

<b>Committee:</b>	<b>Date:</b>
Planning Applications Sub Committee	11 June 2024
<b>Subject:</b> 1-8 Long Lane, London, EC1A 9HF Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.	<b>Public</b>
<b>Ward:</b> Farringdon Within	<b>For Decision</b>
<b>Registered No:</b> 23/01417/FULMAJ	<b>Registered on:</b> 18 <sup>th</sup> January 2024
<b>Conservation Area:</b> No	<b>Listed Building:</b> No

### Summary

The site is located on the north side of Long Lane, west of Aldersgate Street and the Barbican Estate, east of the Smithfield Market south of the London Underground rail lines and it comprises two office buildings (1-5 and 6-8 Long Lane) that are six and five stories high, respectively, dated from the 1960s and 1970s.

The application proposes the demolition of existing office buildings at 1-8 Long Lane to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with provision of cycle parking, associated servicing, plant, amenity terraces, pocket garden with landscaping and other associated works.

It is noted that an application (ref no.: 18/01020/FULMAJ) proposing the demolition of existing buildings and structures at 1-12 Long Lane to basement level and construction of a eight storey office (Class B1) building with basement and lower basement with retail (Class E (a-c)) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works was approved at committee and a decision was thereafter issued on the 21<sup>st</sup> July 2021.

Objections have been received primarily focusing on impacts from the increased massing and height of the development, including daylight and sunlight impacts, impacts generated by the introduction of terraces, such as noise and overlooking impacts, as well as impacts on the free flow of traffic and the pedestrian and cyclists safety. Other concerns raised also relate to the visual impact of the proposed development, which is considered being out of keeping with the wider area. It is noted that additional and correcting information has been provided by the applicant during the process of the application in relation to the daylight and sunlight assessment. Discussions have also been focused on highways and transport issues to address the concerns around traffic and safety. Representations supporting the proposed hotel use have also been received.

An objection has been received from the Barbican Association. Responses to the objections raised regarding massing, height, impact on the nearby conservation area, impacts on residential amenity and highway safety are addressed in the relevant sections of the report.

No representations from Statutory Consultees objecting to the proposed development have been received.

The Applicant has justified the loss of office floorspace at the site by the submission of a Viability Assessment which was independently reviewed. It is considered that the loss of office floorspace, and the proposed hotel use, in this location, would not compromise the primary business function of the City. Hotels are supported as a strategic function of the Central Activities Zone (CAZ) and the London Plan states that 58,000 rooms for serviced accommodation will be required in London by 2041. The need for visitor accommodation is also reinforced in the CoL Visitor Accommodation Sector Commercial Needs Study, dated January 2023, which identifies a demand capacity for an additional 350 rooms per annum in the City of London to 2037. It is therefore considered that the hotel would contribute to the balance and mix of uses in the area and would offer complimentary facilities to be accessed by the public.

The proposed development would also provide a total of 167sqm GIA of flexible retail floorspace (Class E(a)/(b)). Active retail frontage would be retained across the ground floor along Long Lane. The application site is located within a retail link. It is therefore considered that the proposed retail provision, would provide a better-quality retail provision which would enhance the environment of the Retail Link and would provide retail units enabling an active frontage in an area which currently lacks animation.

A number of cultural initiatives and provision of public art are proposed to be delivered on site. The site is located between the future Museum of London and the Barbican and it is therefore considered to be in a nodal point to assist in providing visitor accommodation and also a meaningful culture offer. On that basis, subject to obligations, these provisions would maximise the benefits of the scheme.

Overall, it is considered that the proposed hotel use would make the best use of land, following a design-led approach that optimises the site capacity to accommodate growth and would assist in the rejuvenation of the North of the City, enhancing the distinctive and mixed character of the Smithfield area.

The disposition of the final massing and bulk has followed a design-led approach considering macro and local townscape impacts with multiple pre-application negotiations to mitigate adverse impacts. The stepped massing, highly articulated design, materials, varied tones of colour and curved form would introduce a well-considered, refined, neighbourly architectural set piece. The proposals would also enhance the overall quality and character of this key pedestrian space, providing enhanced landscaping and greater areas of greening and seating.

Overall, it is considered that the proposed hotel use would make the best use of land, following a design-led approach that optimises the site capacity to accommodate a high-quality hotel development alongside a ground floor retail use in close proximity to several cultural attractions which would contribute to the Destination City objectives and would assist in the rejuvenation of the North of the City, enhancing the distinctive and mixed character of the Smithfield area.

In terms of heritage impacts, the proposals, by way of impact on setting, would preserve the significance of heritage assets and slightly enhance the setting of the Smithfield Conservation Area.

The building has been designed around the delivery of optimal microclimatic conditions, as well as creating opportunities for urban greening and accessible amenity spaces, such as the pocket garden to the east of the building. The scheme would deliver an enhanced public realm, enhancing convenience, comfort and attractiveness.

A step free access throughout the development would be provided along with 10% accessible bedrooms.

The proposed development will be car free. An allocated space on site has not at this point been made for the provision of disabled motor vehicle parking. However, the provision of one blue badge parking bay in the vicinity of the site with associated valet service to secure movement to that from the site would be secured within the S106 as an obligation.

In term of public transport provision, the site has the highest level of public transport accessibility level (PTAL) of 6B. The proposals would result in a reduction of servicing vehicles of 5-7 vehicles per day. In terms of drop-off and pick-up activity, it is noted that following discussion with the applicant, no pick up / drop-off activity would be permitted in front of the site. Segregation of cycle facilities would be installed along the frontage of the site to assist with the safety of cyclists. These highway improvements would be secured through Section 278 works.

The proposed development would provide London Plan policy compliant cycle parking facilities for both staff and visitors, namely 10 long stay and 6 short stay cycle parking spaces.

With regard to impacts on daylight and sunlight, of the buildings assessed, the majority of the surrounding properties would not experience any noticeable reductions. The properties that would experience noticeable reductions in daylight are those that are closest and to the north of the application site; 41-43 Charterhouse Square. The impacts on these properties are mainly attributed to the presence of existing obstructions to windows and the depth of the rooms that the windows serve. Considering that these properties are dual aspect, having windows fronting Charterhouse Square and the taking into account the urban nature of the City it is considered that the impacts of the development would not be detrimental to the amenity of the nearby residential occupiers to such an extent that would warrant refusal of the application on these grounds.

The development by reason of its sufficient separation distance to the nearest residential properties is not considered to result in unacceptable overlooking or overshadowing. In terms of noise impacts, residents have raised concerns that the proposed terraces would give rise to increased noise nuisance. It is noted that the terraces, with the exception of two that would be accessible by any guest of the hotel, albeit not publicly accessible, would be terraces to individual rooms. Conditions are imposed restricting the hours of use to those terraces that would be accessible to all hotel guests. However, by reason of their nature, the proposed terraces to the individual rooms are not considered being different to a residential balcony and they are not considered to give rise to a risk of unacceptable levels of noise.

The scheme would provide benefits through CIL for improvements to local training, skills and job brokerage, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.

Whilst the proposed development would result in full redevelopment of the buildings and therefore, in higher whole life-cycle carbon emissions compared to retention scenarios, alternative light and major refurbishment options were explored and they were also reviewed by a third-party expert, who confirmed that the optioneering has been carried out in compliance with the City of London Corporation's ("CoL") Carbon Options Guidance. It is considered that the redevelopment option would have the opportunity for greater floor to ceiling heights and an optimised structural grid layout throughout the whole development which would provide greater spatial and operational efficiency and offer higher quality and more flexible commercial space, and it would result in the most effective use of the land. The redevelopment would also be able to offer additional, wider environmental benefits including significant uplift in greening and biodiversity, end of trip facilities supporting active travel, and greater climate resilience including reduced risk of overheating and flood risk, it would be fully electric utilising air source heat pumps and PV panels and it would achieve BREEAM 'Excellent'. Therefore is considered to be the preferred long-term option.

Currently the site provides very limited urban greening. The proposed development will deliver considered urban greening through a number of soft landscaped terraces and balconies, achieving an urban greening factor (UGF) score of 0.323 / 0.361 (using the London Plan and CoL factors respectively). The Proposed Development will result in a net biodiversity gain of over 13,586%.

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 to come to a view as to whether in the light of the development plan when taken as a whole 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.

Paragraph 11 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving

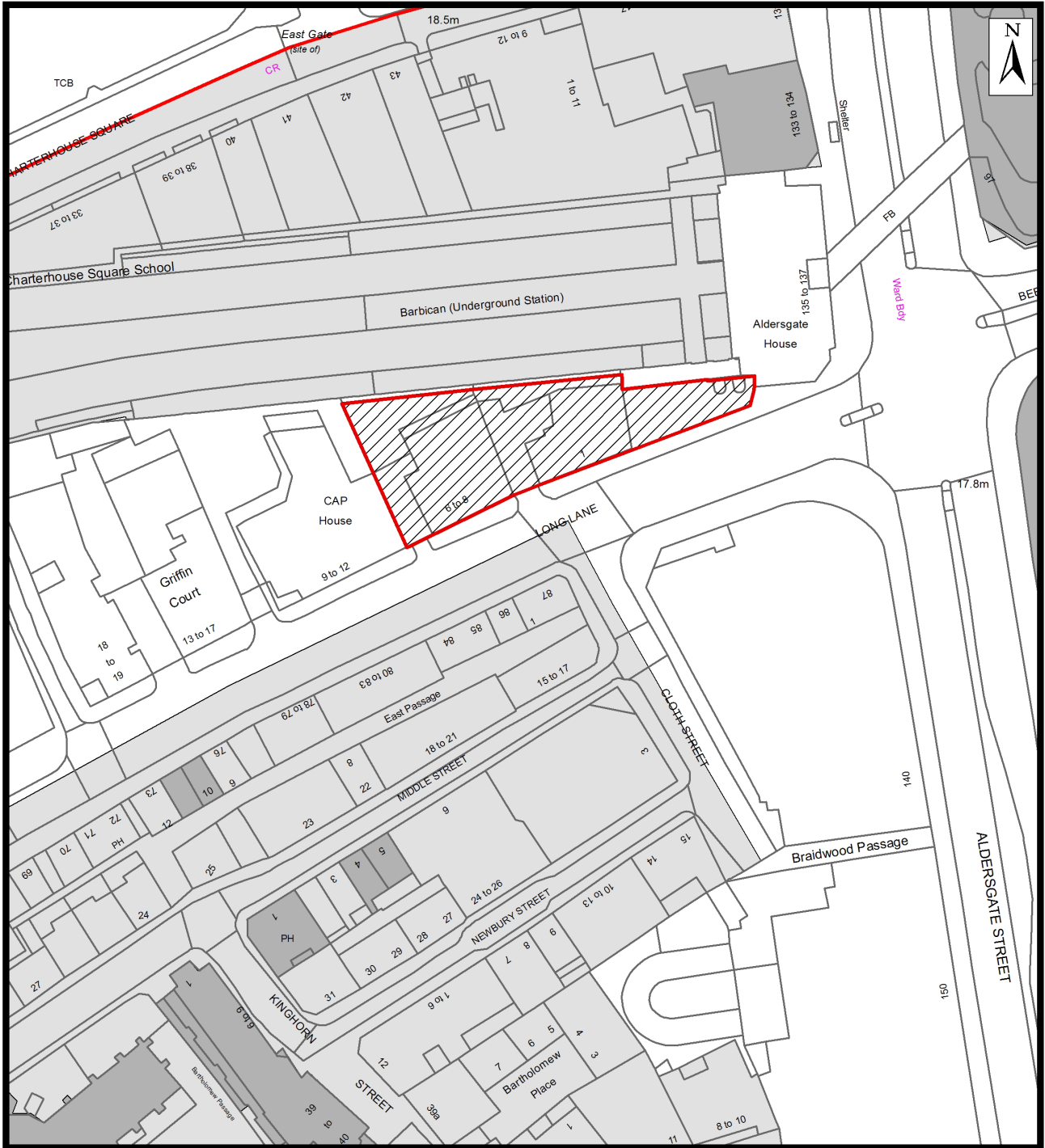
development proposals that accord with an up to date development plan without delay.

It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole. Taking into account all material planning considerations, it is recommended that planning permission be granted subject to all the relevant conditions being imposed and Section 106 obligations being entered into in order to secure public benefits and minimise the impact of the proposal.

### **Recommendation**

1. That, subject to the execution of a planning obligation or obligations in respect of the matters set out under the heading 'Planning Obligations' the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule; and
2. That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in "Planning Obligations" under Section 106 of the Town and Country Planning Act 1990 and any necessary agreements under Sections 278 and 38 of the Highway Act 1980 in respect of those matters set out in the report.





# Site Location Plan



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ADDRESS:  
1-8 Long Lane

CASE No.  
23/01417/FULMAJ

-  SITE LOCATION
-  LISTED BUILDINGS
-  CONSERVATION AREA BOUNDARY
-  CITY OF LONDON BOUNDARY



ENVIRONMENT DEPARTMENT





# APPLICATION COVER SHEET

1-8 Long Lane, London, EC1A 9HF

TOPIC	INFORMATION			
<b>1. HEIGHT</b>	EXISTING		PROPOSED	
	ADD AOD – 40.39 (highest point across 1-8 Long Lane)		ADD AOD – 51.41 (top of plant screen)	
<b>2. FLOORSPACE GIA (SQM)</b>	USES	EXISTING	PROPOSED	
	Office	2905 sqm		n/a
	Retail	320 sqm		167msq
	Hotel	n/a		5110msq.
	TOTAL	3225msq	TOTAL	5277msq
			TOTAL UPLIFT:	2052msq
<b>3. OFFICE PROVISION IN THE CAZ</b>	Existing: 2,906 sqm (GIA) Proposed: 0			
<b>4. EMPLOYMENT NUMBERS</b>	EXISTING		PROPOSED	
	0 for existing vacant offices. Estimated 250 when occupied.		Approximately 50, comprising 20 Full time within administration, reception and maintenance roles and around 30 in housekeeping and other related roles	
<b>5. VEHICLE/CYCLE PARKING</b>	EXISTING		PROPOSED	
	Car parking spaces	3	Car parking spaces	0
	Cycle long stay	0	Cycle long stay	10 long-stay spaces (London Policy compliant)
	Cycle short stay	0	Cycle short stay	6 short-stay spaces (London Policy compliant)
	Lockers	0	Lockers	34
	Showers	2 (one in each guardian area)	Showers	3 total (1 male, 1 female, 1 accessible)
	Changing facilities	none	Changing facilities	Yes, male and female changing facilities plus separate AD-M compliant changing room
<b>6. HIGHWAY LOSS / GAIN</b>	No Loss or Gain			
<b>7. PUBLIC REALM</b>	<p>The proposals include the:</p> <ul style="list-style-type: none"> <li>- Removal of an existing vehicle crossover and reinstatement of footway</li> <li>- Existing vehicle crossover revisions to include appropriate dropped kerb/raised table finish to allow disabled pedestrian use.</li> <li>- Alterations to Loading and Unloading restrictions within the vicinity of the site.</li> <li>- Repaving of the existing footways fronting the site in Yorkstone paving</li> <li>- Provision of cycle lane improvements to deliver cycle segregation.</li> </ul>			

