 'houses' would remain the dominant, clearly legible

feature, acting as a 'coral reef' of conserved original shopfronts and reworked modern shopfronts encircling the main activities of the Museum. These, and the proposed signage lettering and awnings, would add architectural points of interest at once subservient to and yet in the spirit of the original commercial function of the building and would be a sympathetic reimagining of its original intended civic presence within the conservation area. Although of limited visibility within the wider area, the works to the roofs of the General Market, including the introduction of lift overruns and the removal of the section of 'inner crust' original roof structure, would cause a slight level of less than substantial harm to the character and appearance of the conservation area through fractional attrition of the great sequence of Victorian roof structures.

242. Otherwise, the proposals would preserve the overarching qualities of identified Views 2 and 27 in the Conservation Area SPD, of the relationship between the General, Poultry, West and East Markets when seen in tandem from Charterhouse Street and would not affect the wider character, appearance and significance of the conservation area.
243. In common with the previous Inspector, it is considered that the Fish Market makes a strong contribution to the conservation area (para 11 of the decision letter). proposed alterations to the Fish Market would result in a slight enhancement to the character and appearance of the conservation area, through the reinstatement of missing architectural details and sympathetic new interventions in the spirit of, and subservient to, the principles of the original design.
244. There is agreement with the previous Inspector/SOS that the Red House is integral to the Smithfield Market complex and is a non-designated heritage asset making a strong contribution to the Smithfield Conservation Area (para 11 of the 2014 decision letter). The previous appeal Inspector considered, and SOS agreed, that the principle of the redevelopment of the Red House and Iron Mountain together could make a positive contribution to the Conservation Area.
245. While the proposals would restore, extend and reimagine the Red House through a programme of sympathetic new interventions, some of these would undermine the building's contribution to the conservation area, namely the alterations to open up the 'blind' principal east elevation to West Smithfield prominent in identified View 1. The 'blind' architectural treatment is important to the monumentality and architectural integrity of the Red House, intrinsically related to the former function as a cold store, and a departure from this would change the way the building is perceived and understood in relation to the wider market complex. There would therefore be a commensurate undermining of the contribution of the Red House to the Smithfield Conservation Area, albeit when considered against the character, appearance and significance of the conservation area as a whole, this harm would be a low level of less than substantial.
246. The redevelopment of the Iron Mountain site and the extension of the southern range of the Red House are not considered to adversely affect the character, appearance and significance of the conservation area and would preserve identified Views 1, 2 and 3.

247. The proposals for the Engine House would result in little external change to the building, aside from the introduction of a square new lift overrun on the roof, which in identified View 1 would be very much architecturally subservient to the building and partly screened by planting. Overall, the sympathetic restoration and reuse of the Engine House would result in a low level of enhancement to the character and appearance of the conservation area.
248. Overall, taking the individual instances of harm and enhancement together, and considering them against the character, appearance and significance of the conservation area as a whole, it is considered that the proposals would, overall, amount to a slight level of less than substantial harm to the character, appearance and significance of the Smithfield Conservation Area.

Poultry Market: The impact on the Special Architectural and Historic Interest and Heritage Significance of a Designated Heritage Asset

Significance and Contribution of Setting to that Significance

249. The Poultry Market was built between 1961-63 to designs by architect T.P. Bennett and structural engineers Ove Arup and Partners.
250. It replaced an earlier Horace Jones Poultry Market, built in 1875 and destroyed by fire in 1958, designed in a similarly Franco-Italian style as the surviving Central and General Markets. Bennett's new Poultry Market adopted a twentieth-century architectural idiom that has been described as 'pop' architecture. The only realised part of an ambitious 1960s masterplan to rebuild the entire Smithfield complex, the Poultry Market strikingly juxtaposes its modern architecture to the Victorian market buildings while conforming to their scale and basic layout.
251. Undoubtedly the focal point of the building is the concrete shell dome spanning the entire structure, structurally novel for its time and, when built, the largest of its kind in the world. Its extreme shallowness uniquely minimises the presence of the dome in external views, making internal views of it all the more spectacular. Internally, the building follows similar principles to its neighbours. Traders' premises are self-contained and arranged across basement (storage), ground (retail unit) and first floor level (office), connected by a spiral stair and lift compartment.
252. At basement and basement mezzanine levels are located the general cold storage and traders' storage areas and plant rooms, with the former Cock Tavern public house (now a cocktail bar) located to the east end of the basement mezzanine. The ground floor level slopes downwards from east to west, echoing the topographical fall from Smithfield towards the Fleet valley. Linking the building with the Central Market to the east and the General Market to the west, Buyers' Walk forms a central east-west axis through the Poultry Market, with secondary north-south walks intersecting it at each end of the building. Grouped around these routes, the existing traders' units are lightweight steel structures with regular fascia signs and swan-neck lamps reminiscent of the earlier markets.
253. The first-floor level is accessed by a decorative staircase from the east

entrance. Here, office entrances are set in plain walls grouped around a perimeter walkway. At the east is situated a control tower over Buyers Walk below. At the west corners, stairs provide access to the roof. The traders' offices are subdivided to various extents and all incorporate spiral stairs to communicate with their facilities below. Views of the dome from the perimeter walkway are unimpeded.

254. The main heritage values comprising the heritage significance of the Poultry Market are:

Architectural/Artistic: a well-designed, purpose-built post-war market building, which despite minor alteration survives to a high degree of architectural integrity and authenticity. The building's vibrant 'pop-architecture' stylings and daring structural engineering reflect the prevailing aesthetic vogue, underpinned by new technologies then being pioneered. This trait is expressed most strongly by the dome and the use of translucent glazing below so that it appears rest improbably on four small corners.

Historic: there is associative value in the connection with Ove Arup and Jack Zunz, foremost engineers of their day who were responsible for the structural engineering of many notable buildings such as Sydney Opera House. Further associative value is found in the connection with T.P. Bennett, a prolific and well-respected architect of the period. There is illustrative value in the innovative and complex engineering of the building's dome which clearly reads as a successor to the engineering prowess of the Horace Jones markets. And there is further illustrative value in the building's strikingly different appearance from, yet complementary relationship and linkages with, the Victorian Market buildings to the east and west, which indicate its status as the only realised part of a 1960s masterplan to rebuild the Smithfield complex. This is strikingly evident in the design of the canopies over East and West Poultry Avenues, which provide visual evidence of the ambition of the masterplan, even if they now appear somewhat heavy-handed in design, colliding with the neighbouring Victorian buildings.

Archaeological: there is strong evidential value in engineering of the shell dome and the composition of the clerestory glazing, featuring a now-rare form of laminated sheet glass incorporating an interlayer of three layers of fibreglass sheet.

255. In support of the significance described above, the building's special architectural and historic interest chiefly resides in the soaring concrete dome structure, the external architecture and the building's lateral and vertical configuration. Of the latter, the ground floor plan contributes highly to significance for its clarity and continuity of Buyers' Walk. The basement and first floor office interiors are noted in the list entry as not being of special interest. However, their plan forms are of special interest for illustrating the functionality of the floor plan, with facilities for the individual traders arranged over three distinct floor levels. The ground floor traders' units are not intrinsically significant, but their forms and arrangement processes significance as obvious indicators of the market use.

256. The building's setting contributes strongly to its overall significance and specifically its architectural/artistic and historical values. In the report which informed the 2014 Secretary of State decision, the Inspector noted that, while the Poultry Market's principal features are the shell dome and 1960s 'pop-art' elevations, its significance also lies in the carefully considered relationship in form, height and scale to the streets on each side and to the other market buildings [para 407]. The Poultry Market has strong group value as part of, yet architecturally distinct from, a civic parade of Victorian market buildings which all display that period's characteristic architectural eclecticism and engineering vigour. This setting emphasises the Poultry Market's continuity of the planning and engineering precedents laid down by its predecessors while its architectural distinctiveness reflects the character of its own age. In this vein, the overall group value of the Smithfield Market complex contributes strongly to the significance of the Poultry Market. Further strong contributions come from the traditional, low-rise scale and materiality of surrounding buildings in the Conservation Area and beyond, which emphasise the civic pre-eminence of the Poultry Market and its neighbours.

Impact Assessment

257. The Poultry Market would become the Museum's principal temporary exhibition space and administrative, curatorial and learning centre. The proposed alterations to achieve this largely affect the interior of the listed building, with some minor changes proposed to the exterior. Since the previous (2019) scheme a number of very minor changes to the proposals have been introduced, such as the introduction of new door openings or changes to internal partitioning. The majority of these are considered minor with a neutral impact upon the listed building. The more noteworthy changes are highlighted in the following paragraphs.
258. Overall, the external envelope of the building, including its highly significant concrete dome structure and 'pop-art' architecture, would be preserved. The building's principal external elevations to the north and south would be repaired where necessary but otherwise would remain unchanged. At roof level, discreet plant enclosures and new ductwork would be introduced to the east and west elevations and existing access structures would be removed and replaced with access hatches. To the north elevation, a new curatorial lift overrun would rise above the central monitor roof and would be clad in matching materials. These alterations would not be visible from street level. Replacement of the copper roof covering, and associated repair works are being progressed under a separate consent.
259. The east and west elevations would be modified in a complementary style. Existing historic fabric such as signage and roller shutters would be retained. Existing entrances would be retained and adapted with minimal alteration, while new entrances would be created to match those existing. The east elevation to East Poultry Avenue would act as a focal point for servicing and coach drop-offs. The existing Buyers Walk entrance here would be refurbished as the Museum's secondary

entrance, and there would be refurbishment or replacement of the existing doors and shutters. Under the previous (2019) scheme, more changes were proposed to this elevation, including the formation of new openings; these have been found to be unnecessary and have been removed from the present scheme, resulting in retention of more historic fabric.

260. The building's west elevation would become an internal elevation by the permanent enclosure of West Poultry Avenue. Currently symmetrical in composition, the southernmost trader's entrance would be widened to create a secondary entrance to the Learning Centre. The existing west entrance to Buyers' Walk would be widened and new signage installed above. The existing traders' entrances on either side would be fixed open and glazed to allow sightlines into the interior.
261. Above West Poultry Avenue, the existing brickwork panels to the canopies would be removed and replaced with a lightweight steel mesh incorporating LED fittings to serve as the Museum's principal signage. This would result in a slight level of less than substantial harm resulting from the loss of original fabric and the erosion of the original design intent for an entire sequence of post-war market buildings replacing the Victorian ones. The harm would be balanced and outweighed by the heritage benefit of revealing views of the west canopy's angular concrete structure and removing the uneasy junction between the panels and the General Market. Below the new signage, the street would be permanently enclosed by glazed walls with concrete portals to the north and south (instead of steel portals as proposed under the previous (2019) scheme). Within, a new polished concrete floor covering – and the concrete entrance portals – would be embedded with artefacts from the Museum's collections.
262. All the existing windows in the building, including the clerestory glazing to the dome, would be replaced in order to meet the requirements of the Museum's passive energy strategy. Options explored by the applicant have demonstrated how retaining the existing glazing would either require unacceptably intrusive works or would conflict with the Museum's passive energy strategy and wider environmental aspirations. The design of the replacement windows would replicate the existing arrangements but incorporating upgraded glass and opening/closing mechanisms. The complete removal of the clerestory glazing would cause a low level of less than substantial harm, mitigated (but not outweighed) by the like-for-like nature of the replacement glazing bar arrangement and the 'fritting' of sections of the replacement glass to achieve a comparable translucency to the original glass, thereby maintaining the overall architectural effect.
263. Similarly, to meet the acoustic requirements of the proposed Museum use, the inner face of the dome would be coated in an acoustic render, obscuring the original concrete shuttering boardmarks that remain visible and illustrate its method of construction. The slight level of less than substantial harm that this would cause would be mitigated (but not outweighed) by replicating the lines of the boardmarks in the new render.

264. Internally, the building would be comprehensively remodelled to provide exhibition spaces, offices, curatorial facilities, storage areas, learning facilities and plant rooms. The key intervention is the insertion of a new Temporary Gallery structure, rising from basement to first floor level, into the centre of the building. Its proportions have been dictated by the requirement to provide flexible, programmable spaces to international exhibition standards. Inspired by the simple, flexible ethos of the traders' units, this would be a simple steel structure and the associated wall, floor and ceiling finishes would harmonise with the building's existing functional, post-war character.
265. Currently used for traders' and general cold storage and plant, much of the layout and plan of the basement would be removed to accommodate the lower levels of the new Temporary Gallery structure, which would loosely approximate to the original basement plan and the columns of which would align with the original structural grid of the building. The spaces created would be used for a combination of curatorial activities, collection storage and plant. Spaces at basement mezzanine level would be similarly repurposed and this floor level would be partially removed in order to achieve a horizontal ground floor level. The former Cock Tavern, currently used as a cocktail bar, would be converted to storage space and, in a change from the previous (2019) scheme, the staircase to it from the East Poultry Avenue entrance would be removed; the building's list entry ascribes no special interest to the former Cock Tavern interior.
266. To accommodate the insertion of the proposed Temporary Gallery, the existing ground floor would be demolished up to the line of the Traders units' spiral stair and lift enclosures, which would be retained as voids for servicing. The descending east-west gradient would be replaced with a horizontal ground floor level aligned to the lower west end of the building. The form of Buyers' Walk would not be physically defined within the new ground floor level, which would instead be flexible exhibition space, but its east-west axis through the building would be preserved.
267. At the western end, a new arrivals area and associated facilities would be created around the Museum's main entrance, connected by a bridge to the ground floor of the Temporary Gallery. The secondary north-south route would be removed. New staircases and lifts would provide access from basement to first floor level and views of all floor levels would be possible through voids between the new Temporary Gallery and the original building. To the east end of this floor level, the secondary north-south route would remain as part of a retained ensemble of Traders' units adjacent to the Museum's secondary entrance. From here, steps would lead down to the ground floor. There would be a further change to the building's ground floor plan in the adaptation and subdivision of the loading bays to the north and south. The northern bay would be reconfigured to act as the Museum's principal loading bay, with a large section of floor slab removed to accommodate goods lifts. The southern bay would be repurposed as a 'learning bay', with a Learning Centre for school groups and a Lecture Theatre for Museum visitors and the general public.

268. The ground floor plan form is of architectural and historic significance, not only intrinsically for its clarity and continuation of its predecessors' principles but also for its maintenance of the east-west axis of Buyers' Walk, the historic, commercial spine that runs through the interiors of the Smithfield Market complex. While the basement and first floor office interiors are not of special interest (as noted in the list entry), their plan forms contribute to significance as being a part of the building's carefully conceived vertical and lateral functionality. Cumulatively, the loss of the original lateral and vertical plan form and hence the original functionality of the Poultry Market would cause a low level of less than substantial harm to the significance. This harm would be mitigated (but not outweighed) by the new interpretation of Buyers' Walk through the ground floor plan. There would also be changes to the viewing points of the dome roof from ground floor level, but this would be balanced by the overall visibility of a similar quantum of dome roof from ground floor (north to south as opposed to the existing east to west view) and by the creation of new publicly accessible viewing points at first floor level.
269. Although the fabric of the traders' units is not of inherent historic interest, their forms are the most obvious evidence of the building's original purpose as a market and their near-wholesale loss would cause a slight level of less than substantial harm to the significance of the listed building. This harm would be mitigated (but not outweighed) by preserving vestiges of the traders' units towards the east end of the ground floor.
270. The new Temporary Gallery structure would rise to the level of the existing perimeter walkway at first floor level, leaving voids either side to permit views down into the ground and basement floor levels. Approximately twenty-five percent of the original balustrade to the perimeter walkway would be removed to integrate it with the new gallery floorspace, which would be used for exhibitions and events and would incorporate a café and bar area to its eastern extremity. Accordingly, the new floorspace would be a simple, open-plan area but for the lift and café structures and glazed balustrades to the east and west end. At the west end, staircases and lifts would lead down to the ground floor level. At the east end, the existing control tower and decorative staircase would be retained.
271. The Museum's office areas and research and curatorial facilities would be located at first floor level. The cellular forms of the existing offices would largely be retained, with some minor alteration, but the staircases communicating between the traders' units below would be removed. Small areas of floor slab would be removed to accommodate new lifts and stairs. Glazed screens would be inserted into the perimeter walls facing the walkway to allow views and greater natural light into the curatorial spaces, augmented with information displays. To the west end, the first-floor balustrade would be widened to create meeting space for staff. Security barriers would be installed to prevent the public from accessing this area; otherwise, the first-floor level would be publicly accessible.

272. Aside from the clerestory windows, the replacement of other windows in the building would be on a like-for-like basis. Loss of these windows and other original elements of fabric such as the sections of first floor balustrade would cause a slight level of less than substantial harm to the building. In mitigation, the applicants are committed to retaining and reusing as much historic fabric and features as possible throughout the scheme, including the original clerestory glazing. This will be secured via condition.
273. As part of the wider scheme there would be development within the immediate setting of the Poultry Market, comprising (i) the alterations to the east elevation of the General Market, (ii) the restoration and conversion of the Engine House and (iii) the alterations and extension to the Red House and the erection of the metalwork canopy upon the Iron Mountain site. The proposals for the east elevation of the General Market and the Engine House would amount only to very minor, benign change in the setting of the listed building. The proposals for the Red House, comprising the opening of the 'blind' façade and the erection of the new extension to the lower south range, would result in a greater degree of change; however, in scale and proportion these would not substantively alter the existing townscape setting of the building to the south and would preserve views along Smithfield Street of the Poultry Market's south elevation and copper-clad dome above. The demolition of Iron Mountain and the erection of the metalwork canopy structure would likewise amount to benign change within the setting of the listed building. Overall, the setting and therefore significance of the listed building would be preserved.

Conclusion

274. Overall, the proposal would result in a medium level of less than substantial harm to the significance of the Poultry Market as a designated heritage asset through the comprehensive remodelling of the interior, involving losses of fabric and of plan form, and the loss of the clerestory glazing. Otherwise, it is considered that those elements contributing to the overarching architectural/artistic, historic and archaeological value, would be conserved.

General Market: Impact on the Significance of a Non-Designated Heritage Asset

Significance and the Contribution of Setting to that Significance

275. The General Market, built 1879-83, replaced the Old Farringdon Fruit and Vegetable Market, completing the sequence of Victorian market buildings by Sir Horace Jones. Comprising a whole urban block, its dignified architecture conceals an ingenious response to complex site conditions in a manner characteristic of Jones and the Smithfield complex.
276. The outer perimeter with elevations to West Smithfield, West Poultry Avenue, Charterhouse Street and Farringdon Road, (the 'Outer Crust') consists of terraces of three-storey 'houses', parades of individual tall shop/stall pitches with ancillary spaces above. Of high-quality Fareham

red brick and Portland Stone, the General Market maintains the materiality of Jones' earlier markets while being more elaborate and Francophile in style. Structurally, the building is of load-bearing brick and iron, with a solid rear masonry spine wall separating the houses from the market hall, responding to the contours of the Fleet Valley. This allows for an organic Outer Crust of harmonious architectural expression and a consistent human scale. The interior of the Houses reveals some original features of interest such as iron or conventional timber stairs, iron beams and their brick shells. Of particular interest is that these housed a variety of market associated uses, whilst the interior of the former 'Lockhart Coca Rooms', a temperance movement inspired café serving market traders, reveals a surviving interior of original stair and Art Nouveau tiles.

277. The relatively domestic scale of the 'Outer Crust' conceals great innovation behind, an open hall was built over the railway, at the same level as the neighbouring Poultry Market. The market hall canopy is carried on a rational structural grid of sixteen so-called 'Phoenix Columns', an American structural innovation allowing greater load bearing capacity at height, supporting iron lattice cross-beams and laminated timber roof trusses. The roof trusses were like mansards of glass, designed to flood the trading floor with light, surmounted by louvred lanterns for weatherproofed ventilation. The centre of the market hall comprised an open and adaptable floorplate for wholesale trading crowned by an octagonal cupola. By 1889, the hall was re-planned to remove vehicular traffic and the four central pavilions were added.
278. The basement beneath was an engineering feat comprising a series of wrought iron stanchions, girders and beams with brick jack vaults, holding the immense weight of the market above while opening up a space free of brick piers, allowing for the railway and sidings. Back above ground the linking iron and timber canopy connecting the southern vehicular entrance to the Annex Market was erected circa 1900 of iron with timber pelmet and is an intriguing feature. The Victoria cupola and original Harts Corner were lost during WWII, and replacement with more modest structure in the 1950s – the modern Portland Stone Harts Corner tower and a ribbed concrete dome.
279. The heritage values comprising the heritage significance of the General Market are :

Architectural/Artistic: a well-designed purpose-built Victorian market which, despite alteration, survives to a high degree of architectural integrity and authenticity. Architecturally and functionally, Outer Crust and Market Hall, come together as an exemplary piece of Victorian design. These values are particularly evident in the superstructure, external elevations and roof.

Historic: there is a strong associative value in the connection with Sir Horace Jones and in the association with the markets at Smithfield. There is also some illustrative value in the innovative and complex engineering. The form and expression illustrate an excellent example of 19th century civicism on a grand scale.

Archaeological: strong evidential value is embodied in the superstructure, particularly in the use of wrought iron and the Phoenix Columns.

280. In common with the previous Inspector it is considered that the plan form, with active street frontage (unlike the other, previous markets), well-considered post-war additions, rich ornamental facades, intactness and attractiveness of the original roof form and, overall, the unique relationship of market hall and perimeter shops, goes to the heart of that significance (see paras 409-10). It is also common ground that the General Market is integral to the Smithfield market complex and is a significant non-designated heritage asset.
281. That architectural/artistic and historic value draws a large part of significance from the contribution of its setting. This derives from a strong group value, as part of a fine sequence of ingeniously planned and engineered Victorian markets. This shared setting relationship, alongside such monuments as Farringdon Road, the Fleet Valley, Holborn Viaduct, the Rotunda and other surrounding buildings associated with the market use, form a wider coherent symbol of Victorian intervention, civic pride and engineering on an ambitious scale, accentuating those illustrative and associative historic values. In addition, the fine-grain mix of uses, market functions and traditions offer a less tangible element of setting which contributes to that historic value of the long-running use on the site, albeit these have started to naturally fade.

Impact Assessment

282. The proposal would retain the General Market whilst preserving the integrity and spirit of its superstructure and functionality. The market hall would be sensitively restored and reopened to the public. Cultural programming would reintroduce dynamic activity fanning out from the central dome, intermingling in a mix reminiscent of the original market activity. Standout features such as the dome, roof and Phoenix Columns would be preserved, opened up and celebrated.
283. The proposal would work with fine grain of the original market, reusing all the original pedestrian and vehicular entrances. The main entrance would be that from West Poultry Avenue, offering a westerly climax to the historic east-west 'Buyers Walk' which unifies the entire parade of market buildings.
284. The relationship between the Market Hall and Outer Crust Houses would be meaningfully preserved. The 'Houses', once an eclectic terrace of small-scale shops (tobacconists, newsagents and most distinctively the surviving Lockhart Cocoa Rooms) feeding the distinct character of the market, would continue to perform this role. The applicant likens the concept as "a coral reef" of activities interdependent on each other and in the spirit of the original market use and its associated shops. The interior shells of the Houses shop pitches would on the whole be conserved, including the rare and interesting interior of the Cocoa Rooms.

285. The Houses would be repaired and restored. Their main external architectural features would be act as frames for restored historic shopfronts (where these survive), Museum windows (sightlines into the market hall or exhibitive vitrines) or contemporary shopfronts. For the latter, new elements such as prismatic glass fronts would be sensitively designed and would conserve the significance of the whole ensemble. Awnings would be reinstated in a contemporary style. New screens, glazed and veiled in slatted timber reflecting historic intervention in the facades, would offer views into the Museum and would enhance an appreciation between the market hall and the Houses. New windows would be sympathetic in composition and character. Since the previous (2019) scheme there have been a number of very minor changes to the shopfront details that would not result in a departure from these principles. All shopfront details would be secured via condition.
286. Architectural lighting and artistic lettering and associated structure are proposed for all elevations. The submitted Lighting Strategy proposes lighting which would enhance an appreciation for the architecture after dark, utilising existing architectural features and relief to accommodate fittings in a discreet manner, whilst being sensitive to the architectural integrity of the building.
287. Innovatively, displays of lettering, which will be curated as part of the cultural offer, would be mounted on the architecture and would take the form of lettering 'pinned' to a mounting structure, some fixed in place, some removable, of which there is a strong historical precedent in London. The mounting structure would be discreet and appropriately fixed back with the historic fabric in mind, whilst being respectfully sited on the architecture, following cornice lines or, in the case of the West Smithfield turret, echoing lost architectural detail. The lettering would be reversible, transient and in distinct contrast to the host architecture and in the spirit of commercial eclectic informality which characterized the elevations of the market. These elements would preserve the character, appearance and significance of the General Market ensemble especially when appreciated in the evening alongside a coherent architectural façade lighting scheme.
288. It is proposed to demolish a collection of modern, single-storey structures in a small wedge shaped lightwell between the Outer and Inner Crust roof on the western (Farringdon Road) side. To accommodate a restaurant off the market hall, it is proposed to install a double-height lightweight glazed roof abutting restored historic stock brick elevations incorporating a green roof. This would preserve, restore and complement the fabric enclosing it, would not be visible from the public realm (with limited visibility in high level private views), and the detail of a sensitive interface is reserved for condition.
289. Proposals for Building Regulation compliant vertical circulation in the 'Houses' would result in some small incursions in the historic roofscape to accommodate servicing. However, these breaches are minor, isolated and are on rear or secondary elevations which would largely not be visible or prominent from street level, preserving the overarching integrity

of the ornamental roofscape.

290. The most substantial change at roof level is the removal of part of the roof to accommodate a large green roof with photovoltaic panels alongside other plant equipment. Although the original roof structures to be removed are in a poor state of repair and would otherwise require rebuilding, their loss, as part of an intact roofscape, would cause a degree of harm given the integrity of the roofscape of the building. Extensive townscape testing has demonstrated that these roofs are not visible from the surrounding streets. The need to accommodate building services and wider sustainable infrastructure here, rather than in more sensitive locations is considered to provide clear and convincing justification for their removal.
291. The proposed photovoltaic panels and other M&E would not be visible from the public realm, preserving a visual appreciation of the overall integrity of the roofscape. Other necessary, sensitive, upgrading of the retained original roofs and post-war dome is proposed to meet sustainability requirements and would preserve the historic appearance of the lanterns and historic fenestration, which would be imperceptible in wider views and would otherwise secure these important original roofs.
292. The opening of the post-war canopy would better reveal the restored West Poultry Avenue elevation of the General Market. The removal of the modern Iron Mountain structures and their replacement with the proposed lightweight canopy structure would offer a complementary neighbour to the General Market, preserving the relationship between it and the Red House and Fish Market as a coherent group and accentuating its significance. The alterations to the West Poultry Avenue canopy and opening of the Iron Mountain and better revealing of the relationship with the Red House and Fish Market would result in a slight enhancement to the setting of the building and therefore its significance as a non-designated heritage asset.

Conclusion

293. The proposal would, overall, result in a low level of less than substantial harm to the significance of the General Market as a non-designated heritage asset as a result of the loss of a significant amount of original roof, albeit roof of lesser significance overall. Otherwise, those elements contributing to the overarching architectural/artistic and historic value would be preserved. . .

Fish Market: Impact on the Significance of a Non-Designated Heritage Asset

Significance and the Contribution of Setting to that Significance

294. Designed by Horace Jones and completed in 1888, the Fish Market is the last of Horace Jones' market buildings at Smithfield and shares their traditional materiality and Renaissance stylings. Here, as with his other buildings, Jones ingeniously reconciled the spatial and use constraints, the difficult topography, the need for light (but not unwanted direct light), ventilation, circulation and security. Contrasting with the General Market, the architecture here is largely blind, though skilfully modelled and

ornamented in the style exhibited elsewhere.

295. The interior avenues are of simpler construction to the General Market, but fine and complementary Italianate in style, with open stalls above raised offices. The roof, whilst less complex than the General Market, is of interest. In this case the 'outer crust' roofs are simple pitches and partly walled, while the inner crust above the avenues are the same as those employed at the General Market, which Jones described as "an adaptation of the mansard principle". These comprised laminated timber trusses which were glazed with a hipped lantern top with louvers – flooding the buyers' avenues with light, while mitigating the effects of unwanted direct light on perishable goods and delivering efficient passive ventilation.

296. The heritage values comprising the heritage significance of the Fish Market are deemed:

Architectural/Artistic: a characteristic example of the work of Horace Jones at Smithfield, combining efficient engineering with a strong sense of architectural integrity, responding to an awkward site with a design which is elegant, well composed and one of his most Baroque. This significance is best represented in the principal West Smithfield and Snow Hill elevations, the plan form and interior avenues and to a lesser extent the roof.

Historic: a good example of Horace Jones's work and of a late Victorian market building and the final piece of a fine market complex and the undertaking of half a century of civic undertaking. This is best represented in its plan form and external appearance.

Archaeological: the intactness and authenticity inherent in the surviving fabric of an excellent and unique example of a Victorian market building give it some value. This is represented in its physical fabric where it survives.

297. It is considered that the wider setting of the Fish Market as part of the complex of market buildings and associated uses and functions, make it part of an exceptional, rare and unique example of a Victorian industrial townscape in the capital, and of its civic architectural, engineering and urban planning prowess on an ambitious scale. An appreciation of it as part of this wider setting contributes substantially to its significance.
298. In common with the previous Inspector and SOS, it is agreed that Fish Market is integral to the Smithfield market complex and is a non-designated heritage asset (para 11 of the 2014 decision letter). It was considered that this significance lies in its integrated design of its plan, elevations and roof.

Impact assessment

299. Following the approach underpinning the scheme, the proposal is to conserve the building as found, intervening where historic fabric is no longer present, or where necessary to support the proposed use. Overall, the structure and external envelope of elevations and roof would be preserved and restored as a single coherent entity and integrated

piece of design.

300. In terms of interventions in the principal elevations it is proposed to i.) replace modern infilling on the original West Smithfield/Snow Hill pedestrian entrances with fenestration ii.) install a new servicing entrance on Snow Hill iii.) install perforated metal sliding gates on the north and south vehicular entrances iv.) accommodate a junction and drainage detail with the proposed Iron Mountain canopy and v.) reinstate lost architectural detail, including brick and stone chimneys, 'sturgeon' sculptures, finials and balustrade bottles and the installation of architectural lighting. The previous (2019) scheme proposed opening up many of the 'blind' windows in the facades of the building; these have largely been removed from the present (2022) scheme, thereby preserving more historic fabric.
301. The blocking up of a modern door in the penultimate Snow Hill bay, leaving evidence of an aperture, would preserve the essence of symmetry in composition, while allow the new use to function. The new hardwood multi-light mullioned and transomed windows in the western turret would be faithful reinstatements. Where there is no historical precedent, on the west elevation and the north and south vehicular entrances, modern complementary metalwork is proposed, including the potential for a fine interlace complementing the original architecture. The siting, proportions and detail of the proposed service door on Snow Hill, whilst resulting in the loss of a small amount of fabric, would appropriately define the central projecting bay.
302. The proposal to reinstate the original lost sturgeon sculptures and stone chimney on the western turret would restore its integrity and, alongside the reinstatement of lost finials, balustrade bottles and a lost chimney adjacent to the northern vehicular entrance would enhance the building's architectural significance. Architectural lighting would follow the sympathetic principles established in the Lighting Strategy. The Iron Mountain canopy would relate well to the west elevation and, subject to detailed condition, would sit proud of it, the principal columns following the regular rhythm of its unmoulded buttressing piers, with a neat drainage detail incorporated behind the parapet.
303. The roof would be repaired and restored consistent with the original design, but with some sensitive upgrading to meet modern sustainability requirements. Alterations are proposed comprising of a plant enclosure in the centre of the roof, a lift overrun in the north east corner and the loss of a small amount of roof for a plant enclosure in the south east corner.
304. The plant enclosure would involve the loss of a small, much altered section of the centre pavilion roof, a small part of the wider roof complex, replacing it with a slatted timber screened M&E enclosure, 1.1m high, to serve prospective tenants. The detail would reflect the profile of the original timber louvres and would not be visible from street level, or from raised views across the roofscape from Holborn Viaduct. On the north east part of the roof a small lift overrun would penetrate the pitch, albeit to the rear of it on the eastern elevation, falling below the main ridge and

so would not be visible from the public realm, whilst performing the key function of providing building regulation compliant access to a viable first floor level use.

305. The alteration of a small south-eastern section of roof, much altered and of limited interest, to accommodate a raised plant deck and extension of a terrace on the adjacent Red House, would preserve the essential form of the roof and would not be visible from the public realm.
306. The main change in the setting of the Fish Market would be the erection of the Iron Mountain canopy and removal of the current modern structure. This would reveal, for the first time in half a century, an appreciation of the restored eastern elevation, including the reinstated chimney stack. Whilst abutting at a different scale, it is considered that the proposed Iron Mountain canopy would be refined, lightweight and transparent enough to not overpower or dominate the Fish Market, thereby preserving its setting and therefore its significance.

Conclusion

307. Overall, the proposal would result in a slight level of less than substantial harm to the significance of the Fish Market as a non-designated heritage asset. The harm would result from some slight loss of good historic fabric of architectural/artistic and historic value to an appreciation of the original design and function. Where harmful intervention is proposed, it has clear justification, and would be mitigated by good new design.
308. In common with the previous Inspector and SOS, it is considered that the restored main elevations would be an enhancement, including the reinstatement of important architectural features restoring the integrity of the original design. On balance, it is considered that this would sufficiently outweigh the slight harm caused, subject to detail reserved for condition, and that overall the proposal would result in a low level of enhancement to the significance of the Fish Market.

Red House: Impact on the Significance of a Non-Designated Heritage Asset, and the Iron Mountain

Significance and the Contribution of Setting to that Significance

309. The original London Central Market Cold Store, better known as the Red House, was built in 1899 on leftover land abutting the open railway line over a former ramp to the basements of the Poultry Market. Following the death of Jones, the architects were Reeves and Styché, who adopted Jones's common Renaissance style in red brick and Portland Stone, 'completing' his vast market ensemble. The building comprises two distinct parts. The first is the northern block, 'flat iron' in plan with a tall range comprising an applied double order of blind arcading with segmental arches, oeil-de-boeuf and ball finials, symmetrically composed. It has a monumental appearance yet shares an architectural politeness with the other market buildings. The second part is a lower, single-storey range to Smithfield Street and short return to Snow Hill. Also largely blind, and relieved with monumental blind arcading including faux door architraves and simple parapet, the return onto Snow Hill (the former offices) has coupled fenestration and a carved relief panels with

characterful Tritons unfurling a cartouche, fittingly reflecting the sculpture of the Fish Market.

310. Formerly a purpose-built cold store for the London Central, the building was purchased at the turn of the century by the Vesty Brothers who had established Cold Union Storage as a meatpacking and distribution network and by 1920 it was the largest cold storage company in the world. The building was part of a cluster of cold storage buildings serving the markets and some of its basement cold storage chambers are understood to have been used for wartime experimentation.
311. Originally there was a shallow pitched roof over the southern section, alongside chimneys associated with the southern offices, which are now lost. From an early stage, the northern section roof clearly comprised an asymmetric ensemble of lift overruns and other functional elements.
312. The heritage values comprising the heritage significance of the Engine House are deemed:

Architectural/Artistic: good townscape landmark forming integral part of Smithfield family of complementary architecture, this time in a monumental manner, completing the Annex Market island site.

Historic: illustrative of a 'blind' cold store and part of a family of associated uses integral to the operation of the historic market.

Archaeological: limited evidential value as a result of the building's dilapidation and survival only of the facades, without tangible material primary evidence of the historic function.

313. It was listed at grade II on 3 March 2005 and de-listed on 6 August 2008. The former list description stated the reason for listing being it is a valuable component of the market complex at Smithfield, with considerable townscape value forming a good group with the adjacent Annex Market.
314. There is agreement with the previous Inspector/SOS that the Red House is integral to the Smithfield Market complex and is a non-designated heritage asset (para 11 of the 2014 decision letter). In kind as stated above, this significance is considered to be in its exterior appearance and the contribution its materials, decoration and use shared a relationship with the wider market buildings (para 413).
315. The current modern structure on the Iron Mountain site is of no intrinsic character or significance, and it detracts from an appreciation of the rear elevation of the Red House. The previous Inspector concurred that it is of very limited architectural and historic value.

Impact assessment

316. It is considered that the current proposal would preserve the essential significance of the Red House as a non-designated heritage asset and that high quality new contextual design would mitigate the harm caused through alteration.
317. The Red House would be transformed into and mixed office/retail use and the following main alterations are proposed: i.) the alteration of the

existing facades and insertion of new fenestration to accommodate windows, doors and ventilation panels ii.) alteration and insertions at roof level on the northern part of accommodate roof access and landscaped terrace iii.) the reconfiguration of a rear south eastern façade and insertion of a new terrace and iv.) a contemporary two storey extension above the single storey range on Smithfield Street/Snow Hill.

318. The principal elevation to West Smithfield/Smithfield Street would be opened in a significant departure from the original 'blind' architectural treatment. This would allow for natural light to serve the viable new uses for the long-derelict building. The 'blind' architectural treatment is important to the monumentality and architectural integrity of the Red House, whilst intrinsically related to the former function as a cold store, and a departure from this would undermine its architectural/artistic and historic value and cause a low level of less than substantial harm.
319. As well as the clear justification for this departure, the design response would mitigate the harm in several ways. On the principal West Smithfield façade, the amount of opening up, the relief, modelling and detail of the new openings, preserving the two 'blind' bookends to the composition, would retain the compositional symmetry, in addition to allowing an appropriate solid-to-void proportion and sense of robust solidity. This façade would retain its monumental appearance, the important grid of a double classical order preserved and enhanced through the reinstatement of lost crowning finials. The new windows and doors are appropriate to the grain and character of the building are reserved by condition, would be of appropriate depth and modelling and of a high quality metal appropriate to the Red House and of intrinsic significance to the Smithfield market complex. Inspiration for the detail of the windows was taken from the former cold storage on Charterhouse Street.
320. In relation to the single storey southern range on Smithfield Street/Snow Hill, it was also designed blind, with no relationship between large blind apertures and internal function, apart from the end bay reflecting the office use. The building has a symmetrical character consistent with the group of market buildings. The existing architrave would be retained and new (and where possible reused) architraves would be inserted with doors in a consistent bronze-effect metal style. New appropriately designed fanlights are proposed between the segmental arch and the final detail is reserved for condition.
321. Back-of-house servicing would be accommodated in the final three bays of the Smithfield Street elevation, and the single bay on Snow Hill. This part is considered less sensitive than the new civic destination on the Iron Mountain and the principal West Smithfield landmark elevation.
322. A ventilation grill is proposed for the third from last bay and detailed to relate to the former aperture in the penultimate southern bay, of matching brickwork. Matching bronze-finished louvered doors would be installed to the penultimate and final bays and would match the other fenestration in character. A different approach is proposed to the end bay on Smithfield Street and that on Snow Hill to reflect their former office use,

resulting in a coherent architectural treatment sympathetic to the Smithfield Street range while preserving the distinctive character of the Snow Hill elevation. Whilst this would result in the loss of some fabric of interest (a carved base relief and coupled windows), the same detail would be preserved on Snow Hill. On this elevation, a quadripartite arrangement of louvres and double doors would be inserted below the relocated carved relief panel. This would be a refinement of the proposed design in this location under the previous (2019) scheme. This would cause a slight level of less than substantial harm, but is necessary for ventilation purposes, and final details reserved for condition would help to mitigate this harm. The adjacent surviving hardwood timber door would be salvaged and re-used.

323. Terraces would be formed on the roof of the northern part and to the rear of the southern part of the Red House with access to the main northern roof located in the south western corner. Here, an existing rooftop enclosure would be reused and extended in footprint. There has always been a breach of the main parapet at this point and the proposal would not substantively change this. In a change from the previous (2019) scheme, the enclosure has had to be slightly increased in dimensions as a result of further internal survey work, but this change would not materially affect the external impact of the proposal. The extended rooftop enclosure would continue to be visible in long views from West Smithfield, but is considered subservient to the building, and its impact would be further mitigated by planting including a unified perimeter treatment of planters behind a parapet. The existing brick upstand along the southern elevation would be extended in the same architectural manner and incorporate an access to the proposed adjacent extension which with the proposed new extension would not be visible from street level.
324. An additional terrace is proposed on part of the southern range of the Red House. This would involve the loss of a section of raised parapet wall and a couple of chimneys in addition to the severing of a moulded brick string course which ties together the north part and lower southern part architecturally. This would cause a slight level of less than substantial harm to significance, although is less sensitive than the main elevations and, at present, is not visible to the public and would only become visible via the transformation of the Iron Mountain under this proposal. Otherwise, the terrace would not detract from any existing important views from the public realm and would be incidental from within the proposed Iron Mountain space.
325. A two-storey office extension is proposed over the roof of the southern range of the Red House. It is considered a strong, striking, yet contextual, piece of contemporary architecture. The extension would be recessed a metre back from the main Smithfield Street elevation, ensuring it would appear recessive. The height aligns with the main cornice of the northern part, sitting below the crowning parapet to be subservient. The restrained rectangular extension as a symmetrical composition is appropriate with a convincing interplay of vertical and horizontal elements of glazing and patinated steel. The 'Okulux' glazing,

a high-quality glazing unit with expanded metal interlayer of matt red colour, would respond to the hues of the host building and appear as a convincing addition. The flank walls would be kept largely solid and restrained, befitting the character of the building. The associated roof level services would be housed in an appropriately restrained and discreet plant enclosure.

326. Its height, bulk, massing and architectural expression would preserve that important view of the Red House from the junction between West Smithfield and Smithfield Street identified in the Conservation Area SPD. It would also preserve identified View 3, and an appreciation of the parabolic roof of the Poultry Market from the junction of Smithfield Street and Snow Hill.
327. Perhaps the biggest change in the setting of the Red House would be the removal of the current Iron Mountain structure and the erection of a civic, semi-enclosed canopy structure of metal and glass. The loss of the Iron Mountain structure, which has no intrinsic architectural, historic, social or other functional relationship with the Red House, would be an enhancement, in principle, reinstating the relationship of the Red House western elevation with West Smithfield/Farringdon Street. The previous appeal Inspector considered that provided that the street elevations of the Red House are preserved, appropriate redevelopment of the Red House and Iron Mountain sites could make a positive contribution to the character of the conservation area (para 426). Historic England, in response to this application welcomed the removal of the Iron Mountain structure, which helps to reveal the relationship between the former Cold Store and the Annexe.
328. The proposal would create a new civic public space, enclosed by the Red House and Fish Market, allowing them to be better appreciated as a group again and enhancing the significance of the Red House. The new canopy structure would be no higher than the Red House, and would consist of a lightweight, truss roof and columns on cross-beamed walls clad in weatherproofing glass. Architecturally, it would read as a contemporary successor to the roof structures of Horace Jones's market buildings. It would enhance the prominence of the Red House and preserve its architectural significance and relate subserviently with the parapet of the Red House, preserving important views of the principal façade from the east along West Smithfield. Below the canopy, the civic space would be of traditional mix of York Stone and timber setts, for which there is evidence of on site.
329. Facing the Iron Mountain, the rear elevation of the Red House is of blind brickwork. Existing openings would be reused, and new openings made in an informal manner. New fenestration would appropriately be of metal and glass.
330. Other elements of change within the setting of the Red House, such as the restoration and alterations to the Engine House and Fish Market, and the transformation of the southern portal of West Poultry Avenue, would have a benign impact on the setting and therefore the significance of the building.

Conclusion

331. Overall, the proposal would cause a medium level of less than substantial harm to the Red House as a non-designated heritage asset, as a result of the direct impact of the loss of historic fabric and undermining of the original architecture and related function. It is considered that there is strong and clear justification for these interventions and that the good design proposed would mitigate that harm.

Engine House: Impact: on a Non-Designated Heritage Asset

Significance and the Contribution of Setting to that Significance

332. The Engine House is a near contemporary of Horace Jones' Poultry Market, 1873-75, perhaps a little later, and to a degree its origins and history is uncertain. Jones made a reference in 1877 to *"accommodation for the comfort and convenience of the public, as well as a depositing place for condemned meat has been provided at a triangular space to the south-west of the Poultry Market"*.
333. Whilst that part above ground is considered to have always been a public convenience serving the markets, it also once bore an 80ft chimney serving the boilers powering the refrigerator engines in the Poultry Market. Underneath it is a complex of vaults connected to the Poultry Market which contained those refrigerator engines and boilers, adjacent to the London, Chatham and Dover Railway which run under the Annex site. It originally had an open passage, the entrances to which are still evident, providing access to a series of toilet cubicles/urinals alongside the huge chimney. The brickwork, of the finest quality, is of washed red clay, rubbed, with fine, ashlar-style joints, with Portland Stone dressings in the tradition of the market buildings, and with rusticated pilasters and stone chimneys with a heavy patina of age.
334. The heritage values comprising the heritage significance of the Engine House are deemed:

Architectural/Artistic: a well-crafted and detailed piece of architecture belying its utilitarian origins, with a patina of age evocative of the wear-and-tear of the historic market and function.

Historic: illustrative of the Victorian sense of duty and civic pride as a minor, yet functional, part of an operational market complex.

335. It is considered that the wider setting of the Engine House as part of the complex of market buildings and associated uses and functions, make it part of an exceptional, rare and unique example of a Victorian industrial landscape in the capital, and of its civic architectural, engineering and urban planning prowess on an epic scale. An appreciation of it as part of this wider setting contributes substantially to its significance.
336. There is agreement with the previous Inspector who considered, and SOS agreed, that the Engine House is integral to the Smithfield market complex, is a non-designated heritage asset (2014 decision letter para 11). The Inspector also agreed that the significance of the Engine House lies in its exterior appearance and the contribution its materials,

decoration and use and the shared relationship with the wider market buildings (para 413).

Impact Assessment

337. In the spirit of this heritage-led cultural regeneration project, the proposal is to conserve the building as found: to stabilise and undertake necessary repair, but to retain the strong patina of age. This would preserve the fundamental character and architectural/artistic and historic value of the building.
338. The existing, collapsing roof would be re-built, with the addition of a new capping block course of Portland Stone raising it by 250mm to accommodate a biodiverse green roof allowing for generous planting. For the same reason, the base detail of the former chimney would be lifted by 820mm. In a change from the previous (2019) scheme, a small lift overrun would be placed centrally upon the roof, partly screened by planting and very much subservient to the host building. Details would be secured via condition.
339. Existing, blocked up fenestration would be reopened in complementary traditional material and styles comprising hardwood beaded timber doors and conservation-type slim double-glazed painted timber windows, the detail of which is reserved for condition. The building would provide access to the basement which could comprise a variety of uses in the retained vaults while the remainder of the space acts as a small kiosk. This 'light touch' refurbishment would enhance the architectural/artistic and historic values associated with its significance.
340. The main change to its setting would be the alteration and addition to the Red House and the new entrance and lettering on the General Market. The essential character of these associated market buildings would be preserved and rejuvenated, accentuating the significance of the Engine House, which would still be read as part of a coherent group.

Conclusion

341. In common with the previous Inspector and SOS it is considered that the restoration of the Engine House, and re-use as a café/retail unit, would be consistent with its conservation (para 428) and that the bringing it back to beneficial use would be a significant benefit (para 441). It would result in a medium level of enhancement to the Engine House as a non-designated heritage asset.

Impacts on the significance of Heritage Assets through development within their setting

Central London Markets (grade II*) and its Rotunda (grade II) : The significance and setting of Designated Heritage Assets

342. The main special interest/significance of the Central London Market building lies in its original structure and engineering, the architectural treatment and overall plan form representative of the original use. The main special interest/significance of the Rotunda lies in its robust brickwork engineering and its visual and physical relationship with the Central London Markets building. The low to mid-rise buildings which

enclose it; the long radial approaches and the openness of the spaces surrounding it are the elements of its setting which make the most significant contribution to the heritage significance of the asset – allowing a full appreciation and understanding of the scale of the civic project and engineering feat, as well as the distinguished architecture.

343. In common with the previous Inspector, it is also considered that the wider Smithfield market complex buildings form part of a shared setting and functional relationship which contributes strongly to the significance of these listed market buildings (2014 inspector's report para 416). The SOS agreed with the previous Inspector that the partial removal of the canopy between the General and Poultry Market would not cause substantial harm to the significance of the Poultry Market, but that the disruption in their setting caused by the proposed office blocks would cause substantial harm to the significance of the listed market buildings (2014 decision letter para 19).
344. Overall, by fundamentally preserving the form and architecture of the Poultry and General market buildings and by sensitively restoring and extending the Annexe, it is considered that these proposals would preserve the significance and setting of the Central London Markets and Rotunda.

Farringdon Street Bridge: The significance and setting of a Designated Heritage Asset (grade II)

345. The main special interest/significance of the Farringdon Street Bridge lies in its dynamic structural engineering and architectural treatment, an example of Victorian civicism. The main elements of setting which contribute to this are the Smithfield Market complex, especially the General, Annexe and Poultry Markets, and the existing topography and road alignments of the Fleet Valley and therefore indicate the Bridge's *raison d'être*. This is consistent with the previous (2014) Inspector, with whom the SOS agreed, who took the view Holborn Viaduct lies in a wider shared setting with the market complex which strongly enhances the significance of each, reflecting their origins as grand Victorian engineering schemes that fundamentally shaped the area you see today (decision letter para 11). It was considered then that the bridge structures have an important visual and historic relationship with the market complex and that there were important high-level views from the Viaduct of the complex (inspector's report para 416). The previous Inspector found that the intrusive additions to the General Market would have radically changed the nature of the shared setting and the integrity of the market group – that visual and historic relationship being weakened and the strong contribution to setting significantly reduced (inspector's report para 431).
346. The current proposal would retain the fundamental architecture and form of the General and Poultry Markets, and sensitively preserve and extend the Annexe, preserving the contribution these make to the significance and setting of Farringdon Street Bridge, and thereby preserving the setting and significance of the Farringdon Street Bridge.

51-53 Charterhouse Street, the former Central London Markets Cold Store: The significance and setting of a Designated Heritage Asset (grade II)

347. The main special interest/significance of 51-53 Charterhouse Street lies in the buildings' strongly civic/commercial architectural treatment which expresses the former use as cold storage, part of a family of related ancillary uses which once clustered around the Smithfield market complex. The buildings are in the Charterhouse Square Conservation Area and are part of the sequence of historic frontages which define its southern boundary. The main elements of their setting which now contribute to this significance are the General and Poultry Market buildings which face them across the street and the architectural, if not now historic, relationship between the two. By fundamentally retaining the architecture and form of the General and Poultry Markets, the proposals would preserve the significance and setting of 51-53 Charterhouse Street.

67-77 Charterhouse Street (former Smithfield Meat Market): The significance and setting, a Designated Heritage Asset (grade II)

348. The main special interest/significance of 67-77 Charterhouse Street lies in the building's expressive architectural treatment as a commercial market building. It sits within the Charterhouse Square Conservation Area and forms part of the run of historic frontages which define its southern boundary. Consistent with the previous Inspector, the elements of setting which support its significance are the Central Meat Market, Poultry and General Market buildings, the last of which is seen in more distant views and the relationship of architectural form and appearance, if not now by historic function. By fundamentally retaining the architecture and form of the General and Poultry Markets, the proposals preserve the significance and setting of 67-77 Charterhouse Street.

79-83 Charterhouse Street (former Meat Inspectors Office for Smithfield Market): The significance and setting of, a Designated Heritage Asset (grade II)

349. The main special interest/significance of 79-83 Charterhouse Street lies in its civic architecture and associations with the prevailing market uses of the wider area. It is in the Charterhouse Square Conservation Area and forms part of the run of historic frontages which define its southern boundary. The elements of setting which contribute to its significance is the architectural relationship with the Central Meat Market, Poultry and General buildings, the latter two of which relate to it in longer, oblique views. By fundamentally retaining the architecture and form of the General and Poultry Markets, the proposals would preserve the significance and setting of 79-83 Charterhouse Street.

Charterhouse Square Conservation Area, a Designated Heritage Asset : The significance and setting

350. The main character, appearance and significance of the Charterhouse Square Conservation Area derives from the tightly knit medieval street pattern and incremental development of traditional scale, much of which

to the south of the conservation area is related to the evolution of the Smithfield market area. The previous Inspector considered that the CA was characterised by small scale nature of the streets and buildings and the variety of uses, many stemming from proximity to the markets, with which they share a scale and quality (para 414).

351. The main elements of setting which contribute to this significance are the grand sequence of market building in Smithfield and their juxtaposing formal Victorian geometry. By fundamentally retaining the architecture and form of the market buildings, the proposals would preserve the significance of the Charterhouse Square Conservation Area.

Hatton Garden Conservation Area: The significance and setting of the Designated Heritage Asset

352. The main character, appearance and significance of the Hatton Garden Conservation Area lies in its seventeenth-century development, accumulation of nineteenth century warehouses and other buildings associated with the jewellery trade. The elements of setting which contribute to this are the General and Annexe Market buildings separated by the canyonlike form of Farringdon Road, illustrating the former Fleet valley topography of the area. The previous Inspector, in his findings at para 415, found that an important element of setting were long views up the length of Charterhouse Street and across the markets to the Barbican beyond (para 415).
353. By fundamentally retaining the architecture and form of the market buildings, the proposals would preserve the significance of the Hatton Garden Conservation Area.

Heritage: Conclusion

354. The planning application proposals, subject to detail reserved for condition, would result in a medium level of less than substantial harm to the significance of the Poultry Market as a designated heritage asset. It has also been found that the proposals, cumulatively, considered against the Conservation Area as a whole and not just the specific part of it encompassing the application site, would result in a slight level of less than substantial harm to the significance of the Smithfield Conservation Area.
355. For the purposes of section 66 of the Town Planning (Listed Building and Conservation Areas) Act 1990 the special interest of the Poultry Market would not be preserved and considerable importance and weight should be attributed to that harm in the balancing exercise.
356. For the purposes of the Town Planning (Listed Building and Conservation Area) Act 1990, section 72, the proposal would not preserve or enhance the character or appearance of the Conservation Area. Considerable importance and weight should be attributed to that harm to the Conservation Area in the balancing exercise.
357. In terms of non-designated heritage assets, subject to detail reserved for condition, it is considered that the proposal would result in:
358. On balance, a low level of less than substantial harm to the significance

of the General Market as a non-designated heritage asset.

359. On balance, a low level of enhancement to the significance of the Fish Market as a non-designated heritage asset.
360. On balance, a medium level of less than substantial harm to the significance of the Red House as a non-designated heritage asset and.
361. On balance, a medium level of enhancement to the significance of the Engine House as a non-designated heritage asset.
362. It has been concluded that the proposals would preserve the significance and setting of relevant designated heritage assets which are in the setting of the proposals.
363. The current proposals are substantively different than those last considered by the Inspector/SOS at appeal, where substantial harm was found to heritage assets. The current proposals have responded substantially to the outcomes of the last appeal so as to significantly alter the balancing exercise.
364. The NPPF, para 199, requires great weight be given to the conservation of a designated heritage asset - the more important the asset, the greater the weight. Consistent with section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard has been had to the desirability of preserving the special interest and setting of the Poultry Market, and the less than substantial harm to significance should be attributed considerable importance and weight in this balancing exercise. Similarly, under section 72 of the same Act, special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Smithfield Conservation Area, and great weight attributed to its conservation under the NPPF, with considerable importance and weight attributed to the less than substantial caused to the significance of the Smithfield Conservation Area.
365. The NPPF, para 200, states that any harm or loss of significance of a designated asset should require clear and convincing justification. It is considered that, for the reasons addressed in this report, that on all occasions there is clear and convincing justification for that harm to the significance of the Poultry Market and to the conservation area as the changes which would cause that harm to those designated heritage assets are those that deliver the public benefits.
366. In respect of both designated and non-designated assets, the harm is considered to be less than substantial. Where there is less than substantial harm to the significance of a designated heritage asset the NPPF, para 202, requires less than substantial harm to be weighed against the public benefits. The NPG, para 020, is clear that public benefits could be any economic, social or environmental objective as prescribed in the NPPF and should be of a nature and scale of benefit to the public at large (i.e. not a private benefit), and which can include heritage benefits.
367. The NPPF, at para 203, states that the effect of an application on the significance of non-designated heritage assets should be taken into

account in determining the application, requiring a balanced judgment having regard to the scale of any harm or loss and the significance of the heritage.

368. The harm would result in a degree of conflict with adopted Development Plan Policies CS 12, DM 12.1, DM 12.2 and DM 12.3 of the adopted Local Plan (2015) and policy HC1 of the London Plan 2021 and draft City Plan 2036 Policies S11 and HE1, which collectively seek to conserve and enhance the significance of heritage assets, taking account of cumulative impacts, seeking to repair, restore and put to viable uses consistent with their conservation.
369. In weighing this harm and degree of conflict with the Development Plan with the public benefits, consistent with the previous Inspector and SOS, little weight is afforded to the deteriorated state of the buildings which, at least in part, was deemed the result of neglect, so that less weight is afforded to the benefit of repair (decision letter para 12). Consistent with the previous Inspector, the threat of vacancy does not weigh heavily in favour of the proposal (decision letter para 32); indeed, in the case of the Poultry Market, the building is occupied.
370. It is considered that the substantial public benefits that would flow from the whole proposal (set out in detail earlier in the land use considerations section of the report),
371. Giving considerable importance and weight to the desirability of preserving the listed Poultry Market and other listed buildings and their settings or any features of special architectural or historic interest which they possess, and giving considerable importance and weight to the desirability of preserving or enhancing the character or appearance of the Smithfield Conservation Area,
372. that area., and giving significant weight to the harm to the significance of non-designated heritage assets, it is the view of officers that, ascribing the weight referred to in the conclusions section of this report to the benefits, those public benefits would significantly outweigh the harm caused.
373. Overall, it is considered that the proposal would put these irreplaceable heritage assets back into beneficial public use, consistent with their overarching conservation, for all Londoners and other visitors irrespective of their social or economic position. It would provide a new home for the Museum of London, a key London and UK cultural destination for the active presentation and interpretation of London's rich history, a truly unique civic destination in the heart of the capital and an international exemplar in the repurposing of historic buildings for a public, inclusive use. The scheme as a whole is considered to be exceptional and world class. These overarching substantial public benefits would far outweigh the less than substantial harm caused and would thereby rebut the presumption against granting planning permission for development proposals which fail to preserve a listed building or its setting or any features of special architectural or historic interest which it possesses, and/or proposals which fail to preserve or enhance the character or

appearance of a conservation area.

374. It is also necessary to consider the application for listed building consent. Section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 provides “(2) In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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. Footnote 67 to the NPPF states that the policies in chapter 16 of the NPPF relate, as applicable, to heritage related consent regimes such as applications for listed building consent. The NPPF, para 199, requires great weight be given to the conservation of a designated heritage asset - the more important the asset, the greater the weight.
375. The NPPF, para 200, states that any harm or loss of significance of a designated asset should require clear and convincing justification. It is considered that, for the reasons addressed in this report, that on all occasions there is clear and convincing justification for that harm as the changes which would cause that harm are those that deliver public benefits.
376. The harm to the significance of the Poultry Market is considered to be a medium level of less than substantial harm. The NPPF, para 202, requires less than substantial harm to be weighed against the public benefits. The NPG, para 020, is clear that public benefits could be any economic, social or environmental objective as prescribed in the NPPF and should be of a nature and scale of benefit to the public at large (i.e. not a private benefit), and which can include heritage benefits. When carrying out the balancing exercise the harm to significance should be afforded considerable importance and weight.
377. The harm would result in a degree of conflict with adopted Development Plan Policies CS 12, DM 12.1 and DM 12.3 of the adopted Local Plan (2015), emerging City Plan 2036 Policies S11 and HE1 and London Plan 2021 Policy HC1, which collectively seek to conserve and enhance the significance of heritage assets, taking account of cumulative impacts, seeking to repair, restore and put to viable uses consistent with their conservation.
378. Overall, it is considered that the substantial public benefits that would flow from the whole proposal (set out in detail earlier in the land use considerations of the report), even when applying considerable importance and weight to the statutory duty to have special regard to the desirability of preserving the building or its setting or any special features of special architectural or historic interest that it possesses, would significantly outweigh the harm caused.

Impact on Protected Views

379. The London View Management Framework (LVMF) establishes a series of London-wide, cross-borough public views designated as contributing to London’s character and identity at a strategic level. The following Designated Views have Assessment Points which are inclusive of a

Protected Vista which in part over sail the site, where St Paul's Cathedral is the identified Strategically Important Landmark:

2A.1 (London Panorama: Parliament Hill): Landmark Viewing Corridor and Wider Setting Area;

3A.1 (London Panorama: Kenwood): Landmark Viewing Corridor and Wider Setting Area;

4A.1 (London Panorama: Primrose Hill): Wider Setting Area;

5A.2 (London Panorama: Greenwich Park): Wider Setting Area (background) and;

6A.1 (London Panorama: Blackheath Point): Wider Setting Area (background).

380. The proposal would fall below the thresholds of all the Protected Vistas and would have no impact on them, thus preserving the Designated Views, in accordance with Local Plan Strategic Policy CS13(1), draft City Plan Policy S13(1) and London Plan policy HC 4, and guidance contained in the LVMF Supplementary Planning Guidance (SPG) and the Protected Views SPD.
381. Part of the site is in the 'St Paul's Heights Policy Area' which, since the 1930s, has protected the immediate townscape and riparian setting of St Paul's Cathedral from inappropriate development. No part of the site, retained or proposed, would breach the Heights Grid, the integrity of which would be preserved.
382. The proposal would accord with Local Plan strategic policy CS 13(2) and draft City Plan 2036 policy S13(bullet 2), and guidance contained in the adopted Protected Views SPD, preserving local views of the Cathedral deemed significant to the strategic character of the City of London.

Archaeology

383. Policy considerations and conclusions in respect of archaeology remain largely the same as when the application was considered in 2020.
384. Local Plan 2015 policy DM12.4, draft City Plan 2040 policy HE2, London Plan 2021 policy D5 seek to preserve and enhance archaeological remains. Development proposals should address any potential impact on archaeology.
385. The Archaeology chapter of the ES has been updated. The baseline has been updated from 2019 to a 2022 baseline to reflect additional information from watching briefs conducted between 2018 and 2022.
386. The buildings are in an area of archaeological potential located to the north west of the Roman and medieval walled City, on the edge of a known Roman cemetery area and on the east bank of the Fleet river valley. There is potential for survival of remains from the Roman, medieval and post-medieval periods and environmental remains associated with the Fleet river. An Historic Environment Assessment and Report on Monitoring Geotechnical Work have been submitted with the application.

387. The archaeological potential includes Roman burials, structures such as revetments or embankments from the Roman, medieval and post-medieval periods, remains of the 19th century railway infrastructure and environmental remains of the now buried Fleet River and its valley. Archaeological evaluation and recording of site investigation have been carried out which has provided more detail on the extent of survival. The predicted survival reflects the slope of the Fleet Valley as the western part of the site on the edge of the valley has the highest potential and the central and eastern parts of the site have the lowest potential. The archaeological survival is also affected by the construction of the existing basement and railway tunnel.
388. The proposed scheme would have an impact on archaeological remains where new or renewed foundations are required, and from a proposed attenuation tank, lift pits and services. Proposed alterations to the existing basement floor level would have little or no additional impact.
389. The proposals are acceptable with regard to potential archaeological impact in accordance with policy DM12.4 of the Local Plan 2015, policy HE2 of the draft City Plan 2040 and policy D5 of the London Plan 2021 subject to the attached archaeology related conditions, to cover a programme of archaeological work and foundation design.

Transport and Highways

390. The Transport and Highway considerations remain largely the same as the considerations set out in 2020.

Parking

391. Local Plan 2015 Policy DM16.5 – 1 and Draft City Plan 2040 policy VT3 – 1 require development in the City to be car-free except for designated Blue Badge spaces. London Plan Policy T6.4 A requires leisure uses in the CAZ to be car free except for disabled persons parking and parking required for taxis, coaches and deliveries or servicing. Policy T6.5 requires proposals to provide at least one Blue-Badge parking space.
392. The proposed development would remain car free.
393. No blue badge parking is proposed within any of the three buildings. The applicant has provided information on blue badge parking available on the highway and within public car parks in the area surrounding the site. The Transport Assessment details that additional provision of accessible parking, in the form of on-street Blue Badge bays, would be secured through the S278 agreement.
394. Subject to the S278 agreement securing Blue Badge parking it is considered that the proposal is compliant with the aforementioned policies in relation to car parking.

Cycle Parking

395. London Plan policy T5 requires cycle parking be provided at least in accordance with the minimum requirements published in the plan.

Policy T5 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. Policy T5F requires that where the use class is not fixed at the point of application, the highest potential applicable parking standard should be applied.

396. For the General Market and Poultry Market, 42 long stay cycle parking spaces are proposed at ground level within the Poultry Market, accessed via a dedicated entrance on East Poultry Avenue. The level of provision is based on London Plan standards requiring 1 space per 8 FTE staff for the estimated 335 staff. Space for adapted bicycles would be provided as part of the mix of cycle parking. 5 showers and 42 lockers would be provided in the basement of the Poultry Market.
397. For the General Market Houses and Annexe building, where a flexible range of use classes are proposed, applying the highest potential applicable parking standards requires 26 long-stay spaces for the General Market Houses and 78 long-stay spaces for the Annexe Building.
398. Twelve long-stay spaces are proposed across the General Market houses, with provision ranging from 1 to 3 spaces per each house. Two showers are proposed within the General Market Houses.
399. For the Annexe, 42 spaces are proposed at basement level as well as space for non-standard bicycles to park. Six showers and 45 lockers would be provided in association with these spaces. The cycle parking would be accessed via a staff entrance on Snow Hill, with a cycle lift providing access to the basement. Thirty-eight long-stay spaces would be provided within the fish market at ground floor with associated Showers and lockers.
400. To ensure that the cycle parking is of the highest quality further details on the design of the long stay cycle parking would be secured by condition.
401. For all the proposed buildings, the London Plan requires 662 short-stay cycle parking spaces. All the buildings fill their curtilage and as such no space is provided within the developments for short-stay cycle parking. The applicant has provided plans in the Transport Addendum to demonstrate the space required within the public realm to provide 330 short-stay cycle parking spaces. Cycle parking provision within the public realm surrounding the site would be secured through the S278 agreement, although full compliance with London Plan Standards would not be achieved. Notwithstanding, a contribution of £200,000 towards providing additional TFL cycle hire docking stations in the vicinity of the site would be secured through the S106 agreement and would contribute towards enabling visitors to cycle to the museum.
402. The proposed long-stay cycle parking provision for the General Market and Poultry Market accords with policies DM16.3 of the Local Plan and T5 A(2) of the Intend to Publish London Plan.

403. The proposed long-stay cycle parking for the General Market Houses and the Annexe would not accord with London Plan policy T5F due to the flexible range of uses being applied for. Given the space constraints and configuration of these sites the shortfall in parking is considered to be acceptable.
404. The short-stay cycle parking provision would not be compliant with London Plan policy T5 A(2), however this is considered acceptable given the lack of curtilage available in which to provide short-stay parking. A proportion of the short stay cycle parking would be provided on the highway under the S278 agreement as previously agreed when the scheme was considered in 2020.

Coach drop off

405. Policy CS16 of the Local Plan seeks to minimise congestion and reduce vehicle emissions by continuing to facilitate intermediate modes, including coaches.
406. The Transport Assessment details that the new Museum would generate 10 coach trips per day, which is consistent with what was set out in 2020 and is considered to remain a robust assumption. A travel Plan will be secured by condition (see below) which will provide a suite of measures and incentives to maximise arrivals to and from the site by suitable modes, including measures to minimise trips by coach. For those trips that need to be undertaken by coach the application proposes a coach drop-off and pick-up on East Poultry Avenue, with two of the existing market loading bays amended to allow coach drop-off during the day and market loading overnight. The exact location of the coach drop-off would be finalised within the S278 agreement.
407. The proposal would accord with policy CS16 of the Local Plan.

Taxi drop off

408. Draft City Plan 2040 policy VT3 – 5 states that new taxi ranks will only be permitted in key locations such as stations, hotels and large retail developments and where they do not conflict with other policies in the development plan.
409. The museum is proposing to hold evening events, during which taxis and private hire vehicles picking up attendees may coincide with the peak operating hours for the markets. There is also the possibility that evening taxi movements would be generated by potential A3/A4 uses on the Annexe site and in the General Market Houses. Taxis circulating in the area during the operational hours of the market is not unusual given the night time uses in the locality. Following the removal of market loading bays on either side of the Poultry Market kerbside space for taxi drop-offs and picks ups would be available. The safe provision of suitable space for such activity would need to be considered in the context of the wider area, such as changes to footways and pedestrian crossings, and secured through the S278 agreement.

Public Transport and Pedestrian Movement (including stopping up)

410. The Updated Transport Assessment details that the new Museum is expected to generate an average of 2 million visitors a year by 2027. This figure remains consistent with details provided in 2020 and is considered to represent a robust worst case scenario for the purposes of assessing the implications of this application. The expected number of trips would represent a significant increase from the existing site in London Wall which generated around 825,401 visitors in 2016. This existing figure has not been updated as part of the revised application documents update however the 2016 data is still considered to be suitably representative of the level of the level of visitors generated by the existing museum.
411. The site is highly accessible by public transport indicated by its PTAL rating of 6b. The site has national rail services from City Thameslink and Farringdon stations within 400m of the site. Services on the Central, District, Circle, Metropolitan and Hammersmith and City lines are available at tube stations within walking distance of the site. The Elizabeth Line is also now available at Farringdon East and West stations, both of which are within walking distance of the site. There are 16 bus services available within walking distance of the site. Additionally, there are two cycle hire docking stations close to the site, one immediately adjacent to south of the Annexe building and one a short walk from the site on the south side of the Smithfield Rotunda.
412. The Museum will be formed of the General Market and Poultry Market with the two buildings connected by West Poultry Avenue with the principal entrance points for the museum remaining at the north and south of West Poultry Avenue, from Charterhouse Street and West Smithfield. Two further public entrances, one off Harts Corner at the junction of Farringdon Street and Charterhouse Street and one on the southern side of the General Market on West Smithfield are also proposed with separate school arrival, lecture theatre and event entrance points proposed at the south eastern and western corner of the Poultry Market building.
413. A pedestrian comfort level (PCL) assessment has been included within the Transport Assessment which outlines the impacts of the development on pedestrian movement through the area using 2019 data. This remains unchanged from the original submission which accounted for the expected increases in trips associated with Crossrail and is considered to represent a robust worst case scenario. The recommended minimum level for all areas in the City is B+. The current PCL for the footways surrounding the site would be F. Transport for London's Pedestrian Comfort technical guide recommends a minimum clear footway width of 3.3m within tourist areas with active flows, as this width allows two groups to pass each other. The Transport Assessment identifies the footways adjacent to the north and south façade of the Poultry Market on West Smithfield and Charterhouse Street, and footways surrounding the Annexe Building and Engine

House as locations for footway widening to satisfy PCL requirements and this widening would be secured through the S278 agreement. This scope of works is consistent with details set out in 2020. The transport assessment details that a PCL of A or A+ would be achieved on all footways surrounding the site following this proposed widening.