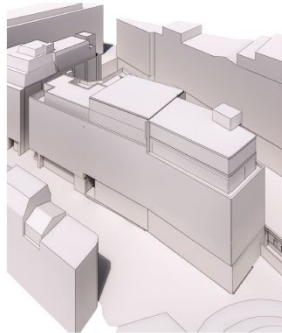
	Creation of an on-site pocket park space featuring greening, trees and seating, as well as Sheffield stand cycle parking.																																													
8. STREET TREES	EXISTING	PROPOSED																																												
	0	6																																												
9. SERVICING VEHICLE TRIPS	EXISTING	PROPOSED																																												
	10-12 deliveries per day.	Up to 5 deliveries per day.																																												
10. SERVICING HOURS	This will follow CoL guidance which permits deliveries to take place outside of peak hours (no servicing between 07:00-10:00, 12:00-14:00 and 16:00-19:00).																																													
11. RETAINED FABRIC	Substructure: 30% of substructure retained by mass - including retaining walls																																													
12. REGULATED OPERATIONAL CARBON SAVINGS	Improvements against Part L 2021: 13.6% GLA requirement: 35 %																																													
13. OPERATIONAL CARBON EMISSIONS	8,955 tCO <sub>2</sub> e over 60 years 1,697 kgCO <sub>2</sub> e/m <sup>2</sup> (GIA) over 60 years																																													
14. EMBODIED CARBON EMISSION	PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS (Residential benchmarks used as currently no hotel benchmarks exist)																																													
	4,610 tCO <sub>2</sub> e (875 kgCO <sub>2</sub> e/m <sup>2</sup> GIA) upfront embodied carbon (A1-A5) 8,330 tCO <sub>2</sub> e (1,580 kgCO <sub>2</sub> e/m <sup>2</sup> GIA) embodied carbon over 60 years (A-C)																																													
	<p style="text-align: center;"><b>Embodied carbon comparison against industry benchmarks (A-C)</b></p> <table border="1"> <caption>Embodied carbon comparison against industry benchmarks (A-C)</caption> <thead> <tr> <th>Category</th> <th>Shell &amp; Core Residential</th> <th>Shell &amp; Core Residential (Asp)</th> <th>Full Fit Out Hotel</th> </tr> </thead> <tbody> <tr> <td>Substructure</td> <td>200</td> <td>140</td> <td>117</td> </tr> <tr> <td>Frame</td> <td>270</td> <td>180</td> <td>300</td> </tr> <tr> <td>Envelope A4-A5 (CWCT Method)</td> <td>240</td> <td>160</td> <td>315</td> </tr> <tr> <td>Envelope</td> <td>70</td> <td>40</td> <td>137</td> </tr> <tr> <td>Partitions</td> <td>10</td> <td>10</td> <td>232</td> </tr> <tr> <td>Internal finishes</td> <td>140</td> <td>100</td> <td>189</td> </tr> <tr> <td>FF&amp;E</td> <td>20</td> <td>20</td> <td>243</td> </tr> <tr> <td>Building services</td> <td>240</td> <td>160</td> <td>92</td> </tr> <tr> <td>External works</td> <td>1190</td> <td>810</td> <td>1580</td> </tr> <tr> <td><b>Total</b></td> <td><b>1190</b></td> <td><b>810</b></td> <td><b>1580</b></td> </tr> </tbody> </table>		Category	Shell & Core Residential	Shell & Core Residential (Asp)	Full Fit Out Hotel	Substructure	200	140	117	Frame	270	180	300	Envelope A4-A5 (CWCT Method)	240	160	315	Envelope	70	40	137	Partitions	10	10	232	Internal finishes	140	100	189	FF&E	20	20	243	Building services	240	160	92	External works	1190	810	1580	<b>Total</b>	<b>1190</b>	<b>810</b>	<b>1580</b>
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**15. WHOLE LIFE CYCLE CARBON EMISSIONS**

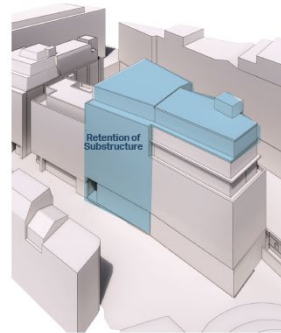
Total whole life-cycle carbon emissions: 17,747 tCO<sub>2</sub>e  
 Whole life-cycle carbon emissions per square meter: 3,363 kgCO<sub>2</sub>e/m<sup>2</sup> (GIA)

**16. WHOLE LIFE-CYCLE CARBON OPTIONS**

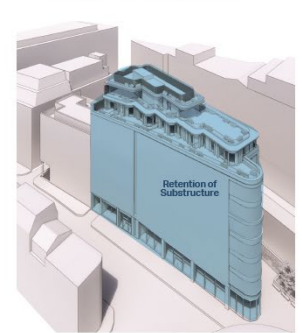
**1. Refurbishment of Existing**  
 Retention of both existing buildings  
 5 Levels + Plant + Basement



**2. Retention of 1 Building**  
 Retention of 1-5 Long Lane only  
 6 Levels + Plant + Basement



**3. Retention of Substructure**  
 Demolition & Re-build  
 8 Levels + Plant + Basement



	<b>Option 1</b> Refurbishment of existing	<b>Option 2</b> Retention of 1 building + extension	<b>Option 3</b> New build
Gross Internal area (GIA) m <sup>2</sup>	3,320	4,423	5,242
Number of keys (rooms)	64	91	131
Substructure % retained by mass	95	40	30
Superstructure % retained by mass	95	45	0
Upfront Embodied Carbon (A1-A5) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	459	585	630
Embodied Carbon (B-C) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) excl. B6 & B7	350	354	355
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	809	939	985
Fuel source	Electricity	Electricity	Electricity
Estimated Whole Building Operational Energy Use (kWh/m <sup>2</sup> GIA per year)	120	120	100
Estimated Whole Building Operational Carbon for building lifetime (B6) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	183.6	183.6	153.0
Total WLC Intensity (incl. B6 & pre-demolition) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) (excl. Module B7)	994	1,135	1,153
Upfront Embodied carbon (A1-A5) (tCO <sub>2</sub> e)	1,525	2,589	3,301
In-use embodied carbon (B-C) (tCO <sub>2</sub> e)	1,162	1,564	1,860
Operational Carbon for building lifetime (B6) (tCO <sub>2</sub> e)	610	812	802
Total WLC (incl. B6 and pre-demolition, excl. B7) (tCO <sub>2</sub> e)	3,300	5,018	6,041

<b>17. TARGET BREEAM RATING</b>	<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="border: 1px solid black; padding: 5px; text-align: center;">Good</div> <div style="border: 1px solid black; padding: 5px; text-align: center;">Very Good</div> <div style="border: 2px solid green; padding: 5px; text-align: center; background-color: #d4edda;">Excellent</div> <div style="border: 1px solid black; padding: 5px; text-align: center;">Outstanding</div> </div> <p>Policy target Excellent or Outstanding</p>
<b>18. URBAN GREENING FACTOR</b>	<p>London Plan 2021: 0.323  City of London draft City Plan 2036: 0.361</p>
<b>19. BIODIVERSITY NET GAIN</b>	<p>Total net % change: +13,586.55%</p>
<b>20. AIR QUALITY</b>	<p>Air Quality Neutral</p>



## Site Photographs



Image 1: View of the site from the south east



Image 2: Open space to the east of the site





Image 3: The site from the south



Image 4: The site, and adjacent building at 9 – 12 Long Lane, from the west





Image 5: The site from Barbican Tube Station platform level



Image 6: The site viewed from the Barbican Podium





Image 7: The north of the site, alongside adjacent buildings, viewed from Hayne Street



## **Main Report**

### **Site and Surroundings**

1. The site is located on the north side of Long Lane, west of Aldersgate Street and the Barbican Estate, east of the Smithfield Market south of the London Underground rail lines.
2. The site itself comprises two office buildings, 1-5 and 6-8 Long Lane that are six and five stories high, respectively. 1-5 Long Lane, at the eastern end of the site, was constructed in the 1970s with basement, ground and four upper floors. A fifth upper floor was subsequently added. The freehold title for the building includes an open space to the east of the building, which forms part of the application site. The space is currently occupied by external seating associated with a café within the ground floor of the building. 6-8 Long Lane was constructed at a similar time with single basement, ground and four upper floors. The total floor area for the site is 3,225sq.m (GIA).
3. The buildings are clad in brick and concrete. They are not considered to be of aesthetic, cultural, historic or evidential significance. The buildings are architecturally unremarkable and are not considered to be non-designated heritage assets or significant contributors to the setting of nearby listed buildings.
4. The surrounding area is mixed in character comprising a variety of uses including offices, retail and residential accommodation. The character of the buildings in the vicinity of the site varies, consisting of a mixture of Victorian masonry buildings or varying plot widths and finishing materials and postwar buildings.
5. The site lies within a Retail Link. Although the site is not located within a conservation area, it is surrounded by three conservation areas, namely the Barbican and Golden Lane to the east, Charterhouse to the north and Smithfield to the southwest.

### **Planning History**

6. An application (ref no.: 18/01020/FULMAJ) proposing the demolition of existing buildings and structures at 1-12 Long Lane to basement level and construction of a eight storey office (Class B1) building with basement and lower basement with retail (Class E (a-c)) at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works was approved at committee and a decision was thereafter issued on the 21<sup>st</sup> July 2021.

## **Proposals**

7. Planning permission is sought for the demolition of existing office buildings at 1-8 Long Lane to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with provision of cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.
8. It is proposed to retain, re-enforce and extend the existing basement levels of the existing buildings. The ground and upper floors of the buildings are proposed to be demolished.
9. The scheme would provide 5,277 sq.m GIA floorspace, comprising:
  - 5,110 sq.m of hotel floorspace (Class C1);
  - 167 sq.m of retail/café/restaurant (Class E(a) and (b))
10. The proposed building will be split into four elements; (a) the base of the building, which would effectively form the ground floor, (b) the main body, which consists of the five upper floors, (c) the attic articulating the top element of the brick building and (d) the crown, the top two metal floors, which set back from the main building line of the south and east elevations. Above the crown there is a further recessed plant enclosure.
11. At ground floor the development would accommodate retail/café/restaurant uses on the eastern section and the hotel lobby/reception on the western area, with back of house facilities located to the north. Two cores are proposed providing two staircases and three lifts, two of which are evacuation lifts and one firefighting lift. A total of 128 hotel rooms will be provided to the upper floors. The two upper floors would be set back providing terraces/roof gardens, as well as a small area on the northern part of the building and a bio solar roof, measuring 310sqm. At roof level an enclosed plant area and lift overrun are proposed, together with a biodiversity brown roof and 237sqm of photovoltaic panels. At basement level there will be back of house functions and hotel staff facilities, together with cycle storage, refuse area, plant, electricity sub-station and a basement level element of the retail unit.
12. In terms of external finishing materials, the development would be finished in rich green colour glazed brick at the base. Red brick has been chosen for the main body, with a lighter variation for the attic storey. The crown of the building would be finished in metal cladding. Decorative elements of brick work have been included in the elevational design and on the eastern section of the building creating a 'tower' effect. Awnings are proposed to be installed at ground floor openings to assist in providing human scale. the lengthy façade of the building is proposed to be articulated with a recessed section above the main hotel entrance.

13. To the east of the building a pocket garden is proposed to be created, which measures 100sqm. The proposed landscaping will introduce trees, planting areas and a green wall along the northern boundary. Timber and natural stone seating will be provided in various locations and the area will be paved in natural stone. There is also opportunity for art installation on the pocket garden and the eastern façade of the building.
14. In terms of urban greening, apart from the pocket garden at ground level, the site incorporates several green roof terraces some of which are accessible, achieving an urban greening factor score of 0.34 when using the GLA factors and 0.381 when using the City of London factors.
15. There is a servicing access point proposed on the west side of the building leading to a service yard to the northwest of the building. The main access route to the bike storage area for staff would be east from the pocket garden.
16. The proposed development would provide 10 long stay cycle parking spaces for the hotel element for both the staff and visitors at basement level. Short stay cycle parking will be made available, by way of 6 short stay cycle parking spaces located on-street adjacent to the proposed pocket garden.
17. In terms of accessibility, it is noted that a step free access will be provided at ground level for both the public area and the back-of-house area. There will be accessible sanitary facilities at ground level and the lifts will be wheelchair accessible. A total of 13 wheelchair accessible guest rooms will be provided.
18. The main amendments incorporated to the current proposal from the previously approved application (ref no.: 18/01020/FULMAJ) are as follows:
  - The development relates to 1-8 Long Lane. The previously approved scheme also included the building at 9-12 Long Lane.
  - The proposal is primarily for a hotel use with ancillary retail uses at ground floor rather than an office building, as previously approved.
  - The current proposal almost follows the same building line as the previously approved scheme. Although the height of the main element of the development is 350mm lower than the approved development, the proposed plant enclosure would be marginally higher (approximately 750mm) than the consented scheme. The building also projects marginally beyond the east elevation of the consented scheme. The eastern core of the building will extend beyond the building line of the previously consented scheme.

## **Consultations**

### **Statement of Community Involvement**

19. The Applicants have submitted a Statement of Community Involvement dated May 2023 outlining their engagement with stakeholders. Public consultation took place via a dedicated project website, virtual meetings, in-person meetings and two in-person exhibitions. A flyer was also distributed to the local area, including a freephone number and email address. The distribution area consisted of 1,847 addresses, comprising local residents and businesses around the site.
20. The applicant has engaged with key stakeholders and has conducted briefings with local stakeholders. Meeting with the Barbican Association, Culture Mile and Charterhouse were held in the summer of 2022. Follow-up meetings were held with the Barbican Association and the Culture Mile BID.
21. Engagement with the Ward members had also taken place on the 7<sup>th</sup> July 2022. Meeting with the neighbouring Members at Aldersgate were held in July 2022.
22. A digital website was created and has been live since 20<sup>th</sup> September 2023. The website has remained live since its launch. On 18<sup>th</sup> October 2023, the website had been viewed 236 times.
23. Two in-person exhibitions have been held on Site. The exhibitions were advertised to the local community in a flyer, publicised on the online consultation website and advertised on the Barbican Association's website. The exhibitions were held on different days of the week and at different times to maximise the opportunity for the local community to engage with us.
24. 36 surveys were completed either in person or online and 49 people attended the public exhibitions.
25. The applicant has also engaged with the City of London Corporation officers through formal pre-application process.
26. The Statement of Community Involvement concludes that the feedback received throughout the consultation period has been positive towards the introduction of a hotel at this location. There was a desire that the building was in keeping with its immediate surroundings, and represented a high quality development. The existing site being empty was a particular concern for people, with the majority welcoming the prospect of the site being used to contribute to the local economy.

Statutory Consultation

27. Following receipt of the application, it has been advertised on site and in the press and has been consulted upon in accordance with article 15 of the Development Management Procedure Order (as amended). Copies of all received letter and e-mails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.

<b>Consultation responses</b>	
Historic England	Historic England has not commented upon this application. They state that Historic England provides advice when their engagement can add most value. In this case they are not offering advice. This should not be interpreted as comment on the merits of the application.
GLAAS, Historic England Archaeology	<p>Assessment of Significance and Impact</p> <p>The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.</p> <p>The site is located to the north-west of the Roman and medieval city walls. An Archaeological Desk Based Assessment accompanied the planning application (MOLA 2023) which identified a high potential for Roman agricultural and quarrying remains, a possibility for Roman burials and a moderate potential for remains of medieval and post-medieval date. Buildings are shown on the site on historic maps and the site is just outside the medieval Charterhouse Precinct.</p> <p>Although the site is currently occupied by a building that has a basement, the basement is only single storey and therefore the site retains a potential for archaeological deposits of Roman and medieval date. The proposed development comprises a new basement slab being constructed in 1-5 Long Lane and the lowering of the existing basement in 6-8 Long Lane. There will also be</p>

	<p>associated piling. The lowering of the basement and the construction of a new slab is likely to have an impact on archaeological remains.</p> <p><b>Planning Policies</b>  NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. NPPF paragraph 200 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.</p> <p>NPPF paragraphs 195 and 203 and London Plan Policy HC1 emphasise the positive contributions heritage assets can make to sustainable communities and places. Where appropriate, applicants should therefore also expect to identify enhancement opportunities.</p> <p>If you grant planning consent, paragraph 211 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.</p> <p><b>Recommendations</b>  It is advised that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. However, although the NPPF envisages evaluation being undertaken prior to determination, in this case consideration of the nature of the development, the archaeological interest and/or practical constraints are such that I consider a two-stage archaeological condition could provide an acceptable safeguard. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation.</p> <p>Officer response: This matter is addressed in the Archaeology section of the report below.</p>
<p>Transport for London –  LU/DLR –  Infrastructure  Protection</p>	<p>Though TfL have no objection in principle to the planning application there are a number of potential constraints on the redevelopment of a site situated close to railway infrastructure. Therefore, it will need to be demonstrated to the</p>

	<p>satisfaction of TfL Infrastructure Protection engineers that:</p> <ul style="list-style-type: none"> <li>- TfL's right of support is not compromised</li> <li>- the development will not have any detrimental effect on TfL structures either in the short or long term</li> <li>- the design must be such that the loading imposed on TfL structures is not increased or removed</li> <li>- TfL offers no right of support to the development or land</li> </ul> <p>It is also noted that the grant of planning permission should be subject to conditions including, but not limited to, the submission of a Risk Assessments and Method Statements (RAMS) for any activities which TfL may deem to be a risk to London Underground (LU), a Risk Assessments and Method Statements (RAMS) for activities scaffolding tall plant use and demolition plant, a ground movement analysis during demolition, a detailed design for foundations, basement and ground floor structures, or for any other structures below ground level, including piling, a detailed design for all superstructure works, details on the erection and use of tall plant and scaffolding, a Tower Crane base design and Risk Assessment and Method Statement for siting, erection, lifting arrangements, operational procedure, jacking up and derigging.</p> <p>TfL has also requested that an informative is attached requiring the applicant to contact the TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant: scaffolding: security; boundary treatment; safety barriers; landscaping and lighting.</p> <p>A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.</p>
<p>Transport for London</p>	<p>The site is located on a strategic cycle route, Quietway 11, which passes immediately outside of the site, currently in an advisory on-carriageway cycle lane. This is not acknowledged or mentioned anywhere in the application materials.</p>

Long Lane is not part of the Transport for London Road Network (TLRN) and TfL is not the highway authority.