414. A stopping up order would be required for the majority of West Poultry Avenue, where the museum entrance, linking the General and Poultry Market buildings, is proposed. It is envisaged at this stage that West Poultry Avenue would be open to visitors and people to pass through between 7am to midnight. It would sometimes be closed for operational reasons, private functions (this space is an important part of the Museum's offer) and for security or safety reasons (note this is a curated space and will need to be managed accordingly). Full details of its use and management would be provided in the access management plan secured by the S.106 and conditions. This would also include scope to review as to whether enhanced access beyond the envisaged opening hours could be provided in the future.
415. Policy 16.2 (4) of the Local Plan 2015 states that "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". The stopping up of West Poultry Avenue is acceptable in this instance as the right of access would be secured through the S.106 agreement and by condition. This would ensure that the right to pass over the route would not be withdrawn at the will of the developer. On this basis, the proposal is considered to accord with policy 16.2(4) of the Local Plan 2015.
416. The Transport Statement identifies locations for improvements to pedestrian crossing infrastructure, to facilitate movement between the museum and key transport arrival points. These improvements and any other improvements to crossings deemed necessary to facilitate safe pedestrian movement would be delivered through the S278 agreement. Such changes could also be integrated into the wider public realm visions for the Smithfield area.

Travel Plan

417. Policy CS16 of the Local Plan, and policy T4 of the London Plan requires developers to demonstrate through travel plans how the environmental impacts and road danger of travel and servicing will be minimised.
418. A Framework travel plan has been submitted within Appendix G of the updated Transport Statement. The submission of a full travel plan, encompassing staff and visitor travel, would be secured by condition in accordance with policy.

Servicing Arrangements

419. Policy DM16.5 of the Local Plan and draft City Plan 2040 Policy VT2 – 1 require developments to be designed to allow for on-site servicing. Policy VT2 – 2 requires major commercial development to provide for freight consolidation. Policy VT2 – 4 requires delivery to and servicing

of new developments to take place outside peak hours (7am – 10am, 12pm – 2pm and 4pm – 7pm on weekdays) and requires justification where deliveries within peak hours are considered necessary. London Plan policy T7 G 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.

420. No changes are proposed to the management of deliveries and servicing when compared to what was initially proposed in 2020. Deliveries to the General Market, Poultry Market and Annexe buildings would be consolidated using a physical consolidation centre, which would be secured by condition. Acknowledging the unique Museum use, allowance for non-consolidated deliveries (this could include sensitive items such as artefacts or exhibition items) would be provided within the delivery and servicing management plan, the submission of which would be secured by condition.
421. The General Market would be serviced via two dedicated loading bays, accessed from the existing Snow Hill ramp. The width of the ramp and access road would only allow one vehicle to travel in either direction at any one time. The ramp and access are shared with the Charterhouse Place site on Farringdon Road in Islington and with Network Rail for access to the Thameslink Railway.
422. The transport assessment predicts that the General Market would generate demand for 17 servicing and delivery vehicles each day. Within the Transport Assessment Addendum submitted in 2020 the applicant estimated that the Charterhouse Place development would generate demand for 46 servicing and delivery vehicles using the ramp each day and this is still considered to be representative of the expected additional servicing activity associated with the neighbouring site. This would result in a total of 63 servicing and delivery vehicles per day. A restriction on the number of vehicle bookings using the ramp each hour would be secured through the Delivery and Servicing Management Plan secured by condition to minimise the potential for vehicle conflict. A management system would be employed by all ramp users to ensure vehicles do not meet on the ramp and reverse back onto West Smithfield. The management system would employ the use of a traffic light system and ANPR cameras to manage access to and from the ramp. All vehicles using the ramp would be pre-booked using a centralised management system. The provision of an area of kerbside for vehicles to wait should a vehicle be exiting the ramp and any other changes necessary to facilitate access and egress to and from the ramp would be considered through the S278 agreement.
423. Deliveries to the General Market would not be restricted to our standard hours. This is to allow deliveries to be spread out across the day to minimise the likelihood of vehicles requiring use of the ramp at the same time.
424. The General Market Houses have no internal connection to the General Market and as such would be serviced from the street by cargo bikes between 0700 and 1900, with occasional infrequent

deliveries by vehicle from nearby loading areas permitted outside of these hours. The City's ready reckoner estimates that the six houses could generate demand for 30 servicing and delivery vehicles per day. Most of these deliveries would be re-moded onto cargo bicycles with any deliveries by motor vehicles retimed outside of the peak pedestrian hours. Further detail on the management of deliveries and servicing of the General Market Houses would be secured in a delivery and servicing plan, secured by condition.

425. The Poultry Market would be serviced via three dedicated off-street loading bays for general deliveries and a separate area with known consignor status for items requiring customs clearance, both accessed from East Poultry Avenue. Most vehicles would enter and exit from East Poultry Avenue in a forward gear. Infrequent deliveries made by articulated vehicles would be unable to turn within the loading bay and would exit via West Poultry Avenue. Such deliveries would be timed outside of Museum opening hours.
426. The transport assessment estimates that the Poultry Market would generate demand for 36 servicing and delivery vehicles each day. All deliveries to the Poultry Market would be pre-booked and timed to arrive outside of the AM and Lunchtime pedestrian peak hour (0700 – 1000 and 1200 – 1400). Deliveries to the Poultry Market would be permitted between 1600 – 1900, the pm peak, on event days to allow event set up to take place.
427. The Annexe site would be serviced from the Snow Hill highway. The provision of a loading facility on Snow Hill would be secured through the S278 agreement. The transport assessment estimates that the Annexe would generate demand for 30 deliveries a day. The applicant has agreed to a cap limiting the number of deliveries to 30 per day through the Delivery and Servicing Plan which would be secured by condition. Deliveries to the Annexe site would be prohibited between the peak hours of 0700 – 1000, 1200 – 1400 and 1600 – 1900.
428. Event deliveries would take place from within the General Market and Poultry Market loading bays. If demand for event servicing space exceeds loading bay capacity, deliveries would be undertaken on street from Charterhouse Street or West Smithfield. The provision of kerbside loading space to accommodate these deliveries would be secured through the S278 agreement. Event deliveries would be pre-booked using the same system as the Museum deliveries to ensure vehicles do not arrive at the same time. Non-event deliveries to the Museum would be scheduled outside of event set up and take down times to ensure capacity within the internal loading areas is available for event purposes. The submission of an Events Management Plan, which would include further detail on delivery and servicing management, would be secured by condition.
429. A final delivery and servicing plan, detailing the exact consolidation arrangements and the management system in place for all the proposed uses, would be secured by condition.

430. Subject to the conditions detailed above, including a scheme of highway works required under a S278 agreement to facilitate the safe arrival and departure of vehicles for deliveries and servicing, the proposed servicing arrangements for all three buildings are considered acceptable. The approach taken would be policy compliant in that off street servicing would be undertaken for the General Market and Poultry Market and only where this is not possible i.e. on the Annexe Site and General Market Houses, a suitable on street arrangement is proposed. In respect of delivery and servicing the proposal would accord with policy DM16.5 of the Local Plan, policies VT2-1, VT2-2 and VT2-4 of the Draft City Plan 2040 and policy T7G of the London Plan.

Waste

431. Policy SI8 of the London Plan 2021, policies CS17 and DM17.1 of the Local Plan and policy CE1 of the Draft City Plan 2040 seek to ensure that developments plan for waste requirements and that suitable waste and recycling storage facilities are provided in new developments.
432. Policy compliant refuse storage facilities would be provided on the ground floor of the Red House and in the Engine House for the Annexe site, in a communal store off Charterhouse Street for the tenant Houses, at basement level for the General Market and a ground floor level in the Poultry Market. Waste collections are included in the number of servicing trips for each building as set out above.

S278 Agreement

433. If required S278 works would be coordinated with the wider public realm changes which could potentially come forward in the wider Smithfield area. The proposed S278 would secure any changes to the highway considered necessary to facilitate the development and to ensure the continued safe operation of the highway, whether or not the wider public realm proposals are brought forward.
434. S278 works are considered necessary to mitigate the impacts of the increase in the pedestrian trips generated by the site including a high share of younger children and school groups, the unique servicing arrangements of the site and the challenges these present. The applicant has undertaken an Active Travel Zone Assessment and identified indicative locations for improvements to crossing facilities and provided an indicative scope of the S278 works area including plans showing specific locations for footway widening around the Poultry Market and Annexe and Engine House buildings. These S278 proposals are not materially different from those previously issued which were subject to a stage 1 road safety audit (RSA). The recommendations from this RSA will be considered in the design and delivery of the S278 works, which will be subject to their own road safety audit process. The exact scope of the S278 will be subject to further discussion and is not subject to the plans submitted.
435. A plan showing proposed changes to existing market loading bays is provided in the Transport Addendum and is provided for reference in Appendix F. The applicant is proposing the removal of the market

loading bays adjacent to the north and south facades of the Poultry Market on Charterhouse Street and West Smithfield (marked as MMKT3, MMKT5 and MMKT 26) and the market loading bays on West Poultry Avenue following the stopping up of the highway. The applicant is proposing to retime the use of market loading bays on East Poultry Avenue (marked as MMKT 6) for use by the markets between 20:00 and 09:00. The applicant is proposing to retime the use of market loading bays on Charterhouse Street (marked as MMKT1 and MMKT2) and West Smithfield (marked as MMKT 30, MMKT33, MMKT 34, MMKT 35 and MMKT 36) and Smithfield Street (marked as MMKT 31) for use by the markets between 00:00 and 08:00.

436. The S278 works (including design and evaluation costs) include but are not limited to;
- Widening and making good of footway, improvements to existing crossings and new crossing facilities and any other safety measures to ensure safe pedestrian passage to, from and between the three buildings
 - Any necessary changes to the highway to accommodate servicing of the Annexe and General Market
 - Provision of security measures on the highway to protect the buildings and members of the public
 - Provision of coach drop-off and pick up facility
 - Provision of accessible parking spaces on the highway
 - Provision of short stay cycle parking on the highway
 - Changes to the market loading bays and hours of operation
 - Introduction of wayfinding measures on the highway
437. In addition to the above, the applicant will be required to enter into a separate S278 agreement with TfL to secure any necessary changes to the TLRN.

Construction Logistics

438. An outline construction logistics plan was submitted within the Transport Assessment. An appropriate draft has been submitted on which the Market Superintendent has been consulted (in 2020) and considered that the proposals strike a reasonable and proportionate balance between the Museum construction and the unhindered operation of the Market. The plans showing the proposed market loading bay suspensions for each phase of the construction works can be found in appendix F.
439. As is set out above, a representation has been received which expresses concerns over the mis-use of yellow lines by RHGV lorries associated with the Market. The local resident considers that the problem is caused by the closure of loading bays in conjunction with construction works at the General Market associated with the potential

Museum, which displaces Market vehicles and results in them using yellow lines for loading for prolonged periods.

- 440. The resident acknowledges that with management the matter could be addressed. The Market Superintendent is reviewing the matter.
- 441. A construction logistics plan, secured by condition, would be required in conjunction with this proposal should planning permission be granted. This would seek to ensure that construction vehicles and the highway is managed in such a way that it would not have a significantly detrimental impact on the surroundings.

Security

- 442. External security measures, proposed in the planning application as lines of bollards on the highway to protect pedestrian areas, would be provided around either end of the main entrance on Charterhouse Street and West Smithfield and at the entrance on Harts Corner. This remains consistent with the details set out in 2020 and the implementation of these security measures would be secured through the S278 agreement and with ongoing consultation with City of London Police counter terrorist security advisors.
- 443. Vehicle blockers are proposed on the entrances to the General Market and Poultry Market loading areas.
- 444. Counter Terrorism Security Advisers from the City of London Police previously confirmed they are satisfied with the proposals, subject to ongoing consultation with them as plans develop.

Impact of the proposed highway and transportation arrangements on the adjacent market use

- 445. As set out in the land use considerations section of this report the continuation of the Market use in Smithfield is supported in the Local Plan. It therefore needs to be ensured that the proposed highway and transportation arrangements would ensure that the museum could operate in a safe environment whilst not compromising the function of the adjacent market.
- 446. Careful consideration has been given to the operational requirements of both the proposed museum and the market. With managed delivery and servicing arrangements and a package of S278 works that is in line with the principles set out above, it is considered that the two uses could co-exist alongside each other in highway terms. This is given that most of the activity on the museum site would take place during the day (although evening events would also take place) and the majority of trading on the market site takes place from early evening, throughout the night until early morning. The peak operational hours of the two sites complement each other.
- 447. At present the markets do use the loading bays around the application site. As set out above it would be intended to remove three loading bays around the Poultry Market in order to facilitate increased footway widths for the museum. The timing of the remaining loading bays would be changed to enable them to be used by vehicles during the

evening/night until the early morning but kept clear of vehicles during the day to ensure that pedestrians can pass easily around the museum site. The Market Superintendent has previously confirmed that “The current proposals strike a reasonable and proportionate balance between the proposed Museum construction and operational works, and the continuing and unhindered operation of the Market, which must remain paramount at all times”.

- 448. It is acknowledged that when the museum hosts evening events there could be more taxis in the area. This would be at a time when the market would be operational. The provision of a suitable location for drop offs and pick ups would be considered as part of the S278 agreement so as not to impact on market operations. Notwithstanding, the Smithfield area already has a vibrant night time economy with taxis dropping off and picking up in the area during operational market trading hours.
- 449. The demolition and construction works of the proposed scheme would be carefully managed through securing construction and demolition management plans via condition so as not to impact on market operations.
- 450. Subject to conditions and an appropriate package of S278 works, it is considered that the proposal would not compromise the ability of the adjacent market site to function in highway and transportation terms (thereby supporting the continued presence of Smithfield Market) in accordance with policies CS5 of the Local Plan and policy S25 of the Draft City Plan 2040 which seek to support the continued function of the Markets.

Highways and Transportation Conclusion

- 451. Subject to conditions securing an evaluation and design fee payment through the S.106 agreement and a scheme of highway works to be developed pursuant to S278 of the Highways Act, the scheme would be policy compliant in respect of its approach to car parking, long stay cycle parking for the General Market and the Poultry Market, coach drop off, taxi drop off and servicing arrangements. These elements of the scheme would comply with Local Plan policies DM 16.5-1, DM16.3, CS16, DM16.5, CS17 and DM17.1, Draft City Plan policies VT3-1, VT3-5, VT2-1,2,4 and CE1 and London Plan policies T6.4, T6.5, T5A(2), T7 G and SI8.
- 452. Levels of short stay cycle parking and long stay cycle parking for the General Market Houses would not be compliant with policies T5F and T5A(2) of the London Plan. It is accepted that space on the site and within the wider public realm is constrained to accommodate the required levels of cycle parking.
- 453. The S278 agreement would ensure that a pleasant and safe public realm would be delivered for visitors to the Museum of London and for future users of the Annexe site.
- 454. The outline package of S278 works, delivery and servicing arrangements and construction logistic details have been worked up to

ensure that the East and West Markets and the Museum can co-exist. The operational times of the two uses would complement each other with the Museum mainly in operation during the day with some evening opening and functions and the Markets mainly in operation throughout the night. The Market Superintendent has confirmed that the highway proposals strike a reasonable and proportionate balance between the proposed Museum's construction and operational works, and the continuing and unhindered operation of the Market. The highway and transportation arrangements would accord with policy CS5 of the Local Plan and S25 of the draft City Plan 2040 which seek to support the continued function of the Markets.

Public Access and Inclusivity

- 455. 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, S8 and HL1 of the draft City Plan 2040, and policy D5 of the London Plan 2021.
- 456. The proposed development has been carefully designed within the constraints of the existing buildings to ensure that the access needs of all users have been considered. The City of London Access Group (CoLAG) and Museum of London Access Panel have been consulted and involved in the evolution of the scheme.
- 457. As part of the 2022 update minor revisions have been made to internal layouts. These changes have been assessed from an accessibility and inclusive access perspective. The City's Access Officer considers that matters raised have been justified, addressed, or will be addressed at the next stage of design.
- 458. Ramps and lifts would be provided where necessary throughout the buildings in order to aid navigation around the site and address level changes. Facilities such as accessible toilets and long stay cycle parking are provided within the respective buildings. Blue badge parking would be required under the S278 agreement along with alterations to footway widths and the introduction of pedestrian crossings which would aid navigation around the perimeter of the buildings. Further information on some detailed matters such as accessible WC layouts and accessible cycle parking layouts would be required by condition.
- 459. Level access into the General Market Houses remains an important consideration. The 2020 considerations set out how the houses around the perimeter of the General Market have varying relationships with the levels of the external pavements. The applicant has carried out some initial exploration as to how level access could be achieved. A condition is recommended requiring further details of how step free access would be achieved.
- 460. The secondary entrance into the Poultry Market off East Poultry Avenue would be used for people attending specific events initially. Stepped access and a lift option would be provided, all be it the lift

would be 20 metres from the lobby area. The Museum has demonstrated that in the future there would be scope to provide a platform lift adjacent to the steps and within direct sight of the lobby should this entrance become a main entrance that links with a future scheme in the East and West Markets.

461. Concerns were previously raised over the tapered steps proposed in conjunction with the civic space that would replace the Iron Mountain facility. As part of the 2022 update the steps have been removed and replaced with a seating structure. Full details of the design of the new public realm area would be required by condition.
462. The proposal has been designed to ensure that the site is accessible for all. Accessibility is key to ensuring that the Museum of London can realise its aspiration to become a world class visitor attraction. Great consideration has been given to how constraints provided by the existing building could be overcome in order to secure the best solution for all. Subject to conditions securing further detail in relation to elements of the design, it is considered that the proposal accords with the access related policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1, S8 and HL1 of the draft City Plan 2040 and policy D5 of the London Plan 2021.

Energy and Sustainability

463. This section of the report has been revised and updated since the scheme was considered in 2020 in order to ensure assessment against current policy considerations.

Circular Economy

464. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. Emerging City Plan 2040 Policy S16 sets out the City's support for Circular Economy principles.
465. Due to their historic and cultural significance, the majority of each of the market buildings would be retained. Super-structure, sub-structure and facades/roofs are the building elements with the highest embodied carbon emissions, and an estimate for each of the retained building elements is shown in the table below (expressed in percentage of volume for substructure, superstructure and some façade/roof elements):

	Detail of retention from the original structure			
	Poultry Market	General Market	(Annexe) Fish Market	(Annexe) Red House
Substructure	75% of substructure by volume retained, as calculated by AKT.	45% of substructure by volume retained, as calculated by AKT.	100% of substructure by volume retained, as calculated by AKT.	70% of substructure by volume retained, as calculated by AKT.

Superstructure	60-65% of superstructure by volume retained, as calculated by AKT.	25-45% of superstructure by volume retained, as calculated by AKT. The intention is to reuse as much of the structural frame as possible, however the extent of this is dependent on further surveys.	90% of original steelwork by volume (cast-iron columns and wrought-iron beams) retained 50% of timber floors by volume retained, as calculated by AKT.	70% of the steel in the north-wing by volume retained, as calculated by AKT.
Façade / Roof	Where feasible, existing glass blocks on the south and north elevations, and brickwork from the façade will be retained. All masonry walls of the façade are repaired and retained. This likely accounts for around 80% of the elevation.	The roof slates are to be reused and existing roof sarking boards, timber/steel structure and outer crust roof are to be retained. The historical parts of the existing shop front will be retained and upgraded, and the façade brickwork will be retained. The existing window frames will be retained and upgraded. This accounts for most of the façade.	The roof consists of two different systems: the arches and the outer roofs. The intention is to retain as much of the existing as possible, however it will be subject to further investigations. An estimated 75% of the arches and 50% of the outer roof will be retained. The existing masonry façade for the Fish Market is being retained	The existing masonry façade for the Fish Market is being retained, however new penetrations will be made for window openings.
Internal Spaces	The north/west staircase is to be retained, and reuse of the following materials will	The existing timber floorboards are to be retained and reused, and other	Not applicable	Not applicable

	be investigated at Stage 4: blue metal balustrade of first floor balcony, timber doors, hanging meat racks as lighting mounts, basement hardwood studwork as wall lining, existing roller shutters and light fixtures.	salvaged timberwork and brickwork are to be retained and reused where possible. Spiral staircases and other existing staircases are also being retained.		
--	--	--	--	--

466. A pre-redevelopment audit has been carried out in line with the Circular Economy Statement requirements to identify opportunities to salvage items and reduce, re-use and recycle demolition materials, where viable. Items that were not identified in the audit report are likely to be of historic significance and are to remain in situ. The key strategy approach to address Circular Economy principles is material efficiency that includes, where possible, to reuse and restore materials within the existing buildings to reduce the use of new resources and to maintain the original character of the buildings. The space layout and material selection has been developed to accommodate future changes of use of the building and to minimise the frequency of material replacement over its lifespan. Key elements of this approach include: flexibility and adaptability of the spaces; robustness of materials in areas with high pedestrian traffic; robustness of the building fabric against environmental factors (e.g. moisture, solar radiation); and future climate scenarios. The new materials that will be installed in the building will be responsibly sourced and with consideration of their environmental impact. The applicants also intend to adopt material passporting and digital twinning across the project. Details of the material passports are required at post completion stage by condition.
467. A Circular Economy Assessment update and a post-completion update in line with the Mayor's guidance on Circular Economy Assessments to confirm full details and achievement of the planning stage intentions have been requested by conditions. These assessments 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

468. The Energy Statement accompanying the planning application confirms that there are no changes to the key design principles since the submission of the scheme in 2019. The statement demonstrates that the

refurbished and altered buildings have been designed to achieve an overall 72% reduction in regulated carbon emissions compared to a Baseline building model representing the performance of the existing buildings in their proposed use class. For the individual buildings, the overall carbon emissions savings would be 72% for the General Market, 75% for the Poultry Market and 57% for the Annexe Building.

469. The proposed energy demand reduction measures include upgrades to the performance of the building fabric, including the roofs, walls and windows where possible within heritage constraints of the buildings, incorporating natural ventilation and utilising the thermal mass of the building fabric to maintain the required conditions. The optimisation of daylight levels and minimising solar gain have been considered. The individual carbon emissions savings through energy efficient design are 65% for the General Market, 66% for the Poultry Market and 47% for the Annexe Building.
470. Nearby Citigen district heating network would be the primary provider for heating and cooling to all buildings. Based on the Citigen carbon factor of SAP 2012 as agreed with the GLA, and as a result of energy provided by a mix of ground source heat pumps and gas based Combined Heat and Power, the individual carbon emissions savings through clean energy supply are 8% for the General Market, 9% for the Poultry Market and 9% for the Annexe Building.
471. The proposed renewable energy strategy for the site includes photovoltaic panel installations on the roof of the General Market and on the southern roof of the Red House, resulting in a 1% reduction in carbon emissions for the General Market and the Annexe Building.
472. This energy strategy demonstrates excellent operational carbon emissions savings for each of the buildings. In addition, measures to monitor the energy performances post-construction will be put in place and results reported to the GLA.

BREEAM

473. BREEAM pre-assessments were provided for each use to identify a list of credits which could be targeted by the project. The targeted BREEAM requirements will be incorporated as the design progresses. The proposed scores are detailed below:

Assessment scope	BREEAM scheme	Targeted rating	Targeted score
General Market and Poultry Market	BREEAM 2014 Refurbishment and fit-out (RFO) 2014 (Other building, Assembly and Leisure)	Excellent	81.81%

Annexe Building office area	BREEAM 2014 Bespoke	Excellent	81.49%
Annexe building retail area	BREEAM RFO 2014 (Retail)	Excellent	81.54%

474. The assessments for the new buildings indicate high scores in the City's four priority categories of Energy, Materials, Water and Pollution as well as the achievement of the Adaptation to Climate Change credit. Further relevant credits may be achieved through the detailed design development.
475. A condition has been included requiring the submission of post-construction BREEAM assessments for each of the individual buildings, demonstrating that the target rating of 'Excellent' as a minimum has been achieved.

Whole Life-Cycle (WLC) carbon emissions

476. 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.
477. The overall embodied carbon emissions of the proposed development over a 60-year study period are made up of 38.8% in the product stage (life-cycle modules A1-A3), 30.9% for repair and replacements (modules B1-B5), 15.8% for site operations (module A5), 8.8% for the end of life stage (modules C1-C4) and 5.8% for the transportation stage (module A4). The percentage for life-cycle modules A1-A3 is particularly low due to the extent of retained building elements.
478. The proposed embodied carbon emissions compare to the GLA benchmarks for education uses as shown in the table:

Scope	Proposed Redevelopment	Benchmark	Benchmark Source
RICS Components	kgCO2/m2	kgCO2/m2	
A1-A5	456	750	GLA Standard
		500	GLA Aspirational
A-C (excluding B6-B7)	711	1000	GLA Standard
		675	GLA Aspirational
A-C (including B6-B7)	2,949		

479. Over the proposed buildings' whole life-cycle the embodied carbon emissions calculated at this planning stage demonstrate that the proposals would perform significantly better than the GLA's standard benchmark but result in 5% more carbon emissions compared to the aspirational benchmark. However, the applicants consider that the carbon emissions from modules A to C can potentially be reduced by 11% in order to outperform the GLA's aspirational benchmark, e.g. by reducing the carbon intensity of concrete and steel. In terms of upfront embodied carbon emissions (from modules A1-A5), the proposals already demonstrate a 9% reduction of embodied carbon emissions below the aspirational benchmark emissions target for buildings in education use (considered the most similar use to the proposed use, and the most onerous building typology). This performance is attributed to the high level of retention of existing building elements in addition to material efficiencies and low carbon credentials as detailed in the Circular Economy Statement.
480. The embodied carbon impact of the Museum of London proposals would be 28,664 tonnesCO₂ over the building's life cycle of 60 years. Overall, including operational carbon emissions, the Museum of London proposals would result in 118,800 tonnesCO₂ over the building's life cycle of 60 years.
481. The confirmation of the strategy including further improvements from the detailed design stage, and a confirmation of the post-construction results have been requested by conditions.

Energy and Sustainability Conclusion

482. The scheme is considered to demonstrate outstanding sustainability and energy credentials through the reuse of the existing buildings, the incorporation of measures to reduce energy demand, connection to Citigen and the incorporation of a renewable energy strategy for the site.
483. The scheme would accord with London Plan Policies SI7 and SI2, Local Plan policies CS15, DM15.1 and DM15.2 and draft City Plan 2040 policies S16, DE1.

Urban Greening and Biodiversity

484. London Plan Policies G5 and G6, Local Plan policies DM19.2 and CS5, Draft City Plan 2040 policies OS2 OS3, S8 and DE2 seek to ensure that new development incorporates urban greening and promotes biodiversity.
485. The Design and Access Statement sets out the urban greening proposals which will enhance biodiversity. The proposed development includes:
- A biodiverse landscape of wildflowers and shrubs on the roof of the Engine House.
 - A roof top garden, including a large clustering of shrubs and green walls, on the roof of the Red House.
 - A biodiverse roof on the General Market. The roof would be planted with a mixture of wildflower seeds and native species including sedum, grasses, mosses and wild flowers. Insect hotels would be attached to the PV and Hibernacula (sand/stone and log piles) would be incorporated to maximise the ecological value of the roof.
486. There is no existing green infrastructure on the current buildings. The inclusion of green roofs is welcome and would deliver a biodiversity net gain to the site. It is also welcome that plant species to be selected under the PV panels would be drought tolerant and shade resistant.
487. The draft City Plan 2040, Policy OS2, and the London Plan 2021 both set Urban Greening Factor (UGF) targets as a metric for measuring the contribution of proposed greening of the urban environment. The City of London's UGF Study allows for slightly different factor values against the respective types of landscape and an UGF based on this calculation has been submitted with the application:

Surface Cover Type	Area (sq.m)	UGF (City of London)
Extensive green roof	843	0.8
Permeable paving	241	0.1
Intensive green Roof	48	0.9

Green Wall (modular system or climbers rooted in soil)	25	0.7
UGF Total: 0.04		

488. The UGF for this application has been calculated as 0.04 based on the information provided. This falls well short of the City's proposed target UGF score of 0.3 as a minimum. The proposal would not therefore accord with draft City Plan 2040 policy OS2(2, bullet point 1).
489. It is recognised that the development falls short of the target due to the nature of the development and specific site constraints including the historic character of the market buildings which prevent significant greening. The introduction of the proposed greening measures are supported and represent an enhancement given there is no greening on the site at present.
490. The provision of greening and measures to enhance biodiversity on the site are in accordance with London Plan policies G5 and G6, Local Plan policies DM19.2 and CS5, Draft City Plan 2040 policies OS3, S8 and DE2, all be it the quantum of greening proposed falls short of the Urban Greening target.

Climate Change Resilience

491. Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2 seek to ensure that buildings and the public realm are designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.
492. Application documents relevant to climate change resilience and adaptation have been submitted and reviewed, including the relevant sections of the Environmental Statement, Design and Access Statement and Sustainability Statement. The Flood Risk and Sustainable Drainage Strategy has also been reviewed.
493. Climate change adaptation of the proposed development has been reviewed in line with BREEAM credit Wst05 (Adaptation to climate change); credit Wst05 is targeted for all parts of the development. The assessment considers UKCP09 climate projections, the Thames Estuary 2100 plan and the ARCC Design for Future Climate report. The assessment identified a risk of overheating in most of the buildings of the proposed development.

Overheating and the Urban Heat Island

494. Thermal upgrades have been proposed to most buildings in order to improve the performance of the building fabric. This must be sensitively designed and managed to respond to the historic nature of the buildings. A number of passive measures have also been included to minimise solar gain.

- 495. The strategy to mitigate overheating in the General Market and Poultry Market includes addition of fritting on windows to reduce solar gain, and to deliver 'activated thermal mass' with chilled water in underfloor pipes in the floor slabs.
- 496. A green roof is proposed on the General Market, which will improve building insulation and contribute to mitigation of the urban heat island effect.
- 497. In the Annexe Buildings, the transparent glazed area of the Fish Market skylights and the Red House façade is to be reduced. Remaining windows are to be treated with fritting to reduce solar gain. Thermal mass in the basement areas is to be exposed to manage heat build-up. Active cooling, to complement natural ventilation, is to be provided to office spaces. Green roofs have been proposed for the Red House and Engine House.
- 498. The proposed development utilises numerous basement/subsurface spaces on the existing plots, such as the General Market salt store, basements of the Poultry Market and vaults of the Annexe Buildings. Consideration should be given to safeguarding general public access to some or all of the below ground space, which may have utility as a naturally cooler space during heatwaves.

Water stress

- 499. Low flow water fittings, metering and presence detection will be incorporated as standard. Rainwater harvesting is proposed from the roofs of the General Market and Poultry Market. This will be stored in a below ground attenuation tank from the General Market and an above ground attenuation tank from the Poultry Market, with water used for toilet flushing. Condensate from air handling units will also be diverted to rainwater harvesting tanks.
- 500. The Annexe Buildings incorporate rainwater attenuation via a green roof, and rainwater harvesting via an above ground attenuation tank. Water will be used for WC flushing, irrigation, and cleaning of the roof, terraces and bin stores.
- 501. The proposed development achieves 4/5 credits for BREEAM Wat01.

Flooding

- 502. The site is of low risk of flooding from all sources. In line with the London Plan drainage hierarchy, the proposed development includes rainwater harvesting, attenuation measures for rainwater and storage of rainwater. These measures combined reduce surface water discharge to 3x the greenfield runoff rate.
- 503. Sustainable drainage measures are somewhat limited by the historic nature of the development, however green roofs, rainwater attenuation and storage tanks are proposed sustainable drainage measures. A small area of permeable paving and bio-retention (conveyance) is also proposed in the Annexe Buildings.

Biodiversity

- 504. The development proposes biodiverse green roof on the General Market and Annexe Buildings respectively, accommodating native planting and invertebrate features. This includes an intensive green roof (800mm substrate) on the Red House, with large shrubs/small trees.
- 505. The Urban Greening Factor score is 0.04. This is below the London Plan target of 0.3 for non-residential buildings, although the refurb nature of the development and historic constraints limit the score available. As a result, public realm greening opportunities should be maximised, e.g. at the west end of West Smithfield.

Energy and air quality considerations

- 506. The proposed development will connect to the Citigen local district heat and cooling network and will also include photovoltaic panels. Water heaters will be electric point-of-use. This minimises use of fossil fuel combustion which may worsen air quality, which is a particular risk during hotter, drier summers.
- 507. The ventilation system will include air intakes at roof height to minimise exposure to poor air quality.
- 508. The proposed development comprehensively considers climate resilience and is in compliance with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.

Environmental Impact of the Proposals on the Surrounding Area

- 509. This section of the report has changed since the consideration of the scheme in 2020. This is to ensure that assessment aligns with current policy considerations.
- 510. Local Plan 2015 policy DM10.1 seeks to ensure that developments are designed to avoid unacceptable wind impacts at street level or intrusive solar glare. Policy D8 of the London Plan 2021 and Policy DE2 and policy S8 of the draft City Plan 2040 seek to ensure that new development optimises micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort. The Wind Microclimate Guidelines for Developments in the City of London are a material consideration in the determination of this application. Since the application was considered in June 2020 the Thermal Comfort Guidelines have been adopted and are also a material consideration.
- 511. Local Plan 2015 policy DM10.7 seeks to resist development that would noticeably reduce daylight and sunlight to nearby dwellings and open spaces.

Wind Microclimate

- 512. Wind tunnel testing has taken place to predict the local wind environment associated with the completed development and the

resulting pedestrian comfort within and immediately surrounding the site in accordance with the City of London Wind Microclimate Guidelines.

513. Wind conditions are compared with the intended pedestrian use of the various locations including carriageways, footways and building entrances. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Wind Microclimate Guidelines, being 5 Comfort Categories defining conditions suitable for frequent sitting/occasional sitting/standing/walking/uncomfortable. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.
514. In considering significance and the need for mitigation measures, if resulting on-site wind conditions are identified as being unsafe (major adverse significance) or unsuitable in terms of the intended pedestrian use (moderate adverse significance) then mitigation is required. For off-site measurement locations, mitigation is required in the case of major adverse significance – if conditions become unsafe or unsuitable for the intended use as a result of the development. If wind conditions become windier, but remain in a category suitable for intended use, or if there is a negligible or beneficial effect, wind mitigation is not required.
515. Assessments have been carried out for both the windiest and summer season in the following configurations:
- Scenario 1: Existing site with existing surrounding buildings (baseline scenario)
- Scenario 2: Development with existing surrounding buildings
- Scenario 3: Development with cumulative surrounding buildings
516. The results of the wind assessment are contained within the Environmental Statement and are summarised in the following paragraphs of this section of the report.

Scenario 1: Existing Baseline Conditions

517. The wind tunnel testing for the development was undertaken in 2019. As part of the 2022 update it has been assessed whether the test results are still relevant and sufficiently robust to use in conjunction with the development. There have been no material changes to the massing of the development. While there have been some changes to surrounding existing and consented buildings, most of the new consented schemes are outside the scope effect area to the development and have been judged to have a negligible impact on the wind microclimate. There are two newly consented schemes within 100 m of the development - Snow Hill Police Station at 5 Snow Hill and the 14 – 21 Holborn Viaduct development which includes 32-33 and 34-35 Farringdon Street. The impact of these schemes has been considered in the Environmental Statement which concludes that they would have an insignificant impact on the wind microclimate around the development. Therefore, the results from the 2019 baseline are

considered robust and appropriate for the 2022 baseline. This approach is acceptable.

518. In the baseline scenario all test locations are suitable for their intended activities. (One test location on Farringdon Road has uncomfortable wind conditions, however this is on a road where pedestrians would not be expected to go). Safety criteria are not exceeded in this scenario.

Scenario 2: Development with Existing Surrounding Buildings

519. All test locations are suitable for their intended purpose and no safety criterion are exceeded:

Entrances (required minimum condition: standing)

520. All but one entrance to the Annexe Building, during the worst season, would experience wind conditions that are at least one category better than the required condition. The remaining entrance would be suitable for its intended use.

521. During the worst season all entrances to the Engine House, Poultry Market and General Market would experience wind conditions that are one or more categories calmer than the required condition.

On- Site thoroughfares (required minimum condition: walking)

522. Wind conditions along thoroughfares around the Annexe building would range from being suitable for occasional sitting, to being suitable for standing during the worst season.

523. Wind conditions on thoroughfares around the Engine House would be suitable for occasional sitting during the worst season.

524. Wind conditions on thoroughfares between the Annexe Building, the Engine House, the General Market and the Poultry Market range from being suitable for occasional sitting to standing during the worst season.

525. Wind conditions at thoroughfares around the Poultry Market range from being suitable for occasional sitting to walking.

526. Wind conditions at thoroughfares around the General Market range from being suitable for occasional sitting to standing.

527. With the development in place thoroughfares would either comply or be calmer than the required conditions.

Off site thoroughfares (required minimum condition: walking)

528. Wind conditions on the surrounding thoroughfares were either the same as the baseline or were windier but still suitable for their intended use.

529. As per the baseline, one test location on Farringdon Road has uncomfortable wind conditions. As set out above this location is in the middle of a road. The proposed development would not exacerbate wind conditions in this location.

Roof Terraces (required minimum condition: occasional sitting)

530. During the worst season, wind conditions at the roof terrace of the Red House would be suitable for frequent sitting. This is one category calmer than required for the intended use.

Scenario 3: Development with Cumulative Schemes

531. The effect of the cumulative scenarios on entrances, thoroughfares and roof terraces would mainly be similar to conditions experienced in either scenario 1 or scenario 2. There would be minor fluctuation (occasional sitting to standing) in some of the results, particularly on the north east corner of the General Market and Annexe Building and the south east corner of the Poultry Market but all locations would remain suitable for their intended purpose.
532. Wind mitigation measures would not be required because of the proposed development. The wind modelling results are favourable with the two most comfortable categories of the City's Lawson Criteria (Frequent and Occasional Sitting) substantially covering the perimeter of the proposed Museum particularly during the summer months. This would result in very good conditions to enable these areas to be used for recreational activities such as sitting, dwelling, pop up street markets and events, all of which are associated with cultural attractions.

Wind Conclusion

533. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan 2021 Policy D8, Local Plan 2015 policy DM10.1 and policies S8 and DE2 of the draft City Plan 2040 and the guidance contained in the Wind Microclimate Guidelines for Developments in the City of London.

Daylight and Sunlight and Solar Glare

534. Local Plan 2015 policy DM10.7 relates to the impact of development on the daylight and sunlight levels in residential dwellings. Policy DE8 of the draft City Plan 2040 requires development proposals to demonstrate that acceptable daylight and sunlight levels would be provided to nearby dwellings and open spaces and that solar glare is mitigated. In July 2017 the City of London published 'Solar Glare' Planning Advice Note.

Daylight and Sunlight

535. A daylight, sunlight and solar glare report was submitted in conjunction with the scheme in 2019. The assessment has been updated as part of the 2022 application update. It has been undertaken in accordance with the Building Research Establishment (BRE) guidelines 2022 and having regard to relevant Local Plan and draft Local Plan policy. The BRE guidelines can be used to assess whether harm is likely to occur. London Plan and Local Plan policy require a judgement to be made as to whether daylight and sunlight levels will be sufficient and whether the level will be unacceptable.
536. The BRE guidelines consider a number of factors in measuring the impact of development on daylight and sunlight on existing dwellings:

- Daylight to windows: Vertical Sky Component (VSC): a measure of the amount of sky visible from a centre point of a window. The VSC test is the main test used to assess the impact of a development on neighbouring properties. A window that achieves 27% or more is considered to provide good levels of light, but if with the proposed development in place the figure is both less than 27% and reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable.

- Daylight Distribution: No Sky Line (NSL): The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important. The BRE Guide requires compliance with both the VSC and daylight distribution guidelines.

- Sunlight: sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window receives less than 25% of annual probable sunlight hours (APSH), or less than 5% APSH between 21 September and 21 March; and receives less than 0.8 times its former sunlight hours as result of a proposed development; and has a reduction in sunlight hours received over the whole year greater than 4% of annual probable sunlight hours.

537. The proposed scheme would primarily refurbish the existing buildings within the existing building envelope, all be it new massing would be added to the Red House, which forms part of the Annexe site.
538. As per the 2019 submission it is still considered that the scheme would not result in any significant losses of light to existing surround residential dwellings. There are few existing dwellings close to the development site. Records indicate that the nearest dwelling would be a flat at 23-24 Smithfield Street. The flat does appear to have some windows facing the new massing, but it would be over 80 m away and is located at sixth floor level. It is therefore concluded that any loss of daylight or sunlight would be negligible.
539. Number 26 Smithfield Street is a public house which may have a flat above it (the council tax register has deleted record of such flat). Notwithstanding, its windows face directly into Smithfield Street, and it would only have an extremely oblique view of the new massing, which would be some 90 metres away. Any loss of daylight would be negligible, and loss of sunlight would not be an issue as the windows in question face north.

540. Other flats in the vicinity on West Smithfield and Cock Lane either do not face the proposed massing or would have no view of the massing and therefore there would be no resultant loss of light.
541. There are no existing gardens or open spaces in the vicinity which could experience loss of sunlight because of the new development.
542. The daylight/sunlight assessment has been updated to take account of relevant cumulative schemes in the locality. The redevelopment of 61-65 Holborn Viaduct (ref. 21/00781/FULMAJ), to the south of the Annexe site, has been approved since the 2019 scheme was considered. Given the distances and orientations of the residential properties described above it is not considered that there would be any additional cumulative impacts.
543. An assessment has been carried out as to the impact of the proposal on the daylight to the proposed student accommodation at first and second floor level in 61-65 Holborn Viaduct. Sunlight would not be an issue since the rooms with a view of the new massing to the Annexe face northerly.
544. All windows and rooms meet the vertical sky component and daylight distribution guidelines. Loss of daylight would be small and not significant.

Solar Glare

545. New areas of glazing would be limited and at low level therefore the potential for solar glare is limited.
546. The orientation of the site would provide favourable sunlight levels to the terrace areas on the roof of the Annexe site.

Daylight, Sunlight and Solar Glare Conclusion

547. It is considered that the proposal is acceptable in respect of its daylight, sunlight and solar glare impacts and that it would accord with Local Plan 2015 policies DM10.1 and DM10.7, policies DE2 and S8 of the draft City Plan 2040 and policy D8 of the London Plan 2021.

Thermal Comfort

548. London Plan Policy D8 and Draft City Plan policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be considered in order to encourage people to spend time in a place. Draft City Plan 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 were published in December 2020 and they set out how the thermal comfort assessment should be carried out. A Thermal Comfort Assessment has been submitted in conjunction with this application as part of the 2022 scheme update.
549. The technique for assessing thermal comfort 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.

550. The Universal Thermal Climate Index (UTCI) metric will be utilised for predicting thermal comfort. The usage categories for thermal comfort are set out below and are used to define the categorisation 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)

551. Three scenarios have been tested:

Existing site with existing surroundings (surroundings – street level)

Proposed development with existing surroundings (surroundings – street level, proposed terraces)

Proposed development with consented surroundings (surrounding-street level, proposed terraces)

Existing Site with Surroundings

552. Overall, for the majority of time across the year, the thermal conditions are comfortable for pedestrians. On site the year round comfort grade is largely seasonal indicating conditions suitable for outdoor dining. East Poultry Avenue experiences an 'All Season' comfort grade, indicating conditions suitable for year round amenity use. Off site such as Farringdon Street, the conditions are largely suitable for 'Seasonal' and 'Short-Term' uses – the latter indicating conditions suitable for short stay uses.

Proposed development with existing and consented surroundings

553. This scenario is largely similar to the existing scenario set out above. The site is mainly in the 'Seasonal' category. Off site areas such as Farringdon Street, Snow Hill and Charterhouse Street would be suitable for 'Seasonal' and 'Short-Term' uses.
554. The proposed Iron Mountain public realm area is sheltered from wind and sunlight. The thermal comfort grade for this area would be 'All Season' indicating conditions suitable for public amenity space.
555. Roof terraces typically experience greater exposure to sunlight and wind velocities than at street level. The resulting year-round comfort grade for the Red House terrace would be seasonal indicating conditions that would be suitable for outdoor dining.

Thermal Comfort Conclusion

556. The site and surrounding content would have thermal conditions appropriate for their use in all scenarios. The proposal accords with policy D8 of the Local Plan and policies S8 and S15 of the draft City Plan.

Environmental Impacts Conclusion

557. The Environmental Implications of the proposal have been carefully considered. The proposal is considered to be acceptable in terms of its impacts on daylight sunlight, solar glare, thermal comfort, wind, air quality and flood risk. The proposal is therefore considered to accord with Local Plan policies DM10.1, DM10.7, draft City Plan policies DE2 and S8 and London Plan 2021 policy D8.

Flood Risk

558. The flood risk considerations remain principally the same as those set out in 2020.
559. Local Plan 2015 policy CS18 seeks to “reduce the risk of flooding from surface water throughout the City, by ensuring the development proposals minimise water use, reduce demands on the combined surface water sewer and sewerage network”. The use of Sustainable Urban Drainage Systems is supported by Local Plan policy CS18 and policy CR3 of the draft City Plan 2040.
560. A Flood Risk assessment has been submitted in support of the proposal. The site is in Flood Zone 1 (land assessed as having a less than 1 in 1000 annual probability of river or sea flooding), it is within one of four Local Flood Risk Zones identified within the City of London

and the site lies adjacent to an area with the risk of surface water flooding depths reaching beyond 2 metres on Farringdon Street to the south of the site.

- 561. In accordance with the NPPF the proposed mix of uses would be appropriate in Flood Zone 1.
- 562. The potential of flooding from fluvial and tidal sources, sewers and local drainage, surface water and artificial sources has been assessed and it is concluded that there is a low probability of the site flooding from these sources. In terms of flooding from groundwater there may be some risk to the General Market basement. An appropriate waterproofing strategy would need to be developed and subject to appropriate waterproofing there would be low probability of flooding from groundwater.
- 563. A SUDS scheme is proposed in conjunction with the development. This would include measures such as rainwater harvesting and attenuation tanks. Conditions are recommended to require final details of the SUDs measures.
- 564. The proposed Flood Risk and SUDS strategy would accord with policies CS18 of the Local Plan 2015, CR3 of the draft City Plan 2040 and policies SI12 and 13 of the London Plan 2021.

Air Quality

- 565. Local Plan 2015 policy CS15 seeks to ensure that developments positively address air quality. Policy DE1 of the draft City Plan 2040 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 are supported by policy SI1 of the London Plan 2021. Large scale development proposals, subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating how the proposal has considered ways to maximise benefits to local air quality; and what measures or design features would be put in place to reduce exposure to pollution and how would this be achieved.
- 566. An Air Quality Assessment including an Air Quality Neutral Assessment was submitted in conjunction with the 2019 submission. An updated Air Quality Assessment has been submitted. The existing air quality baseline has been updated to include monitoring carried out since 2019, updated traffic generation predictions have been taken into account and the approach to the 'Air Quality Neutral' assessment has been updated to reflect the London Plan Guidance, Air Quality Neutral (Consultation draft November 2021).

567. The submitted air quality assessment has assessed the construction and operational phases of the development. It recommends that a Construction Environmental Management Plan be submitted which would include measures for controlling dust and pollution during the demolition and construction phases of the development, and that a construction logistics plan should be required by condition in order to minimise site traffic generation. Conditions relating to demolition and construction management, construction and deconstruction logistics are recommended in order to obtain further detail on these elements post consent once the applicant has finalised such arrangements.
568. In terms of the operational phase of the development it would be car free (with the exception of provision of blue badge spaces under the S.278 agreement), with only service vehicles and a small number of coaches and taxis. Heating would be provided through a connection to the Citigen district heating system therefore significant building emissions are not anticipated. The development would be ventilated by a mixture of mechanical and natural ventilation, with intakes at roof height, to minimise pollutant concentrations in indoor air, reducing exposure of visitors, staff and artefacts. Details of extraction systems of any future A1/A3/A4 units and details of the impact that any plant would have on air quality would be required by condition.
569. The Air Quality Neutral assessment considers building and transport emissions. As set out above the scheme will be connected to the Citigen district heating network and no boilers or significant combustion plant for space or water heating are proposed. Therefore, the building will not result in direct emissions to air and is considered to be air quality neutral in terms of building emissions. As the development would be car free it is considered air quality neutral in terms of transport emissions.
570. In response to the requirements from the London Plan an Air Quality Positive statement has been submitted as part of the 2022 scheme update to be read in conjunction with the Air Quality Assessment. The opportunity to integrate air quality considerations was considered at an early stage in the design process, such measures include:
- Ventilation with filters and high level air intakes to minimise exposure of visitors, employees and artifacts to poor air quality.
 - Retention and conversion of the existing buildings to reduce demolition and construction emissions.
 - Use of Citigen to prevent combustion emissions.
 - Point of use electronic water heaters will be installed across the site to reduce energy output and wasted energy for hot water usage.
 - Car free development in a location that is accessible by public transport to reduce vehicle emissions.
 - Registration of the museum buildings under the BREEAM scheme where a rating of 'Outstanding' is targeted. BREEAM

includes a credit for indoor air quality which ensures indoor air quality is considered throughout the development of the scheme covering aspects including ventilations, building occupancy and uses, the specification of low emissions materials and maintenance in use.

- Use of a Dust and Air Quality Management Plan to minimise construction emissions.

571. The delivery of such measures would be controlled by condition.
572. Subject to conditions the development would have minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan 2015 policy CS15, policies HL2 and DE1 of the draft City Plan 2040 and policy SI of the London Plan 2021.

Impact on amenity (noise and disturbance)

573. The considerations in this section of the report have not changed significantly from those considered in 2020.
574. Local Plan 2015 policy DM15.7 and London Plan policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that there would be no increase in background noise levels from plant. Local Plan 2015 policy CS5 seeks to protect the residential environment in the North of the City.
575. Policy S23 of the draft City Plan 2040 seeks to preserve privacy, security and noise abatement for residents and businesses. Policy SB1 relates to culture mile impacts and seeks to ensure that the impact of noise generating uses, particularly night time activities is considered on residents and business occupiers. Policy HS3 seeks to protect the amenity of existing residents.
576. Smithfield has a variety of night time uses and the market is currently operational throughout the night. There are residents near the site and St Barts Hospital is in close proximity. The Environmental Statement gives consideration to the impact that the proposal would have on noise and disturbance to sensitive local receptors (residents in Islington and the City) given that the museum intends to run programmed events, that may require amplified music.
577. The Environmental Statement acknowledges that there would be some impact on residents in the surrounding locality particularly at 23-24 Smithfield Street and 25-27 Farringdon Street where noise levels from music would be audible above background noise levels.
578. The Environmental Statement recommends that the impact of the noise could be mitigated to some degree by operating the General and Poultry Market's ventilation strategy in 'event mode'. This facilitates the operation of the Poultry Market with only window towards the east of the building open and in the General Market it would mean that

operation should take place with the majority of louvres closed. This would reduce noise break out to all receptors.

579. Notwithstanding the above, the Environmental Statement considers that the noise impact must be considered in the context of the intermittent nature and that the programming generating high levels of amplified music sound at night would be a small number of occurrences a year.
580. Further details on event programming and minimising the impact of events on amenity in terms of dispersal of visitors at night time and noise and disturbance would be required as part of the Event Management Strategy that would be secured via condition.
581. The proposed plant would be subject to a condition that require noise levels to be compliant with the City's standard of at least 10 dBA below background noise level.
582. The impacts of the demolition and construction work on the surrounding area would be controlled by conditions requiring the submission of schemes of works to protect neighbouring occupiers.
583. Subject to the imposition of conditions, in particular those relating to noise from plant and schemes of works to protect against the impacts of demolition and construction and event management, it is considered that the application is in accordance with the policies CS5 and DM15.7 of the Local Plan 2015, policies S23, SB1 and HS3 of the draft City Plan 2040 and policies D13 and D14 of the London Plan 2021.

Health Impact Assessment

584. This section of the report has been included to address the requirements of the London Plan 2021 and the Draft City Plan 2040 as set out below.
585. Policy GG3 of the London Plan 2021 states that those involved in planning and developments should assess the impacts of development proposal on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments. Policy S1 of the draft City Plan 2040 requires Health Impact Assessments depending on the scale and impact of proposals.
586. In accordance with policies GG3 and S1 a Health Impact Assessment has been submitted in conjunction with the proposal. It concludes that the positive impacts of the development would include:
 - Opportunity to sensitively revive an underutilised area of Smithfield into a new destination that would be accessible for all and have economic, environmental, cultural and social benefits. This would encourage social interaction and cohesion in the local area.
 - Provision of facilities for community use through the creation of a new cultural hub and upgraded public realm. The overarching

aim of the development design is to be people-centred and provide a place of culture, learning and leisure that is open to all.

- Provision of a new area of public realm on the Annexe site. This improves the public realm in the area and could provide a place for people to socialise and relax.
- Integration of inclusive design principles into the scheme to ensure Protected Groups with reduced mobility are able to access all facilities with ease. Pedestrian routes through the site will be accessible to pushchairs and wheelchairs.
- Facilitation and encouragement of cycling through the provision of long and short stay cycle parking.
- Generation of jobs including temporary ones during construction work and permanent end use ones.
- Integration of sustainable design principles into the design of the proposal for example re-use of the existing buildings and provision of natural ventilation.

587. The main potential adverse impacts associated with the proposed development may occur during the construction phase, particularly in noise and dust generation and temporary disruption to pedestrian footways. These impacts would be mitigated through the requirement for a Construction Logistics Plan and a Construction Environmental Management Plan, both of which would be secured by condition.

588. The main potential adverse impacts associated with the proposed development may occur during the construction phase, particularly in noise and dust generation and temporary disruption to pedestrian footways. These impacts would be mitigated through the requirement for a Construction Logistics Plan and a Construction Environmental Management Plan, both of which would be secured by condition.

589. The Health Impact Assessment makes the following recommendations, further to which the applicant has provided a response:

- Provide a travel information pack for staff with mobility impairments - The applicant has confirmed that there are existing arrangements in place for the communication of this information via the staff intranet and internal communications channels; Additionally this information will be set out in the staff travel plan for the new Museum.
- Consider whether the workspace will be made available to a range of occupiers, including local businesses – The applicant has confirmed that the Museum of London work with a variety of stakeholders in the Square Mile and beyond, including local businesses and schools. The existing arrangements will continue at the new Museum, which will include collaborating with London businesses through the provision of the “Houses” accommodation in the outer crust. Areas in the New Museum in the Houses and

beyond, offer the Museum of London the opportunity to support key aspects of the vision for the New Museum Project as a whole – adding value and vibrancy not only to the life of the museum but to the public realm, the local area, the community and London itself. A mix of occupiers will make the most appropriate use of each of the spaces. Potential uses include (but are not limited to) retail, work spaces, food and beverage, workshops, and cultural activity. The Museum is endeavouring to create a shared place for London – this entails working in partnership with a wide range of organisations. The Museum will work alongside partners to: enhance the work and activity of the museum; generate income; broaden access to opportunities; and to create a vibrant and thriving streetscape that enhances the environment for visitors, local workers and residents alike.

- Investigate including opportunities for work for local people via local procurement arrangements, or the production of a skills and training strategy. The existing staff at the Museum will be offered the opportunity to work at the new Museum. Additionally the new Museum project will create numerous new job opportunities that will be procured locally as far as possible. Existing staff and new staff are subject to on-going training. Working in close partnership with organisations such as the Islington Youth and Employment Service (YES) programme and Culture Mile Fusion Futures, the Museum develops and implements programmes to prepare local young people for future careers, for example by working with local schools and youth organisations. Creating a legacy through the New Museum project's social and added value plans which will continue into the operation of the New Museum.

590. It is considered that the impact of the proposal on health have been comprehensively assessed and that the proposal complies with policy GG3 of the London Plan 2021 and policy S1 of the draft City Plan 2040.

Fire Safety

591. Policy D12 of the London Plan 2021 seeks to ensure that proposals have been designed to achieve the highest standards of fire safety, embedding these into developments at the earliest possible stage.
592. A Fire Statement has been submitted as part of the 2022 application update. It demonstrates how the development would achieve the highest standards of fire safety.
593. The City's District Surveyor's Team have reviewed the submitted fire statement and consider that it is acceptable. It is therefore considered that the proposal meets the requirements of policy D12 of the London Plan.

CIL and Planning Obligations

594. 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.
595. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
596. On the 1st of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor is collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).
597. 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	£311,193	£298,745	£12,448

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	£51,225	£48,664	£2,561
Affordable Housing	£34,150	£33,809	£341
Local, Training, Skills and Job Brokerage	£20,490	£20,285	£205
Section 278 Design and Evaluation	£100,000	£100,000	£0
Carbon Offsetting (As Designed)	£3,032,815	£3,032,815	£0
Monitoring Costs	£3,750	£0	£3,750
Total liability in accordance with the City of London's policies	£3,242,430	£3,235,573	£6,857

City's Planning Obligations

598. The obligations set out below are required in accordance with the City's SPD 2021. 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:

- Carbon Offsetting
- Legible London Contribution (tbc)
- TfL / Cycle Hire Contribution (£200,000)
- Construction Monitoring Costs
- The provision of public access to the West Poultry Route
- The provision of public access to the new Iron Mountain Public Realm

599. The appropriate mechanism for securing the above planning obligations, and enabling your Committee to give weight to them, requires particular

consideration in this case because the City Corporation as landowner intend to bring forward the Annexe part of the redevelopment independently from the Museum, and also because at the time of writing the report the Museum of London do not yet have an interest in the site which would enable them to enter into planning obligations which bind the land. At the point that the City Corporation (as landowner) and the Museum of London enter into an agreement for lease, the Museum of London will have the necessary interest in the museum part of the site (consisting of the General Market, the Poultry Market and the Market Houses) ("the Museum Site") to enter into binding planning obligations.

600. At the current time, it is understood that the entry into the agreement for lease is imminent. As such the proposed approach is that the obligations relating to the Museum Site are to be given by the Museum of London, whilst the planning obligations relating to the Annexe buildings (consisting of the Red House, the Iron Mountain facility, the Fish Market and the Engine House) ("the Annexe Buildings") are to be given by the City Corporation as landowner. In the event that there was a delay in the Museum of London being granted an interest in the Museum Site for any reason, flexibility for securing the planning obligations should be retained in order to enable the obligations to be secured and the planning permission granted without delay. This could be achieved by the City Corporation as landowner giving all of the planning obligations in a unilateral undertaking prior to the granting of the planning permission. The City Corporation as landowner would then ensure that the grant of any interest to the Museum of London was conditional upon the Museum of London entering into planning obligations with the City Corporation directly in respect of the Museum Site, on substantially the same terms as those set out in the unilateral undertaking.
601. The fact that the City Corporation as landowner will be giving some of the covenants under section 106 of the Town and Country Planning Act 1990 (or in the event of a delay in an interest being granted to the Museum of London, all of the covenants), gives rise to a technical enforceability issue because the City Corporation could not take legal action against itself. In order to give weight to the planning obligations to be provided, the City Corporation as local planning authority needs to be satisfied that the required planning obligations would be complied with, notwithstanding the lack of ultimate enforcement powers through the courts.
602. The City Corporation has previously taken advice from Leading Counsel as to how to address planning obligations in the situation where the City Corporation is the owner of the land and bringing forward a development, and this advice is still considered sound. Leading Counsel advised that an appropriate way of addressing this enforceability issue is for the City Corporation as landowner to resolve to comply with the planning obligations in the event that it develops the land itself (in addition to giving assurances that it will ensure the obligations are binding on any future purchaser or development partner). Additionally, the advice was that a unilateral undertaking under section 106 should be signed by the City Corporation as landowner, and this will be placed on the local land

charges and planning registers to provide a public record of the covenants, as is the practice with all section 106 deeds.

603. The City Surveyor has delegated authority to consent to the City Corporation's land being bound by planning obligations and to make it a condition of any freehold or leasehold disposal, that the freeholder or leaseholder is required to enter into planning obligations on like terms as the undertakings given. An express commitment will be sought from the City Surveyor's prior to the permission being issued, and subject to this commitment being coupled with either a section 106 agreement or unilateral undertaking signed by:

- the Museum of London in respect of the Museum Site (if they have taken an interest in the Museum Site by the time the City Corporation as local planning authority are in a position to grant the planning permission or shortly thereafter) or the City Corporation as landowner if an interest has not yet been granted; and
- City Corporation as landowner in respect of the Annexe buildings.

604. The Comptroller and City Solicitor advises that it would be reasonable for your Committee to give weight to the proposed planning obligations (on the basis that no reasonable local authority charged with public duties would undermine its credibility and reputation by failing to honour such a commitment). The obligations may therefore properly be taken into account in reaching a recommendation and decision on the acceptability of the proposals.

605. Your approval is therefore sought for planning obligations being accepted to cover the obligations as set out above. As negotiations on the form of the section 106 will continue after any resolution to grant planning permission, I request that I be given delegated authority to continue to negotiate and agree the detailed terms of the obligations and enter into any associated section 278 agreement, and to make minor changes in the event that changes are needed to vary or add conditions or informatives to those proposed, or to move conditions into obligations or vice versa, provided always that officers do not exceed the substantive nature of the Committee's decision.

Monitoring and Administrative Costs

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

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

Relevance of the City Corporation's interest

608. The City's interest as landowner is relevant to the issue of the enforceability of planning obligations and it is also relevant to:

Regulation 10 of the Town and Country Planning Regulations 1992 (which prevents a committee from determining an application if that committee is also responsible for the management of any land to which the application relates); and

Regulation 64(2) of the Environmental Impact Assessment Regulations 2017 which provides that where a local authority is bringing forward a proposal it must make appropriate administrative arrangements to ensure functional separation between persons bringing forward the proposals and the persons responsible for determining it.

609. Members will be aware that steps have been taken to ensure compliance with Regulation 64, including the publication of a handling note in respect of this application. As the application is being considered by a sub-committee that does not have any responsibility for the management of any land to which the application relates, compliance with Regulation 10 is ensured. In all other respects the City's interest as landowner is to be disregarded as irrelevant, as it is not a material planning consideration.

Equality Impacts

610. As set out in the considerations section of the report the Committee is required to have due regard to its obligations under the Equality Act 2010. An Equalities Impact Assessment has been carried out in respect of the scheme by the Local Planning Authority and is appended to this report (see appendix E).
611. It has considered that the physical design and layout of the scheme has been designed to be accessible to all regardless of age, disability, whether you are pregnant, race, sex, sexual orientation and gender reassignment and marital status. This would be achieved through measures such as:
- The provision of level access or lifts where this cannot be achieved due to building constraints
 - Resting/seating areas within the final fit out of the museum
 - The commitment to provide accessible parking and public realm improvements via the section 278 agreement
 - The provision of accessible facilities including changing places, toilets (sex specific and gender neutral), a wheelchair store and accessible cycle parking
 - Safe evacuation procedures for people with physical disabilities or impairment
 - The provision of a prayer room within the Poultry Market for users of the Museum
612. Final details of access to the tenant houses would be secured by condition in order to ensure equality of access.

613. The Museums commitment to engagement with communities would promote equality and inclusivity of access to the Museum. Examples of such engagement strategies include:
- The commitment to engage 200,000 school children per year. Schools in disadvantaged areas and that do not usually access the museum would be targeted.
 - Strategies to promote well being including volunteering apprenticeships and creative courses which would in part be targeted at older people living with loneliness.
 - An enhanced access programme for people with disabilities. This would include tailored tours, sessions and resources for people living with dementia and families with autistic spectrum conditions.
 - Grassroots projects that recognise that many black, Asian and ethnic minorities see museums as 'not for the likes of us', and therefore work to involve these groups.
614. With regard to advancing equality and fostering good relations, the Equalities Impact Assessment acknowledges that the scheme would have an impact on the Poultry Market Traders and that the traders in the East and West markets are concerned about the scheme.
615. Conditions, informatives and a S278 agreement would be required to cover matters such as the accessible parking, final layout of supporting facilities such as the toilets and access into the tenant houses. An informative would be placed on the permission reminding future occupiers of their duty under the Equality Act 2010. This would be particularly relevant in the instance of the Annexe site where the future occupiers are unknown.
616. The Corporation needs to ensure that dialogue with the market traders is maintained.
617. A suitable programme of highway works and conditions relating to construction and demolition management and logistics, noise and dust management are recommended in order to minimise the impact of the scheme on the East and West Markets and those with Protected Characteristics.
618. The applicant has also submitted an Equality Impact Assessment as part of the 2022 application update. It concludes that overall the proposed development would have a positive impact on Protected Characteristics. The delivery of employment space and public realm will generate beneficial impacts for the local community, existing and new employees and visitors include those who share Protected Characteristics. The location of the Proposed Development will provide enhanced links to public transport allowing a broader range of people to access and use the facilities. The report suggests that monitoring and review practice is put in place for the proposed development in order to avoid negative impacts on Protected Characteristics.

619. For the reasons set out above officers consider that overall the proposal would have a positive impact on Protected Characteristics. Any potential negative impacts that could arise through construction would be managed by the recommended conditions.

Conclusions

Planning Permission: 19/01343/FULEIA

620. The proposal still seeks to deliver a mixed-use scheme that centres around the provision of a new site for the Museum of London, allowing it to become a world class attraction within the context of the historically significant Smithfield Market buildings. The scheme is driven by conservation and enhancement of the existing buildings. Repair and renew to best conservation practice. It represents a successful weaving together of Victorian, Twentieth Century and contemporary architecture that would create a new destination with a strong sense of identity. The development displays outstanding sustainability and environmental credentials.
621. In response to which twelve letters of support were received. One holding objection has been received from the Smithfield Market Traders Association expressing concern over the impact that the proposal would have on the functioning of the Markets. Historic Buildings and Places have expressed concern over some of the proposed works to the Red House. SAVE support the proposal whilst considering that elements of the design of the scheme need further consideration. One representation has been received from a local resident raising concern over the impact of construction work at the site and the implications that this has on traffic associated with the Market. Representations considered in 2020 have been taken into consideration where they have not been superseded.
622. 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 including SPDs and SPGs, the NPPF, the emerging Local Plan and considering all other material considerations.
623. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and come to a view as to whether in the light of the whole plan the proposal does or does not accord with it. The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.
624. In this case the proposals are considered to comply with a number of policies in the development plan in particular those relating to culture, design, transport, microclimate, sustainability, amenity and access.
625. The proposed museum use is supported on the basis of the City's wider cultural aspirations and the vision for the Smithfield area with regard to the Culture Mile and the public benefits of the scheme. Such benefits include securing a strategic development that would generate

employment, spending and tourism which would benefit the economy, allowing the museum to enhance its visitor offer and showcase more of its collection for the public to enjoy, provision of enhanced learning space which would allow more engagement with schools, securing a dedicated long term occupier for the General Market and Poultry Market to breathe life into, revive and enliven these buildings and the surrounding public realm, giving the public the opportunity to access and appreciate the interiors of such historically significant buildings, the opportunity for the Museum to expand its work with communities around well-being and social inclusion and securing a development that is environmentally responsible.

626. Transforming the market buildings into a world class museum and flexible retail/office use would inevitably require change. While this has been dealt with in a careful and skilful way, there is inevitably some harm to historic fabric through the remodelling of interiors in the instance of the Poultry Market and through the alteration of the historic fabric to accommodate the new uses. The harm to the Poultry Market and the Smithfield Conservation Area, is considered to be less than substantial and outweighed by the public benefits of the scheme. The harm to the non-designated assets would be outweighed by the public benefits of the scheme. Overall, the scheme is an exceptional and world class example of the sensitive restoration and re-use of historic buildings whilst maximising economic and social inclusive public access.
627. The scheme is exemplary in terms of its environmental and sustainability credentials, especially given that the works are proposed within the constraints of the existing buildings. Circular economy principles would be adopted, there would be a connection to Citigen, new solar panels and an increase in greening. SUDS principles would be adopted, and the development would not unduly impact on air quality.
628. With regard to highway and transportation issues an appropriate package of s278 works would be agreed in order to facilitate the development and make the development acceptable in planning terms. Matters relating to cycle parking, car parking, taxi drop off, coach parking and delivery and servicing have been satisfactorily addressed.
629. An additional benefit of this scheme is that it is considered to constitute 'Good Growth'. This is growth that is socially and economically inclusive and environmentally sustainable, a concept that underpins all policies in the Intend to Publish London Plan. The proposal would accord with the ambitions of objectives GG1 (Building strong and inclusive communities), GG2 (Making the best use of land), GG3 (Creating a healthy city) and GG5 (Growing a good economy) of the London Plan 2021. This is on the basis that the scheme would be accessible, would re-use the existing buildings and adopt circular economy principles, promote and support London's rich heritage and cultural assets and seeks to foster inclusivity of local communities and

wider London in its design and through the day to day work of the Museum of London.

630. The scheme also accords with strategic objectives (3, 4 and 5) of the Local Plan 2015 which seek to: promote a high quality of architecture and street scene appropriate to the City's position at the historic core of London, complementing and integrating the City's heritage assets and supporting the continued development of the City as a cultural destination for its own communities and visitors; ensure that the City of London remains at the forefront of action in response to climate change and ensure the provision of inclusive facilities and services that meet the high expectations of the City's business, resident, student and visitor communities.
631. It is acknowledged that the proposal would be contrary to Local Plan 2015 policy CS5(10) and draft City Plan 2040 policy S25(2) in that it would not support the continued presence of Smithfield Market in the Poultry Market building. The scheme would be contrary to policies CS12 (1), DM12.1(1), DM12.2 (1) and DM12.3(2) of the adopted Local Plan 2015, London Plan Policy HC1 and draft City Plan 2040 policies S11(1) and HE1(1) in respect of the heritage harm. The scheme would be contrary to policy OS2 (2, 2) of the emerging plan in that it would not comply with the required UGF target.
632. Although there would be diminishment of the capacity of Smithfield Market through the loss of the Poultry Market, the majority of traders and units operate from within the East and West Markets, which would continue as part of the proposal. The scheme has been designed to co-exist alongside an operational market. Careful consideration has been given to the potential 278 works, delivery and servicing arrangements and the impact that the proposal would have on the markets during construction. It is the view of your officers that the extent and significance of that breach of those policies would be minor, as the proposals do not undermine the ability of Smithfield Market to continue in use and operation.
633. In respect of urban greening, it is recognised that the development falls short of the UGF target due to the nature of the development and specific site constraints including the historic character of the market buildings which prevent significant greening. It is the view of your officers that the extent and significance of the breach would be minor as the scheme proposes greening where there is no greening on the site at present which would represent an enhancement.
634. In respect of heritage policies, the heritage policies in the London Plan (in particular HC1) and in the Local Plan (in particular CS12) do not incorporate a balancing exercise as found in paragraphs 202 (relating to designated heritage assets) and 203 (relating to non designated heritage assets). As a result, if a proposal results in any harm to the significance of a heritage asset, even if less than substantial and at the lower end of the scale, it will result in conflict with heritage policies.