The submitted Outline Construction Logistics Plan (CLP) shows no drawings or proper proposals for how access by construction vehicles will actually work. These may be proposed to access via the existing crossover onto Long Lane.

The proposal mentioned vaguely for construction access vehicles to use existing on-street bays across the street does not sound safe or workable, although very little detail has been provided on it to enable proper assessment. Specifically, it may be unsuitable and cause unacceptable highway safety risk to cyclists using Quietway 11 during construction.

The existing on-street parking and loading bays across the street on Long Lane should be surveyed for existing levels of occupancy prior to determination. As many of them as possible should be reduced/removed in the final local highway arrangement.

Drawings in the Design & Access Statement show new on-street cycle parking stands on Long Lane close to its junction with A1 Aldersgate Street. The City Corporation should secure these and other improvements via a Section 278 (S278) agreement for local highway works. However, no drawings have been provided for a proposed package of S278 works to support the scheme, which is unacceptable.

Further information is required regarding the location of the cycling access to cycle parking within the scheme.

Overall, TfL currently object to the scheme due to a lack of sufficient information and because no enhancements are proposed to Quietway 11 immediately adjacent to it. Specifically TfL would strongly recommend production of drawings to show a workable proposed arrangement for construction access, which should be subject to a Stage 1 Road Safety Audit (RSA) and Designer's Response prior to determination. In the absence of



such drawings TfL currently object to the outline CLP due to highway safety concerns.

TfL also recommend schematic or concept design drawings are produced to show a package of Section 278 (S278) works to support the scheme, enhancing Quietway 11 as required by London Plan policy T5 (Cycling). This should cover both sides of Long Lane between its junctions with Cloth Street and A1 Aldersgate Street. The carriageway should be resurfaced at least. A traffic survey, which can be a spot check, should also be carried out in order to enable assessment of this stretch of local highway against the TfL Cycle Route quality criteria.

The current advisory cycle lane is only acceptable as a Quietway on parts of London's highway network with certain features and traffic flows, as application of the criteria Check can show. Should the Check demonstrate that more significant highway works are needed outside the development site to make necessary improvements to Quietway 11 (e.g. enhanced segregation), those works should be secured from this development proposal. This may be achievable at relatively low cost, for example using wand or armadillo cycle lane separators. We would also recommend that the City Corporation considers requesting and having designed up carriageway narrowing and footway widening and replacement wherever possible at this location, in addition to the reduction i.e. removal of on-street vehicle bays referred to above.

Subject to further clarification being provided on construction access and an acceptable package of S278 works enhancing Quietway 11, the cycle parking quantum and access arrangement proposed could be deemed acceptable on balance, even despite the proposal to limit general access to the basement by hotel guests, so they would be reliant on hotel staff to take their bikes there, which is undesirable.

**Officer Response:** Noted – these comments are addressed in the Transport section of the report below.

Barbican Association	<p>The Barbican Association has written to object to the proposed development. They have objected on three grounds, which are summarised below:</p> <p>1) its unacceptable height and mass</p> <p>This application represents a substantial overdevelopment of the space with an increase in total floorspace of a hefty 64% compared to the footprint of the existing buildings. Whilst they are aware that the previous office development scheme was consented for the site at 1-12 Long Lane, we remain of the opinion that the height and massing of the revised proposals for this smaller site at 1-8 Long Lane are still inappropriate for this setting and hence that reductions to both are necessary.</p> <p>This suggests that the proposed scheme is actually one floor higher than the previously consented scheme and may help to account for at least part of the 64% increase in the massing. The submitted documents are unhelpful in clarifying this issue.</p> <p>The proposed height and volume of the building will clearly be at odds not only with the historic character of the area but also and more significantly with the height-line of the other buildings in Long Lane. As such it will set an unwelcome precedent for other potential developments in the area. The building will be higher than the Kaleidoscope Building OSD at the Elizabeth Line station and will continue to overshadow both neighbouring properties and the historically significant Charterhouse and Smithfield Conservation areas.</p> <p>As we pointed out in our objection to the previous application, the Elizabeth Line OSD set a new reference height for buildings at the other end of Long Lane, and we are concerned that the increasing height of new developments along Long Lane will just continue to be perpetuated. We would remind that Policy HS3 of the Draft City Plan 2040 states that <i>“the cumulative impact of planning applications for individual developments on the amenity of existing residents will be considered”</i>. This is clearly not the case here. Our view remains that the height of this proposed development</p>
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should be restricted either to its existing height, or to that of the Kaleidoscope Building, whichever is the greater.

2) loss of residential amenity on the grounds of loss of light, overlooking and noise pollution and

Roof terraces and balconies

We are concerned that the existence of the outside spaces put forward in this application are in potential contravention of these policies and will cause significant harm to the amenity of residents in the near vicinity. The Planning Statement states at Point 7.94 *“On upper floors of the Proposed Development, guest rooms include a private ‘garden’ for guests to use. The depictions of this “private garden” show its location to be at the Eastern end of the building ie. the closest point to the many residential flats both in the Barbican Estate and the wider locality. The same issues arise with the proposed use of the “pocket park” at street level.*

Given the obvious concerns that the existence of these outside spaces would raise, it is disappointing that the applicant has provided no accompanying details as to the timing and scale of their proposed use – an important omission indeed. What is meant by *“performance within the landscape setting”*? How many guests will be able to use these outdoor spaces? Will the general public be able to use them? At what times? Will parties/groups be allowed? Are outside events planned here? If so, what type? Will music be played? These are significant omissions from the application.

We note that the prior planning application was consented in 2021 but, significantly, with conditions attaching to it which restricted, inter alia, the use of the terraces on the office development to between 8am-9pm on weekdays only. No live, amplified or other music was to be played on the roof terraces and no promoted events were to be allowed on the premises. These conditions were imposed in order to *“safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.”*

Should this current hotel application be approved, we would suggest that such conditions – but with stricter time limits - should also be applied to this application in order to protect the amenity of the many residential flats in the near vicinity.

#### Loss of light

In terms of loss of light, overshadowing etc, the Daylight and Sunlight analyses throw up the usual conclusions. For Seddon House, Lauderdale Tower and John Trundle Court the effects of the proposed building on daylight and sunlight are all deemed to be “*within the recommendations of the BRE guidelines. The effects are therefore considered negligible*”.

They would point out however that what developers deem to be “negligible” losses of light are clearly not the same as what is considered negligible to the property occupants impacted by the overdevelopment of this space. Policy DE8 of the emerging Draft City Plan 2040: Daylight and Sunlight states that “*Development proposals should have regard to the daylight and sunlight levels of historic interiors and should seek opportunities to improve daylight and sunlight levels where this would be achievable and appropriate*”. This is clearly not the case in this application.

3) the dangerous impact on traffic flow and cyclist and pedestrian safety.

We would remind that Long Lane is a busy, narrow and already congested road, with eight short stay car parking bays (seemingly always fully occupied) on the opposite side of the road to the hotel and with a narrow cycle lane on the same side (ie. eastbound towards Aldersgate Street) and directly in front of the proposed entrance to the hotel. The increased traffic generated during construction, then continued by guests and hotel service vehicles will inevitably worsen the already poor air quality in the area, increase noise pollution and endanger motorists, pedestrians and cyclists.

Part 10 of the Design & Access Statement - SITE ACCESS & ENTRANCES confirms that “*The main*

*guest access to the hotel is off Long Lane. The retail unit will also be accessed from Long Lane". They note that "Delivery access will be the south of the site on Long Lane with goods in to the rear of the building at GF level". It continues "Some guests, visitors and staff may utilise taxis and minibuses to arrive to the Site. These vehicles accessing the Site will be required to make use of the section of single yellow line kerbside adjacent to the Site on Long Lane to pick-up/drop-off guests, also being able to make use of parking bays on Long Lane for set down purposes. Due to the spatial constraints of the Site, it is not possible to afford taxi set-down areas on-site. Note that black cabs and other vehicles rely on a kerb on which to deploy their built-in ramps, and community transport vehicles often have a large wheelchair-platform lift at the rear".*

It is pointed out that the "single yellow kerbside adjacent to the site" is a narrow cycle lane. Cyclists facing stationery taxis dropping off passengers to the hotel will have to swerve into oncoming traffic to avoid these – which is both unacceptable and highly dangerous.

The Transport Statement confirms that "*Taxis undertaking pick-up/drop-off activity to the Site will be able to make use of the single yellow line kerbside adjacent to the Site....*" "*The hotel reception will be located directly opposite this location and will be able to monitor taxi activity at this frontage to ensure that vehicles do not dwell on-street and utilise this kerbside location for short set-down/collection purposes only.*"

In theory this may sound just about plausible but how on earth can this work effectively in practice? What if the receptionist is busy? Will a taxi driver really take notice of someone with no authority to move them on? This is clearly unworkable and has not been properly thought through. As for the possible arrival of guests by coach, "*The hotel will advise upon bookings being taken that there is limited opportunity for coaches to unload guests and will advise visiting coaches to utilise larger loading locations such as the significant provision of loading bays on West Smithfield circa 120m west of the Site...*"

It is noted that there is NO opportunity for coaches to unload guests in such a restricted and narrow road in a location in a cycle lane just ahead of traffic signals at the busy junction with Aldersgate Street rather than “limited opportunity”.

In the consultation meeting with residents, the developers said that they did not envisage that many guests would need to use taxis given that so much public transport was available in the near vicinity. It is understood that this is not the case.

The applicant seeks to justify this lack of safe and dedicated taxi drop off point in the Transport Statement by comparing rates of drop off and pick ups at two so-called comparable hotels in London. However, the statement then goes on to admit that “While it is noted that the sites selected are not within the CoL (due to a lack of comparable recent hotel survey data on the TRICS database), the sites selected are in highly accessible locations. 1-8 Long Lane is NOT a highly accessible location and hence these comparisons are worthless.

The Society are not against the redevelopment of the site per se but the problems of access do cause us some concern. They do agree that hotel guests will be likely to use the excellent nearby transport links, but that is most likely once they have arrived. They believe that many guests, particularly those from overseas, will prefer to take a taxi or similar on arrival and departure so as to avoid having to carry luggage on public transport with which they may be unfamiliar. Long Lane is a narrow street that already carries a high volume of pedestrians, cyclists and motor vehicles on an important through route in the City. A hotel will inevitably add significantly to traffic volumes and the prospect of taxis blocking the cycle lane and part of the carriageway while guests load/unload baggage and pay the driver will surely bring about traffic chaos.

It is also note that a hotel, by its very nature, will have more people and servicing movements than an office development which will inevitably increase traffic volumes. In addition, the location is also in close proximity to the Smithfield gyratory system and could disrupt key deliveries and market operations to this essential business area. As is the case with the use of outside spaces, the

previously approved office scheme had conditions regarding servicing attaching to the consent. These conditions stated that no servicing of the premises were to be carried out between the hours of 23.00 on one day and 07.00 on the following day on weekdays, with more restrictive times applied at weekends and Bank Holidays. This servicing condition “includes the loading and unloading of goods from vehicles and putting rubbish outside the building. We would expect similar such conditions to be attached to any consideration of this application.

#### Summary

In summary, the Barbi Society object to the revised plans and would request that the height of the development be further reduced, at least to match the height of the Kaleidoscope Building and neighbouring properties, in order to prevent unacceptable levels of overshadowing and loss of residential amenity in what are significant and historic Conservation Areas. They also have concerns over the potential use of the external spaces and request that, should this current hotel application be approved, conditions over their use and timings be applied in order to protect the amenity of the many residential flats in the near vicinity. We also have severe misgivings over the access plans for guests to the hotel, with the lack of a dedicated drop-off point in the service road at the rear of the property suggesting not only traffic chaos in this narrow lane but also significant danger to cyclists and pedestrians.

**Officer Response:** Noted. Comments around massing, height and impact on the nearby conservation area are addressed in the Design and Heritage section of the report. Comments regarding the impact on residential amenity are addressed in the Environmental Impact of Proposals on Surrounding Area, including impacts on daylight and sunlight, as well as noise impacts. Comments regarding the impacts of the development on highway safety and highway network are assessed in the Highways and Transportation section of the report.

Thames Water	<p>Thames Water have raised no objections and given that the site is located within 15 metres from a strategic sewer have requested conditions to be included to require a piling method statement.</p> <p>As required by Building regulations part H paragraph 2.36, Thames Water requests that the Applicant should incorporate within their proposal, protection to the property to prevent sewage flooding, by installing a positive pumped device (or equivalent reflecting technological advances), on the assumption that the sewerage network may surcharge to ground level during storm conditions. If as part of the basement development there is a proposal to discharge ground water to the public network, this would require a Groundwater Risk Management Permit from Thames Water. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.</p> <p>Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like an informative attached to the planning permission regarding Groundwater Risk Management Permit from Thames Water.</p> <p>Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, they would not have any objection to the above planning application, based on the information provided.</p> <p>Water comments If mains water is planning to be used for construction purposes, it's important that the applicant let Thames Water know before you start</p>
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	<p>using it, to avoid potential fines for improper usage.</p> <p>On the basis of information provided, Thames Water would advise that with regard to water network and water treatment infrastructure capacity, Thames water would not have any objection to the above planning application. Thames Water recommends the an informative be attached to this planning permission regarding minimum pressure at the point where it leaves Thames Waters pipes.</p> <p>There are water mains crossing or close to your development. Thames Water do not permit the building over or construction within 3m of water mains. If works are planned near Thames Water mains (within 3m) we'll need to check that the development doesn't reduce capacity, limit repair or maintenance activities during and after construction, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.</p>
Lead Local Flood Authority	Conditions are recommended requiring further details of SuDs system, including a Lifetime Maintenance Plan, a Maintenance Inspection Checklist/Log and a Maintenance Schedule of Work and flood prevention measures.
Crossrail Safeguarding	The application relates to land within the limits of land subject to consultation by the Crossrail Safeguarding Direction. If the Local Planning authority is minded to grant planning permission, conditions regarding detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level. An informative regarding assessing and mitigating the possible effects of noise and vibration arising from the operation of the Elizabeth line is recommended.
Network Rail	No comments.
District Surveyor	The fire statement is acceptable and the proposal is considered to generally comply with policies D5 and D12. However, there is no information regarding provision of fire hydrants and it is recommended dealing with this by way of condition.

	<b>Officer Response:</b> Comment noted and the suggested condition is imposed.
Environmental Health	<p>Environmental Health have suggested a number of conditions regarding restricting access and music to roof areas and terraces, restricting opening hours to the ground floor uses, imposing requirements around doors at ground floor, restricting noise levels, imposing requirements for fume arrangements and cooking, managing freight vehicle movement, securing scheme of protection of nearby residents during demolition and construction, submitting a Lighting Strategy, controlling sound and vibration from mechanical plant, protecting from contamination and ensuring odour control from ventilation and extraction systems.</p> <p><b>Officer Response:</b> Noted – these comments are addressed in the Noise and contamination sections of the report below. Conditions have been imposed as suggested.</p>
Waste storage and collection facilities	<p>The waste storage and collection facilities indicated in the Delivery, Servicing and Waste Mgt Plan, December 2023, and Drawing No. 11246-EPR-ZZ-00-DR-A-TP-0200 Rev P01 comply with their requirements. This Division will, therefore, raise no objections to this application.</p> <p><b>Officer Response:</b> Noted</p>
London Borough of Islington	No comments.

### **Letters of Representation**

In accordance with the SCI, notification letters were sent to residential properties in the vicinity in addition to the site and press notices as set out above. Responses received can be summarised as follows:

### **Objections**

Letters of representation – A total of 31 representations have been received. 29 letters objecting to the proposed development have been received, of which two have been signed by multiple objectors, in particular one has been signed by 15 objectors and the second one by 17 objectors.

One of the submitted objection letters is from the Smithfield Market Tenants' Association.

Objection Comment	Officer Response
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Lack of trust to the data, methodology and conclusions of the Daylight and Sunlight Assessment submitted by the applicant. This is due to reliance on information included in the previously submitted Daylight and Sunlight Assessment as part of application 18/01020/FULMAJ, lack of information, choice of alternative target values, and land use and internal floor plan layout inconsistencies.

The comments raised are noted. Impacts from daylight and sunlight are assessed in the relevant section of the report. It is also noted that following the submission of the objection, the applicant has submitted a Daylight and Sunlight Addendum providing additional information and clarifications to address the concerns raised. With regard to the used choice of alternative target values, it is noted that the Local Planning Authority has commissioned a third party review of the Daylight and Sunlight Assessment and no objection has been raised in that respect from the reviewer.

Several comments and concerns have been raised around the quality of the Daylight and Sunlight Report accompanying application 18/01020/FULMAJ.

Although it is understood that this report was produced from the same consultancy, it is noted that it was produced and assessed as part of another application. A new report accompanies the currently assessed application and only comments relevant to this report would be considered relevant for the purposes of the assessment on the application.

<p>Rather than reviewing the desktop analysis from the applicant's consultant, City of London Planning should insist on the appointment of a verifiably independent surveyor to conduct a verifiably independent D&amp;S Assessment.</p>	<p>It is noted that it is common practice for the independent reviews to evaluate the submitted reports/assessments that commissioning new studies.</p>
<p>Some of the affected windows will serve a school and this has not been addressed on the consultant's report.</p>	<p>It is noted this comment has been brought to the applicant's attention and an addendum report has been submitted assessing these windows. The impacts are further discussed in the Daylight and Sunlight Section.</p>
<p>The proposed development would result in greater impacts with respect to (1) Vertical Sky Component (VSC) and Annual Probable Sunlight Hours (APSH), although there is a marginal improvement in terms of No Sky Line (NSL) in comparison to the consented scheme at 1-12 Long Lane (18/01020/FULMAJ).</p>	<p>Comments noted. The impacts on Daylight and Sunlight are assessed in the relevant section of the report below.</p>
<p>The criteria have not been applied consistently in the Daylight and Sunlight report. Assessments, with and without balconies have been considered, as well as reductions in the VSC.</p>	<p>Although the impacts on daylight and sunlight are further discussed below, it is noted that, it is the BRE guidance that advises to assess the impacts with and without existing obstructions (i.e. balconies) when they are existing. Similarly reduced VSC is suggested in urban areas, where the built environment is very dense.</p>
<p>Concerns have been raised in relation to the daylight and sunlight impacts of the development on a nearby residential property.</p>	<p>The impacts on daylight and sunlight are assessed in the relevant section of the report.</p>
<p>The objector disputes that the daylight and sunlight consultants had access to the objector's flat.</p>	<p>The matter was brought to the applicant's attention, and it has</p>

	<p>been advised that the flat was accessed in January 2016 before the submission of the previous application (18/01020/FULMAJ). It is understood that the current owner of the flat purchased the property later than that date.</p>
<p>Concerns have been raised regarding the comparisons drawn in the submitted Daylight and Sunlight submitted between the consented and current schemes. The loss of Daylight and Sunlight from the proposed scheme is more significant than in the previously approved scheme.</p>	<p>The comparison of the two schemes in terms of their impact on daylight and sunlight are assessed below in the relevant section of the report.</p>
<p>Without contractual undertakings restricting the development of 9-12 Long Lane, the prohibited combined loss of amenity rests only on a future application.</p>	<p>It is noted that the officers and decision makers can only assessed the proposed development in front of them and not speculative development. Should an application be submitted for the redevelopment on the site at 9-12 Long Lane, the Daylight and Sunlight assessment would have to take into consideration the cumulative impacts, including the current development, if approved.</p>
<p>Given that the applicant has confirmed that the consented scheme will not be built, it is questionable whether any representations with cite the precedent scheme (18/01020/FULMAJ) are valid.</p>	<p>Although the consented scheme is a material planning considerations, any representations shall relate to the currently assessed scheme than the one that was previously consented, as this is no longer the matter of assessment.</p>
<p>Unclear difference between the height of the consented scheme and the current proposal.</p>	<p>It is noted that the development would be</p>

	<p>largely within the envelop of the consented scheme in terms of height and massing. Although the height of the main element of the development is 350mm lower than the approved development, the proposed plant enclosure would be marginally higher (approximately 750mm) than the consented scheme.</p>
<p>The increase in height is consistent with the negative impact on Daylight and Sunlight presented by Point 2 with regard to the South side of Charterhouse Square, when 18/01020 is compared with 23/01417.</p>	<p>As noted above the height difference of the two buildings will be limited and localised in the plant enclosure are, which is also recessed from all sides. The impacts on Daylight and Sunlight are assessed in the relevant section of the report below.</p>
<p>The LPA can revisit the visual impact of the height of the development, given that the consented scheme will not be erected.</p>	<p>The consented scheme is a material planning consideration. Officers have negotiated the proposed scheme at pre-application stage taking into consideration the consented scheme.</p>
<p>The view points in the Heritage, Townscape and Visual Impact Assessment have been selected to disguise the impact.</p>	<p>The view points in the TVIA have been agreed with the Officers and are selected on the basis of the strategic and locally protected views. It is considered that they offer a fair assessment of the anticipated views and have not been selected to disguise the impact. An additional viewpoint has been provided by</p>

	the applicants following public consultation comments.
Concerns have been raised regarding the use of terraces in the night hours and weekends. The terraces of the consented office scheme were conditioned to be used only during restricted hours.	Comments noted. The impacts of the development on noise are assessed in the 'Noise' section below. Matters relevant to overlooking are assessed in the 'Overlooking, Privacy, Outlook and Overbearing Impact' section of the report.
Concerns around overlooking and loss of privacy.	The overlooking impacts are assessed in the 'Overlooking, Privacy, Outlook and Overbearing Impact'.
The applicant has deliberately divided the site to maximise planning gain.	The submission of an application relating to the two buildings at 1-8 Long Lane, rather than the three buildings at 1-12 Long Lane previously approved for an office development, does not raise any material planning concerns (i.e. deliberate subdivision of a planning unit to avoid affordable housing provision) in this instance, given the nature of the proposed use. Should the redevelopment of the building at 9-12 Long Lane be brought forward, then any cumulative impacts of this considering the development at 1-8 Long Lane, if approved, would be taken into consideration. This

	would include daylight and sunlight impacts.
The applicant has moved View Point 7 (Cloth Street) within the TVIA to provide a favourable comparison and additional views from the south should be provided.	Officers have reviewed the TVIA and are satisfied that View Point 7 has not been significantly relocated. The TVIA contains verified views, and since submission View No. 7 has been updated with a full rendered image in addition to the wire line providing further detail of the proposals in this view. As such, Officers are satisfied with the information submitted in this regard and an assessment is provided within the Design & Heritage section of the report.
The TVIA does not include a view from directly north of the site – the views provided are not representative.	The applicants have used the same locations within the TVIA as the previous submission at the site. Nonetheless, at the request of Officers an additional wireline image has been provided by the applicants from the north of the site by Florin Court. This has been taken into consideration within the assessment in the Design & Heritage section of the report.
The proposed development no longer includes the stepping back of the upper storeys on the northern elevation, which were part of the previously consented scheme.	It is acknowledged by Officers that the setback of the upper storeys on the northern elevation would be reduced, owing to the



	<p>reduced size of the development site. However, the proposed development is still considered to have a sufficient setback from the northern building line at the upper floors, and the impact on neighbouring dwellings and designated heritage assets has been assessed as acceptable with details in the relevant sections of the report.</p>
<p>Omission of cross section drawings showing neighbouring buildings.</p>	<p>This is not a validation requirement, and as such the applicant is not required to submit this information. Nonetheless, Officers consider the submitted details sufficient to undertake an informed assessment on amenity and visual impacts as set out within the Heritage and Environmental Impact sections of the report.</p>
<p>Concerns have been raised regarding the Construction Logistics Plan. In particular it is requested that construction traffic should be restricted between 8am and 6pm Monday to Friday. If this is secured there will be no adverse impact on the Market. It is important the route through the Market is maintained during operational hours. Concerns are raised regarding loading and unloading areas or the suggestion of any road closures.</p>	<p>Comments noted. The details of construction will need to be secured via condition within the detailed Construction Logistic Plan. The highway inspectors are familiar with the market hours and can ensure there is no impact on trading.</p>
<p>Concerns have been raised in relation to dust and pollution.</p>	<p>It is noted that a securing scheme of protection works during demolition and construction will be secured by condition.</p>

<p>Although in favour of the proposal in principle, as the development would replace two existing unappealing buildings and the alternative to an office use, concerns are raised regarding the height of the proposed development.</p>	<p>The visual impact of the proposed development, including its height are assessed in the 'Desing' section of the report. The impacts from the increased height in terms of daylight and sunlight are addressed in the 'Daylight and Sunlight' section of the report.</p>
<p>Concerns have been raised regarding the safety of the cyclists, due to the narrow roads and high traffic levels. Taxi pick-up and drop-off will cause further issues.</p>	<p>Comments are noted. Following discussion with the applicant, an extended loading/unloading restriction and extended cycle lane segregation will be secured via 278 works. Further details are discussed in the 'Highways and Transportation' section.</p>
<p>Concerns regarding lighting impacts.</p>	<p>This matter is further assessed in the 'Light pollution' section.</p>
<p>Concerns are raised regarding the height and massing of the development. The building is disproportionate with the buildings in the wider area.</p>	<p>The visual impact of the proposed development, including its height and massing are assessed in the 'Desing' section of the report. The impacts from the increased height and massing in terms of daylight and sunlight are addressed in the 'Daylight and Sunlight' section of the report. The overbearing impacts are assessed in the 'Overlooking, Privacy, Outlook and Overbearing Impact' section of the report.</p>
<p>Concerns are raised regarding pick up and drop off to the hotel premises.</p>	<p>This matter is addressed in the 'Highway and</p>

	Transportation' section of the report and in particular the section addressing 'Pick-up and Drop-offs'
Given the proximity of the site to residential properties, working hours during construction should be restricted.	This is secured by condition.
There are concerns regarding traffic flows, which will also impact pedestrian traffic.	These impacts are assessed in the 'Highways and Transportation' section.
Concerns regarding monitoring and control of air quality and noise levels throughout the demolition and construction process.	These matters are assessed in the 'Air quality' and 'Noise' sections of the report. Relevant conditions are imposed to secure monitoring and control of air quality and noise.
If an annual daylight simulation video was provided the daylight effect could easily be observed.	Comment noted; however, this is not common practice for such video to be produced by the application and not a validation requirement to assess the proposed development. A Daylight and Sunlight Assessment has been submitted by the Application and independently reviewed by the consultant appointed by the LPA.
Not suitable location for a hotel.	Comment noted. The provision of a hotel use is assessed in the 'Proposed Uses' section of the report.
Concerns are raised regarding impacts from trucks.	Impacts during demolition and construction, as well as servicing and deliveries are secured by conditions.
The building is not architecturally in keeping with the area.	Noted. The architecture of the building is discussed in the

	'Design' section of the report.
The proposal represented overdevelopment of the site.	Comment noted. The scale and massing of the building are assessed in the 'Design' section of the report.
Increased risk of accidents. The location's proximity to the Smithfield gyratory presents a hazard as eastbound traffic will suddenly encounter standing vehicles servicing the hotel.	It is noted that servicing of the building will take place off road. Further details and assessment of the servicing impacts can be found in the 'Highways and Transportation' section of the report.
No details of the traffic assessment during construction have been submitted.	It is noted that the details of the Construction Logistics Plan will be secured by condition.
Objections are raised regarding events taking place on the site due to the potential noise issues.	Although this has been highlighted in the planning statement as a potential cultural offer, details of such events have not been agreed with the LPA. Although the details of the cultural plan will be secured in the S106 agreement, it is considered that outdoor space is restricted in size and therefore, this limits the number of people on site.
The development would result in loss of view from a nearby property.	It is noted that loss of view from a private property is not a material planning consideration.

### **Support**

Two letters of support and one commenting have been received which are summarised below.

<b>Support Comment</b>	<b>Officer Response</b>
Supportive of the proposed high quality hotel accommodation.	Comment noted.
Hotel accommodation is required in the area.	Comment noted. The provision of a hotel use is assessed in the 'Proposed Uses' section of the report.
The proposed development would enhance the area for tourism and cultural engagement, increase footfall and support the objectives of Destination City.	Comment noted.

28. It is noted that all material planning consideration raised in the representations above are addressed within this report.

### **Policy Context**

29. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
30. The City of London (CoL) is preparing a new draft plan, the City Plan 2040, which will be published for Regulation 19 consultation in the Spring of 2024. It is anticipated that the City Plan will be submitted to the Secretary of State in Summer 2024. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 48 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
31. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2023 and the Planning Practice Guidance (PPG) which is amended from time to time.
32. The National Planning Policy Framework (NPPF) states at paragraph 2 that "Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise".

### **The NPPF**

33. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.
34. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11.
35. 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.
36. 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).
37. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
38. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
39. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.

40. Paragraph 97 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.
41. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 109 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*”.
42. Paragraph 116 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles.
43. Paragraph 117 states that “*All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed*”.
44. Chapter 11 of the NPPF seeks to achieve effective use of the land. Paragraph 123 advises that “*Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.*”
45. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 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.*”
46. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise

the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and create places that are safe, inclusive and accessible and which promote health and wellbeing.

47. Paragraph 136 of the NPPF states that “*Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...*”.
48. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
49. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 152 states that the planning system should support the transition to a low carbon future in a changing climate. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings.
50. Paragraph 159 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.
51. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 180 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, *inter alia*, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.
52. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 201 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.

53. Paragraph 203 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."*
54. Paragraph 205 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."*
55. Paragraph 206 states that *"any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*
  - a) *grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
  - b) *assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*
56. Paragraph 208 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"*.
57. Paragraph 209 of the NPPF states *"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*.

### **Statutory Duties**

58. 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 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).
59. 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).
60. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).