635. Given the extent and significance of the breaches of the policies identified, and taking into account the policies that are complied with and the weight which is given to those policies, it is the view of officers, as a matter of planning judgement, that proposal accords with the development plan when considered as a whole.
636. It is for the LPA to consider and weigh other material considerations and decide whether any outweigh the priority statute has given to the development plan. Other material considerations are set out below.
637. Paragraph 8 of the NPPF sets out that there is a presumption in favour of sustainable development. This weighs in favour of the proposal.
638. As set out in paragraph 199 of the NPPF, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the designated heritage asset's conservation, and paragraph 200 provides that any harm to, or loss of, the significance of a designated heritage asset, should require clear and convincing justification.
639. With regard to designated heritage assets, NPPF paragraph 202 requires that any less than substantial harm be balanced against the public benefits of the development proposal. The paragraph 202 balancing exercise is to be applied when considering the harm to the Poultry Market. That balancing exercise is set out earlier in this report. It is the view of officers that giving great weight to the conservation of heritage assets, and considerable importance and weight to the desirability of preserving the special architectural and historic features of the listed building, the identified harm is outweighed by the public benefits of the proposal. These public benefits are set out earlier in the report and reiterated again below.
640. In respect of non-designated heritage assets, NPPF paragraph 203 requires 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 paragraph 203 weighing exercise is to be considered in respect of the harm to the Annexe Market and the General Market. It is considered that the harm to the significance of the market buildings would be outweighed by the merits of the proposal which have been set out earlier in the report and are reiterated below.
641. Officers consider the following weight should be afforded to the benefits of the proposal:
- Securing a strategic development that would provide land uses which support the growth of the economy at City of London and Greater London level through the generation of employment (anticipated creation of 1707 additional jobs), increased spending in the locality boosting local businesses (£755 million GVA) and an increase in national and international tourism through the attraction of an average of 2 million visitors per year. This in turn would have a positive impact on the national economy. This

benefit is attributed significant weight.

- Allowing the Museum of London, an internationally renowned visitor attraction, to remain in the City of London and realise its full potential and commitment to an enhanced visitor offer through the provision of increased gallery space and exhibits which would allow more people to engage with and learn more about the seven million objects within the London Collection than ever before. This benefit is attributed significant weight.
- Provision of enhanced learning space which would allow the Museum to fulfil its aspirations to engage with more schools and reach every school child within London. This benefit is attributed significant weight.
- Provision of a world class Museum and visitor attraction that would deliver on the fundamental aims of the Cultural Mile and cultural aspirations for Smithfield. The scheme would revive this area of West Smithfield and give it a new identity and sense of place. It would act as a catalyst for the realisation of a cultural destination of international renown in this part of the City. This benefit is attributed significant weight.
- Securing a new dedicated long-term occupier for the General Market and Poultry Market which would breathe new life into the buildings and carefully restore them providing them with a long-term sustainable use. This benefit is attributed significant weight.
- Giving the wider public access to historically significant areas of the market buildings, enabling the potential to understand and appreciate the strong heritage of the buildings and the wider Smithfield area, and their importance to Londoners and the Nation. This benefit is attributed significant weight.
- Provision of public access to the basement of the General Market which would allow appreciation of the relationship between the building and the live railway running beneath the site. This benefit is attributed moderate weight.
- Securing a development that is environmentally responsible in that it would seek to reduce carbon emissions and reduce waste through the re-use of as much of the existing material on site as possible through the adoption of circular economy principles. This benefit is attributed significant weight.
- The Museum of London's commitment to ensure that the museum is a cultural institution that is socially inclusive and accessible to all facilitated by the design of the building and the museum's ongoing engagement with local communities and stakeholders through its Smithfield programme. This benefit is attributed significant weight.
- Giving the Museum of London the ability to expand its programmes around the promotion of well-being with surrounding communities and stakeholders, including those with disabilities

and Autism. This benefit is attributed significant weight.

- 642. In addition to the general planning obligations there would be site specific measures secured in the S106 Agreement and by condition. Together these will ensure that the impact of the proposal is acceptable and that the benefits of the scheme are realised.
- 643. As the proposal accords with the development plan when considered as a whole and when considered overall other material considerations also indicate that planning permission should be granted, it is recommended that planning permission be granted.

Listed Building Consent 19/01344/LBC

- 644. Under the proposals, the interior of the Poultry Market would be remodelled and there would be minor alteration to the exterior of the listed building.
- 645. The PPG on the Historic Environment (paragraph 002) states that where changes are proposed to listed buildings, the NPPF sets out a clear framework for decision taking in respect of both applications for planning permission and for listed building consent.
- 646. The proposals would result in medium magnitude harm to the Poultry Market as a building of special architectural and historic interest. This is the result of the loss of historic fabric and original plan form which is of special interest/heritage significance, thus a direct impact, and not as the result of change to its setting. Where harm has been identified clear and convincing justification is provided for it in accordance with paragraph 200 of the NPPF. In terms of the NPPF paragraph 202, the harm is considered less than substantial as overall key features of the buildings special interest/heritage significance would be retained. This harm would mean that the proposal would fail to preserve the special architectural or historic interest of the building under section 16 of the Town Planning (Listed Building and Conservation Areas) Act 1990 which seeks to preserve the special architectural or historic interest or any features of special architectural or historic interest that the building possesses. Special regard has been had to the desirability of preserving this interest and considerable importance and weight is attributed to the harm caused in the balancing exercise.
- 647. The proposals, resulting in some medium magnitude harm, would detract from its special interest, character and significance of the listed building, causing a degree of conflict with adopted Local Plan Policy DM 12.3(2) (Listed Buildings).
- 648. It is considered that given the considerable range of public benefits, and the weight to be ascribed to them (as set out above) those benefits would outweigh the harm caused, even when that harm is attributed considerable weight and importance.
- 649. The less than substantial harm caused by the proposals would be significantly outweighed by the substantive public benefits that the works would secure. Accordingly, it is recommended that listed building consent be granted.

Background Papers

Application Documents 2022 update

Air Quality Assessment RSK July 2022

Air Quality Positive Statement RSK July 2022

Circular Economy Statement Arup July 2022

Conservation Plan Julian Harrap Architects July 2022

Covering Letter Gerald Eve August 2022

Cultural Statement July 2022

Design and Access Statement Stanton Williams July 2022

Drainage Strategy Annexe Report AKT II July 2022

Drainage Strategy MoL AKT II July 2022

Ecology Report RSK biocensus July 2022

Energy Statement Arup July 2022

Environmental Statement Non Technical Summary Waterman July 2022

Environmental Statement Main Text Waterman July 2022

Environmental Statement Volume 2 Figures Waterman July 2022

Environmental Statement Volume 3 Townscape and Visual Impact Assessment July 2022

Environmental Statement Volume 4 Technical Appendices July 2022

Equality Impact Assessment Buro Happold August 2022

Fire Statement OFR August 2022

Flood Risk Assessment AKT II July 2022

Health Impact Assessment Buro Happold August 2022

Heritage Impact Assessment Julian Harrap July 2022

Planning Statement Gerald Eve July 2022

Retail Impact Assessment Colliers July 2022

Statement of Community Involvement London Communications Agency July 2022

Sustainability Statement Arup July 2022

Thermal Comfort Assessment AKT II Bioclimatic July 2022

Transport Assessment Momentum July 2022

Whole Life Carbon Report Arup 2022

BRE Daylight, Sunlight and Solar Glare Report October 2022

Existing Drawing Numbers:

Existing : Plans	
2125-SWA-PM-B1-DR-A-PL007	PA01
2125-SWA-PM-BM-DR-A-PL008	PA01
2125-SWA-PM-00-DR-A-PL009	PA01
2125-SWA-PM-01-DR-A-PL010	PA01
2125-SWA-PM-02-DR-A-PL011	PA01
2125-SWA-PM-RF-DR-A-PL012	PA01
2125-SWA-GM-B1-DR-A-PL013	PA01
2125-SWA-GM-B1-DR-A-PL014	PA02
2125-SWA-GM-BM-DR-A-PL015	PA01
2125-SWA-GM-LG-DR-A-PL016	PA01
2125-SWA-GM-00-DR-A-PL017	PA02
2125-SWA-GM-01-DR-A-PL018	PA02
2125-SWA-GM-02-DR-A-PL019	PA02
2125-SWA-GM-RF-DR-A-PL020	PA01
2125-SWA-AB-B1-DR-A-PL021	PA01
2125-SWA-AB-00-DR-A-PL022	PA01
2125-SWA-AB-01-DR-A-PL023	PA01
2125-SWA-AB-02-DR-A-PL024	PA01
2125-SWA-AB-03-DR-A-PL025	PA01
2125-SWA-AB-RF-DR-A-PL026	PA01
2125-SWA-AB-RF-DR-A-PL027	PA01

Existing : Elevations	
2125-SWA-PM-ZZ-DR-A-PL028	PA01
2125-SWA-PM-ZZ-DR-A-PL029	PA01
2125-SWA-GM-ZZ-DR-A-PL030	PA01
2125-SWA-GM-ZZ-DR-A-PL031	PA01
2125-SWA-AB-ZZ-DR-A-PL032	PA01
2125-SWA-AB-ZZ-DR-A-PL033	PA01
2125-SWA-AB-ZZ-DR-A-PL034	PA01
Existing : Sections	
2125-SWA-PM-ZZ-DR-A-PL035	PA01
2125-SWA-PM-ZZ-DR-A-PL036	PA01
2125-SWA-PM-ZZ-DR-A-PL037	PA01
2125-SWA-GM-ZZ-DR-A-PL038	PA01
2125-SWA-AB-ZZ-DR-A-PL039	PA01

External

Received in Conjunction with planning permission 19/01343/FULEIA

Received in the period between Planning and Transportation Committee in June 2020 and the submission of the 2022 update (September 2022)

17.01.2021	Mr Joseph Bailey
08.02.2021	Mr Sebastian Walker
Response to 2022 update	
03.02.2022	Smithfield Market Tenants' Association
23.09.2022	Mr David Reddaway
07.10.2022	Mr Matthew Bell
07.10.2022	Mr Anthony Swanson
12.10.2022	Mr Alan Cohen
13.10.2022	Ms Reem Waines

24.10.2022	Mr David King
26.10.2022	Miss Nurjahan Julie Begum
28.10.2022	Ms Kathryn McDowell
08.11.2022	Mr Nicholas Schott
23.09.2022	Sir Stuart Lipton
24.10.2022	Network Rail
19.10.2022	Historic Buildings and Places
11.10.2022	Thames Water
03.10.2022	London Underground
30.09.2022	Department for Levelling Up
23.09.2022	Crossrail
Internal	
28.10.2022	District Surveyors
03.10.2022	Lead Local Flood Authority
21.09.2022	Environmental Health, Air Quality
09.11.2022	Access Advisor
<u>Received in conjunction with 19/01344/LBC</u>	
30.10.2022	Reem Waines
07.11.2022	Benjamin Sturdy

Appendix A

ENVIRONMENTAL ASSESSMENT ON

Reasoned Conclusion

As required by regulation 26 of the Environmental Impact Assessment (EIA) Regulations the City is required to examine the environmental information and reach a reasoned conclusion on the significant effects of the proposed development on the environment. The environmental information has been examined and a reasoned conclusion has been reached as set out in the officers' report and as summarised in the assessment and conclusions sections of that report. The conclusions have been integrated into the decision as to whether planning permission should be granted.

The SMTA have raised concern that the submitted EIA is not robust and does not comply with the legal requirements for such assessments. In particular, they question the approach taken in the Environmental Statement (ES) with regard the proposed flexible use classes, noting that "...the Local Planning Authority would need to assess each and every potential use class proposed in its minimum and maximum floorspace. From an initial review of the ES it is apparent that the assessment has not been carried out on this basis, but rather assumptions as to floorspace caps within the use classes have been utilised. To be robust such assumptions should be captured as floorspace restrictions in planning permission conditions and/or section 106 obligations".

The applicants and the City agreed the scope of the EIA prior to its submission. The ES provides details of the EIA methodology, the existing site, alternatives and design evolution, the proposed development, the development programme, socioeconomics, archaeology, built heritage, wind microclimate, transport and access, noise, cumulative effects and a summary of residual effects. Air quality has been addressed in a separate Air Quality Assessment which does not form part of the ES, but the assessment of air quality is based on traffic movement assumptions set out in the transport assessment. On the 4th May 2020 the applicants submitted further information to support the ES under regulation 25 of the EIA Regulations.

The planning permission would authorise a range of different uses. The floor areas proposed to be devoted to each use are described in the application materials and summarised in the Table 5.3 of Volume 1 of the ES.

The 'houses' forming the perimeter to the General Market and parts of the Annexe (including the Engine House) are proposed for a range of flexible uses including A1/A2/A3/A4/B1/D1 and D2.

Article 3 of the Town and Country Planning (General Permitted Development) (England) Order 2015 grants planning permission for the classes of development described as permitted development in Schedule 2. Class V of Part 3 of Schedule 2 includes the following description of permitted development:

Development consisting of a change of use of a building or other land from a use permitted by planning permission granted on an application, to another use which that permission would have specifically authorised when it was granted.

Given uncertainty as to the precise disposition of uses in those elements of the

development where permission for flexible uses is sought, the City Corporation is of the view that the method adopted, namely to adopt assumptions as to future use or to assess a worst case scenario are appropriate and effective means of assessing the likely significant effects of the proposed development on the environment. It would be disproportionate to assess every possible quantum and combination of use within the classes referred to, especially given that the class D1 museum use accounts for 80% of the proposed floorspace. In particular:

- i. For the purposes of the transport assessment assumptions have been made as to the proportion of non food and food retail uses in the floorspace for which flexible use is proposed. The Applicant describes those assumptions as being adopted in order to forecast a 'worst-case scenario'. Those assumptions inform other aspects of the assessment such as the servicing plan and air quality assessment. Given the range of uses proposed, potential trip generation, and the range of potential uncertainty, it is the City Corporation's view that the approach adopted is an appropriate and effective method for assessing the likely significant effects of the development proposed.
- ii. For the purposes of waste management as set out in the Transport Assessment Addendum section 4.3 assumptions have been made that A3 and A4 uses are calculated at the same waste output. D2 use is calculated at the same waste output as a B1 use in order to forecast a 'worst-case scenario'. As the D2 use would be a gym waste output would be low and it would be assumed that waste would be less than that of an office (Class B1 use). The City Corporation considers this to be an appropriate and reasonable approach to take in order to assess the likely significant effects of the development proposed.
- iii. For the purposes of the socio-economic assessment, express assumptions have been on employment densities. The City Corporation consider that those assumptions are appropriate and reasonable given the uncertainty as the precise uses to which those part of the premises identified for flexible uses will be put.
- iv. The noise assessment has been based upon assumptions relating to noise break out from the noisiest activities likely to take place within the development which is anticipated to be noise from amplified music within the Museum of London. The City Corporation considers this to be an appropriate and reasonable approach to take in order to assess the likely significant effects of the development proposed.

The chapters relating to archaeology, built heritage, wind microclimate, noise and cumulative impact provide a comprehensive assessment of the environmental impacts of the scheme as a whole in these respects.

The local planning authority is satisfied that the environmental statement includes a description of the likely significant effects of the potential range of uses comprised in the proposed development on the environment.

Monitoring and Mitigation Measures

If planning permission were granted, it is considered that monitoring measures should be imposed to secure an archaeological watching brief, a construction

logistics plan, a Delivery and Servicing Plan and a Travel Plan. Mitigation measures should be secured including running the General Market and Poultry Market ventilation systems in event mode when functions are taking place that use amplified music and securing footway widening. These as well as other measures, to ensure the scheme is acceptable would be secured and monitored through the S106 agreement, recommended conditions and the S278 agreement.

Appendix B

Representations Received in 2020

Letters of Support

05.06.2020 Email Hugh Dennis
04.06.2020 Email Sandy Nairne
03.06.2020 Email Chris Wilkinson
29.05.2020 Email David Alberman
29.05.2020 Email Martin Rose
29.05.2020 Email Baroness Tess Blackstone
29.05.2020 Email Richard Hardie
28.05.2020 Email Charles Clark
22.05.2020 Email Inua Ellams
22.05.2020 Email Kristy Warren
21.05.2020 Email Sir Simon Rattle
21.05.2020 Email Nicholas Shott
21.05.2020 Email Peter Murray
19.05.2020 Email Richard Sandell
19.05.2020 Email Eric Reynolds
18.05.2020 Email Swadhinata Trust
18.05.2020 Email Michael Cassidy
18.05.2018 Email Baroness Floella Benjamin
18.05.2020 Email Harriet Salkeld
18.05.2020 Email Jane O'Sullivan
17.05.2020 Email Linda Bradfield
16.05.2020 Email Kumiko Mendl
16.05.2020 Email Polly Richards
16.05.2020 Email Alex Oma Pius on behalf of IROKO Theatre Company
15.05.2020 Email Dee Collins
15.05.2020 Email Alice Black
15.05.2020 Email Kulvarn Atwal
15.05.2020 Email Robert Dufton
14.05.2020 Email Peter Bazalgette
14.05.2020 Email David Reddaway on behalf of the Goldsmiths' Company
14.05.2020 Email Nigel Carrington
14.05.2020 Email Will Griffiths

14.05.2020 Email Stuart Lipton
13.05.20120 Email Justin King
13.05.2020 Email Philip Miles
13.05.2020 Email Simon Jenkins
12.05.2020 Email Jan Williams
12.05.2020 Email Alistair Fitzpatrick
12.05.2020 Email Hat Margolies
12.05.2020 Email Janet Joan Ellis
12.05.2020 Email Pamela Kerr
12.05.2020 Email Philip Feather
12.05.2020 Email Susan Wardman
11.05.2020 Email Graham Bennett
11.05.2020 Email Susan Clark
11.05.2020 Email Cara Courage
09.05.2020 Email Alan Newman
09.05.2020 Email Danusia Beard
08.05.2020 Email Katy Barrett
07.05.2020 Email Jorn Cooper
07.05.2020 Email Agnes Segal
07.05.2020 Email Steven Wilson
07.05.2020 Email Anne Dorst
07.05.2020 Email Bill Wiffen
07.05.2020 Email Emma Winn
07.05.2020 Email Beatrice Pembroke
07.05.2020 Email Jan Eillis
07.05.2020 Email Judith Evans
07.05.2020 Email Kate Davey
07.05.2020 Email Laurance and Janet Clark
07.05.2020 Email Lynne Madgwick
07.05.2020 Email Marjorie Och
07.05.2020 Email Peter Clayton
07.05.2020 Email Philip Hendrick
07.05.2020 Email Preston Thayer
07.05.2020 Email Renate Herrmann
07.05.2020 Email Sally Mohan

07.05.2020 Email Steve Thompson
07.05.2020 Email Richard Moore
06.05.2020 Email Lois Keidan
05.05.2020 Email Mark Houghton-Berry

Letters of Representation

20.03.2020 Email Jennifer Freeman
06.06.2020 Email Hazel Brothers

Consultation Responses

16.01.2020 Email City of London Police
13.01.2020 Email Thames Water
24.01.2020 Letter City of London Conservation Area Advisory Committee
27.01.2020 and 19.05.2020 Letter Historic England
30.01.2020 Email Ministry of Housing, Communities and Local Government
30.01.2020 and 21.05.2020 Email Natural England
31.01.2020 Letter The Victorian Society
31.01.2020 Memo Lead Local Flood Authority
03.02.2020 Letter Smithfield Market Tenants' Association (Holding response)
05.02.2020 and Email Department of Markets and Consumer Protection (Superintendent)
07.02.2020 Memo Department of Markets and Consumer Protection (Environmental Health Officer)
13.02.2020 and 15.05.2020 Memos Department of Markets and Consumer Protection (Air Quality Officer)
15.02.2020 Letter City Heritage Society
20.02.2020 Email Network Rail
22.05.2020 Email Crossrail Limited
25.02.2020 and 29.05.2020 Letter London Borough of Camden
27.02.2020 Letter Smithfield Market Tenants' Association
03.04.2020 Letter SAVE Britain's Heritage
16.04.2020 Letter Twentieth Century Society
17.04.2020 Email Joe Kenway (Further information on museum design)
27.04.2020 Letter Greater London Authority
22.01.2020 and 07.05.2020 Emails London Underground
04.05.2020 and 10.06.2020 Emails Transport for London

12.05.2020 and 29.01.2020 Email and Letter Environment Agency

15.05.2020 Email Joe Kenway (How the Museum Engages the Local Community with Culture)

22.05.2020 Email Crossrail

05.06.2020 Email Department of Markets and Consumer Protection (Superintendent)

05.06.2020 Email Stanton Williams

09.06.2020 Email Gerald Eve

Appendix C

Museum of London Consultations with SMTA

**MUSEUM OF LONDON
SMTA RESPONSE – CONSULTATION & ENGAGEMENT
28 APRIL 2020, DRAFT 2**

This document has been prepared in response to the SMTA objection to the Museum of London's planning application (issued on 27 February 2020). It provides an overview of the extensive consultation and engagement undertaken on the New Museum project, which a wider range of stakeholders – including the SMTA – were made aware of and encouraged to engage with. For the purpose of this summary we have just focussed on an overview of the core engagement activities. However, the Statement of Community Involvement, submitted as part of the planning application, details the Museum of London's full and extensive programme of consultation and engagement activities.

1. Direct response to SMTA's reference in the objection letter

The planning application was validated on 10 January 2020. To inform the public and our stakeholders that the application had been submitted the following steps were taken:

- A press release was issued on Monday 13 January to an extensive list of local, trade, specialist and national media.
- The Museum of London issued letters to all key stakeholders, including to the SMTA on Thursday 23 January 2020 to inform them that the application had been submitted.
- The Museum of London's social media channels and website were updated with the news of the planning submission.
- An email was sent out on Thursday 16 January to all those who have subscribed for news on the New Museum project with an update on the submission of the planning application.

In addition to this, the City of London Corporation advertised the start of the statutory consultation period, using the following methods:

- Press notices
- Site notices
- Consultation letters
- Neighbour notification letters

2. Wider consultation on the planning application

The consultation approach for the New Museum project ensured that the proposals were extensively promoted to key stakeholders and local communities, providing multiple opportunities for everyone, including the SMTA, to comment on the plans.

In order to promote the proposals and gather feedback, a number of engagement activities took place between early 2016, around the start of Design Competition, and December 2019, the date of the planning application submission. The main consultation and engagement activities were conducted in four phases set out below:



Phase - Early engagement with key stakeholders on the vision for the project and the Design Competition (2015 – 2016):

- Consultation began with the public in July 2016 with an exhibition of the six shortlisted design concepts that were put forward by architectural teams during an international design competition.
- **The SMTA were invited to attend this exhibition.**

Phase 2 – Meetings with key stakeholders, amenity and heritage groups to develop the proposals (Late 2016, 2017 – summer 2019):

- The Museum of London embarked on a long programme of engagement. This included a series of meetings with key heritage societies; amenity groups and businesses in the local area. Key stakeholders from all levels of Government including Central Government; the Greater London Authority (GLA); the City of London Corporation and neighbouring local authorities have been engaged with throughout the process via a range of different methods.
- **Given the site's history and its proximity to local traders, the Museum of London has also held a number of meetings with the Smithfield Market Tenants' Association during this period – these have been set out in Section 3.**
- **The Museum worked closely with the SMTA as a partner on the Smithfield 150 in 2018 and Smithfield Street Party in 2019. At both events, a public activity / display about the new museum project was included.**
- **The Museum also worked with the SMTA on the Smithfield Lecture Series in 2018 and 2019.**

Phase 3 – Public engagement on emerging proposals for the New Museum and reviewing feedback (Summer 2019 – End of 2019)

- The plans for the site were revealed to the public at a series of public exhibitions inside the General Market building in July 2019. This display was also replicated at the current Museum of London site on London Wall for people to leave feedback. An extensive exercise was then undertaken to analyse all of the feedback to ensure this was best reflected in the Application. Ahead of submission of the application, further meetings were also held with key stakeholders.
- **A special preview session was held for the Market Traders in Catering Meats on Friday 5 July starting at 5am to encourage attendance for those working in the market. There were a further four staffed public events that week at varied times.**

Phase 4 - Continued engagement post-submission (January 2020 onwards)

- The Museum of London is committed to continuing engagement with key stakeholders and the public over the next few years to create the best possible Museum for London.
- Alongside the programme of activity already undertaken and set out in Section 1, the Museum of London will shortly be issuing a summary newsletter, updating the website and social media channels as well as targeted stakeholder emails.
- Wider communication had been planned at major events including Smithfield Street Party 2020 and Open House in 2020 – while this is unlikely to go ahead in physical format due to COVID-19 there will be plans for other means of digital consultation and engagement in their place.

3. Programme of meetings with the SMTA

Alongside a programme of regular dialogue between Sharon Ament of the Museum of London and Greg Lawrence of the SMTA, the following formal meetings have been held with the SMTA:

- 4 June 2015 – Meeting between the SMTA Chairman and Museum Director



- 14 January 2016 – Meeting between the SMTA Chairman and Museum Director
- 14 April 2016 – Meeting between the SMTA Chairman and Museum Director
- 16 February 2017 – Meeting between the SMTA Chairman & team and Museum Director
- 14 June 2018 – Meeting between the SMTA Secretary Lis Batterson and Museum Director
- 23 November 2018 – Meeting between the SMTA and the museum project team to provide a briefing on the new museum project.
- 30 November 2018 – Call between the SMTA Chairman and Museum Director
- 27 February 2019 – CoLC/MOL/SMTA discussion at Guildhall
- 21 March 2019 – Meeting between the SMTA Chairman and Museum Director
- 26 June 2019 – New museum public consultation display images delivered to SMTA Unit 225
- 28 June 2019 – Meeting between the SMTA and Sharon Ament ahead of the public consultation events to provide an update on the new museum project.
- 22 October 2019 – Meeting between the SMTA and the Museum of London ahead of planning submission to update on progress.

END

Appendix D

Relevant London Plan 2021 Policies

Policy GG1 Seeks good growth that builds on openness, diversity and equality.

Policy GG2 Seeks to create sustainable mixed-use places that make the best use of land.

Policy GG3 Seeks to improve Londoners' health and reduce health inequalities by ensuring the wider determinants of health are addressed including air quality and ventilation within buildings.

Policy GG5 Seeks to conserve and enhance London's global economic competitiveness. Development must fulfil a range of criteria including promoting and supporting London's rich heritage and cultural assets.

Policy GG6 Seeks help London become a more efficient and resilient city improvements in energy efficiency should be sought, buildings should be designed to adapt to climate change, make efficient use of water and avoid contributing to the heat island effect. A safe and secure environment should be created that is resilient to terrorism.

Policy SD4 The unique international, national and London-wide roles of the CAZ based on an agglomeration and rich mix of strategic functions and local uses, should be promoted and enhanced. The distinct environment and heritage of the CAZ should be sustained and enhanced. Measures should be taken to improve air quality in the CAZ. The unique concentration and diversity of cultural, arts, entertainment, night-time economy and tourism facilities should be promoted and enhanced.

Policy SD5 Offices and other CAZ strategic functions are to be given greater weight relative to new residential development in all other areas of the CAZ except those stated in the plan.

Policy D3 All development must make the best use of land by following a design led approach that optimises the capacity of sites. Development proposals should address form and layout, experience and quality and character.

Policy D4 The design quality of development should be maintained by ensuring maximum detail appropriate for design stage, ensuring the wording of planning permission, associated conditions and legal agreements provide clarity regarding the quality of design and avoid considering large elements of design by condition. Consideration should be given to conditioning the ongoing involvement of the original design team to monitor the design quality of development through to completion.

Policy D5 Development proposals should achieve the highest standards of accessible and inclusive design.

Policy D11 Development proposals should maximise building resilience and minimise potential physical risks. Development should include measures to design out crime.

Policy D12 Development proposals must achieve the highest standards of fire safety. All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy produced by a third party,

suitably qualified assessor.

Policy D13 New noise generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

Policy D14 In order to manage noise development proposals should consider a number of measures including control and mitigation through applying good acoustic design principles.

Policy S6 Large-scale developments that are open to the public should provide and secure free publicly-accessible toilets suitable for a range of users and free changing places toilets.

Policy E1 Improvements to the quality, flexibility and adaptability of office space of different sizes should be supported by new office provision, refurbishment and mixed-use development.

Policy E9 A successful, competitive and diverse retail sector which promotes sustainable access to goods and services for all Londoners should be supported. London's markets should be supported.

Policy HC1 Development proposals affecting heritage assets and their settings should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. Development proposals should avoid harm. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.

Policy HC4 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.

Policy HC5 The continued growth and evolution of London's diverse cultural facilities and creative industries are supported.

Policy HC6 Planning decisions should promote the night-time economy, where appropriate, particularly in the CAZ. The range of night time activities should be diversified including extending opening hours of daytime facilities such as shops, cafes, galleries and museums.

Policy S5 It should be ensured that there is sufficient supply of good quality sports and recreational facilities.

Policy G5 Major development proposals should contribute to greening by including urban greening as a fundamental element of site and building design.

Policy SI1 Development proposals should not lead to further deterioration of existing poor air quality and must be air quality neutral. Major proposals should be submitted with an Air Quality Assessment. In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

Policy SI2 Major development should be net zero carbon. Greenhouse gas emissions should be reduced in line with the energy hierarchy.

Policy SI4 Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and incorporation of green infrastructure. Development proposals should demonstrate through an energy strategy how the potential for internal overheating and reliance on air conditioning systems would be reduced.

Policy S15 the use of mains water, water supplies and resources should be protected and conserved. Development proposals should minimise the use of mains water, achieve BREEAM excellent for the water category and incorporate measures to achieve lower water consumption.

Policy SI7 Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted.

Policy SI12 Development proposals should ensure that flood risk is minimised and mitigated.

Policy SI13 Development proposals should aim to achieve greenfield run-off rates and ensure that surface water is managed as close to its source as possible. There should be a preference for green over grey features.

Policy T1 Development proposals should facilitate all trips in London to be made by foot, cycle or public transport by 2041. Development should make the most effective use of land, reflecting its connectivity and accessibility.

Policy T2 development proposals should be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport.

Policy T4 Development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity. Development proposals should not increase road danger.

Policy T5 Development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle. Appropriate levels of cycle parking should be secured. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Where it is not possible to provide short stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on street location for the required provision.

Policy T6 Car free development should be the starting point for all development.

Policy T6.5 Disabled persons parking should be provided in accordance with the required standards, ensuring that all non-residential elements provide access to at least one on or off street disabled persons parking bay.

Policy T7 Development proposals should facilitate safe, clean and efficient deliveries and servicing. Adequate space for servicing, storage and deliveries should be made off street, with on street loading bays only used where this is not possible. Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night time. During the construction phase of development, inclusive, safe access for people walking or cycling should be priorities and maintained at all times.

Relevant Draft City Plan 2040 Policies

Policy S1 seeks to create a healthy and inclusive environment to promote social and economic inclusivity and enable all communities to access a wide range of health, education, recreation and leisure opportunities. Buildings should be managed and designed to provide for the access needs of all the City's communities. Developers and development should engage with neighbours before and during construction, promote healthy buildings, improve local air quality and limit unnecessary light spillage.

Policy HL1 Buildings, open spaces and streets must meet the highest standards of accessibility and inclusive design.

Policy HL2 Developers will be required to effectively manage the impact of their proposals on air quality. Major developments must provide an Air Quality Impact Assessment. All developments must be at least Air Quality Neutral. Developments subject to an Environmental Impact Assessment should adopt an air quality positive approach wherever possible. Construction and deconstruction and the transport of construction materials and waste must be carried out to minimise air quality impacts. Air intake points should be away from existing and potential pollution sources.

Policy HL3 Developments must consider the noise and lighting impacts of their development. Internal and external lighting should reduce energy consumption and protect amenity of light sensitive uses. A noise assessment will be required where there may be an impact on noise-sensitive uses. Noise or light pollution conflicts between existing activities and new development should be minimised. Noise and vibration from deconstruction and construction must be minimised and mitigated where necessary. Developers should demonstrate there would be no increase in noise levels with new plant. Opportunities will be sought to incorporate improvements to the acoustic environment and existing lighting schemes within major development.

Policy HL4 Where development involves ground works developers will be expected to carry out a detailed site investigation to establish where the site is contaminated and determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified and provided where needed.

Policy HL6 A range of directly accessible public toilet facilities should be provided in major retail, leisure and transport developments.

Policy HL7 The provision of new sport and recreation facilities will be encouraged particularly where they would be accessible to all, would be near residential areas and would not have an undue impact on neighbouring occupiers.

Policy HL9 Developments will be required to deliver health benefits to the City's communities and mitigate any negative impacts. A Rapid or Full HIA should be submitted for larger scale development proposals.

Policy S2 the City Corporation will seek to ensure the City is secure from crime, disorder and terrorism and is able to accommodate large numbers of people safely and efficiently.

Policy SA2 Applications for major or commercial development which propose

night-time uses must include a Management Statement setting out detailed proposals for the dispersal of patrons and workers from premises to ensure the safe egress of people, minimise overcrowding and reduce instance of noise nuisance and anti-social behaviour.

Policy SA3 Security measures should be designed into developments at an early stage in liaison with the City of London Policies.

Relevant Local Plan Policies

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.

CS1 Provide additional offices

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

DM1.3 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.

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.

DM3.5 Night-time entertainment

- 1) Proposals for new night-time entertainment and related uses and the extension of existing premises will only be permitted where it can be demonstrated that, either individually or cumulatively, there is no unacceptable impact on:
 - a) the amenity of residents and other noise-sensitive uses;
 - b) environmental amenity, taking account of the potential for noise, disturbance and odours arising from the operation of the premises, customers arriving at and leaving the premises and the servicing of the premises.
- 2) Applicants will be required to submit Management Statements detailing how these issues will be addressed during the operation of the premises.

CS4 Seek planning contributions

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

CS5 Meet challenges facing North of City

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

CS10 Promote high quality environment

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

DM10.1 New development

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building lines, character, historic interest and significance, urban grain and materials of the locality and relate well to the character of streets, squares, lanes, alleys and passageways;
- b) all development is of a high standard of design and architectural detail with elevations that have an appropriate depth and quality of modelling;
- c) appropriate, high quality and durable materials are used;
- d) the design and materials avoid unacceptable wind impacts at street level or intrusive solar glare impacts on the surrounding townscape and public realm;
- e) development has attractive and visually interesting street level elevations, providing active frontages wherever possible to maintain or enhance the vitality of the City's streets;
- f) the design of the roof is visually integrated into the overall design of the building when seen from both street level views and higher level viewpoints;
- g) plant and building services equipment are fully screened from view and integrated in to the design of the building. Installations that would adversely affect the character, appearance or amenities of the buildings or area will be resisted;
- h) servicing entrances are designed to minimise their effects on the appearance of the building and street scene and are fully integrated into the building's design;
- i) there is provision of appropriate hard and soft landscaping, including appropriate boundary treatments;
- j) the external illumination of buildings is carefully designed to ensure visual sensitivity, minimal energy use and light pollution, and the discreet integration of light fittings into the building design;
- k) there is provision of amenity space, where appropriate;
- l) there is the highest standard of accessible and inclusive design.

DM10.2 Design of green roofs and walls

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

DM10.5 Shopfronts

To ensure that shopfronts are of a high standard of design and appearance and to resist inappropriate designs and alterations. Proposals for shopfronts should:

- a) respect the quality and architectural contribution of any existing shopfront;
- b) respect the relationship between the shopfront, the building and its context;
- c) use high quality and sympathetic materials;
- d) include signage only in appropriate locations and in proportion to the shopfront;
- e) consider the impact of the installation of louvres, plant and access to refuse storage;
- f) incorporate awnings and canopies only in locations where they would not harm the appearance of the shopfront or obstruct architectural features;
- g) not include openable shopfronts or large serving openings where they would have a harmful impact on the appearance of the building and/or amenity;
- h) resist external shutters and consider other measures required for security;
- i) consider the internal treatment of shop windows (displays and opaque windows) and the contribution to passive surveillance;
- j) be designed to allow access by users, for example, incorporating level entrances and adequate door widths.

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 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.

DM12.3 Listed buildings

1. To resist the demolition of listed buildings.
2. To grant consent for the alteration or change of use of a listed building only where this would not detract from its special architectural or historic interest, character and significance or its setting.

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.

DM15.1 Sustainability requirements

1. Sustainability Statements must be submitted with all planning applications in order to ensure that sustainability is integrated into designs for all development.
2. For major development (including new development and refurbishment) the Sustainability Statement should include as a minimum:
 - a) BREEAM or Code for Sustainable Homes pre-assessment;
 - b) an energy statement in line with London Plan requirements;
 - c) demonstration of climate change resilience measures.
3. BREEAM or Code for Sustainable Homes assessments should demonstrate sustainability in aspects which are of particular significance in the City's high density urban environment. Developers should aim to achieve the maximum possible credits to address the City's priorities.

4. Innovative sustainability solutions will be encouraged to ensure that the City's buildings remain at the forefront of sustainable building design. Details should be included in the Sustainability Statement.
5. Planning conditions will be used to ensure that Local Plan assessment targets are met.

DM15.2 Energy and CO2 emissions

1. Development design must take account of location, building orientation, internal layouts and landscaping to reduce likely energy consumption.
2. For all major development energy assessments must be submitted with the application demonstrating:
 - a) energy efficiency - showing the maximum improvement over current Building Regulations to achieve the required Fabric Energy Efficiency Standards;
 - b) carbon compliance levels required to meet national targets for zero carbon development using low and zero carbon technologies, where feasible;
 - c) where on-site carbon emission reduction is unviable, offsetting of residual CO2 emissions through "allowable solutions" for the lifetime of the building to achieve national targets for zero-carbon homes and non-domestic buildings. Achievement of zero carbon buildings in advance of national target dates will be encouraged;
 - d) anticipated residual power loads and routes for supply.

DM15.3 Low and zero carbon technologies

1. For development with a peak heat demand of 100 kilowatts or more developers should investigate the feasibility and viability of connecting to existing decentralised energy networks. This should include investigation of the potential for extensions of existing heating and cooling networks to serve the development and development of new networks where existing networks are not available. Connection routes should be designed into the development where feasible and connection infrastructure should be incorporated wherever it is viable.
2. Where connection to offsite decentralised energy networks is not feasible, installation of on-site CCHP and the potential to create new localised decentralised energy infrastructure through the export of excess heat must be considered
3. Where connection is not feasible or viable, all development with a peak heat demand of 100 kilowatts or more should be designed to enable connection to potential future decentralised energy networks.

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

DM15.5 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.

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.

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 recycle sorting or energy recovery, which minimises the need for waste transfer, should be incorporated wherever possible.

DM17.2 Designing out construction waste

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

- a) reuse of existing structures;
- b) building design which minimises wastage and makes use of recycled materials;
- c) recycling of deconstruction waste for reuse on site where feasible;

- d) transport of waste and construction materials by rail or river wherever practicable;
- e) application of current best practice with regard to air quality, dust, hazardous waste, waste handling and waste management

CS18 Minimise flood risk

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

DM18.2 Sustainable drainage systems

1. The design of the surface water drainage system should be integrated into the design of proposed buildings or landscaping, where feasible and practical, and should follow the SuDS management train (Fig T) and London Plan drainage hierarchy.
2. SuDS designs must take account of the City's archaeological heritage, complex underground utilities, transport infrastructure and other underground structures, incorporating suitable SuDS elements for the City's high density urban situation.
3. SuDS should be designed, where possible, to maximise contributions to water resource efficiency, biodiversity enhancement and the provision of multifunctional open spaces.

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.

DM20.3 Retail uses elsewhere

To resist the loss of isolated and small groups of retail units outside the PSCs and Retail Links that form an active retail frontage, particularly A1 units near residential areas, unless it is demonstrated that they are no longer needed.

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.

CS22 Maximise community facilities

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

Appendix E

Equality Impact Assessment

EQUALITY ANALYSIS (EA) TEMPLATE

Decision

Planning application for the relocation of the MoL and provision of flexible uses

Date

*20.05.2020 and reviewed
November 2022*

What is the Public Sector Equality Duty (PSED)? [Double click here for more information / Hide](#)

The Public Sector Equality Duty (PSED) is set out in the Equality Act 2010 (s.149). This requires public authorities, in the exercise of their functions, to have 'due regard' to the need to:

- Eliminate discrimination, harassment and victimisation
- Advance equality of opportunity between people who share a protected characteristic and those who do not, and
- Foster good relations between people who share a protected characteristic and those who do not

The characteristics protected by the Equality Act 2010 are:

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership.
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

What is due regard?

- It involves considering the aims of the duty in a way that is proportionate to the issue at hand
- Ensuring that real consideration is given to the aims and the impact of policies with rigour and with an open mind in such a way that it influences the final decision
- Due regard should be given before and during policy formation and when a decision is taken including cross cutting ones as the impact can

The general equality duty does not specify how public authorities should analyse the effect of their business activities on different groups of people. However, case law has established that equality analysis is an important way public authorities can demonstrate that they are meeting the requirements.

Case law has established the following principles apply to the PSED:

- **Knowledge** – the need to be aware of the requirements of the Equality Duty with a conscious approach and state of mind.
- **Sufficient Information** – must be made available to the decision maker
- **Timeliness** – the Duty must be complied with before and at the time that a particular policy is under consideration or decision is taken not after it has been taken.
- **Real consideration** – consideration must form an integral part of the decision-making process. It is not a matter of box-ticking; it must be exercised in substance, with rigour and with an open mind in such a way that it influences the final decision.
- **Sufficient information** – the decision maker must consider what information he or she has and what further information may be needed in order to give proper consideration to the Equality Duty
- **No delegation** - public bodies are responsible for ensuring that any third parties which exercise functions on their behalf are capable of complying with the Equality Duty, are required to comply with it, and that they do so in practice. It is a duty that cannot be delegated.
- **Review** – the duty is not only applied when a policy is developed and decided upon, but also when it is implemented and reviewed.

be cumulative.

What is an Equality Analysis (EA)?

[Double click here for more information / Hide](#)

How to demonstrate compliance

[Double click here for more information / Hide](#)

Deciding what needs to be assessed

[Double click here for more information / Hide](#)

Role of the assessor

[Double click here for more information / Hide](#)

How to carry out an Equality Analysis (EA)

[Double click here for more information / Hide](#)

There are five stages to completing an Equality Analysis, which are outlined in detail in the Equality Analysis toolkit and flowchart:

2.1 Completing the information gathering and research stage - gather as much relevant equality-related information, data or research as possible in relation to the policy or proposal, including any engagement or consultation with those affected;

2.2 Analyse the evidence - make an assessment of the impact or effects on different equality groups;

2.3 – Developing an action plan – set out the action you will take to improve the positive impact and / or the mitigation action needed to eliminate or reduce any adverse impact that you have identified;

2.4 Director approval and sign off of the equality analysis - include the findings from the EA in your report or add as an appendix including the action plan;

2.5. Monitor and review – monitor the delivery of the action plan & ensure that changes arising from the assessment are implemented.

The Proposal *Click and hover over the questions to find more details on what is require*

Assessor name: Gemma Delves

Contact details: 020 7332 1704

1. What is the Proposal?

A planning application for the conversion of the General Market, Poultry Market and Annexe site to a museum (Class D1) and flexible uses (A1, A2, A3, A4, D1, D2, B1)

2. What are the recommendations?

It is likely to be recommended that planning permission be approved.

3. Who is affected by the Proposal? *Identify the main groups most likely to be directly or indirectly affected by the recommendations.*

Age *Double click here to add impact / Hide*

Check box if NOT applicable ☐

Key borough statistics:

The City has proportionately more people aged between 25 and 69 living in the Square Mile than Greater London. Conversely there are fewer young people. Approximately 955 children and young people under the age of 18 years live in the City. This is 11.8% of the total population in the area. Summaries of the City of London [age profiles from the 2011 Census can be found on our website](#)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

Double click here to show borough wide statistics / hide statistics

Age

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on age:

1. The proposed plans – Showing the layout of the buildings and access arrangements.
2. Statement on how the Museum engages the local community with culture - Gives details on the schools engagement programme and well being programmes for older people.
3. The Socio-economics chapter of the ES - sets out the age distribution of the population in the City as part of its assessment of the impact of the schemes job creation on the local demographic.
4. The statement of community involvement - sets out how different groups have been engaged in development of the Museum's offer.
5. The Equality Impact Assessment submitted with the application which evaluates the impacts of the proposal on the Protected Characteristics.

Age

What is the proposal's impact on the equalities aims? Look for *direct impact* but also evidence of *disproportionate impact* i.e. where a decision affects a protected group more than the general population, including *indirect impact*

The whole development has been designed to incorporate level access wherever possible or provide lifts in order to ensure ease of movement around the site.

The Museum intends to engage people of all ages through its outreach programmes. This includes an intention to engage with 200,000 school children per year across primary, secondary and SEND level in all London Boroughs. Schools in disadvantaged areas and those that do not visit the museum now would be targeted.

The Museum would continue to run initiatives to promote the wellbeing of local communities including volunteering, apprenticeships and creative courses which would in part be targeted at older people living with loneliness.

Construction work may give rise to noise, dust and cause pedestrian diversions which can have a negative impact.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue its community engagement programmes to ensure that the Museum's offer is relevant to people of all ages.

Ensure that a scheme of protective works and demolition and construction logistics plans are secured through to condition in order to minimise impacts of noise, dust and any disruption to footways.

Disability [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics:

Day-to-day activities can be limited by disability or long term illness - In the City of London as a whole, 89% of the residents feel they have no limitations in their activities – this is higher than both in England and Wales (82%) and Greater London (86%). In the areas outside the main housing estates, around 95% of the residents responded that their activities were not limited. Extract from summary of the [2011 Census relating to resident population health for the City of London can be found on our website](#).

The 2011 Census identified that for the City of London's population:

- 4.4% (328) had a disability that limited their day-to-day activities a lot
- 7.1% (520) had a disability that limited their day-to-day activities a little.

Source: 2011 Census: [Long-term health problem or disability, local authorities in England and Wales](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Disability

Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals

The following documents submitted with the application are relevant in order to assess the impact of the proposal on disability:

1. The proposed plans – Showing the layout of the buildings and access arrangements.
2. Statement on how the Museum engages the local community with culture.
3. Design and Access Statement – sets out how the scheme has been designed to be accessible and inclusive through the way that the buildings are designed.
4. The statement of community involvement - sets out how different groups have been engaged in development of the Museum's offer including the Museum of London Access Panel and the City of London Access Group.
5. The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics.

Disability

What is the proposal's impact on the equalities aims? *Look for direct impact but also evidence of disproportionate impact i.e. where a decision affects a protected group more than the general population, including indirect impact*

The scheme has been designed to incorporate level access wherever possible. Where this would not be possible due to site constraints accessible lifts are provided. Careful consideration has been given to the circulation arrangements within the building.

Accessible parking and public realm improvements would be provided as part of the S278 agreement.

Accessible facilities would be provided including changing places, toilets, accessible cycle parking, seating and a wheelchair store.

Safe evacuation procedures have been developed for people with physical disabilities or impairment.

The new museum would feature an enhanced access programme for people with disabilities. This would include tailored tours, sessions and resources for people living with dementia and families with children with autistic spectrum conditions.

Construction work may give rise to noise, dust and cause pedestrian diversions which can have a negative impact.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Accessible parking and public realm improvements need to be delivered through the S278 agreement. The City's Access Officer should be involved in this process. Consideration would need to be given to levels, entrance thresholds, circulation routes, obstacles and materials.

Further design refinements are needed to the toilet facilities in the Museum. Details of which can be controlled by planning condition in order to ensure that they would be accessible.

Ensure that a scheme of protective works and demolition and construction logistics plans are secured through to condition in order to minimise impacts of noise, dust and any disruption to footways.

Pregnancy and Maternity [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics:

Under the theme of population, the [ONS website](#) has a large number of data collections grouped under:

- [Conception and Fertility Rates](#)
- [Live Births and Still Births](#)
- [Maternities](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Pregnancy and Maternity

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals.*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on pregnancy and maternity:

1. The proposed plans – Showing the layout of the buildings and access arrangements.

Pregnancy and Maternity

2. The Design and Access Statement

3. The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics.

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

Level access would be provided wherever possible and where this would not be possible lifts would be provided in order to ensure ease of movement around the site.

The scheme incorporates a number of accessible toilet facilities.

Seating would be provided through the Museum with a choice of heights and some provided with arms and backrests on both sides.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

Race [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key Borough Statistics:

Our resident population is predominantly white. The largest minority ethnic groups of children and young people in the area are Asian/Bangladeshi and Mixed – Asian and White. The City has a relatively small Black population, less than London and England and Wales. Children and young people from minority ethnic groups account for 41.71% of all children living in the area, compared with 21.11% nationally.

White British residents comprise 57.5% of the total population, followed by White – Other at 19%.

The second largest ethnic group in the resident population is Asian, which totals 12.7% - this group is fairly evenly divided between Asian/Indian at 2.9%; Asian/Bangladeshi at 3.1%; Asian/Chinese at 3.6% and Asian/Other at 2.9%. The City of London has the highest percentage of Chinese people of any local authority in London and the second highest percentage in England and Wales. The City of London has a relatively small Black population comprising 2.6% of residents. This is considerably lower than the Greater London wide percentage of 13.3% and also smaller than the percentage for England and Wales of 3.3%.

[See ONS Census information](#) or [Greater London Authority projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below

[Double click here to show borough wide statistics / hide statistics](#)

Race

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on race:

1. The Design and Access Statement
2. The Museum's statement on how local communities are engaged with culture
3. The Statement of Community Involvement
4. The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics.

Race	
<p>What is the proposal's impact on the equalities aims? Look for <i>direct impact</i> but also evidence of <i>disproportionate impact</i> i.e. where a decision affects a protected group more than the general population, including <i>indirect impact</i></p> <p>The Museums research shows that many black, Asian and ethnic minorities see museums as 'not for the likes of us'. The Museum would prioritise those less engaged through dedicated community workshops.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>The Museum should continue its community engagement programmes.</p>

Religion or Belief Double click here to add impact / Hide Check box if NOT applicable <input type="checkbox"/>	
<p>Key borough statistics – sources include:</p> <p>The ONS website has a number of data collections on religion and belief, grouped under the theme of religion and identity.</p> <p>Religion in England and Wales provides a summary of the Census 2011 by ward level</p>	<p>NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.</p>

[Double click here to show borough wide statistics / hide statistics](#)

Religion or Belief	
<p>Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals</p> <p>The following documents submitted with the application are relevant in order to assess the impact of the proposal on religion or belief:</p> <ol style="list-style-type: none"> 1. The Design and Access Statement 2. The Statement of Community Involvement 3. The proposed plans 4. The Museums statement on how it engages local communities with culture 5. The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics. 	
<p>What is the proposal's impact on the equalities aims? Look for <i>direct impact</i> but also evidence of <i>disproportionate impact</i> i.e. where a decision affects a protected group more than the general population, including <i>indirect impact</i></p> <p>A prayer room would be located in the Poultry Market.</p> <p>Separate sex toilet facilities would be provided.</p> <p>The museum is committed to running engagement programmes in order to ensure that the museum is accessible and relevant to all groups.</p>	<p>What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?</p> <p>The museum should continue with its engagement programmes.</p>

Religion or Belief

Sex Double click here to add impact / Hide

Check box if NOT applicable ☐

Key borough statistics:

At the time of the [2011 Census the usual resident population of the City of London](#) could be broken up into:

- 4,091 males (55.5%)
- 3,284 females (44.5%)

A number of demographics and projections for demographics can be found on the [Greater London Authority website in the London DataStore](#). The site details statistics for the City of London and other London authorities at a ward level:

- [Population projections](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Sex

Additional Equalities Data (Service level or Corporate) Include data analysis of the impact of the proposals

The following documents submitted with the application are relevant in order to assess the impact of the proposal on sex:

1. The Design and Access Statement
2. The Statement of Community Involvement
3. The Museums statement on how it engages local communities with culture
4. The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics.

What is the proposal's impact on the equalities aims? Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact**

Separate sex toilet facilities would be provided.

The Museum is committed to engagement with local community groups. For example Octopus FM was a project in partnership with All Change Arts and Culture Mile Learning which involved working with a cohort of vulnerable women not in education, employment or training, to gain radio production skills and create content for a radio station during the Smithfield Street Party.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue to run its community engagement programmes to ensure that the Museum's officer is accessible and relevant to all.

Sexual Orientation and Gender Reassignment [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics – suggested sources include:

- [Sexual Identity in the UK – ONS 2014](#)
- [Measuring Sexual Identity – ONS](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Sexual Orientation and Gender Reassignment

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The following documents submitted with the application are relevant in order to assess the impact of the proposal on sexual orientation and gender reassignment:

1. The Design and Access Statement
2. The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

Within the scheme gender neutral toilet facilities would be provided in addition to separate sex facilities.

The Museum is committed to ensuring that it runs engagement programmes in order ensure that the Museum is accessible and relevant to all.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue with its community engagement programmes.

Marriage and Civil Partnership [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

Key borough statistics - sources include:

- [The 2011 Census contain data broken up by local authority on marital and civil partnership status](#)

NB: These statistics provide general data for these protected characteristics. You need to ensure you have sufficient data about those affected by the proposals – see below under “additional equalities data”.

[Double click here to show borough wide statistics / hide statistics](#)

Marriage and Civil Partnership

Additional Equalities Data (Service level or Corporate) *Include data analysis of the impact of the proposals*

The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics.

What is the proposal’s impact on the equalities aims? *Look for **direct impact** but also evidence of **disproportionate impact** i.e. where a decision affects a protected group more than the general population, including **indirect impact***

It is not envisaged that there would be an impact.

What actions can be taken to avoid or mitigate any negative impact or to better advance equality and foster good relations?

The Museum should continue with its community engagement programmes.

Additional Impacts on Advancing Equality & Fostering Good Relations [Double click here to add impact / Hide](#)

[Check box if NOT applicable](#) ☐

This section seeks to identify what additional steps can be taken to promote these aims or to mitigate any adverse impact. Analysis should be based on the data you have collected above for the protected characteristics covered by these aims.

In addition to the sources of information highlighted above – you may also want to consider using:

- Equality monitoring data in relation to take-up and satisfaction of the service

- Equality related employment data where relevant
- Generic or targeted consultation results or research that is available locally, London-wide or nationally
- Complaints and feedback from different groups.

[Double click here to show borough wide statistics / hide statistics](#)

Additional Impacts on Advancing Equality & Fostering Good Relations

Additional Equalities Data (Service level or Corporate)

The following documents submitted with the planning application are relevant in assessing additional impacts:

1. The Planning Statement
2. The Equality Impact Assessment submitted with the application evaluates the impacts of the proposal on the Protected Characteristics.

Are there any additional benefits or risks of the proposals on advancing equality and fostering good relations not considered above?

The scheme would have an impact on the traders in the Poultry Market. Traders in the East and West markets are concerned about how the scheme would impact on them. Whilst these concerns are of course valid and understood, in terms of The City Corporation's duty under s149 of the Equality Act 2010, the Corporation, are not aware of any impact on traders that would give rise to issues which are additional to those considered above. In particular the City Corporation are not aware of protected characteristics held by any individual traders or shared by the traders as a group. The SMTA have been given the opportunity to provide further information so that any equality impact on the traders that the Corporation might not be aware of can be taken into account, but at the current time, no further information has been provided.

What actions can be taken to avoid or mitigate any negative impact on advancing equality or fostering good relations not considered above? Provide details of how effective the mitigation will be and how it will be monitored.

Liaison should continue between the City as land owner and the traders as tenants.

The S278 agreement should include highway alterations that would enable the museum and the East and West markets to function alongside each other.

Construction and demolition logistics and method statements should be secured by condition in order to ensure that the works would not have an undue impact on market function.

Conclusion and Reporting Guidance

Set out your conclusions below using the EA of the protected characteristics and submit to your Director for approval.

If you have identified any negative impacts, please attach your action plan to the EA which addresses any negative impacts identified when submitting for approval.

If you have identified any positive impacts for any equality groups, please explain how these are in line with the equality aims.

Review your EA and action plan as necessary through the development and at the end of your proposal/project and beyond.

Retain your EA as it may be requested by Members or as an FOI request. As a minimum, refer to any completed EA in background papers on reports, but also include any appropriate references to the EA in the body of the report or as an appendix.

This analysis has concluded that...

Careful consideration has been given to the design of the buildings in order to ensure that they are physically accessible within the constraints of the existing building. The museum would continue to run engagement programmes so that its offer is engaging and relevant. Conditions, informatives, the S.106 agreement and a S278 agreement would be needed in order to secure equality of opportunity.

The scheme would impact on the Poultry Market traders. Liaison would need to continue between the City as land owner and the traders as tenant in order to agree a compensation/re-location package.

Outcome of analysis - *check the one that applies*

☐ Outcome 1

No change required where the assessment has not identified any potential for discrimination or adverse impact and all opportunities to advance equality have been taken.

Adjustments to remove barriers identified by the assessment or to better advance equality. Are you satisfied that the proposed adjustments will remove the barriers identified?

☐ Outcome 3

Continue despite having identified some potential adverse impacts or missed opportunities to advance equality. In this case, the justification should be included in the assessment and should in line with the duty have 'due regard'. For the most important relevant policies, compelling reasons will be needed. You should consider whether there are sufficient plans to reduce the negative impact and/or plans to monitor the actual impact.

☐ Outcome 4

Stop and rethink when an assessment shows actual or potential unlawful discrimination.

Signed off by Director:

G Richards

Name: Gwyn Richards

Date: 25.05.2020

Appendix F

Changes to Loading Bays

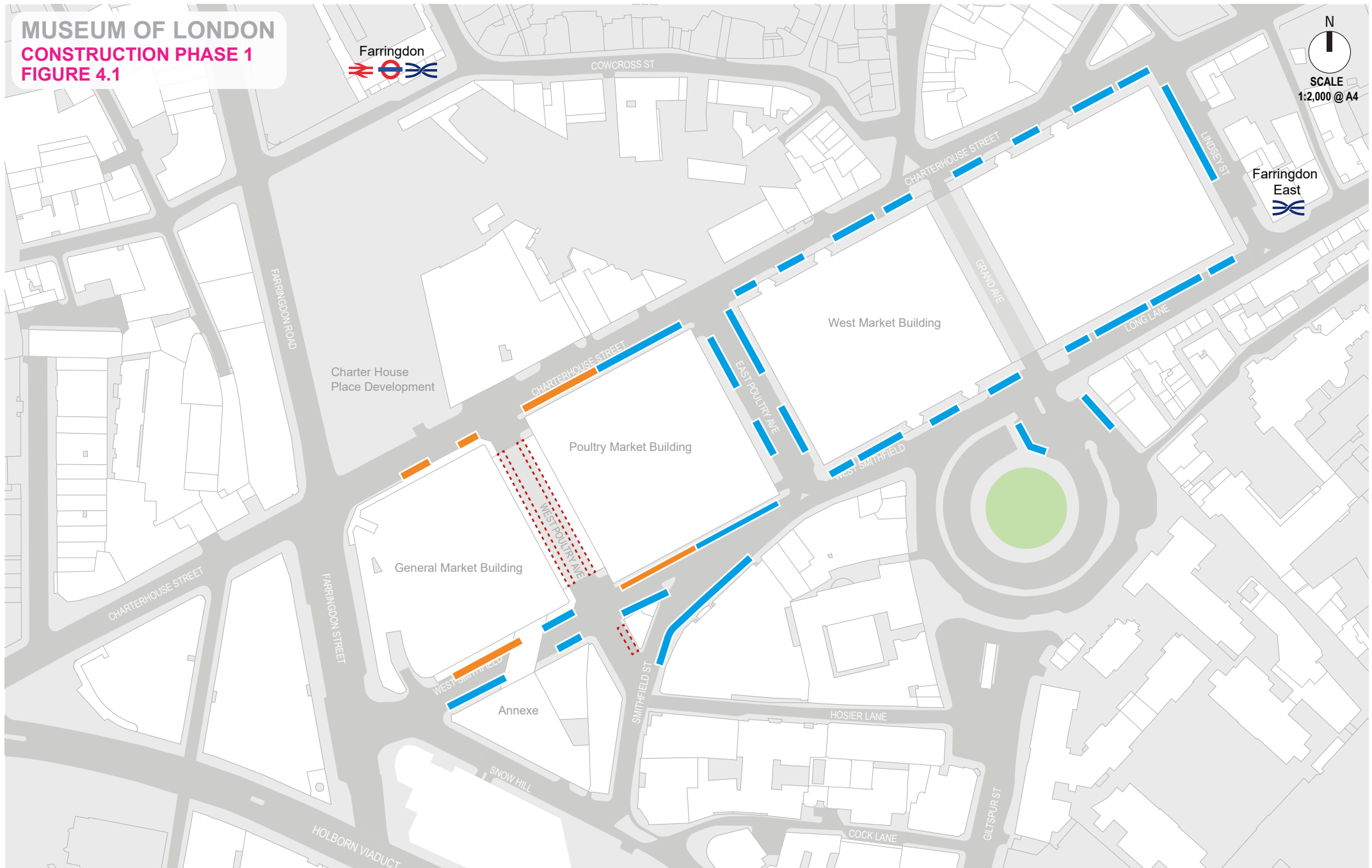
MUSEUM OF LONDON
CONSTRUCTION PHASE 1
FIGURE 4.1




Farringdon


N

 SCALE
 1:2,000 @ A4

Farringdon
 East

-  Loading Bays Operational
-  Suspended Bays to Facilitate Works
-  Permanently Removed Bays

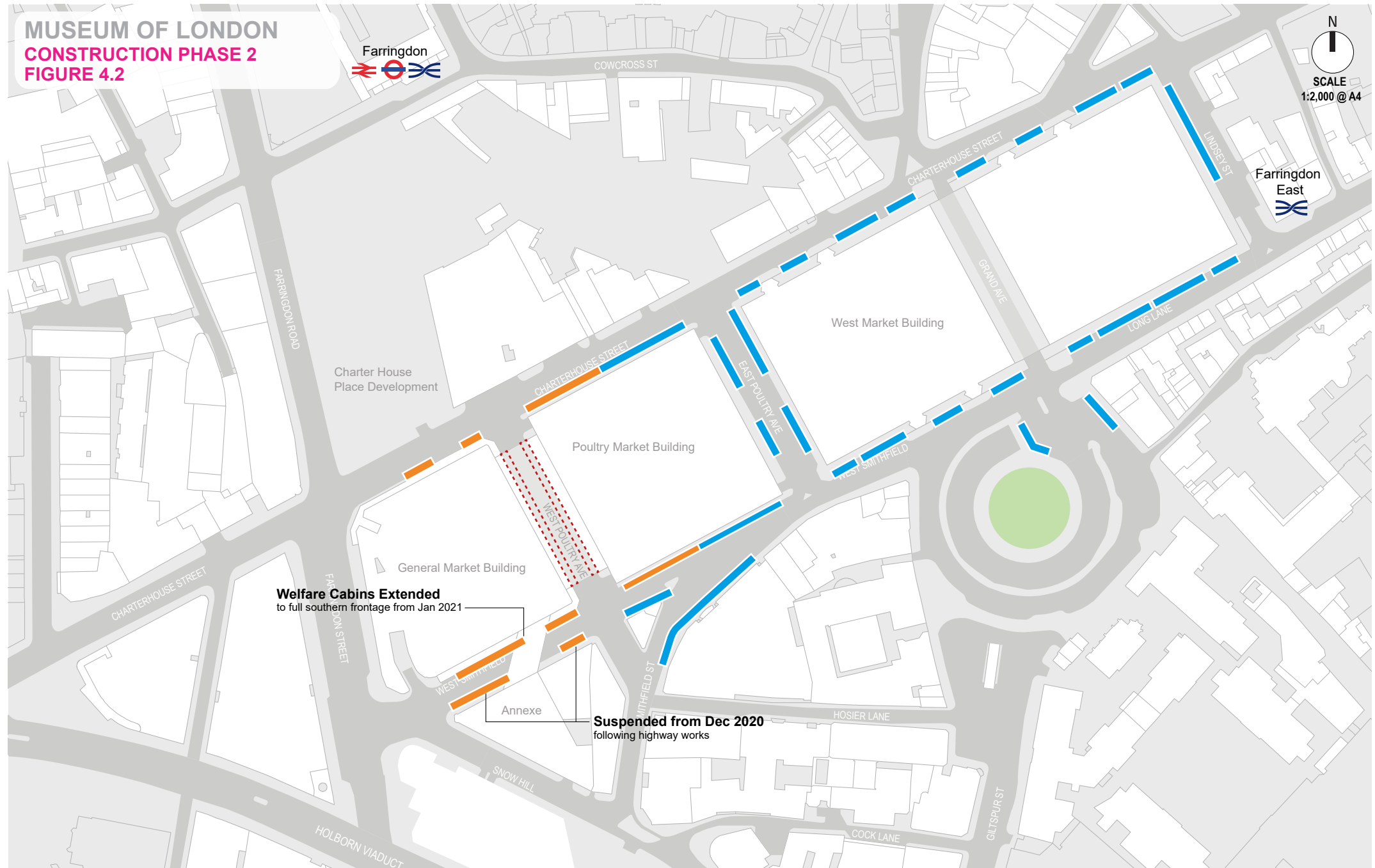
MUSEUM OF LONDON CONSTRUCTION PHASE 2 FIGURE 4.2




Farringdon


N

 SCALE
 1:2,000 @ A4

Farringdon
East

-  Loading Bays Operational
-  Suspended Bays to Facilitate Works
-  Permanently Removed Bays

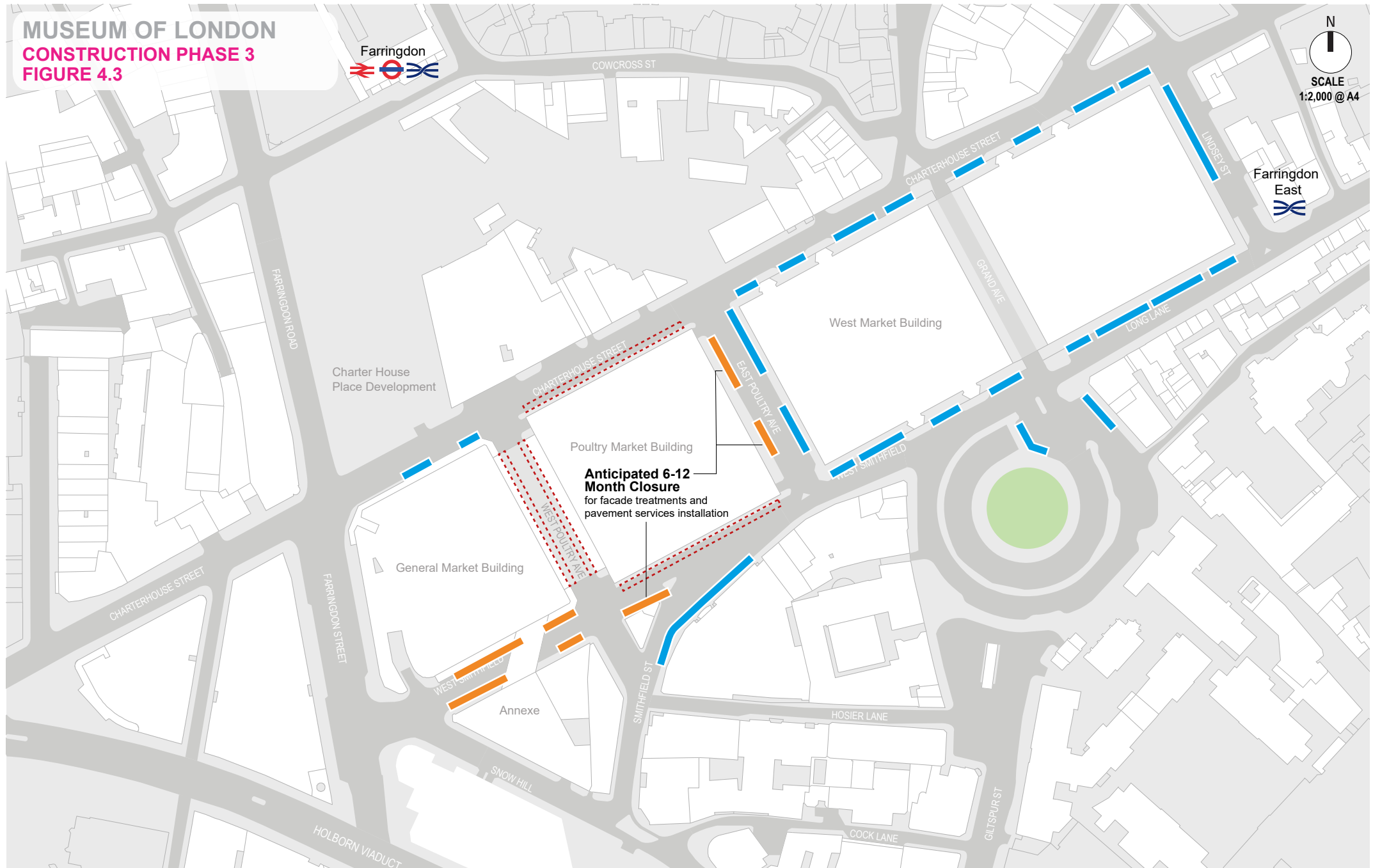
MUSEUM OF LONDON
CONSTRUCTION PHASE 3
FIGURE 4.3




Farringdon


N

 SCALE
 1:2,000 @ A4

Farringdon
 East

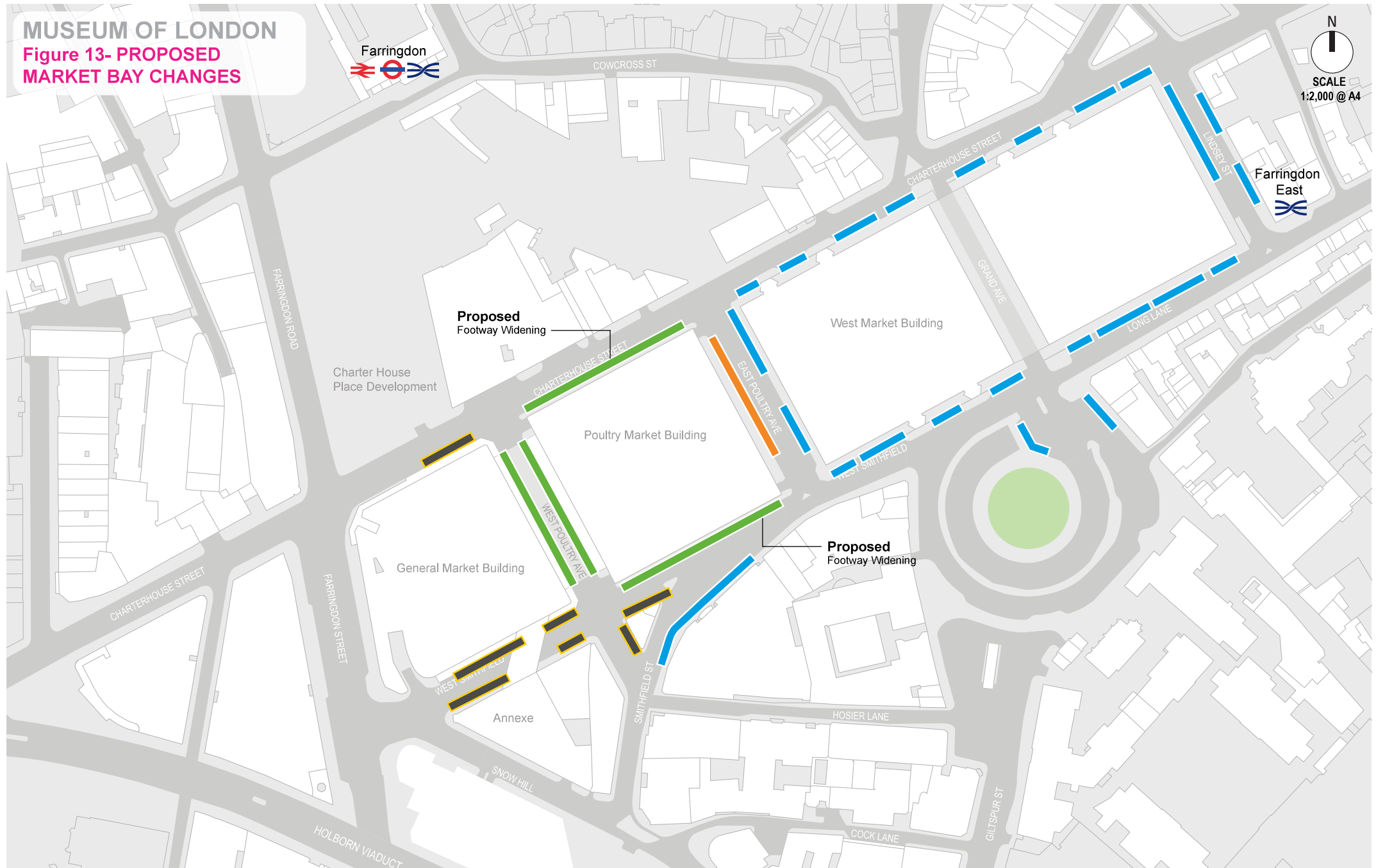
-  Loading Bays Operational
-  Suspended Bays to Facilitate Works
-  Permanently Removed Bays

Appendix G

Loading Bay Suspensions

MUSEUM OF LONDON

Figure 13- PROPOSED
MARKET BAY CHANGES



Bays to keep

Bays to remove

Sharing & Retiming

Retiming for night use only

SCHEDULE

APPLICATION: 19/01343/FULEIA

Poultry Market And General Market And The Annexe Buildings West Smithfield London

General Market

Partial demolition, repair, refurbishment and extension of the existing building known as the General Market at 43 Farringdon Street on the basement, ground, first and roof levels; creation of a new entrance structure on West Poultry Avenue (and associated refurbishment of the existing canopy over West Poultry Avenue) with new facades to West Smithfield and Charterhouse Street; new entrances on the corner of Farringdon Street and Charterhouse Street; Change of use to provide a museum and ancillary uses and areas, together with a flexible retail, restaurant, drinking establishment and leisure (gym) use for the perimeter 'houses'.