### **Main Considerations**

61. In determining the planning application, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.
62. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.
63. The principal issues in considering this application are:
- a) The principle of development, including the proposed hotel use and associated retail uses.
  - b) The economic impact of the proposal.
  - c) The impact of the development on the character and appearance of the area and the design of the building itself.
  - d) The impact of the development on designated and non-designated heritage assets.
  - e) The impact on strategic views in the London Views Management Framework and on other strategic local views.
  - f) The impact of the development on public realm.
  - g) The impact of the development on ecology.
  - h) The accessibility and inclusivity of the development

- i) The impact of the development on any potential archaeological assets beneath the site.
- j) The impact on the development in highway and transportation terms.
- k) The impact of the development in terms of energy, sustainability and climate change.
- l) The acceptability of the scheme in terms of its environmental impacts, including solar glare, daylight and sunlight, thermal comfort, noise and vibration, air quality and contamination
- m) The impact of the proposed development on the amenity of nearby residential and other occupiers.
- n) The impact of the development on health and wellbeing.
- o) The impact of the development on fire safety.
- p) The acceptability of the proposed security, suicide prevention and fire safety arrangements
- q) The requirement for the development to secure financial contributions and planning obligations.
- r) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights Act 1998

### **Principle of Development**

#### **Loss of Office Floor space**

- 64. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.
- 65. London Plan Policy E1 supports increases in the current office stock. Likewise, Core Strategic Policy CS1 of the Local Plan and Strategic Policy S4 of the Draft City Plan 2040 seek to ensure that the City provides additional office accommodation to meet demand from long term economic and employment growth.
- 66. This application would result in the loss of 2,905sqm (GIA) of existing Class E(g) office floorspace.
- 67. Local Plan Policy DM1.1 and draft City Plan Policy OF2 seek to protect office accommodation. Policy DM1.1 seeks to prevent the loss of existing office accommodation where the building is considered suitable for long term viable office use and there are strong economic reasons why the loss would be inappropriate. *“Losses would be inappropriate for any of the following reasons:*
  - *prejudicing the primary business function of the City;*
  - *jeopardising the future assembly and delivery of large office development sites;*

- *removing existing stock for which there is demand in the office market or long term viable need;*
  - *introducing uses that adversely affect the existing beneficial mix of commercial uses.”*
68. The supporting text (paragraph 3.1.8) to Local Plan Policy DM1.1 and the Office Use SPD indicate that proposals for the change from offices will normally be refused if the building or site is considered suitable for long-term viable office use. The Local Plan indicates that, exceptionally, the loss of an individual office development to other commercial uses may be acceptable where the proposed alternative use meets the wider objectives of the Local Plan.
69. To address the policy requirements, the applicant has submitted a financial viability assessment. Three office led scenarios have been assessed, as follows:
- light refurbishment – essentially comprising decorative works to minimise capital expenditure. The changes still result in a Grade B office accommodation. The light refurbishment scenario would not affect the existing floorspace.
  - comprehensive refurbishment - assumes an ‘on floor’ Category A refurbishment of the offices to provide Grade A accommodation. The comprehensive refurbishment scenario would not affect the existing floorspace.
  - new build – for this assessment two options were considered, a main scheme and an alternative scheme with different core arrangement. This study excludes 9-12 Long Lane, which formed part of the previously office-led consented scheme (1-12 Long Lane - ref no.: 18/01020/FULMAJ), but broadly respects the consented massing to avoid daylight and sunlight transgressions under BRE guidance. The first option is based on a 1:8 occupancy ratio, with a building extending in 7 storeys, plus plant enclosure, with two main stair cores allowing for a column free space. The alternative design relocated the main core to the western side, allowing for a double fronted floor plate; however, this results in the need for additional columns cost inefficiencies due to a split core, and practical challenges at upper levels, rendering them unviable for lettable space.
70. For the viability assessment the applicant has compared the Residual Land Value with the Benchmark Land Value. The Benchmark Land Value (BLV) has been provided on the basis of Existing Use Value + methodology, which equates to £13.1m. The local planning authority has instructed a third party review of the viability assessment, which found that the applied BLV to be reasonable.

71. In terms of rental values, the applicant has adopted a rental value of £35.00 to £45.00 per sq ft for the light refurbished scenario, with the highest yield applied (6.37%). For the full refurbishment scenario, the rental values adopted were between £65.00 and £75.00 per sq ft and the yield applied was 6.00%. Finally, for the new build scenario, the rental values adopted were between £75.00 and £80.00 per sq ft for the first to fifth floors and a premium of £85.00 per sq ft for the upper floors. A 5.75% yield was applied for this scenario. The independent reviewer considers that the adopted rental values are agreeable.
72. For the construction costs, there appears to be some minor differences between the costs suggested by the applicant and those suggested by the independent advisor, with the advisor suggesting a higher cost for the light refurbishment and lower costs for the full refurbishment and new build. The highest difference is that of the new build. The level of contingency has been agreed at 5%.
73. The advisor considered that the cost the planning obligations will be higher than that suggested by the applicant. Another minor difference between applicant's assessment and the independent reviewer's assessment includes the finance rate, which the reviewer considers to be slightly higher at 8%. All other inputs, including professional fees, legal and agent fees and profit return have been agreed between the two parties.
74. The output of the viability assessment demonstrates that all scenarios assessed will be unviable. The independent review also concurs with the applicant's assessment with very slight differences between the achieved profit returns, being between -36.22%, 4.07% and 28.48% for the light refurbishment, full refurbishment and new build, respectively.
75. The applicant has provided a sensitivity analysis, demonstrating that if the new build scenario rent were to increase by 10% and build costs reduce by 10% the scheme would only produce a profit on cost of 5.81%, below the target rate of return (15%).
76. It has therefore been demonstrated that an office use would not be viable in any three scenarios assessed.
77. The Office use SPD advises that "*Evidence of the marketing of the building for continued office use having regard to the use, condition, quality and location of the building. Information should be provided setting out:*
- *the length of time the property/site has been marketed;*
  - *the number and details of enquiries received, such as the number of viewings, the proposed uses and comments from prospective purchasers or tenants (including as to the suitability of continued office use).*"

78. The applicant has submitted marketing information in relation to 6-8 Long Lane. The building was marketed for rent as a refurbished office space for longer than 2 years, between summer 2021 and November 2023. An agency board was installed outside the building, and it was also listed on several online agencies. A schedule of interest has also been provided by the applicant showing that the site was viewed four times within the marketing period and it was not selected by the intended tenants due to its size, the contract length and quality of space. The building at 1-5 Long Lane was occupied until April 2024, when it became vacant. Due to the lack of interest for the building at 6-8 Long Lane, this building was never marketed. It is noted that the two buildings were constructed almost at the same time period (1970s) and are of similar size (1-5 Long Lane is 1,560sqm and 6-8 Long Lane is 1,625sqm in size).
79. The marketing information submitted for 6-8 Long Lane is considered sufficient evidence to demonstrate that the site was marketed for long enough period and there were limited intended tenants, that decided not to proceed with the tenancy of the building due to the reasons stated above. This information demonstrates that the building was not lettable. Although no marketing evidence for the building at 1-5 Long Lane has been provided, it is considered that by reason of the aforementioned similarities between the two buildings, it is unlikely that the building at 1-5 Long Lane would have progressed to a successful tenancy agreement. As a result, the evidence submitted is considered sufficient to demonstrate that the buildings were not lettable for an office use.
80. Change from offices will normally be refused if the building or site is considered to be suitable for long-term viable office use. Accompanying reports indicate that the buildings are currently unattractive for long term office use, they constitute Grade B office buildings in poor decorative repair, with EPC ratings of C and D. Other issues of the existing properties include the lack of bicycle storage and showers, lack of WCs on the fifth floor of the building at 1-5 Long Lane, limited natural light due to the restricted height of the glazing recessed comfort cooling units and single glazing in parts. Following the global pandemic there is greater demand for cycling facilities and buildings with good air circulation and natural light which may decrease desirability of the current buildings.
81. A City Office Market Overview has been submitted advising that there is currently existing capacity of office floorspace with further floorspace under development. It is also stated that the poorest quality accommodation is taken on very short term or flexible leases prior to occupiers taking permanent better-quality accommodation. If 1-8 Long Lane was removed from the City office market, the impact would be reduction of circa 0.02%. This percentage is negligible, and it is not considered that it would impact

the health of the market, or it would prejudice the primary business function of the City. It is also stated that demand is strongly concentrated on Grade A, modern and best-in-class accommodation. This is also supported by the recently prepared Future of Office Use Summary Report, June 2023, advises that demand for best in class is higher now than pre-pandemic. It is therefore considered that an office scheme would be a poor competitor to other buildings in better locations or of higher quality.

82. The loss of office floorspace on this site is considered to be minimal when considered against the existing and pipeline floorspace in the City of London, including those schemes which this Committee has resolved to permit but which have not progressed yet to full permission. Whilst the Local Plan resists the loss of office floorspace, the scale of the loss on this site would not prejudice the overall supply of office space in the City, nor prejudice the potential for future site amalgamation or result in the loss of existing stock for which there is demand or longer-term viable need.
83. To conclude, although continued office use might be feasible in the short term, the viability assessment demonstrates that in the longer term this is unlikely to be a viable proposition and that alternative uses should be considered. It has also been demonstrated that different scenarios refurbishing the exiting building or even providing a new built are not viable options. It is therefore considered that the loss of existing office floorspace would not have an adverse impact on the overall stock of floorspace in the City or prejudice the City's role as an international business and professional centre. It is considered that the proposed high quality hotel accommodation will contribute towards diversifying the City's building stock and land uses, adding vibrancy and activity for seven days per week and contribute to the achievement of the City Corporation's Destination City ambitions and align with the City Corporation's wider ambitions for a post-Covid City.
84. The loss of office accommodation is therefore considered to be acceptable within the provisions of Local Plan policies CS1 and DM1.1 and emerging policy in the draft City Plan 2040.

#### Proposed Uses

85. The proposed building has been designed to provide primarily a hotel use with secondary retail (Class E(a)/ E(b)) uses at part ground and part basement level. The upper eight floors and part of the ground and basement floors would be used for the hotel use.

#### Provision of Hotel Accommodation

86. The site is within the Central Activities Zone (CAZ). London Plan Policy SD4 states that the strategic function of the CAZ includes tourism and hotels.

87. London Plan Policy E10 states that London's visitor economy should be enhanced through visitor experience and supporting infrastructure, and that a sufficient supply and range of serviced accommodation should be maintained. The Policy states that smaller scale provision should be promoted in the CAZ except wholly residential streets or predominantly residential neighbourhoods and subject to impact on office space and other strategic functions. It states that the intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses. The policy also requires accessible bedroom provision. The supporting text of Policy E10 states that it is estimated that 58,000 additional bedrooms will be required in London by 2041.
88. Based on the findings of the City of London Visitor Accommodation Sector Commercial Needs Study, dated January 2023, it is advised that there a positive level of demand for additional hotel and serviced apartments development within the City of London. The area around the Smithfield Market has been considered as an appropriate area for visitor accommodation.
89. Furthermore, the study advises that *"Despite the significant recent growth, the current pipeline of hotel projects within the City is relatively low (and lower than neighbouring boroughs) with 10 schemes identified (including one serviced apartment) representing a potential increase of 1,483 bedrooms. This is likely due to a combination of available sites and the ongoing impact of both Covid-19 and the current economic downturn on funding markets"*. It is also stated that *"future visitor accommodation demand prospects for the City remain buoyant"*. Consideration has been given to the fact that the City has seen a growing shift towards a becoming a leisure destination in its own right in recent years. It is therefore forecasted that *"there is demand capacity for an additional 350 rooms per annum in City of London to 2037, maintaining market occupancy at around 85%. This represents supply growth of 4,012 rooms over 15 years, equating to a 38.6% increase, including those schemes in the planning pipeline."*
90. The applicant has submitted a Hotel Needs assessment, which concludes that the immediate area has relatively little hotel room supply compared to other Central London Areas. Furthermore, there are a considerable amount of demand drivers within the locality, with further regeneration of the area. It is also stated that hotels within the area have seen strong levels of occupancy within recent years demonstrating that demand is strong.
91. The site lies within the North of the City, a Key City Place as defined within Core Strategic Policy CS5 and within a rejuvenation area. Policy CS5 supports implementing proposals for the rejuvenation, intensification and further improvement of this area. Criterion 9 of the policy also requires



further enhancing the distinctive character of the Smithfield area by retaining a range of buildings for accommodating a mix of uses, whilst recognising the particular challenges arising from the 24 hour character of the area. The provision of appropriate new development, suitable for accommodating a mix of uses is also supported by the draft City Plan 2040 Strategic Policy S24. Furthermore, draft Strategic Policy S23 (Smithfield and Barbican) requires improving the area by supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role. The site is located in the immediate vicinity of the Smithfield Market. The proposed hotel use with ancillary ground floor retail uses is considered to contribute to the distinctive character of the area and it would support the provision of mixed uses.

92. Local Plan Policy CS11 seeks to promote the City's cultural, and visitor offer by allowing hotels where they support the primary business or cultural role of the City and refusing new hotels where they compromise the City's business function or the potential for future business growth. Local Plan Policy DM 11.3 states that new hotel and apart-hotel accommodation will be permitted where they:
- do not prejudice the primary business function of the City;
  - are not contrary to policy DM1.1;
  - contribute to the balance and mix of uses in the immediate locality;
  - do not result in adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;
  - provide satisfactory arrangements for pick-up/drop-off, service delivery vehicles and coaches, appropriate to the size and nature of the hotel or apart-hotel;
  - are inclusive, providing at least 10% of hotel rooms to wheelchair-accessible standards;
  - ensure continuing beneficial use for historic buildings, where appropriate.
93. For the reasons addressed in the above section (Loss of Office Use) it is considered that the proposed hotel use would not prejudice the primary business function of the City and is not contrary to Policy DM 1.1, as it would not result in loss of viable office floorspace. the development is located in a mixed-use area, comprising office, residential, retail and some hotel uses in the wider area. It is therefore considered that the proposed development would contribute to the mix of uses and it would be compatible with the character of the area, considering its proximity to significant cultural sites (i.e. the future Museum of London and the Barbican) and transport links.
94. The impacts of the development on the highway safety and network are further assessed below in the relevant section of the report. Similarly, the impacts of the development on residential amenity are discussed below. albeit it is noted that the applicant has submitted an Operational

Management Plan to minimise the impacts of the development of the amenities of the neighbouring occupiers, which is further assessed below, and its implementation will be secured by condition. The site is not a historic building and therefore, this criterion is not relevant in this instance.

95. In light of the above, and subject to the ensuring that the development would be acceptable in terms of its impact on the highway safety and network and in terms of securing the amenity of the nearby neighbours, the development would be acceptable in planning terms and compliant with the London Plan policies SD4 and E10 and Local Plan policies CS11 and DM11.3.

#### Retail uses

96. The site is not within a designated Principal Shopping Centre (PSC) but is located within a Retail Link. Policy DM 20.2 (Retail Links) aims to encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Retail Links.
97. The retail provision within the existing building comprises one retail unit occupied café totalling 320sq.m (GIA). A total of 167sq.m (GIA) of flexible retail floorspace (Class E(a)/(b)) is proposed at ground and lower ground floor levels and would be positioned to the east of the of the hotel reception area along Long Lane and adjacent to the pocket garden. There would be flexibility in utilising the space as one or two retail units. Although the size of the retail area would be reduced, it is noted that at ground floor the retail unit(s) would be larger than the existing retail unit and it would also result in a wider active frontage. It is therefore considered that the proposed retail provision, although smaller in actual numbers, it would provide a better-quality retail provision which would enhance the environment of the Retail Link. It is also welcomed that this stretch in a prominent location on a Retail Link close to Barbican Station and the new Elizabeth Line Station, as well as cultural uses, such as the Barbican centre and the future London Museum, would provide retail units enabling an active frontage in an area which currently lacks animation.

#### Economic Considerations

98. It is stated that the proposed development would create 35 full-time and 30 part-time jobs.
99. The National Planning Policy Framework places significant weight on ensuring that the planning system supports sustainable economic growth, creating jobs and prosperity.

100. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
101. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. It also states that planning decisions should recognise and address the specific locational requirements of different sectors.
102. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041. CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
103. Despite the short-term uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic, and social fundamentals underpinning demand remain in place, and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and draft City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, delivering the accommodation, facilities, attractions and infrastructure required for a leading destination, creating a more vibrant and diverse retail economy, enhancing the City's evening and weekend economy, securing improvements in public realm, urban greening, and a radical transformation of the City's streets in accordance with these expectations.
104. It is considered that the proposed development would in principle support the above aims.

## **Design and Heritage**

### **Existing Site, Surrounding Context and Contribution to Townscape**

105. Nos. 1 – 8 Long Lane comprises two office buildings (Nos. 1 – 5 and Nos. 6 – 8) on the northern side of Long Lane. The site is bounded by Long Lane to the south; Aldersgate Street to the east; a neighbouring office block at Nos. 9 – 12 Long Lane to the west; and Barbican Underground Station and the disused City Widened Lines to the north.
106. The application site is not within a conservation area. It lies to the north of the Smithfield Conservation Area, to the south of the Charterhouse Square Conservation Area and to the west of the Barbican and Golden Lane Conservation Area. In addition, the site is also located within close proximity to the London Borough of Islington's Charterhouse Square Conservation Area which sits to the north immediately beyond the City's Conservation Area of the same name. The development site is visible in views into and out of the surrounding conservation areas.
107. The site is within the wider settings of several listed buildings, including the Grade II listed Barbican Estate located to the east of Aldersgate Street; the Grade II\* listed Smithfield Central Market buildings to the west along Long Lane; and the Grade II listed buildings at Nos.74 and 75 Long Lane. Some distance from the site on the northern side of Charterhouse Square are the listed buildings of The Charterhouse and its precinct (Grade I) and the St Bartholomew's Medical College buildings and railings, including Nos. 12a, 12 – 13 and 14 (Grade II). On the eastern side of Charterhouse Square is Nos. 4 – 5 Florin Court (Grade II).
108. The subject site is located within a small cluster of commercial buildings which run along the north side of Long Lane between Lindsey Street and Aldersgate Street. These buildings vary in height between 5 and 7 stories, and sit as a contrast to the compact, dense townscape located to the south of Long Lane which holds a modest and traditional scale and character. To the east of the site is the Barbican Estate, which provides a further stark contrast to the surrounds it sits within, owing to its unique Brutalist architecture and significant scale.
109. The townscape beyond the London Underground lines to the north is traditional, albeit with a varied scale, with buildings facing onto Charterhouse Square. To the north east of the site is additional commercial buildings above Barbican Tube Station. Smithfield Market dominates the townscape further west along Long Lane, with its monumental scale and form acting as a focal point in the surrounds. Several commercial buildings, including the recent addition Kaleidoscope, sit between the site and the Market.
110. Nos. 1 – 8 Long Lane itself comprise two office buildings (Nos. 1 – 5 and Nos. 6 – 8) dating from the 1960s and 1970s. Nos. 1 – 5 Long Lane was constructed in the 1970s with a basement and upper floors with a fifth floor

added later. The building has a concrete frame structure, clad with a brown mosaic ceramic tile bonded to a concrete panelled system. Nos. 6 – 8 Long Lane was constructed in the 1960s, with a basement, upper storeys and rooftop plant clad with London Stock Brick and metal cladding panels.

111. The existing buildings are considered to be unremarkable, with no apparent potential for inherent architectural, historic or archaeological interest. As such, an assessment of their potential for non-designated heritage asset status is not required. Moreover, they are not considered to contribute positively to the settings of nearby designated heritage assets. Their redevelopment is supported in principle from a design and heritage perspective.

## **Architecture**

### *Design Proposals*

112. The proposals seek to make the optimal use of land within a sensitive location within the setting of the Barbican & Golden Lane Estates, Charterhouse Square and Smithfield Conservation Areas alongside numerous listed buildings and the Barbican Registered Historic Park and Garden. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises the site capacity to accommodate growth and would assist in the provision of providing additional hotel accommodation in an appropriate location in proximity to several Cultural Attractions. In this, the proposals would accord with Local Plan Policies CS5: North of the City; Emerging City Plan Policy S23: Smithfield and Barbican; and London Plan Policies SD4, SD6 and E10. It is also considered that the scheme would represent 'Good Growth' by design, in accordance with the Local Plan Good Growth Objectives GG1 – 6: growth which is socially, economically and environmentally inclusive.
113. The two existing buildings are proposed to be replaced by one development, which has been informed by a design-led approach. The proposed development would be articulated to help break down the massing of the building, with two primary bays separated by a central bay which emphasises the location of the proposed hotel entrance with a slight set back from the building line. This would signify the present plot widths at the site. A further slim bay would be provided with a curved bookend feature which would act as a focal point from views from both Aldersgate Street to the east and Cloth Street to the south.
114. The new building would rise sheer up to sixth floor and then would progressively set back from seventh floor to the roof plant to minimise the visual bulk of the top storeys. The stepped upper levels would be recessed so to not appear prominent in views from street level.

115. The building will be clad in high quality materials including a green glazed brick base, red brick body, lighter brick attic and a metal clad crown. The expressive materials as well as greening would create visual richness and depth to the facades. Samples of materials and greening would be reserved by condition.

#### *Bulk, Height and Massing*

116. The disposition of the final massing and bulk has followed a design-led approach considering townscape impacts. The development has been designed to respond to locations of existing residential amenity, visual experiences including local views including those from surrounding Conservation Areas and the immediate surrounding context of the large modern buildings of varying heights found on the north side of Long Lane.
117. The proposed modelling of the façade has split into four bays of differing sizes with a setting back of the top of the building at 7th and 8th floor would effectively break down the massing and minimise the bulk of the building in views from street level. The proposed height, bulk and massing are considered appropriate to the context on the northern side of Long Lane, outside of a Conservation Area. The existing roofline datum along this stretch of Long Lane is varied, however, it is considered that the proposal would sit comfortably in long views both from the east and west.
118. The appropriateness of redeveloping the site with a building of a larger bulk, height and massing was analysed under planning application 18/01020/FULMAJ based on a rigorous assessment of views and impact on surrounding heritage assets. The principle of a larger building located on the subject site was considered to be acceptable, given the location of the site outside of a Conservation Area and the massing of the building appearing at a comparable height to the Kaleidoscope OSD at the western end of the cluster of larger commercial buildings on the northern side of Long Lane.
119. Whilst the new proposal involves the redevelopment of a smaller site, omitting Nos. 9 – 12 Long Lane from the scheme, the height is largely comparable to the previously approved scheme with the set back crown feature retained. The proposal would have a slight divergence to the height and massing at the upper levels, with the plant of the building 750mm higher than the approved scheme. However, the habitable element of the building would be 350mm lower when compared to the previous scheme with some variation to the massing of the step down feature at the eastern end of the building.
120. The step down feature at the eastern end of the building would be retained, however, it would be lower than the previously consented scheme and therefore positioned more comfortably when viewed alongside the

neighbouring building at Nos. 135 – 137 Aldersgate Street. In views from the west, the Kaleidoscope OSB building would appear as a comparable height to the proposed development due to the set back at the upper floors, and the proposal sits comfortably within the townscape on the northern side of Long Lane responding to the strong horizontal expression of the street.

121. Owing to the reduced size of the development site, the proposals now presented have a reduced setback on the northern side of the building. However, the proposed development is still considered to have a sufficient setback of approximately 25 metres from development on the northern side of the railway line to the north. A comprehensive assessment of the impacts of the proposals on residential receptors to the north, including daylight and sunlight, are provided within the Environmental Impacts section later in the report.
122. The curved corners of the proposed development, in addition to the slight setbacks demarcating the entrance to the hotel and retail unit, help soften the impact from the larger bulk and massing of the proposal when compared to the existing. The bullnose feature located on the eastern corner of the building helps accentuate the bookend towards the Barbican, giving a more comfortable and aesthetic termination to the cluster of larger commercial buildings that the proposal would form part of. The bullnose bookend reflects a common architectural theme of characterful corners found along Long Lane.
123. Visual impacts are further mitigated by the intricate facade detailing and the introduction of different colour tones through the façade – discussed in detail in the following section.

#### *Expression and Materiality*

124. There has been a considered approach to the design detail of the proposal. The base of the proposed building would be clearly defined with a distinctive green glazed brick materiality, finished in a smooth mid to high sheen glaze which echoes Victorian elevational techniques and reflects the fun, playful and expressive character found within the architecture of Smithfield. The materiality is considered to be of a high quality and durable, pertinent given its presence at ground level where the building is most closely interacted with.
125. The base responds to the ground floor datums along Long Lane by offering a “neighbourhood scale” to the streetscape, creating a comfortable relationship between the facade and the surrounding buildings. Large windows would be punched into the façade, providing an active frontage and giving a sense of robustness to the building. The deep external window

cills would provide pedestrians with opportunities to sit, providing further activation and animation to the street.

126. The large, glazed, windows provide a contemporary reinterpretation of traditional shopfronts found on the southern side of Long Lane with metal framed stallrisers, mullions, transoms and transom lights as well as the inclusion of integrated awnings. The size and proportions of the windows have been developed to respond to those found on the southern side of Long Lane and provide a human scale to the development. The windows would be provided at regular rhythms responding the fenestration layout of the upper floors, ensuring consistency across the different bays of the development. The proposed details of the ground floor windows including materiality, tonality, design details and intricacies would be secured by way of condition.
127. The entrances to the hotel and retail unit would be clearly expressed and demarcated by setbacks in the building line defined by curved corners, and curved metal canopies enhancing legibility. The curved corners help subtly guide people into the building, and tie into the overarching architectural language of the building which is defined by the bullnose feature on its eastern elevation and softened rounded edges on all corners. A clock face is proposed to be located above the entrance to the retail unit, creating a focal point that gives a civic presence and enhances the high street character of Long Lane. In addition, signage zones have been integrated into the proposed ground floor façade. Whilst the detailed design is to be conditioned, the design intent is considered to be high quality and well-articulated.
128. A further opening would also be provided on the northern elevation of the bullnose feature facing into a smaller courtyard element of the public space which would allow spill out into this area from the retail unit.
129. There has been a considered approach to the design detail of the upper floors on the southern elevation of the building. The upper levels of the building are broken into two primary bays, broken up by two secondary bays reducing the sense of bulk with detailing responding to the composition of the base of the building and the wider street scape that the building would sit within. Strong banding between the levels would break down the mid-section of the building whilst responding to the horizontal emphasis of views down Long Lane from both east and west. There would be breaks in this horizontal banding to signify the entrances to the building at ground floor level.
130. In addition to the break in the banding, different window treatments would be provided above the hotel entrance alongside the inclusion of patterned and fluted metal panels and slimer window openings. Above the retail unit,



hit and miss brick panels would run down the building demarking the clock face below and accentuating this entrance. These design elements would break down the bulk and massing further, whilst the symmetry would positively denote the significance of the hotel entrance.

131. On the two primary bay frontages, a façade grid has been utilised led by a character analysis of other existing buildings within Smithfield. The fenestration of these bays would be off-centred, reducing the significance of typical bays and positively responding to the balance of the composition of the building toward the bookend facing the Barbican accentuating these feature further. The glazing line is set back with deep reveals to create depth to the building and add to its sense of solidity and robustness. Further articulation and depth is provided through the inclusion of angled fluted soldier course stacked brick panels inclined into the window bay, providing visual interest and decoration.
132. The materiality of the upper floors has been carefully considered through a thoughtful analysis of the existing materiality of Long Lane which is characterised by a variety of brick ages, styles and patterns. The main body of the upper floors would have a high-quality blend of bricks to provide a red appearance with darker and lighter tones and a textured finish to provide a contrast to the smooth green glazed brick base below. At the attic storey, the materiality will change in tone and colour to a lighter mix to effectively signify the cornice of the building and providing termination. This expressive mix of materials is considered to be robust, durable and low maintenance – well suited for its context.
133. In addition to the variation in brick tone, the attic storey would also benefit from a differentiation in the fenestration with slimer windows giving a more recessive and subordinate appearance to the top of the building. On the bullnose feature, the windows would benefit from Juliet balconies providing a greater focus on verticality contrasting with the horizontality of the rest of the building. This is accentuated by the inclusion of fluted brick piers which run up the building from base to attic, emphasising the bullnose as a focal point and giving elegance to the robust building when viewed from the east.
134. The northern elevation of the building, facing towards Barbican Tube Station, is more reserved and muted yet still well-articulated. The materiality would match that of the front elevations, with an expressive red brick body and slightly muted top storey to give an attics treatment. The green glazed brick would continue around the bullnose to be visible on all public facing frontages of the building. Glazing has been reduced on this elevation to minimise light spillage into Charterhouse Square, however, the inclusion of recessed false windows provide a rhythm and provide visual interest that is better suited to this secondary position.

135. The crown of the building would differentiate from the main body of the building through the use of a lightweight materiality to provide a more recessive appearance. The proposed use of metal cladding with a darker colouration when compared to the building's main body appears more subservient, with articulation and detailing help break the crown down further and provide visual interest. The cladding would have a metallic sheen to it, catching the light at different angles adding additional interest and depth to the building. The crown of the building incorporates the plant with metal louvers screening equipment, ensuring a well-integrated and seamless finish in long views of the development. Furthermore, balcony screens and balustrading are also integrated into the design. Further details of this element of the proposal are to be secured by way of condition.
136. The breaking down of the massing and stepping back at higher levels would provide opportunities for green roofs and roof terraces creating significant urban greening. These elements are compliant with Local Plan policies, CS10, policy DM10.2 and DM10.3.
137. Final detailed design of the terraces is to be conditioned to ensure compliance with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. The balustrading has been integrated into the wider design of the building and is considered to be acceptable.
138. M&E plant and building services would be accommodated in the basement, tenth and eleventh floor, with PV panels incorporated at roof level. At roof level the plant room would be integrated to the overall clean lines of the architecture. Further details are required and would be secured via condition including the 5th elevation.
139. Servicing areas are situated on northern side of the sit. These areas would be screened from views from the north owing to the presence of an existing brick boundary wall and through decorative metal gates to the service entrance on the southern side of the building. Final detail of the gates would be secured via condition.
140. Active travel Emerging Strategic Policy S8 (1/2) seeks to optimise pedestrian movement by maximising permeability, promote active travel, and create a safe, welcoming, attractive, convenient, comfortable and inclusive public realm. This is substantiated by emerging London Plan Policies D1, D4, D8 and G4, emerging City Plan 2036 Policies, D3, D4, S14 and OS1 and adopted Local Plan Policies CS16, DM16.2, CS19 and DM19.1, which seek to increase the quantity, quality and accessibility of public open space.
141. Cycle parking facilities would be accessed via visitors giving their cycles in to reception where they would be moved to the cycle storage area by staff.

The active edges and improved pedestrian experience and cycle facilities would encourage active travel walking and cycling. The proposals support active travel and comply with Local Plan policy DM10.1 and Emerging policies S8 (1) (2) (6) and DE2.

142. Irrespective of the submitted drawings, full details of the ground floor frontages, design and materiality of the public realm improvements, and way finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayors Public London Charter promoting a safe, inclusive and welcoming environment.
143. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the context, responding to public safety and enhancing the unique character of the City by night. A detailed Lighting Strategy would be subject to condition to ensure final detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The proposed public realm lighting strategy would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.
144. A high-quality signage strategy for the proposal would be required and would be secured via condition.

#### **Urban Design and Public Realm**

145. The layout of the ground floor with its different uses and the refreshed public space to the east of the site would help generate activity at ground floor level, positively stitching the site into the wider urban grain. The improved public space would contribute to an urban structure characteristic of the city, with streets, courts, and public spaces which are welcoming, convenient to use and attractive. The proposals represent compliance with London Plan Policy D3 and Local Plan Policies CS10, DM10.1 and DM10.4, by offering buildings and spaces that positively respond to character, distinctiveness, scale and appearance of the City's public realm.
146. The existing public space to the east of the site is poor quality, covered with paving with limited planting and concrete bollards providing separation from vehicular traffic. There is limited activity and vibrancy provided with seating associated with the existing café use, however, this is not available for use by non-customers and is removed when the café is closed. It is a sparse and harsh environment, and the proposals are considered to improve this condition insofar as possible.
147. Within the refreshed public space, new seating, greening, landscaping, surface materials and spill out space for the ground floor occupiers will

enliven and animate the public realm, which is currently underutilised. The re-invigorated courtyard has been designed to become a new dwell space, located at a key node between the Elizabeth line and Barbican Tube Station entrances as well as the Barbican and the future London Museum. In addition, the space would have an enhanced level of greening and new wayfinding. Overall, the proposals are considered to be compliant with London Plan Policy D3 and D8 and Local Plan Policies CS10, DM10.1 and DM10.4, by creating public spaces that have a positive relationship with their context and the proposed building.