Poultry Market

Partial demolition, repair, refurbishment and alteration of the existing building known as the Poultry Market, Charterhouse Street at basement, ground and first levels; change of use to a museum and ancillary uses and areas.

Annexe Site (Red House, Iron Mountain, Fish Market and Engine House)

Partial demolition, refurbishment and extension of the existing buildings known as the Annexe Site at 25 Snow Hill and 29 Smithfield Street at basement, ground, first, second and third levels; creation of a triple height canopy above a public realm space; change of use to a flexible museum, offices, retail, restaurant, drinking establishment, events and functions use. Refurbishment of and minor alterations to the existing building known as the Engine House at West Smithfield at basement and ground levels; Change of use to a flexible retail and museum use.

(The proposal would provide 32,864sq.m of Museum floorspace (Class D1), 4,079 sq.m of flexible A1/A2/A3/A4/B1/D1 & D2 floorspace, 2,377sq.m of flexible B1/D1 floorspace, 870sq.m of flexible A3/A4/D1 & D2 floorspace, 18sq.m of flexible A1/D1 floorspace and 82sq.m of flexible A1/A3/A4/D1 floorspace.)

This application is accompanied by an Environmental Statement. Copies of the Environmental Statement from Gerald Eve LLP, One Fitzroy, 6 Mortimer Street, London, W1T 3JJ

CONDITIONS

1 Grampian Condition

No development shall take place in respect of the Poultry Market until details of the relocation of the supporting market facilities (which include but are not limited to the ABP Facility, ancillary office areas, workshops, stores, welfare areas, pallet and packaging collection and

forklift storage area) have been submitted to and approved in writing by the Local Planning Authority and the supporting facilities have been relocated in accordance with the approved details.

REASON: In order to support the continued function of Smithfield Market in accordance with the following policy of the Local Plan: CS5.

2 Time Limit for Commencement

The development hereby permitted shall be begun before the expiration of five 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.

3 Sustainability

(a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement 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.

(b) Prior to the commencement of the development (excluding demolition), after RIBA Stage 4, an update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing by the GLA at circulareconomystatements@london.gov.uk and 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 end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building elements and of the interventions in order to distinguish the historic from the new fabric. 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 Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to construction work commencing in order to establish

the extent of recycling and minimised waste from the time that construction start.

- 4 No later than 3 months after completion of the building and prior to the development being occupied, 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 London Plan.
- 5 Prior to the commencement of the development, excluding demolition, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the GLA at ZeroCarbonPlanning@london.gov.uk and the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions 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 - Draft City Plan 2036: CE 1. These details are required prior to demolition and construction work commencing in order to be able to account for embodied carbon emissions resulting from the demolition and construction phase (including recycling and reuse of materials) of the development.
- 6 Prior to the commencement of the development, excluding demolition, a post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority and the GLA at: ZeroCarbonPlanning@london.gov.uk. The post-construction assessment shall provide an update to the detailed Whole Life-Cycle Carbon Assessment submitted after RIBA Stage 4, 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, unless otherwise agreed. The developer shall use the post construction tab of the GLA's WLC assessment template and the relevant forms must be completed accurately and in their entirety in line with the criteria set out in the latest GLA's WLC assessment guidance. REASON: To ensure whole life-cycle carbon is calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

- 7 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 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.

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

REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation.

- 9 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.
- 10 Details of the rainwater harvesting and greywater collection systems, to include the location of tanks and areas/locations of use for the collected water, shall be submitted to and approved in writing by the Local Planning Authority. REASON: To assist the environmental sustainability of the development and its resilience and adaptation to climate change in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.5
- 11 A post construction BREEAM assessment demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.
REASON: To demonstrate that carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2.
- 12 Details of the position and size of the green roofs, the type of planting and a substantial contribution of the green roofs to biodiversity and rainwater attenuation shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.
REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.
- 13 Environmental Health

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.

- 14 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 construction in order that the impact on amenities is minimised from the time that the construction starts.
- 15 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.

- 16 A. No work below basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. A staged investigation and risk assessment may be submitted in respect of the individual buildings but no development in any individual stage shall be commenced until the related details have been submitted to and approved in writing by the Local Planning Authority.
- B. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the local planning authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.
- C. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.
- REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems, and to ensure that the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with the following policy the Local Plan: CS15. These details are required prior to commencement of works below basement slab level in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
- 17 (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.

- 18 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.
- 19 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 odour penetration to the upper floors from the potential Class A uses. The details approved must be implemented before the Class A use takes place.
REASON: In order to protect commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.
- 20 No cooking shall take place within any Class A1, A3, or A4 unit hereby approved until fume extract arrangements and ventilation have been installed to serve that unit in accordance with a scheme approved by the Local Planning Authority. Any works that would materially affect the external appearance of the building will require a separate planning permission.
REASON: In order to protect the amenity of the area in accordance with the following policies of the Local Plan: DM15.6, DM21.3.
- 21 Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority specifying the kitchen extract arrangements, materials and construction methods to be used to avoid noise penetration to the upper floors from the potential Class A uses. The details approved must be implemented before the Class A use commences and so maintained thereafter.
REASON: To protect the amenities of commercial occupiers in the building in accordance with the following policy of the Local Plan: DM15.7.
- 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 Policies SI1 and SD4 D.

- 23 Unless otherwise agreed in writing by the local planning authority 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 to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.

- 24 Transport and Highways

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 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.

- 25 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.

- 26 Prior to commencement of development on the Museum Site a highway schedule of condition relating to the development of the Museum Site shall be submitted to and approved in writing by the Local Planning Authority detailing the physical condition of the highway around and in close proximity to the Museum Site.

REASON: To ensure that there is a record of the condition of the public highway prior to development commencing, such that the developer shall be responsible for the costs of repair and reinstatement of the highway and surrounding infrastructure following completion of the development where damage has been caused to the highway or infrastructure during any works of demolition or construction in accordance with the following policy of the Local Plan: CS16.

- 27 Prior to commencement of development on the Annexe Site a highway schedule of condition relating to the development of the Museum Site shall be submitted to and approved in writing by the Local Planning Authority detailing the physical condition of the highway around and in close proximity to the Annexe Site.

REASON: To ensure that there is a record of the condition of the public highway prior to development commencing, such that the developer shall be responsible for the costs of repair and reinstatement of the highway and surrounding infrastructure following completion of the development where damage has been caused to the highway or infrastructure during any works of demolition or construction in accordance with the following policy of the Local Plan: CS16.

- 28 Within one year of the commencement of the development of the Museum Site a scheme of highway works necessary to make the development acceptable in planning terms and providing for the repair and reinstatement of highway and infrastructure surrounding the development site, shall be submitted to and approved in writing by the relevant local highway authority (noting that Transport for London are the highway authority for Farringdon Street and have also asked to be consulted on the local works). Unless agreed otherwise all works are to be carried out by the City Corporation's Highway contractors or Transport for London (in respect of TfL highway). The scheme of highway works shall include such works to the public highway and

related structures (including supporting structures not forming part of the public highway) as may be considered necessary by the Local Planning Authority to make the development acceptable in planning terms or required to repair or reinstate any highway damaged during the construction of the development including but not limited to:

- i. Works to enable the integration between the completed development of the Museum Site and the highways and to provide sufficient drainage of the highways;
- ii. Widening, construction of and making good of footways (including alterations to the line and level), kerbs and channels surrounding the three buildings or in respect of any other highway damaged during the redevelopment of the Museum Site;
- iii. Improvements to existing crossings and provision of new crossing facilities;
- iv. Any necessary changes to the highway to accommodate servicing of the General Market, including traffic orders, lining and signing and the provision of a kerbside waiting area for vehicles waiting to use the Snow Hill ramp;
- v. Provision of security measures on the highway;
- vi. Provision of coach drop-off and pick up facility;
- vii. Provision of suitable space for taxi pick-ups and drop-offs;
- viii. Provision of accessible parking spaces on the highway;
- ix. Provision of short stay cycle parking on the highway;
- x. Changes to the market loading bays and hours of operation;
- xi. Introduction of wayfinding measures on the highway;
- xii. the removal of abandoned cross-overs, the construction of new cross-overs
- xiii. replacement or relocation of street lighting and drainage works and provision of new lighting where required lighting levels do not meet the City Corporations standards;
- xiv. the provision or replacement of fire hydrants, cycle parking facilities and pipe subways and alterations to utility cover levels and utility equipment and signage, signals, equipment, bollards and street furniture (including any fixtures to any street furniture or lighting such as Wi-Fi equipment);
- xv. Works required to repair and reinstate any highway to the condition illustrated by the Highway Schedule of Condition and to the City Corporation's standards applicable at the time of such reparation and reinstatement; and
- xvi. alterations to the line and level of footways, kerbs and channels, works to carriageways; alterations to the line and level of the carriageway; full reconstruction of the highway if required, provided that the need for any such works is directly attributable to the development or construction of the Museum Site. The works shall be carried out at the developer's expense at no cost to the City Corporation or Transport for London as highway authority.

REASON: To provide for the necessary changes to the public highway required to provide for the development in the interests of highway and

pedestrian safety and to preserve the amenity of the area in accordance with the following policies of the Local Plan: CS10; CS16.

- 29 Within one year of the commencement of the development of the Annexe Site a scheme of highway works necessary to make the development acceptable in planning terms and providing for the repair and reinstatement of highway and infrastructure surrounding the Annexe Site, shall be submitted to and approved in writing by the relevant local highway authority (noting that Transport for London are the highway authority for Farringdon Street and have also asked to be consulted on the local works). Unless agreed otherwise all works are to be carried out by the City Corporation's highway contractors or Transport for London (in respect of TfL highway). The scheme of highway works shall include such works to the public highway and related structures (including supporting structures not forming part of the public highway) as may be considered necessary by the Local Planning Authority to make the development acceptable in planning terms or required to repair or reinstate any highway damaged during the construction of the development including but not limited to:
- xvii. Works to enable the integration between the completed development of the Annexe Site and the highways and to provide sufficient drainage of the highways;
 - xviii. Widening, construction of and making good of footways (including alterations to the line and level), kerbs and channels surrounding the three buildings or in respect of any other highway damaged during the redevelopment of the Annexe Site;
 - xix. Improvements to existing crossings and provision of new crossing facilities;
 - xx. Any necessary changes to the highway to accommodate servicing of the Annexe Site, including traffic orders and lining and signing;
 - xxi. Provision of any necessary security measures on the highway to protect the Annexe Site;
 - xxiii. Provision of suitable space for taxi pick-ups and drop-offs;
 - xxiv. Provision of accessible parking spaces on the highway;
 - xxv. Provision of short stay cycle parking on the highway;
 - xxvi. Changes to the market loading bays and hours of operation;
 - xxvii. Introduction of wayfinding measures on the highway;
 - xxviii. the removal of abandoned cross-overs, the construction of new cross-overs
 - xxix. replacement or relocation of street lighting and drainage works and provision of new lighting where required lighting levels do not meet the City Corporations standards;
 - xxx. the provision or replacement of fire hydrants, cycle parking facilities and pipe subways and alterations to utility cover levels and utility equipment and signage, signals, equipment, bollards and street furniture (including any fixtures to any street furniture or lighting such as Wi-Fi equipment);

xxxi. Works required to repair and reinstate any highway to the condition illustrated by the Highway Schedule of Condition and to the City Corporation's standards applicable at the time of such reparation and reinstatement; and

xxxii. alterations to the line and level of footways, kerbs and channels, works to carriageways; alterations to the line and level of the carriageway; full reconstruction of the highway if required, provided that the need for any such works is directly attributable to the development or construction of the Annexe Site.

The works shall be carried out at the developer's expense at no cost to the City Corporation or Transport for London as highway authority.

REASON: To provide for the necessary changes to the public highway required to provide for the development in the interests of highway and pedestrian safety and to preserve the amenity of the area in accordance with the following policies of the Local Plan: CS10; CS16.

- 30 An Interim Travel Plan for shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to the occupation of each of the relevant buildings hereby permitted. Each of the buildings shall thereafter be operated in accordance with the approved Interim Travel Plan (or any amended Interim Travel Plan that may be approved from time to time by the LPA) until the full Travel Plan is approved. The Interim Travel Plan shall focus on promoting sustainable travel to and from the development site with the aim of making sustainable travel choices easier to make from the outset of occupation. The following matters shall be addressed within the Interim Travel Plan:

- i. Trips and choices - details of the estimated number of new trips resulting from the development and the development and the predicted share across different transport modes;
- ii. Site Assessment - overview of the existing transport links serving the development, identifying realistic alternatives to car use and any barriers to non-car use, identify possible improvements to the area that would encourage the use of environmentally friendly travel options;
- iii. Provide details of facilities provided on site by the development which will encourage the use of sustainable means of transport, cycling and walking;
- iv. Appointing a travel plan co-coordinator to oversee the development and implementation of the travel plan.

REASON: To ensure that the LPA may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.

- 31 A. Within 6 months of first occupation a full Travel Plan in respect of the relevant building shall be submitted to and approved in writing by the Local Planning Authority ("LPA"). Each of the buildings shall thereafter be operated in accordance with the approved Travel Plan (or any amended Travel Plan that may be approved from time to time by the

LPA) for a minimum period of 5 years from first occupation of that building. The travel plans should focus on promoting sustainable travel to and from the development site, encouraging cycling and targets should be set to reflect achieving full occupancy of the cycle parking provided. The full Travel Plan shall:

- i. Provide a site assessment;
- ii. Provide for the creation of steering group to oversee the development of the travel plan and provide guidance and support;
- iii. Provide a survey of staff travel to work patterns and attitudes to identify how staff travel, where staff travel from, why staff travel the way they do and whether staff are able or willing to change and what measures might encourage them to do so;
- iv. Provide a travel audit of all travel generated to include business travel, visitors, deliveries/suppliers and fleet vehicles where applicable;
- v. Identify the high-level objectives of the travel plan including emissions/vehicle reduction initiatives, public transport initiatives, walking and cycling initiatives, measures and goals and indicators to assess progress against objectives;
- vi. Establish a reporting mechanism to the LPA;
- vii. Provide details of measures and incentives for the encouragement of travel by cycle;
- viii. Set out practical measures through which targets are to be met and objectives may be achieved based upon the results of the survey and audit;
- ix. Provide for regular promotion of measures to facilitate the development sites accessibility by means other than private motor vehicles including as appropriate information to be incorporated into publicity material and by making copies of the travel plan available to staff, visitors and customers to the development;
- x. Provide arrangements for the review and monitoring of the travel plan on an annual basis.

B. Annual monitoring reports shall be submitted to the LPA for 5 years from the first occupation of the relevant building.

REASON: To ensure that the LPA may be satisfied that the scheme provides a sustainable transport strategy and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM16.1.

- 32 11 A. Details of a Delivery and Servicing Management Plan for the Museum Site demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to the first occupation of any of the buildings comprised within the Museum Site. The Museum Site building facilities shall thereafter be operated in accordance with the approved Delivery and Servicing Management Plan (Museum Site) (or any amended Servicing

Management Plan that may be approved from time to time by the LPA) for the life of the building. The Delivery and Servicing Management Plan (Museum Site) must make provision for the following restrictions and principles which apply to the Museum Site:

- i. There shall be no servicing of the General Market Houses by motorised vehicles of the between the hours of 0700 - 1900 on any day with occasional infrequent deliveries by vehicles from nearby loading areas permitted outside these hours;
- ii. There shall be no servicing by motorised vehicles of the Poultry Market between the hours of 0700 - 1000 and 1200 - 1400 and 1600 - 1900 on any day save that deliveries may take place between the hours of 1600 and 1900 solely for the purpose of allowing events to be set up;
- iii. There shall be no more than 36 trips by Goods Vehicles to the Poultry Market per day and/or no more than 72 trips by Goods Vehicles to and from the Poultry Market per day (being 36 trips to and 36 trips from the Poultry Market per day), whichever shall be the fewer;
- iv. There shall be no more than 17 trips by Goods Vehicles to the General Market per day, and/or no more than 34 trips by Goods Vehicles to and from the General Market per day (being 17 trips to and 17 trips from the General Market per day), whichever shall be the fewer;
- v. There shall no more trips by Goods Vehicles to the General Market Houses than is agreed in the Delivery and Servicing Management Plan but the maximum permitted shall be no more than 30 trips by Goods Vehicles per day, and/or no more than 60 trips by Goods Vehicles to and from the General Market Houses per day (being 30 trips to and 30 trips from the General Market Houses per day), whichever shall be the fewer;
- vi. Save as provided at (vii) all servicing of the Poultry Market shall be via three dedicated off-street loading bays for general deliveries and the dedicated servicing area for items requiring customs clearance and no goods or items shall be accepted by any person at the Poultry Market (other than those which have arrived in these dedicated loading areas or from solo motor cycles which have unloaded the items being delivered in a solo motor cycle servicing area constructed for solo motor cycle servicing purposes or from pedal cycles);
- vii. Save as provided at (vii) all servicing of the General Market shall be via the two dedicated basement loading bays accessed from the Snow Hill ramp and no goods or items shall be accepted by any person at the Poultry Market (other than those which have arrived in these dedicated loading areas or from solo motor cycles which have unloaded the items being delivered in a solo motor cycle servicing area constructed for solo motor cycle servicing purposes or from pedal cycles);
- viii. Event deliveries for events associated with the museum are to take place from within the General Market and Poultry Market loading bays unless demand for servicing space exceeds loading bay capacity, in which case deliveries may be undertaking on street from Chaterhouse Street or West Smithfield;

- ix. Save as provided in the exceptions at (a)-(d) there shall be no trips by Goods Vehicles to the Museum Site other than Consolidated Deliveries and there shall be no trips by Goods Vehicles to the Museum Site which have travelled from any location other than from the Consolidation Centre (where items, vehicles and drivers have first been security screened and cleared) except for a) Facilities Management Vehicles, (b) a maximum number of Unconsolidated Deliveries per day and per week which shall be agreed in the Delivery and Servicing Management Plan, (c) the use of the Snow Hill ramp or the General Market basement by Network Rail or for the servicing of Charterhouse Place and (d) for the delivery of sensitive items such as artefacts or exhibition items being delivered to the Poultry Market;
- x. There shall be no trips by Goods Vehicles to the Museum Site unless they have first been allocated Pre-booked Delivery Slots for the time of their arrival and there shall be no arrival of Goods Vehicles to the Museum Site other than at the time allocated by the applicable Pre-booked Delivery Slot;
- xi. Reasonable endeavours shall be used to minimise the number of Facilities Management Vehicles attending the Museum Site;
- xii. The maximum size of Goods Vehicles for servicing and deliveries to the Museum Site shall be set out and the developer shall ensure that the appropriately sized vehicle and an on-site banksman is used during all servicing and deliveries to the Museum Site;
- xiii. For the developer to give notice to the LPA of any change in the occupancy of the Annexe Site that may have a material change on the approved Delivery and Servicing Management Strategy (Annexe)(or any revisions to it) as soon as reasonably practicable and in event one month prior to the commencement of such occupancy;
- xiv. For the ability of the LPA to request a review of the Delivery and Servicing Management Plan in the event of there being a material change to the of occupancy of any part of the Museum Site such that it is the LPA's reasonable opinion that amendments or revisions are required, or where the LPA reasonably believes that the approved Delivery and Servicing Management Plan requires amendments or revisions due to the operational servicing practices of the Museum Site.

The above restrictions shall not apply to Facilities Management Vehicles accessing any of the proposed buildings in the event of an emergency.

B. The developer shall undertake a review of the Delivery and Servicing Management Plan (Museum Site) annually for the first five years to be submitted to the LPA no later than the anniversary of the date of approval of the Delivery and Servicing Management Plan (Museum Site) and then as requested by the LPA and notified in writing to the developer. The review shall set out any amendments considered necessary to the Delivery and Servicing Management Plan (Museum Site) for approval but no amendments shall come into force until they have been approved by the LPA.

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

- 33 12 A. Details of a Delivery and Servicing Management Plan for the Annexe Site demonstrating the arrangements for control of the arrival and departure of vehicles servicing the premises shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to the first occupation of any part of the Annexe Site. The Annexe Site building facilities shall thereafter be operated in accordance with the approved Delivery and Servicing Management Plan (Annexe) (or any amended Servicing Management Plan (Annexe) that may be approved from time to time by the LPA) for the life of the buildings. The Delivery and Servicing Management Plan (Annexe) must make provision for the following restrictions and principles which apply to the Annexe Site:
- i. There shall be no servicing by motorised vehicles of the Annexe Site between the hours of 0700 - 1000, 1200 - 1400 and 1600 - 1900 on any day;
 - ii. There shall be no more than 30 trips by Goods Vehicles to the Annexe Site per day and/or no more than 60 trips by Goods Vehicles to and from the Annexe Site per day (being 30 trips to and 30 trips from the Annexe Site per day), whichever shall be the fewer;
 - iii. All servicing of the Annexe Site shall be via the two dedicated basement loading bays accessed from the Snow Hill ramp and no goods or items shall be accepted by any person at the Annexe Site (other than those which have arrived in this dedicated loading area or from solo motor cycles which have unloaded the items being delivered in a solo motor cycle servicing area constructed for solo motor cycle servicing purposes or from pedal cycles);
 - iv. Save as provided in the exceptions at (a)-(b) there shall be no trips by Goods Vehicles to the Annexe Site other than Consolidated Deliveries and there shall be no trips by Goods Vehicles to the Annexe Site which have travelled from any location other than from the Consolidation Centre (where items, vehicles and drivers have first been security screened and cleared) except for (a) Facilities Management Vehicles; and (b) a maximum number of Unconsolidated Deliveries per day and per week which shall be agreed in the Delivery and Servicing Management Plan;
 - v. There shall be no trips by Goods Vehicles to the Annexe Site unless they have first been allocated Pre-booked Delivery Slots for the time of their arrival and there shall be no arrival of Goods Vehicles to the Annexe Site other than at the time allocated by the applicable Pre-booked Delivery Slot;
 - vi. Reasonable endeavours shall be used to minimise the number of Facilities Management Vehicles attending the Annexe Site;
 - vii. The maximum size of Goods Vehicles for servicing and deliveries to the Annexe Site shall be set out and the developer shall

ensure that the appropriately sized vehicle and an on-site banksman is used during all servicing and deliveries to the Annexe Site;

i. For the developer to give notice to the LPA of any change in the occupancy of the Annexe Site that may have a material change on the approved Delivery and Servicing Management Strategy (Annexe)(or any revisions to it) as soon as reasonably practicable and in event one month prior to the commencement of such occupancy;

ii. For the ability of the LPA to request a review of the Delivery and Servicing Management Plan in the event of there being a material change to the occupancy of any part of the Annexe Site such that it is the LPA's reasonable opinion that amendments or revisions are required, or where the LPA reasonably believes that the approved Delivery and Servicing Management Plan (Annexe) requires amendments or revisions due to the operational servicing practices of the Annexe Site.

The above restrictions shall not apply to facilities management vehicles accessing any of the proposed buildings in the event of an emergency.

B. The developer shall undertake a review of the Delivery and Servicing Management Plan (Annexe) annually for the first five years to be submitted to the LPA no later than the anniversary of the date of approval of the Delivery and Servicing Management Plan (Annexe) and then as requested by the LPA and notified in writing to the developer. The review shall set out any amendments considered necessary to the Delivery and Servicing Management Plan (Annexe) for approval but no amendments shall come into force until they have been approved by the LPA.

REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: DM16.1.

- 34 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. A stated scheme of construction logistics may be submitted in respect of the individual buildings but no works in any individual stage shall be commenced until the related construction logistics plan has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan(s) 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 Construction Logistics Plan(s) shall be subject to consultation with Transport for London, due to the close proximity of the site to the Transport for London Road Network. The Plan(s) 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(s) 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 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.

- 35 No doors, gates or windows at ground floor level shall open over the public highway unless otherwise approved in writing.

REASON: In the interests of public safety.

- 36 Permanently installed pedal cycle racks shall be provided and maintained in the Poultry Market throughout the life of the building sufficient to accommodate a minimum of 42 pedal cycles. 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.

- 37 Permanently installed pedal cycle racks shall be provided and maintained across the General Market Houses throughout the life of the building sufficient to accommodate a minimum of 12 pedal cycles. 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.

- 38 Permanently installed pedal cycle racks shall be provided and maintained in the Annexe building throughout the life of the building sufficient to accommodate a minimum of 42 pedal cycles. 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.

- 39 Changing facilities and showers shall be provided in conjunction with the bicycle parking areas 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 bicycle more convenient in order to encourage greater use of bicycles by commuters in accordance with the following policy of the Local Plan: DM16.5.

- 40 The threshold of all vehicular access points shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM108, DM16.2.

- 41 Archaeology

No works below 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. These details are required prior to commencement of works below basement slab level in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

- 42 No works below 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. A staged scheme of details may be submitted in respect of the individual buildings but no development in any individual stage shall be commenced until the related details have been submitted to and approved in writing by the Local Planning Authority. All works shall be carried out and completed as approved, unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4. These details are required prior to

commencement of works below basement slab level in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

43 Design Details

Before any works thereby affected are begun to the Poultry Market 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:

- a) particulars and samples of all repairs to original external fabric of the Poultry Market, including but not limited to the hexagonal glass blocks, all brickwork types, ceramic tiles, granite and concrete mixes;
- b) particulars and samples of the proposed replacement glazing systems across the building including a scale mockup of the proposed clerestorey glazing and samples of the proposed fritted glass;
- c) particulars and samples of the proposed new elements of the building's entrances including signage, overpanels and roller shutters;
- d) particulars and samples of the metal framework for West Poultry Avenue signage including junctions with existing fabric and associated infrastructure;
- e) details of the conversion of the pavement lights to smoke vents;
- f) details of the integration of plant, flues, fire escapes, lift overruns and other excrescences at roof level.
- g) details of the ramp landings and entrances to the lecture theatre and school arrival area.
- h) details of the layout of the first floor visitor WCs with alternate handing.
- i) details of the layout of the ground floor accessible WC adjacent to the waste store and loading bay.
- j) details of the layout of the four wheelchair accessible staff WCs at first floor level.
- k) details of the layout of the wheelchair accessible baby change facility.
- l) details of the proposed entrances to West Poultry Avenue including particulars and samples of the cast concrete portals.

REASON: To ensure that the Local Planning Authority is satisfied with the proposed detail and to ensure the protection of the special architectural or historic interest of the building in accordance with the following policy of the Local Plan: DM12.3.

44 Before any works thereby affected are begun details and material samples of works to all external faces of the General Market including a specification of works detailing the methods and materials to be used to undertake the proposed works, to be submitted to and approved in writing by the Local Planning Authority, including details of the following, and all works pursuant to this consent shall be carried out in accordance with the approved details:

- (a) All repaired and new shopfronts;
- (b) Awnings;

- (c) All roof level alterations and extensions
- (d) All external building services and M&E plant
- (e) All external lighting;
- (f) The 'Art Canvas' and associated structures;
- (g) All new and re-instated doors and treatment of openings (including security shutters where relevant);
- (h) All new fenestration (including where relevant windows, rebates and grills)
- (i) The 'Museum Displays' either side of the West Smithfield former vehicular entrance;
- (j) Details of all new terraces including planters and all other fixtures;
- (k) Restaurant roof in the General Market and junctions with retained elevations;
- (l) Works to the canopy over West Smithfield connecting the General and Fish Market;
- (m) New and repaired drainage;
- (n) Cleaning of external surfaces;
- (o) Any other excrescences at roof level;
- (p) The access arrangements into the tenant houses;

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 45 Before any works thereby affected are begun details and material samples of works to all external faces of the Annexe Site (including the Engine House) including a specification of works detailing the methods and materials to be used to undertake the proposed works, to be submitted to and approved in writing by the Local Planning Authority, including details of the following, and all works pursuant to this consent shall be carried out in accordance with the approved details:
- (a) All roof level alterations and extensions
 - (b) All external building services and M&E plant
 - (c) All external lighting;
 - (d) Reinstated chimneys, sculpture and other architectural details on the Fish Market;
 - (e) All new and re-instated doors and treatment of openings (including security shutters where relevant);
 - (f) All new fenestration (including where relevant windows, rebates and grills)
 - (g) The Iron Mountain Canopy, including junctions with the Fish Market and Red House;
 - (h) Details of all new terraces including planters and all other fixtures;
 - (i) Works to the canopy over West Smithfield connecting the General and Fish Market;
 - (j) Alterations to the parapet of the Engine House;
 - (k) New and repaired drainage;

- (l) Cleaning of external surfaces;
- (m) Any other excrescences at roof level;
- (n) The top landing of the Fish Market West Smithfield entrance;

(o) The location of the non-standard cycle storage facilities in the Red House basement;

(p) The location and means of access to cycle parking facilities within the Annexe buildings.

(q) details of the proposed extension to the Red House including particulars and samples of the 'Okalux' glazing.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.

- 46 All work in making good shall match the existing adjacent work with regard to the methods used and to materials, colour, texture and profile, unless shown otherwise on the drawings or other documentation hereby approved or required by any condition(s) attached to this permission.
REASON: To ensure a satisfactory external appearance in accordance with the following policy of the Local Plan: DM10.1.
- 47 Detailed drawings and specifications for the Iron Mountain Public Realm shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to any works for the delivery of the Iron Mountain Public Realm being carried out. The submitted specifications shall include the specifications for the design, construction, materials and works to construct the Iron Mountain Public Realm including all hard and soft landscaping, power supply, street furniture, lighting and drainage. There shall be no occupation of the Annexe Site until the Iron Mountain Public Realm has been laid out in accordance with the approved detailed drawings and specifications (including the provision of lighting and power) and the Iron Mountain Public Realm shall be retained in accordance with the approved plans and specifications for the lifetime of the development (including any amendments to it that are approved by the LPA).
REASON: To secure enhanced public realm in accordance with the following policies of the Local Plan: CS10; CS16.
- 48 Detailed drawings and specifications for the West Poultry Route shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to any works for the delivery of the route being carried out. The submitted specifications shall include the specifications for the design, construction, materials and works to construct the West Poultry Route including all hard and soft landscaping, power supply, street furniture, lighting and drainage. There shall be no occupation of the Museum Site until the West Poultry Route has been laid out in accordance with the approved detailed drawings and specifications (including the provision of lighting and power) and the West Poultry

Route shall be retained in accordance with the approved plans and specifications for the lifetime of the development (including any amendments to it that are approved by the LPA).

REASON: To secure enhanced public realm in accordance with the following policies of the Local Plan: CS10; CS16.

49 Lighting

Prior to the commencement of the relevant works, a full Lighting Strategy for external lighting and the proposed controlled internal system shall be submitted to and approved in writing by the Local Planning Authority, which shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on operational energy usage, light pollution and residential amenity. The development shall be carried out and maintained in accordance with the details of the approved lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development including a satisfactory external appearance and reduction in energy usage in accordance with the following policies of the Local Plan: DM10.1, DM 15.7, CS15, DM15.2 and emerging policy DE2 of the Draft City Plan 2036.

50 Refuse

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.

51 Hostile Vehicle Mitigation

The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device and provide such measures as are necessary to protect the areas around the museum entrances and other spaces where crowding is expected, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.

REASON: To ensure that the premises and its surrounds are protected from road vehicle borne damage in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

52 SUDS and Drainage

Before any construction works hereby permitted are begun the following details shall be submitted to and approved in writing by the Local Planning Authority in conjunction with the Lead Local Flood Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, rainwater harvesting systems, flow control devices, pumps, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 45.7 l/s from the museum portion area of the site and 10.2 l/s from the annex portion of the site, provision should be made for an attenuation volume capacity capable of achieving this, an intelligent rainwater harvesting system shall be included;

(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. These details are required prior to construction in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

53 Before the shell of the first building 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.

54 Utilities

No works except demolition shall take place before details of the utility connection requirements of the development (or relevant part thereof) including all proposed service connections, communal entry chambers, the proposed service provider and the anticipated volume of units

required for the development and a programme for the ordering and completion of service connections from the utility providers have been submitted to the Local Planning Authority for approval in writing. No service connections shall be ordered in connection with the development unless in accordance with the final programme approved pursuant to this condition.

REASON: To ensure that the utilities infrastructure arising from the development are met in accordance with policy CS2 of the Local Plan.

55 Local Procurement Strategy

1 In this condition "Local Procurement Code and Guidance" means the documents entitled "Local Employment and Procurement Code" (2021) and the "Employment and Skills Plan Guidance 2021" together with any amendments or revisions thereto.