148. Active frontages would be provided along the south elevation of the proposal, which would run around to the east of the building around the bullnose feature. The windows would be openable internally to enable them to open up in the summer months creating new connections between the street and the internal uses.
149. The mixed use nature of the proposals would result in a positive contribution to the vibrancy and activity of the area, offering social and economic benefits that align with the established high street character of Long Lane. The provision of mixed uses, with both the hotel lobby and a retail unit, would promote activity at different times of day and on different days of the week, appealing to a range of audiences and attracting a diverse range of users to the site. Altogether, the proposals would provide high quality public realm, alongside more pedestrian-focused streets which promote active travel and are comfortable, convenient and attractive, in accordance with London Plan Policy D3 and City Plan Policy S8 and Local Plan Policies CS10, DM10.1 and DM10.4.
150. An appropriate management of the public realm would be ensured via a Public Realm Management Plan. This will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8 and guidance in the Public London Charter.
151. The proposed servicing would be undertaken off street, via a vehicular crossover located on the existing position found at Nos.6-8, whilst the existing vehicular crossover servicing Nos.1-5 would be removed. This would reduce potential conflict between vehicles and pedestrians when compared with the existing situation. The crossovers would be finished in yorkstone, enhancing the public realm and giving greater focus on pedestrian priority. These changes would be delivered through the aforementioned s278 agreement. The proposals have been assessed to ensure they are serviced, maintained and managed in such a way that will preserve safety and quality, with minimal disturbance or inconvenience of

the surrounding public realm. The proposed servicing is considered to take place in the optimal location for the site, altogether, the proposals are in accordance with London Plan Policies D3, D8 and T2.

152. The proposal would deliver green infrastructure, optimising the quantum and planting palette in a manner which is human-centred, seeking to improve health and wellbeing, landscaping in the public space would transform what is currently a hardscaped environment. Final details, including planting palettes, specifications and fit out, are reserved by condition with the intent to optimise the inherent biodiversity and wellbeing benefits, in accordance with London Plan Policy D3 and D8 and Local Plan Policies CS10, DM10.1 and DM10.4.
153. The proposed materials would be robust and high quality, with the final details of surface materials and specification of street furniture to be reserved for condition. The use of Yorkstone paving in the public realm would read as a continuation of the surface treatment on adjacent streets and spaces, helping to suggest to pedestrians that the space is publicly accessible. This would be a betterment to the existing poor quality confusing mix of paving found in the existing space. The new public realm would be a seamless extension of the City's continuous public realm, utilising the material palette and detail established in the City Public Realm SPD and the associated Technical Guide, with final detail reserved for condition. The overall materiality of the public realm would have a coordinated design aesthetic and overall the proposals are considered to be acceptable.
154. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via section 106. A Public Realm Management Plan and Cultural Implementation Strategy will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8(H) and guidance in the (draft) Public London Charter.

#### Conclusion on Architecture and Urban Design

155. The proposals are considered to successfully mediate the changes in scale within its local context and would significantly enhance the wider street block within which it sits. The stepped massing, highly articulated design, materials, varied tones of colour and curved form would introduce a well-considered, refined, neighbourly architectural set piece. The development would be sensitive to townscape contexts at macro and local scale and would optimise the use of land, whilst significantly improving the buildings' interface with their surroundings.

156. The proposals would also enhance the landscaping of the site, providing much greater areas of greening and greater opportunities for seating. The proposals would therefore enhance the overall quality and character of this key pedestrian space, which was previously underutilised, at a key node between Barbican Tube Station, Farringdon Elizabeth line Station and the Barbican.
157. The architecture and urban design proposals comply with Local Plan Policies CS5, CS10, DM10.1, DM10.2, DM10.4 and DM10.5; emerging City Plan Policies S1, S8, S23, DE2-8; London Plan Policies SD4, SD6, D3, D8; the NPPF and City Public Realm SPD which all require a high quality public realm and increased urban greening.
158. Overall, it is considered that the proposal would make the best use of land, following a design-led approach that optimises site capacity to accommodate a high-quality hotel development alongside a ground floor retail use in close proximity to several cultural attractions which would contribute to the Destination City objectives. The proposals are considered to be in accordance with Local Plan Policies CS5: North of the City; Emerging City Plan Policy S23; and London Plan Policies SD4, SD6 and E10.
159. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S23 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the objectives of Destination City by improving the public realm and creating a new sense of place in this part of the City of London.
160. Overall, the proposal would optimise the use of land to deliver a transformative new building for the area. It would result in a diverse mix of use, transforming an underutilised site with little active ground floor uses and limited accessible public realm into a new commercial hub for the City and London. It would deliver an enhanced public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.
161. Irrespective of the approved drawings, full details of the ground floor frontages, design and materiality of the public realm improvements, and way-finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayor's Public London Charter promoting a safe, inclusive and welcoming environment.
162. A high-quality signage strategy for the proposal would be required and would be secured via condition.

### **Townscape & Views:**

163. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG (the SPG), protect and enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London.
164. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. This has been supplemented by additional imagery during the planning application's assessment.

### London View Management Framework (LVMF) Impacts

165. The LVMF designates pan-London strategic views deemed to contribute to the Capital's character and identity at a strategic level. Those relevant strategic views where there would be a material impact are addressed here against London Plan Policy HC4 and associated guidance in the SPG.
166. The application site is not located within an LVMF Panoramic or Linear viewing corridor and the proposal is not of such a scale that it would be perceptible in relation to these or any of the River Prospects or Townscape Views. Whilst it is acknowledged that the previous proposal on the site was located within the Wider Setting Consultation Area (WSCA) of LVMF 1A.2 Alexandra Place, owing to the omission of Nos. 9 – 12 Long Lane from the scheme, this is no longer the case.
167. As such, there would be no potential impact on LVMF views.

### City of London Strategic Views

168. The City of London Protected Views SPD identifies views of St. Paul's Cathedral, the Monument, the Tower of London World Heritage Site and other historic landmarks and skyline features, which must be assessed in relation to proposals for new development. The proposed development site is located within the northern periphery of the City of London, and as such falls outside of the St Pauls Heights policy area, and is located at a significant distance from the Monument views and Tower of London World Heritage Site Local setting study area.

### City Landmarks and Skyline Features

169. The proposal would not affect views of the majority of City landmarks and skyline features in accordance with CS13 (2), only one would be impacted by the proposal as set out below:

*Barbican Towers*

170. This landmark would have a visual relationship with the proposal in views from Long Lane and Charterhouse Square. The proposal would sit as part of the existing collection of large commercial buildings on the northern side of Long Lane, and Officers consider that the proposal would not encroach upon the landmark which would remain prominent in views beyond the site.
171. As such, the experience of the Barbican Towers as a skyline feature would be unchallenged by the proposals and preserved in accordance with the guidance within the SPD. Further assessment of the indirect impacts of the proposal on the listed building is found below.

London Borough of Islington

172. Adopted Islington Development Management Policies DH2 identifies local protected views of St. Paul's Cathedral and St. Pancras Chambers and Station. These comprise Views LV1 – LV8. An assessment has been undertaken of these views, and the proposed development site is not located within the viewing corridors and these views would therefore be preserved.
173. The London Borough of Islington were consulted on the proposals, and no comments were made in relation to the views.

Other Views

174. As a midrise building, the proposals would not be visible in other strategic views. Rather, it would be glimpsed along streets in the locality. The proposed building has been appropriately designed in relation to its surroundings and its quality design and appropriate massing would not detract from the visual amenity of other townscape views. The proposed building would have an appropriate presence in significant views of important buildings, townscape and skylines and would not result in harm to the views identified in the Built Heritage and Townscape Visual Impact Assessment and the settings and significance of the heritage assets and landmark buildings featured within these views would not be harmed by the proposals.

**Built Heritage**

Indirect Impacts:



## Smithfield Central Market Building (Grade II\*) and its Rotunda (Grade II)

### *Significance:*

175. 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.
176. The meat and poultry market was established by Act of Parliament in 1860, and the Central Market was begun in 1866. It was completed in 1868 to designs by City Architect Horace Jones, in red brick with Portland Stone dressings and corner towers. The building has two main wings; the East and West Market, flanking a central Grand Avenue, a central walkway with an elliptical arch and cast iron decoration with the City Arms above. The market possesses historic and architectural interest as a purpose-built 19th century market, which is a notable local feature, and the work of a known architect.

### *Setting:*

177. It is considered that this asset forms part of a group of wider Smithfield Market Complex buildings with a shared setting and functional relationship holding a busy character associated with its present use. The buildings surrounding the market vary in scale, character and age which contribute to a wider understanding of the development of this part of the City over time.
178. Smithfield Market continues to sit as a key landmark, with a hierarchical townscape surrounding with a range of building sizes including Barts Hospital and numerous large commercial buildings. As such, large modern commercial buildings of a variety of materialities and compositions form a well-established neutral part of the Market's setting. The positioning of the market on its own block surrounded by roads which provide access associated with its intensive use reinforces its landmark status but also provides an element of segregation from the surrounding townscape.

### *Impact:*

179. Officers conclude that the proposed development would not have an adverse impact on the setting of Smithfield Central Market Building and its Rotunda. Whilst it is acknowledged there would be intervisibility between

the asset and the proposal, there is a degree of separation between the subject site and the Market which incorporates existing large commercial buildings. This includes the Kaleidoscope OSD Building which sits immediately to the east of the market.

180. The proposal would not compete with the market, with the distinctive cupolas still sitting prominently in views along Long Lane remaining uninterrupted. The proposal would maintain the existing hierarchy of development along the north side of Long Lane responding to the existing scale, form and horizontal datums.
181. The proposals would therefore preserve the setting and significance of the listed building.

#### Barbican Estate Registered Historic Park and Garden (RPG) (Grade II\*)

##### *Significance:*

182. The landscape of the Barbican Estate was conceived and designed as an integral part of the architectural design by Chamberlain, Powell and Bonn with the architects recognising that the spaces between the buildings were of equal importance to the structures themselves. The landscape is now designated as a grade II\* Registered Historic Park and Garden (2003), and, along with Alexandra Road Park, is one of only two post-war landscapes designated above Grade II within Greater London. Its heritage significance is derived from the following values:
  - The creation of the Barbican as a vehicle-free environment through the raising of the precinct above ground level on the podium, creating vehicle-free space the quality and quantity of which is unparalleled in London.
  - The raised ground of the podium and the highwalks as an intrinsic and distinctive feature of the estate. The raised ground provides viewpoints from which to survey the surrounding city below, and, together with the limited entrances to the complex at ground level, contributes to the conception of the Barbican as fortified structure from the surrounding streets.
  - The volume of space created by the concentration of built development in dense 'off-the ground' structures. These spatial reservoirs are recognised to be as significant as the buildings themselves.
  - The contrast of the planning of the Barbican with the grain and plan of the surrounding townscape, and the creation of characteristically unique dramatic vistas across the estate and into the surrounding townscape.
  - The richness and variety of types of external space across the estate delivered within a consistent design idiom, the scale of which is unique.

- The successful designed relationships with ‘found’ historic elements including the Roman and Medieval wall, and the Church of St Giles Cripplegate and associated gravestones.
- The urban character of the Barbican, and its conception and realisation as a new piece of urban fabric designed and delivered in its entirety by a single client and architect.
- The consistent use of a small number of materials and detailing across the estate, delivering a powerful sense of visual continuity and consistency to the estate.
- The impact of soft landscaping and the value of experiencing the architecture of the Barbican in the context of trees, foliage, and greenery. Originally this appears to have been intended to result from use of a restricted palette of planting in raised blocks of greenery or planter boxes which assumed an architectural significance in relation to the buildings. The layout established by Janet Jack across the upper podium employs a freer geometry and more varied planting palette.

*Setting:*

183. Due to the contained and raised conception of the Registered Historic Park and Garden, the primary setting of the landscaped gardens are the Estate buildings and historic elements within it. The enclosed nature and raised level also segregate the wider townscape adjacent to the Barbican, aside from glimpsed views between buildings and from surrounding streets.
184. At the western boundary, larger commercial buildings are a well-established and neutral part of the Barbican’s setting particularly along Aldersgate Street. The scale and proximity of the buildings strengthen the isolation. Glimpses are achieved from the Podium westward down Long Lane, with the commercial buildings on the northern side and the smaller townscape on the south visible and framing longer views toward Smithfield Market.

*Impact:*

185. The proposals would have intervisibility with the landscape of the Barbican Estate both from within its setting and from views within the Estate. Large commercial buildings are an established neutral characteristic along the western boundary of the Estate. Whilst the development would result in change within the setting to the west, it would not detract from the qualities that underpin the significance of the Registered Historic Park and Garden and therefore would have a neutral impact.

Barbican Estate (Grade II)

*Significance:*

186. The Barbican Estate, designed by Chamberlain, Powell and Bon, is a leading example of a modernist project in the high Brutalist style, and is perhaps the seminal example nationally of a comprehensively planned, post-war, mixed-use scheme.
187. The Estate is a composition of towers and long slab blocks at raised podium level, separating pedestrians from vehicular traffic, which enclose private and public landscaped open spaces centred on a canal in a Le Corbusian manner.
188. It is of architectural interest for its compelling architectural narrative, which encapsulates the macro and micro design intent of the architects in a dramatic arrangement of buildings and spaces which are tied together by a consistent and well-detailed bush and pick-hammered finish.
189. It is of historic interest as a modern exemplar of comprehensively planned high-density urban living during the postwar recovery period delivering essential housing for the City of London, and for the associations with the architects.

*Setting:*

190. The Estate's setting varies greatly around its perimeter, where a varying range of largely modern buildings, make a neutral contribution to its significance. There are a number of tall buildings in the vicinity of the Estate which result in a highly urban skyline, however none of these hold a particular architectural or historic relationship with the Estate. As such, large modern commercial buildings of differing materiality and compositions form a well-established neutral part of the Barbican Estate's setting in this western boundary. Their scale and proximity reinforce the enclosure and segregation characteristic of the Barbican Estate, albeit in a neutral way unrelated to heritage significance.
191. The Barbican Estate is appreciated as a standalone set-piece of architectural design and execution and this is supported by the Listed Building Management Guidelines Volume II. There is little reliance on the wider surroundings to aid appreciation or an understanding of the Barbican's historic, architectural and artistic values. Exceptions to this are the Golden Lane Estate to the north and listed buildings to the south including St Giles Cripplegate and Ironmongers Livery Hall.

*Impact:*

192. The proposals would have intervisibility with the Barbican Estate both from within its setting and from views within the Estate. Large commercial buildings are an established neutral characteristic along the western boundary of the Estate. Whilst the development would result in change within the setting to the west, it would not challenge the pioneering mid-20<sup>th</sup> century masterplan, architectural language or qualities which underpin the significance of the Barbican Estate and its existence as a clear entity would remain fully appreciable. It is considered that the proposals would preserve the setting and significance of the listed building.

#### Nos. 74 and 75 Long Lane (Grade II)

##### *Significance:*

193. The building comprises a row of houses, originally dating to circa 1598, albeit with later alterations. These alterations include mid-Victorian and 20<sup>th</sup> century shop fronts at ground floor level, and jetties to the upper floors. The rear elevation has been rebuilt in yellow stock brick, probably in the early 19th century. These modestly scaled houses possess historic and architectural interest as a surviving part of a row of pre-Fire houses providing remanence of the traditional narrow plot widths and character found within Smithfield.

##### *Setting:*

194. These domestic scaled buildings are on the southern side of Long Lane, with a highly urbanised setting. Whilst the immediate surrounding terraced houses and the Old Red Cow pub make a positive contribution to the setting, representing a traditional townscape found in Smithfield. To the north there is no direct historical relationship between the asset and the commercial buildings and therefore the site is not considered to contribute to the setting of this asset.