A. A Local Procurement Strategy shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to any works commencing. The Local Procurement Strategy may be submitted for the full development or this condition may be discharged separately in respect of the Museum Site and the Annexe Site but no works relating to the relevant part of the development shall be commenced until the strategy for that part has been submitted to and approved in writing by the LPA. Where separate strategies are submitted then references to monitoring reports and final reports shall be read as references to the reports relating to the relevant part of the development site. The submitted strategy shall include:

- i. details of initiatives to identify local procurement opportunities relating to the construction of the development and how the tender process will be used to achieve the targets below;
- ii. details of initiatives to reach a 10% target for local procurement from Local SME's and how the tender process will be used to achieve the targets;
- iii. the timings and arrangements for the implementation of such initiatives; and
- iv. suitable mechanisms for the monitoring of the effectiveness of such initiatives to maximise opportunities for local SMEs to access contracts for goods and services pursuant to the Local Procurement Code and Guidance at least biannually.

B. Monitoring reports shall be submitted to the LPA at least biannually to assess:

- i. The performance by all contractors and subcontractors in achieving the 10% Local SME procurement spend target identified in the Local Procurement Code and Guidance and benchmark that performance against the approved Local Procurement Strategy and the overall estimated construction procurement spend on all goods and services;

- ii. all Local SMEs which are sent a tender enquiry or a tender invitation, and all contractors and sub-contractors detailing: the date, the goods and services tendered for and the outcome and value of the tender;
 - iii. all Local SME suppliers of goods and services which are used by the developer and all contractors and sub-contractors together with: the value and type of the goods and services procured (irrespective of whether or not these goods and services were procured pursuant to a tender).
- C. In the event that the Monitoring Reports submitted pursuant to Part (B) above demonstrate that targets are not being achieved a revised Local Procurement Strategy incorporating revisions requested by the LPA shall be submitted to and approved by the LPA.
- D. A final report shall be submitted to the LPA no later than one month after first occupation:
- i. Assessing the overall performance in achieving the 10% Local SME procurement spend target identified in the Local Procurement Code and Guidance and benchmarking that performance against the approved Local Procurement Strategy and the actual total construction procurement spend on all goods and services;
 - ii. Providing details of all Local SMEs which were used to procure goods and services together with the total spend on goods and services procured from Local SMEs, such details to include the name and contact details of the appropriate person(s) within the Local SME.
- E. The Development shall be carried out in accordance with the approved Local Procurement Strategy and the Local Procurement Code and Guidance as may be revised under Part (C) above until the development is occupied.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

56 Local Skills and Job Brokerage

(A) A Local Training Skills and Job Brokerage (Demolition) Strategy shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to any works commencing. The Local Skills and Job Brokerage (Demolition) Strategy may be submitted for the full development or this condition may be discharged separately in respect of the Museum Site and the Annexe Site but no works relating to the relevant part of the development shall be commenced until the strategy for that part has been submitted to and approved in writing by the LPA. The submitted strategy shall include details of:

- i. the advertising of all vacancies relating to the demolition works within the City of London and the Neighbouring London Boroughs via local job brokerage and employment support agencies;

- ii. identifying in advance skills needs which could be met through local training providers and shall provide a plan for meeting such needs;
- iii. measures to meet a target of 20% of the total workforce on the site being resident in the City and Neighbouring London Boroughs;
- iv. the proposed target of apprenticeships to be generated on the Site and recruited from the City and Neighbouring London Boroughs;
- (e) providing appropriate training to ensure effective transition from unemployment to work;
- v. undertaking at least two community benefit and/or education projects per year of construction activity; and
- vi. providing information on the timing and implementation of these initiatives and suitable monitoring mechanisms.

(B) The development shall be carried out in accordance with the approved Local Training Skills and Job Brokerage (Demolition) Strategy.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

In this condition "Neighbouring London Boroughs" means the London Boroughs of Camden, Hackney, Islington, Lambeth, the Royal Borough of Kensington and Chelsea, Southwark, Tower Hamlets Wandsworth, City of Westminster, Haringey and Lewisham.

- 57 A. A Local Training Skills and Job Brokerage (Construction) Strategy shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to any works commencing. The Local Training Skills and Job Brokerage (Construction) Strategy may be submitted for the full development or this condition may be discharged separately in respect of the Museum Site and the Annexe Site but no works relating to the relevant part of the development shall be commenced until the Local Training Skills and Job Brokerage (Construction) Strategy for that part has been submitted to and approved in writing by the LPA. The Local Training Skills and Job Brokerage (Construction) Strategy shall provide for:
- i. measures to meet a target of 20% of the total workforce on the site being resident in the City and Neighbouring London Boroughs;
 - ii. a proposed target of apprenticeships to be generated on the site and recruited from the City and Neighbouring London Boroughs;
 - iii. appropriate training to ensure effective transition from unemployment to work;
 - iv. the undertaking of at least two community benefit and/or education projects per year of construction activity; and
 - v. information on the timing and implementation of these initiatives and suitable monitoring mechanisms.

(B) The development shall be carried out in accordance with the approved Local Training Skills and Job Brokerage (Construction) Strategy.

REASON: To manage the impact of development in accordance with policy CS4 of the Local Plan.

In this condition "Neighbouring London Boroughs" means the London Boroughs of Camden, Hackney, Islington, Lambeth, the Royal Borough of Kensington and Chelsea, Southwark, Tower Hamlets Wandsworth, City of Westminster, Haringey and Lewisham.

58 Access and Management

A. A Public Access and Events Management Plan in respect of the General Market, the Poultry Market, and the West Poultry Route shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to the first occupation of the museum hereby permitted. The submitted Public Access and Events Management Plan shall include details of:

- i. New Museum of London: Operational Vision including forecast visitor numbers.
- ii. Visitor operations including:
 - a. Site entrances;
 - b. Opening times;
 - c. West Poultry Avenue;
 - d. Visitor facilities;
 - e. Fire safety and emergency procedures; and
 - f. Security.
- iii. West Poultry Avenue (the West Poultry Route):
 - a. Confirmation of the hours of public access including opening and closing times of West Poultry Avenue. The West Poultry Route shall be open at least between 7am and midnight with an expectation that the Developer will investigate the feasibility of and work toward extending these hours prior to Occupation.
 - b. Details regarding the closure of West Poultry Avenue for events; and
 - c. Details relating to the management of events that will utilise West Poultry Avenue.
- iv. Information regarding the galleries and exhibitions including:
 - a. Permanent galleries; and
 - b. Temporary exhibitions.
- v. Information regarding commercial and catering offers.
- vi. Events and programming including the maximum numbers which may attend events in each part of the Museum Site (including those which will use West Poultry Avenue), and the number of events that can be held annually and the hours during which events can run during the daytime and the evening.
- vii. An outline of the duties of the staff employed at the premises to patrol the external perimeter of the premises in order to discourage noise, disturbance and anti-social behaviour.

viii. A smoking control scheme relating to the supervision and control of any smoking patrons outside the premises during the hours that the premises are open to the public.

ix. A scheme relating to the dispersal of patrons leaving the premises after 23:00.

a. A taxi licensed private hire scheme:

b. To encourage patrons and staff to use licensed taxis, licensed private hire vehicles when leaving the premises;

c. To encourage patrons to make advanced bookings for such taxis, licensed private hire vehicles from within the premises; and

d. Which details the licensed private hire firm nominated by the operator of the premises to pick up at a point agreed by the LPA.

x. Details of noise monitoring and mitigation including details of neighbours and sensitive receptors engagement.

xi. Details of servicing and deliveries for Events (including management of Taxis and Coaches).

xii. Travel Plan (including promotion of cycling and public transport) setting out:

a. Links to transport networks;

b. School Parties - Arrival and Departure; and

c. Disabled Drop-Off and Access.

xiii. Visitor monitoring and recording.

xiv. Details of the Museum's website.

xv. Provide for the update and review of the Annexe Site Management Plan.

In respect of 1(x) above the noise monitoring and mitigation part of the Public Access and Events Management Plan shall be prepared by a suitably qualified and experienced acoustician and shall provide for:

a. Monitoring and control of noise levels within the venue. It is recognised that this is likely to require noise limiting and frequency control equipment;

b. Control of hours of noisy events;

c. Control of location and the management of noisy activities including patrons. All events to be under the direct supervision of the Museum;

d. The fact that amplified music events after 23:00 may not be practicable in some locations including the Poultry Market upper floor and the General Market;

e. Ensuring noisy activities are managed such that noise levels remain acceptable at later hours;

f. Ensuring noise levels avoid significant adverse impacts to neighbouring premises; and

g. Managing the entry and egress of the Development Site by patrons.

A. The Museum Site shall not be occupied until the Public Access and Events Management Plan has been approved in writing by the LPA and the Museum Site shall not be operated otherwise than in accordance with the approved Public Access and Events Management Plan. No events shall be held at the Museum Site otherwise than in

accordance with the approved plan (including any amendments to it that are approved by the LPA) for the lifetime of the development.

B. No event shall operate (a) in excess of the permitted capacity for that event; or (b) other than in compliance with the noise mitigation agreed; or (c) in excess of the permitted maximum number of such events, as set out in the approved Public Access and Events Management Plan for the lifetime of the development, without the prior written approval of the LPA.

C. The developer shall undertake a review of the Public Access and Events Management Plan annually for the first five years to be submitted to the LPA no later than the anniversary of the date of approval of the Public Access and Events Management Plan and then as requested by the LPA and notified in writing to the developer. The review shall set out any amendments considered necessary to the Public Access and Events Management Plan for approval but no amendments shall come into force until they have been approved by the LPA.

REASON: To protect amenity and secure access over West Poultry Avenue route in accordance with the following policies of the Local Plan: CS5 and DM16.2.

- 59 A. An Annexe Site Management Plan shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to the first occupation of the Annexe Site. The submitted Annexe Site Management Plan shall include details of:
- i. Visitor operations.
 - a. Visitor facilities;
 - b. Fire safety and emergency procedures;
 - c. Security;
 - d. Management of Events;
 - e. Events and programming including the types of Events that may be held, the numbers which may attend Events, the number of Events that can be held annually and the hours of Events;
 - f. Cleaning of the Iron Mountain Public Realm after any Events;
 - and
 - g. Re-opening of the Iron Mountain Public Realm after any Events.
 - ii. Details of the duties of the staff employed at the premises to patrol the external perimeter of the premises in order to discourage noise, disturbance and anti-social behaviour.
 - iii. A smoking control scheme relating to the supervision and control of any smoking patrons outside the premises during the hours that the premises are open to the public.
 - iv. A scheme relating to the dispersal of patrons leaving the premises after 23:00.
 - v. A taxi licensed private hire scheme:
 - a. To encourage patrons and staff to use licensed taxis and licensed private hire vehicles when leaving the premises;

- b. To encourage patrons to make advanced bookings for such taxis, licensed private hire vehicles from within the premises; and
- c. Which details the licensed private hire firm nominated by the operator of the premises to pick up at a point agreed by the LPA.
- vi. Details of noise monitoring and mitigation including details of neighbours and sensitive receptors engagement.
- vii. Details of the servicing and deliveries for Events (including management of Taxis and Coaches).
- viii. Travel Plan (including promotion of cycling and public transport)
 - a. Links to transport networks;
 - b. School Parties - Arrival and Departure; and
 - c. Disabled Drop-Off and Access.
- ix. Maintenance and cleansing of the Iron Mountain Public Realm including lighting and drainage to the Iron Mountain Public Realm and any furniture and hard and soft landscaping.
- x. Provide for the update and review of the Annexe Site Management Plan.

In respect of (vi) above, this part of the Annexe Site Management Plan shall be prepared by a suitably qualified and experienced acoustician and provide for:

- a. Monitoring and control of noise levels. It is recognised that this is likely to require noise limiting and frequency control equipment;
- b. Control of hours of noisy Events;
- c. The management of noisy activities including patrons;
- d. Amplified music events after 23:00 may not be practicable;
- e. Ensuring noisy activities are managed such that noise levels remain acceptable at later hours;
- f. Ensuring noise levels avoid significant adverse impacts to neighbouring premises; and
- g. Managing the entry and egress of the Annexe Site by patrons.

B. The Annexe Site shall not be occupied until the Annexe Site Management Plan has been approved and shall not be occupied or operated otherwise than in accordance with the approved Annexe Site Management Plan. No event shall be held at the Annexe Site otherwise than in accordance with the approved plan (including any amendments to it that are approved by the LPA) for the lifetime of the development.

C. No event shall operate (a) in excess of the permitted capacity for that event; or (b) other than in compliance with the noise mitigation agreed; or (c) in excess of the permitted maximum number of such events, as set out in the approved Annexe Site Management Plan for the lifetime of the development, without the prior written approval of the LPA.

D. An annual review of the Annexe Site Management Plan shall be undertaken with details being submitted to the LPA for 5 years from the first occupation of the Annexe Site with each review to be submitted within one month of each anniversary. The review shall set out any

amendments considered necessary to the Annexe Site Management Plan for approval but no amendments shall come into force until they have been approved by the LPA in writing.

REASON: In order to protect residential amenity and the amenity of the area in accordance with the following policy of the Local Plan: CS5.

60 Culture

An Interim Cultural Implementation Plan shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to any works commencing in respect of the Museum Site. The Interim Cultural Implementation Plan shall set out details relating to the construction phase of the relevant parts of the Museum Site. The submitted draft Interim Cultural Plan shall include details of:

- a) a meanwhile strategy for the use of the buildings during the construction phase until the time when the works to the General Market, the Poultry Market, the General Market Houses are completed; and
- b) Set out how the development will contribute to the City of London's culture offer during the construction phase of the relevant parts of the Museum Site.

The approved Interim Cultural Plan shall be implemented and complied with during the duration of the construction phase of the Museum Site (subject to any amendments or variations agreed in writing with the LPA) until at least practical completion of the Museum Site unless agreed otherwise with the LPA.

REASON: To maintain and enhance the City of London's contribution to London's world-class cultural offer in accordance with the following policy of the draft City Plan 2040: S6.

- 61 A Museum Site Cultural Implementation Plan setting out details relating to the end use phase of the Museum Site shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to the first occupation of Museum Site. The submitted Museum Site Cultural Implementation Plan shall include details of how the relevant parts of the Museum Site will contribute to the enrichment and enhancement of the City's cultural offer and shall cover matters including:
- i. A public art strategy;
 - ii. Partnership working;
 - iii. Public access;
 - iv. Details of the museum's community engagement strategies;
 - v. Details of the strategy for the lettering which is to be mounted on the Farringdon Street, Charterhouse Street and West Smithfield elevations, including above the main Museum entrances on West Poultry Avenue; and
 - vi. Details of the comprehensive lighting strategy

The Museum Site shall not be occupied until the Museum Site Cultural Implementation Plan has been approved the development shall not be operated or occupied otherwise than in accordance with the approved Museum Site Cultural Implementation Plan (including any amendments to it that are approved in writing by the LPA) for the lifetime of the development.

REASON: To maintain and enhance the City of London's contribution to London's world-class cultural offer in accordance with the following policy of the draft City Plan 2040: S6.

- 62 An Annexe Site Cultural Implementation Plan setting out details relating to the end use phase of the Annexe Site shall be submitted to and approved in writing by the Local Planning Authority ("LPA") prior to the first occupation of Annexe Site. The submitted draft of the Annexe Site Cultural Implementation Plan shall include details of how the relevant parts of the Annexe Site will contribute to the enrichment and enhancement of the City's cultural offer including the programming of events.

The Annexe Site shall not be occupied until the Annexe Site Cultural Implementation Plan has been approved the development shall not be operated or occupied otherwise than in accordance with the approved Annexe Site Cultural Implementation Plan (including any amendments to it that are approved in writing by the LPA) for the lifetime of the development.

REASON: To maintain and enhance the City of London's contribution to London's world-class cultural offer in accordance with the following policy of the draft City Plan 2040: S6.

- 63 Approved Documents

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:

2125-SWA-SI-00-DR-A-PL001 Proposed Site - Demise Line - Above Ground PA02

2125-SWA-SI-B1-DR-A-PL002 Proposed Site - Demise Line - Below Ground PA02

2125-SWA-SI-ZZ-DR-A-PL003 Proposed - Location Plan PA01

2125-SWA-SI-ZZ-DR-A-PL004 Existing - Site Plan PA01

2125-SWA-SI-ZZ-DR-A-PL005 Proposed - Site Plan PA03

2125-SWA-PM-B1-DR-A-PL040 Demolition PM - GA Plan – Basement PA02

2125-SWA-PM-BM-DR-A-PL041 Demolition PM - GA Plan - Basement Mezzanine PA02

2125-SWA-PM-00-DR-A-PL042 Demolition PM - GA Plan – Ground PA03

2125-SWA-PM-01-DR-A-PL043 Demolition PM - GA Plan – First PA02

2125-SWA-PM-02-DR-A-PL044 Demolition PM - GA Plan – Roof PA02

2125-SWA-GM-B1-DR-A-PL046 Demolition GM - Plan - Basement Sheet 1 PA02

2125-SWA-GM-B1-DR-A-PL047 Demolition GM - Plan - Basement Sheet 2 PA03

2125-SWA-GM-BM-DR-A-PL048 Demolition GM - Plan - Basement Mezzanine
 PA01
 2125-SWA-GM-LG-DR-A-PL049 Demolition GM - Plan - Lower Ground Floor
 PA01
 2125-SWA-GM-00-DR-A-PL050 Demolition GM - Plan - Ground Floor PA02
 2125-SWA-GM-01-DR-A-PL051 Demolition GM - Plan - First Floor PA01 PA02
 2125-SWA-GM-02-DR-A-PL052 Demolition GM - Plan - Second Floor PA02
 2125-SWA-GM-RF-DR-A-PL053 Demolition GM - Plan - Roof PA01
 2125-SWA-AB-B1-DR-A-PL054 Demo Annexe - Plan - Basement & Mezzanine
 PA01
 2125-SWA-AB-00-DR-A-PL055 Demo Annexe - Plan - Ground PA01
 2125-SWA-AB-01-DR-A-PL056 Demo Annexe - Plan - First PA01
 2125-SWA-AB-02-DR-A-PL057 Demo Annexe - Plan - Second PA01
 2125-SWA-AB-03-DR-A-PL058 Demo Annexe - Plan - Third PA01
 2125-SWA-AB-RF-DR-A-PL059 Demo Annexe - Plan - Roof Terrace PA01
 2125-SWA-AB-RF-DR-A-PL060 Demo Annexe - Plan - Roof PA01
 2125-SWA-PM-ZZ-DR-A-PL061 Demolition PM - Elevations - North & East
 PA02
 2125-SWA-PM-ZZ-DR-A-PL062 Demolition PM - Elevations - South & West
 PA03
 2125-SWA-GM-ZZ-DR-A-PL063 Demolition GM - Elevations - North & East
 PA02
 2125-SWA-GM-ZZ-DR-A-PL064 Demolition GM - Elevations - South & West
 PA02
 2125-SWA-AB-ZZ-DR-A-PL065 Demo Annexe - Elevations - North & Engine
 House Elevations PA01
 2125-SWA-AB-ZZ-DR-A-PL066 Demo Annexe - Elevations - East & South
 PA01
 2125-SWA-AB-ZZ-DR-A-PL067 Demo Annexe - Elevations - Iron Mountain
 Elevations PA01
 2125-SWA-PM-ZZ-DR-A-PL068 Demolition PM - Sections - East - West & North
 - South PA02
 2125-SWA-PM-ZZ-DR-A-PL069 Demolition PM - Short Sections - North - South
 & South - North PA02
 2125-SWA-PM-ZZ-DR-A-PL070 Demolition PM - Section - East - West Loading
 Bay PA02
 2125-SWA-GM-ZZ-DR-A-PL071 Demolition GM - Sections - North - South &
 East - West PA01
 2125-SWA-AB-ZZ-DR-A-PL072 Demo Annexe - Sections - AA & BB PA01
 2125-SWA-PM-B1-DR-A-PL073 Proposed PM - Plan - Basement PA02
 2125-SWA-PM-BM-DR-A-PL074 Proposed PM - Plan - Basement
 Mezzanine PA02
 2125-SWA-PM-00-DR-A-PL075 Proposed PM - Plan - Ground P PA03
 2125-SWA-PM-01-DR-A-PL076 Proposed PM - Plan - First PA02
 2125-SWA-PM-02-DR-A-PL077 Proposed PM - Plan - Roof PA02
 2125-SWA-GM-B1-DR-A-PL079 Proposed GM - Plan - Basement Sheet 1 PA03
 2125-SWA-GM-B1-DR-A-PL080 Proposed GM - Plan - Basement Sheet 2
 PA03
 2125-SWA-GM-BM-DR-A-PL081 Proposed GM - Plan - Basement
 Mezzanine PA02

2125-SWA-GM-LG-DR-A-PL082	Proposed GM - Plan - Lower Ground Floor	PA02
2125-SWA-GM-00-DR-A-PL083	Proposed GM - Plan - Ground Floor	PA03
2125-SWA-GM-01-DR-A-PL084	Proposed GM - Plan - First Floor	PA03
2125-SWA-GM-02-DR-A-PL085	Proposed GM - Plan - Second Floor	PA03
2125-SWA-GM-RF-DR-A-PL086	Proposed GM - Plan - Roof	PA02
2125-SWA-AB-B1-DR-A-PL087	Proposed Annexe - Plan - Basement	PA03
2125-SWA-AB-00-DR-A-PL088	Proposed Annexe - Plan - Ground	PA03
2125-SWA-AB-01-DR-A-PL089	Proposed Annexe - Plan - First	PA02
2125-SWA-AB-02-DR-A-PL090	Proposed Annexe - Plan - Second	PA02
2125-SWA-AB-03-DR-A-PL091	Proposed Annexe - Plan - Third	PA02
2125-SWA-AB-RF-DR-A-PL092	Proposed Annexe - Plan - Roof Terrace	PA02
2125-SWA-AB-RF-DR-A-PL093	Proposed Annexe - Plan - Roof	PA02
2125-SWA-PM-ZZ-DR-A-PL094	Proposed PM - Elevations - North & East	PA03
2125-SWA-GM-ZZ-DR-A-PL096	Proposed GM - Elevations - North & East	PA03
2125-SWA-GM-ZZ-DR-A-PL097	Proposed GM - Elevations - South & West	PA02
2125-SWA-AB-ZZ-DR-A-PL098	Proposed Annexe - Elevations - North & Engine House Elevations	PA02
2125-SWA-AB-ZZ-DR-A-PL099	Proposed Annexe - Elevations - East & South	PA03
2125-SWA-AB-ZZ-DR-A-PL100	Proposed Annexe - Elevations - Iron Mountain Elevations	PA02
2125-SWA-PM-ZZ-DR-A-PL101	Proposed PM - Sections - East - West & North - South	PA03
2125-SWA-PM-ZZ-DR-A-PL102	Proposed PM - Short Sections - North - South & South - North	PA03
2125-SWA-PM-ZZ-DR-A-PL103	Proposed PM - Section - East - West Loading Bay	PA02
2125-SWA-GM-ZZ-DR-A-PL104	Proposed GM - Sections - North - South & East - West	PA02
2125-SWA-AB-ZZ-DR-A-PL105	Proposed Annexe - Sections - AA & BB	PA02
2125-SWA-SI-ZZ-DR-A-PL106	Proposed PM & GM - Section - East – West 2	PA03
2125-SWA-SI-ZZ-DR-A-PL107	Proposed GM & Annexe - Section - North - South	PA02
2125-SWA-PM-ZZ-DR-A-PL110	Proposed PM - Bay Study - West Smithfield Street Ground and First Floor Glazing	PA02
2125-SWA-PM-ZZ-DR-A-PL111	Proposed PM - Bay Study - West Smithfield Street Dome Clerestorey	PA02
2125-SWA-PM-00-DR-A-PL112	Proposed PM - Bay Study - Learning Entrance	PA02
2125-SWA-PM-00-DR-A-PL113	Proposed PM - Elevation - East Poultry Avenue External Doors	PA02
2125-SWA-PM-00-DR-A-PL114	Proposed PM - Elevation - East Poultry Avenue UKPN	PA02
2125-SWA-PM-ZZ-DR-A-PL115	Proposed PM - Section - Monitor Roof	PA02

2125-SWA-PM-ZZ-DR-A-PL116 Proposed PM - Elevation & Plan - West Poultry Avenue Entrance PA02
 2125-AKL-GM-ZZ-DR-A-PL117 Proposed GM - Elevation & Plan - West Smithfield Street Former Entrance PA02
 2125-AKL-GM-ZZ-DR-A-PL118 Proposed GM - Elevation & Plan - Charterhouse Former EntrancePA02
 2125-AKL-GM-ZZ-DR-A-PL119 Proposed GM - Section & Plan - Restaurant Roof PA02
 2125-AKL-GM-ZZ-DR-A-PL120 Proposed GM - Elevation & Plan - Harts Corner Entrance PA02
 2125-JHA-GM-ZZ-DR-A-PL121 Proposed GM - Elevation & Plan - Existing Shopfront Rep airedPA02
 2125-AKL-GM-ZZ-DR-A-PL122 Proposed GM - Elevation & Plan - Display window on West Smithfields PA02
 2125-AKL-GM-ZZ-DR-A-PL123 Proposed GM - Elevation - Cafe Window PA02
 2125-AKL-GM-ZZ-DR-A-PL124 Proposed GM - Elevation - Snow Hill Entrance PA02
 2125-AKL-GM-ZZ-DR-A-PL125 Proposed GM - Elevation & Plan - Display Window on CharterhousePA02
 2125-AKL-GM-ZZ-DR-A-PL126 Proposed GM - Elevation - Bookshop WindowPA02
 2125-JHA-GM-ZZ-DR-A-PL127 Proposed GM - Elevation - Farringdon Street PA02
 2125-SWA-AB-ZZ-DR-A-PL128 Proposed Annexe - Bay Study - Fish Market West Smithfield Entrance PA02
 2125-SWA-AB-ZZ-DR-A-PL129 Proposed Annexe - Bay Study - Fish Market West Smithfield Corner Tower PA02
 2125-SWA-AB-ZZ-DR-A-PL130 Proposed Annexe - Bay Study - Red House (Northern Portion) East PA03
 2125-SWA-AB-ZZ-DR-A-PL131 Proposed Annexe - Bay Study - Red House (Southern Portion) East PA02
 2125-SWA-AB-ZZ-DR-A-PL132 Proposed Annexe - Bay Study - Iron Mountain Canopy & Red House West Side PA0
 2125-SWA-AB-ZZ-DR-A-PL133 Proposed Annexe - Bay Study - Iron Mountain Canopy & Red House ExtensionPA02
 2125-SWA-AB-ZZ-DR-A-PL134 Proposed Annexe - Bay Study - Iron Mountain Canopy & Fish Market East Side PA02
 2125-SWA-AB-ZZ-DR-A-PL135 Proposed Annexe - Bay Study - Engine House North & West PA02
 2125-SWA-PM-ZZ-DR-A-PL141 Proposed PM- Bay study - Lecture Theatre Entrance PA02
 2125-SWA-PM-ZZ-DR-A-PL142 Demolition / Proposed PM - Section - West Poultry Avenue PA02
 2125-JHA-GM-03-DR-A-PL136 Proposed GM - Section - Dome PA02
 2125-JHA-GM-03-DR-A-PL137 Proposed GM - Details - Lantern PA02
 2125-JHA-GM-03-DR-A-PL138 Proposed GM - Details - Lantern Louvres PA02
 2125-JHA-GM-03-DR-A-PL139 Proposed GM - Details - Long Gutter PA02
 2125-JHA-GM-03-DR-A-PL140 Proposed GM - Details - Skylight System PA02

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 Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office £185 sq.m

Retail £165 sq.m

Hotel £140 sq.m

All other uses £80 per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of £75 per sq.m for offices, £150 per sq.m for Riverside Residential, £95 per sq.m for Rest of City Residential and £75 for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party

is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: www.planningportal.gov.uk/cil).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

- 3 Access for people with disabilities is a material consideration in the determination of planning applications. The City of London Corporation has published design standards giving advice on access for people with disabilities and setting out the minimum standards it expects to see adopted in the City buildings. These can be obtained from the City's Access Adviser, Chief Planning Officer and District Surveyor. Further advice on improving access for people with disabilities can be obtained from the City's Access Adviser. Your attention is drawn to the Disability Discrimination provisions of the Equality Act 2010 to ensure that disabled people are not significantly disadvantaged.

Service providers, etc., should make "reasonable adjustments" to facilitate access to their premises and the City asks all applicants for planning permission to ensure that physical barriers to access premises are minimised in any works carried out.

- 4 Service providers are required to have regard to obligations under the Equality Act 2010. In the exercise of their functions, due regard needs to be given to:-
 - elimination of discrimination, harassment and victimisation and any other conduct that is prohibited by or under this Act;
 - advancement of equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - fostering good relations between persons who share a relevant protected characteristic and persons who do not share it

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

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.

- 5 The Markets and Consumer Protection Department (Environmental Health Team) must be consulted on the following matters:

- (a) Approval for the installation of furnaces to buildings and the height of any chimneys. If the requirements under the legislation require any structures in excess of those shown on drawings for which planning permission has already been granted, further planning approval will also be required.
- (b) Installation of engine generators using fuel oil.
- (c) The control of noise and other potential nuisances arising from the demolition and construction works on this site the Department of Markets and Consumer Protection should be informed of the name and address of the project manager and/or main contractor as soon as they are appointed.
- (d) Alterations to the drainage and sanitary arrangements.
- (e) The requirements of the Health and Safety at Work etc Act 1974 and the other relevant statutory enactments in particular:
 - the identification, encapsulation and removal of asbestos in accordance with a planned programme;
 - provision for window cleaning (internal and external) to be carried out safely.
- (f) The use of premises for the storage, handling, preparation or sale of food.
- (g) Use of the premises for public entertainment.
- (h) Approvals relating to the storage and collection of wastes.
- (i) The detailed layout of public conveniences.
- (j) Limitations which may be imposed on hours of work, noise and other environmental disturbance.
- (k) The control of noise from plant and equipment;
- (l) Methods of odour control.

6 The Director of Markets and Consumer Protection (Environmental Health Team) advises that:

Noise and Dust

(a)
The construction/project management company concerned with the development must contact the Department of Markets and Consumer Protection and provide a working document detailing steps they propose to take to minimise noise and air pollution for the duration of the works at least 28 days prior to commencement of the work. Restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(b)
Demolition and construction work shall be carried out in accordance with the City of London Code of Practice for Deconstruction and Construction. The code details good site practice so as to minimise disturbance to nearby residents and commercial occupiers from noise, dust etc. The code can be accessed through the City of London

internet site, www.cityoflondon.gov.uk, via the a-z index under Pollution Control-City in the section referring to noise, and is also available from the Markets and Consumer Protection Department.

(c)

Failure to notify the Markets and Consumer Protection Department of the start of the works or to provide the working documents will result in the service of a notice under section 60 of the Control of Pollution Act 1974 (which will dictate the permitted hours of work including noisy operations) and under Section 80 of the Environmental Protection Act 1990 relating to the control of dust and other air borne particles. The restrictions on working hours will normally be enforced following discussions with relevant parties to establish hours of work for noisy operations.

(d)

Deconstruction or Construction work shall not begin until a scheme for protecting nearby residents and commercial occupiers from noise from the site has been submitted to and approved by the Markets and Consumer Protection Department including payment of any agreed monitoring contribution.

Air Quality

(e)

Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

Boilers and CHP plant

(f)

The City is an Air Quality Management Area with high levels of nitrogen dioxide. All gas boilers should therefore meet a dry NO_x emission rate of <40mg/kWh in accordance with the City of London Air Quality Strategy 2015.

(g)

All gas Combined Heat and Power plant should be low NO_x technology as detailed in the City of London Guidance for controlling emissions from CHP plant and in accordance with the City of London Air Quality Strategy 2015.

(h)

When considering how to achieve, or work towards the achievement of, the renewable energy targets, the Markets and Consumer Protection Department would prefer developers not to consider installing a biomass burner as the City is an Air Quality Management Area for fine particles and nitrogen dioxide. Research indicates that the widespread use of these appliances has the potential to increase particulate levels in London to an unacceptable level. Until the Markets and Consumer Protection Department is satisfied that these appliances can be installed without causing a detriment to the local air quality they are discouraging their use. Biomass CHP may be acceptable providing sufficient abatement is fitted to the plant to reduce emissions to air.

(i)

Developers are encouraged to install non-combustion renewable technology to work towards energy security and carbon reduction targets in preference to combustion based technology.

Standby Generators

(j)

Advice on a range of measures to achieve the best environmental option on the control of pollution from standby generators can be obtained from the Department of Markets and Consumer Protection.

(k)

There is a potential for standby generators to give out dark smoke on start up and to cause noise nuisance. Guidance is available from the Department of Markets and Consumer Protection on measures to avoid this.

Cooling Towers

(l)

Wet cooling towers are recommended rather than dry systems due to the energy efficiency of wet systems.

Noise Affecting Residential Properties

(m)

The proposed residential flats are close to busy roads and are in an existing commercial area which operates 24 hours a day. The scheme should include effective sound proofing of the windows and the provision of air conditioning or silent ventilation units to enable the occupants to keep their windows closed to benefit from the sound insulation provided. This may need additional planning permission.

(n)

The proposed residential units are located in a busy City area that operates 24 hours a day and there are existing road sweeping,

deliveries, ventilation plant and refuse collection activities that go on through the night. The units need to be designed and constructed to minimize noise disturbance to the residents. This should include acoustic treatment to prevent noise and vibration transmission from all sources. Sound insulation treatment needs to be provided to the windows and either air conditioning provided or silent ventilation provided to enable the windows to be kept closed yet maintain comfortable conditions within the rooms of the flat. This may need additional planning permission.

Ventilation of Sewer Gases

(o)

The sewers in the City historically vent at low level in the road. The area containing the site of the development has suffered smell problems from sewer smells entering buildings. A number of these ventilation grills have been blocked up by Thames Water Utilities. These have now reached a point where no further blocking up can be carried out. It is therefore paramount that no low level ventilation intakes or entrances are adjacent to these vents. The Director of Markets and Consumer Protection strongly recommends that a sewer vent pipe be installed in the building terminating at a safe outlet at roof level atmosphere. This would benefit the development and the surrounding areas by providing any venting of the sewers at high level away from air intakes and building entrances, thus allowing possible closing off of low level ventilation grills in any problem areas.

Food Hygiene and Safety

(p)

Further information should be provided regarding the internal layout of the proposed food/catering units showing proposals for staff/customer toilet facilities, ventilation arrangements and layout of kitchen areas.

(q)

If cooking is to be proposed within the food/catering units a satisfactory system of ventilation will be required. This must satisfy the following conditions:

Adequate access to ventilation fans, equipment and ductwork should be provided to permit routine cleaning and maintenance;

The flue should terminate at roof level in a location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. It cannot be assumed that ductwork will be permitted on the exterior of the building;

Additional methods of odour control may also be required. These must be submitted to the Markets and Consumer Protection Department for comment prior to installation;

Ventilation systems for extracting and dispersing any emissions and cooking smells to the external air must be discharged at roof level and designed, installed, operated and maintained in accordance with manufacturer's specification in order to prevent such smells and emissions adversely affecting neighbours.

(r)

From the 1 July 2007, the Health Act 2006 and associated Regulations prohibited the smoking of tobacco products in all enclosed or partially enclosed premises used as workplaces or to which the public have access. All such premises are required to provide signs prescribed by Regulations. Internal rooms provided for smoking in such premises are no longer permitted. More detailed guidance is available from the Markets and Consumer Protection Department (020 7332 3630) and from the Smoke Free England website: www.smokefreeengland.co.uk.

- 7 The provisions of Part 3, Class V, of Schedule 2 to the Town & Country Planning (General Permitted Development) Order 2015 will permit changes of use between the approved flexible use combinations for a period of ten years from the date of this permission.