##### *Impact:*

195. The application site is on the northern side of Long Lane, forming part of the setting of this listed building, sharing a visual relationship. The building itself shares no particular historical or other associations with heritage assets in the vicinity, and is seen as part of the modern, commercial development which characterises this area and as such the proposal is considered to have a neutral impact on this asset, preserving its setting.

#### Charterhouse Square Listed Buildings

196. The Charterhouse and its precinct (Grade I) and the St Bartholomew's Medical College buildings and railings, including Nos 12a, 12-13 and 14 (Grade II) are some distance from the site on the northern side of Charterhouse Square and separated in terms of direct view by a terrace of buildings on Charterhouse Street. On the east side of Charterhouse Square is Nos. 4 and 5 Florin Court (Grade II). These assets form together part of a group clustered around the square.

*Significance:*

197. The Charterhouse complex was constructed in five distinct phases, all of which contribute to a rich and varied historical combination of buildings. The Site was founded originally on the Carthusian Priory of the Salutation of the Virgin Mary in 1371, which was later transformed to a Tudor mansion. In 1611, Sutton's Hospital was founded at the site as a school and almshouse. It was significantly altered in 1820 by Edward Blore, and later reconstructed by Seely and Paget following bomb damage sustained in the Second World War.
198. A number of Listed buildings are arranged as a collection of assets around the greenspace at the heart of the Square, in addition to The Charterhouse include:
- The Master's Lodge (Grade I) - a terraced house dating from 1716 with original detailing and incorporates part of the 15<sup>th</sup> century gatehouse.
  - Pensioners Court and Stable Court (Grade II) – almshouses constructed to designs by Edward Blore as part of Sutton's Hospital between 1826 and 1840 which form part of the wider hospital composition and provide a good example of 19<sup>th</sup> century courtyard plan building.
  - Nos. 4 & 5 Charterhouse Square with Attached Railings (Grade II) – a pair of four storey 18<sup>th</sup> century yellow brick terraced houses with red brick dressings, a well-preserved example of a pair of early 18<sup>th</sup> century townhouses.
  - Warden's House and Gatehouse, St Bartholomew College with Railings (Grade II) – a Tudor style four storey building designed by W Hilton Nash as the headmasters house for Merchant Taylors School in 1894.
  - Nos. 12A, 12-13, 14 Charterhouse Square with Railings (Grade II) – late 18<sup>th</sup> century terraced houses which retain original detailing including a panelled door to No.13 and decorative glazing to 12A. This group of buildings provide a good example of 18<sup>th</sup> century townhouses in this part of London.
  - Former Caretakers Lodge and Gatehouse, St Bartholomew's College (Grade II) – built between 1873-1874 to designs by Edward l'Anson on behalf of the Merchant Taylors School with a French Gothic style that provides a good example of a 19<sup>th</sup> Century gatehouse.

- Florin Court (Grade II) – a stand alone distinctively different building to the rest of the square, a 1936 block of flats designed by Guy Morgan & Partners with a Portland stone plinth and yellow brick curved façade which extends to 10 storeys. A good example of an early 20<sup>th</sup> century pre-war residential development in the area and a representation of how residential development in this area has changed over time.

*Setting:*

199. The buildings are experienced collectively as a group in an enclave of historic development within the wider architecturally diverse, modern city. The buildings are arranged around the green space in the centre of the square and well contained by Clerkenwell Road, Goswell Road, Clerkenwell Road and St John Street.
200. Within the wider setting of the area includes the Barbican and Golden Lane Estates, with the three towers of the Barbican visible to the south and east of the Square showing the narrative of change and ongoing development in the area. Small glimpses of the cluster are achieved here as well as glimpses of large commercial buildings on Aldersgate Street.

*Impact:*

201. Officers consider that whilst the proposed development would be visible from glimpses within the setting of this group of listed buildings, it would not detract from or change the experience of these listed buildings. Where the development is visible, it would be largely peripheral to the experience of the buildings clustered around the square which already has a backdrop of large buildings including the Barbican Towers and other commercial buildings along Aldersgate Street. The proposed development would form part of this backdrop. As such, the proposed impact is considered to be neutral and the setting, significance, character and appearance of the conservation area would be preserved.

Smithfield Conservation Area

*Significance:*

202. The Smithfield Conservation Area Character Summary and Management Strategy SPD (2012) sets out the characteristics which contribute to the special interest of the Conservation Area within Section 3 (pp.10) as:
  - an area with a unique character derived from an established history approaching 2000 years, and a physical fabric and street pattern which has evolved over almost 1000 years, with market use pre-dating this;

- an area which has evolved incrementally with a diversity of built forms and uses that reflect the development of its specialised institutions and activities;
- a townscape with great contrasts in scale between development within the precincts of the former priory, the hospital buildings, and later grand scale engineering interventions;
- an area unusual in the City of London for escaping substantial damage in the Great Fire and the Second World War;
- a large concentration of heritage assets, including statutorily listed buildings as well as numerous unlisted buildings of a high architectural and townscape quality from different periods;
- a townscape enriched by public open spaces, trees and planting;
- an area associated with nationally significant cultural and historic events and notable people;
- a conservation area closely related to streets and buildings to the north, which form part of the London Borough of Islington's Charterhouse Square Conservation Area;
- an area with high archaeological potential.

203. Area 1 of the SPD is the most pertinent to this application and this is defined by buildings arranged around connecting passages, lanes and courts which are irregular in form and have individual character. Buildings in these streets are characterised by stock brick, red brick and glazed bricks and often have a warehouse appearance which have lent themselves to conversion with largely concealed roof extensions as experienced from the street. Buildings in Area 1 within the network of streets are modest and attractive largely 4-5 storeys or less as in the with a consistent cornice and parapet lines. The character of the sub area is also defined by short and kinetic views.

*Setting:*

204. Given the size of the Conservation Area, the setting is varied and diverse. On its northern and eastern border, there is a contrast in scale between the modest townscape within its boundaries and the large commercial buildings on the northern side of Long Lane and the western side of Aldersgate Street.

205. The development site itself presently makes a neutral contribution to the setting of the conservation area, owing to the lack of direct historical relationship and its muted materiality which doesn't compete or detract from this designated heritage asset.

*Impact:*

206. The detailed design of the building has carefully considered and responded to the character of the Conservation Area immediately to the south. The expressive glazed and red brick materiality of the main body of the building,



alongside the careful proportions and detailing, are sympathetic and considerate to the rich styles and detailing found within Sub Area 1 of the Conservation Area. In addition, the improvements to the public space with enhanced greening and new areas of seating create a new focal point to enrich the townscape in this location. As such Officers consider that the impact of the proposal would be a slight enhancement to the setting of the Conservation Area.

### Barbican and Golden Lane Estates Conservation Area

#### *Significance:*

207. The Barbican and Golden Lane Conservation Area Character Summary and Management Strategy SPD (2022) articulates the character, appearance and significance of the Conservation Area set out within six attributes identified within Section 1 ('Summary of Character, Appearance and Significance', pp.4), as follows:
- Two estates which, together, provide a unique insight in the creative processes of a seminal English architectural practice, Chamberlin, Powell and Bon.
  - Integration of the ancient remains of the Roman and Medieval City wall, including Bastions 12, 13 and 14 and the medieval church of St Giles Cripplegate in a strikingly modern context.
  - In scope and extent, the estates are important visual evidence of the scale of devastation wrought by the World War 2 'Blitz' bombing campaign of 1940 –1941.
  - Seminal examples of ambitious post-war housing schemes incorporating radical, modern ideas of architecture and spatial planning reflecting the development of both Modernism and Brutalism.
  - Unprecedented and ingenious provision of open space and gardens within central London, which continue to be a defining characteristic of the estates today.
  - New and striking architectural idioms, particularly at the Barbican, applied on a significant scale; a new architectural language deliberately modern and forward looking; a way of planning and arranging buildings and spaces which was unprecedented in Britain and reflected evolving ideas of the modern city.
  - Overarchingly, the character, appearance and heritage significance of the conservation area can be summarised as the striking juxtaposition between two seminal post-war housing Estates which illustrate evolving trends in architecture, spatial and urban planning and Modernism in general.
208. The conservation area is defined by its pervasive modernity, by the consistency of modern forms, spaces and finishes throughout, all executed to a very high standard of quality and representing an immersive experience

strikingly at odds with the more traditional townscapes and buildings outside the boundary.

*Setting:*

209. The wider setting of this large Conservation Area is informed by dense urban development, of a largely post-war, post-modernist and modern architectural character. The northern boundary abuts the London Borough of Islington, and this setting is typically lower rise with a mixture of modern and historic built fabric set out on a historic streetscape. To the east, there is again a mixed townscape around Moorgate, although largely comprised of large scale modern commercial buildings in the immediate vicinity of the Conservation Area – namely the redeveloped series of office blocks that were built along the road London Wall in the 1970s. To the south, the setting is principally formed by the main route of London Wall, former Museum and Ironmongers, and further large-scale modern commercial buildings. To the west, late 20th century, mid-rise commercial buildings line Aldersgate Street, largely obscuring the more historic areas of Smithfield Market and Charterhouse Square which are adjacent these have a neutral presence.
210. The site is not an element of the setting considered to contribute to the special interest of the Conservation Area. The Barbican and Golden Lane Estate Conservation Area is appreciated as standalone but neighbouring architectural masterplans. There is little reliance on the wider surroundings to aid appreciation or an understanding of their overall historic, architectural and artistic values.

*Impact:*

211. The impact of the proposed development would be limited to experiences within and across the western boundary of the Conservation Area, particularly on the Barbican Podium with views looking westward down Long Lane. The SPD notes that views out of the two estates, with glimpses of the surrounding City, are likely to change because the Conservation Area sits within the dynamic context of a densely developed urban centre. Large commercial buildings are an established characteristic found along the western side of the Conservation Area, and as such the proposal is considered to have a neutral impact and therefore would preserve the setting, significance, character and appearance of the conservation area.

Charterhouse Square Conservation Areas (City of London and London Borough of Islington)

212. The Charterhouse Square Conservation Areas straddle the boundary between the City of London and the London Borough of Islington. The

boundary between the two municipalities is not clearly defined in this location, and it is considered that both Conservation Areas have a very close relationship and a shared historical significance focused around The Charterhouse located within the London Borough of Islington.

213. The City of London's Charterhouse Square Conservation Area Character Summary and Management Strategy SPD (2012) sets out the characteristics which contribute to the special interest of the Conservation Area within Section 3 (pp.9) as:
- An area integral to the historic character, layout and setting of the Charterhouse and Charterhouse Square, the majority of which is within the London Borough of Islington;
  - A range of buildings that act as an important transition between the varied and richly historic character of Charterhouse Square, the railway infrastructure and large modern buildings to the south;
  - An area incorporating the cutting, platforms and associated structure of the former Aldersgate Street Station (now Barbican Station), part of a major Victorian engineering project associated with London's first underground railway line;
  - A conservation area focused on an intact group of Victorian buildings with a distinctive industrial character illustrated by their large windows and a range of surviving features;
  - A streetscape defined by robust brick and Portland Stone masonry buildings with consistent building heights and rooflines.
  - A close relationship with the adjoining Smithfield Conservation Area and London Borough of Islington's Charterhouse Square Conservation Area.
214. The London Borough of Islington's Charterhouse Square Conservation Area Design Guidance largely echoes the significance set out in the City of London's Guidance, highlighting that the area is focused around The Charterhouse complex and the fabric of the area derives from incremental development from Norman times to the present day, with surviving examples of buildings from nine different centuries.

*Setting:*

215. Beyond the boundaries of the two adjoining Conservation Areas of the same name, are various other Conservation Areas including Smithfield (City of London), Barbican and Golden Lane Estates (City of London), Clerkenwell Green (LB Islington), Hat and Feathers (LB Islington) and Hatton Garden (LB Camden). Each of these conservation areas has a character distinctive to itself with variations on building styles and scales.
216. Different views of a range of buildings beyond the boundaries of the Conservation Area are presently achieved including the Barbican Towers and glimpses of commercial buildings on Aldersgate Street and the cluster

in some positions. The urban setting of this Conservation Area is varied in both style and scale.

217. The proposed development site is located directly to the south of the Conservation Area, however, due to the extent of intervening development the current site is only visible in the Conservation Areas setting from glimpses from the Barbican Tube Station platforms and from the junction of Hayne Street and Carthusian Street.

*Impact:*

218. The Charterhouse Square Conservation Area is well contained with the collection of historic buildings focused around a landscaped space in the heart of the square. The Conservation Area is read separately to the larger commercial buildings which sit in its surrounds. The proposed development would sit prominently to the south of the Conservation Area and would be visible in views, particularly above buildings in the foreground. The scale and appearance of the building reflects the established townscape of larger commercial buildings on the northern side of Long Lane and forms part of the Conservation Areas existing setting.
219. Officers considered that the proposed development would have no adverse impact on the setting of the Conservation Area nor its significance, given that the area holds a district intimate character that is detached from the large development in the surrounds which reads separately. Furthermore, the HTVIA shows that the building would be largely screened by trees from views on the western side of the Square.

Other Designated Heritage Assets

220. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of an enormous amount of heritage assets, and it would be disproportionate to assess them all. As part of a scoping exercise, this assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate and no more than is sufficient to understand the potential impact of the proposal on its significance. In accordance with paragraph 201 a number of potentially affected assets were scoped, accounting for their significance and contribution of setting to that significance. Additional assets assessed include:
- Drinking Fountain in Centre of Gardens, Smithfield (Grade II)
  - Nos. 133 and 134 Aldersgate Street (Grade II)
  - Nos. 67 – 77 Charterhouse Street (Grade II)
  - Nos. 79 – 83 Charterhouse Street (Grade II)

- Smithfield Poultry Market (Grade II)
- The Hope Public House (Grade II)

221. The settings and the contribution they make to the significance of these designated assets, would not be adversely affected and/or any impact would not be over and above those impacts already identified. The proposed development would not harm the setting or the contribution that the setting makes to the significance of these designated heritage assets.
222. The assets assessed in detail here are considered sufficient to understanding the impact on significance overall.

### Heritage Conclusion

223. The proposals, by way of impact on setting, would preserve the significance of heritage assets, and an appreciation of that significance. They would slightly enhance the setting of the Smithfield Conservation Area. As such, the proposals are considered to accord with Local Plan Policies CS 12 and DM12.1, emerging City Plan Policies S11 and HE1, London Plan Policy HC1, having accounted for and paying special regard to s.66(1) Planning (Listed Buildings and Conservation Areas) Act 1990 and the relevant NPPF policies.

### Archaeology

224. The proposed development is in an area of archaeological interest. The City of London is considered an archaeologically sensitive area in its entirety. In accordance with the City of London Local Plan 2015, all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.
225. The site itself is located to the north-west of the Roman and medieval city walls. An Archaeological Desk Based Assessment accompanied the planning application (MOLA 2023) which identified a high potential for Roman agricultural and quarrying remains, a possibility for Roman burials and a moderate potential for remains of medieval and post-medieval date. Buildings are shown on the site on historic maps and the site is just outside the medieval Charterhouse Precinct.
226. Although the site is currently occupied by a building that has a basement, the basement is only single storey and covers approximately 90% of the footprint of the site. Therefore, the site retains a potential for archaeological deposits of Roman and medieval date. The proposed development includes the extension of the existing basements under 1-5 Long Lane, the use of

piled foundations and lowering of the floor level of the existing basement. This is likely to have an impact on archaeological remains.

227. NPPF Section 16 and the London Plan (2021 Policy HC1) recognise the positive contribution of heritage assets of all kinds and make the conservation of archaeological interest a material planning consideration. Paragraph 200 requires that applicants provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. It is also stated that “*Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible.*”
228. Core policy CS12 of the Local Plan requires the protection and promotion of the evaluations and assessment of the City’s archaeological remains and their setting, including interpretation and publication of results of archaeological investigations. The preservation, protection and safeguarding of the archaeological remains and their setting and their public display and interpretation is a requirement of policy DM 12.4 of the Local Plan.
229. The Archaeology Adviser has been consulted and recommended that the development could cause harm to archaeological remains and field evaluation is needed to determine appropriate mitigation. Due to the nature of the development and practical constraints, a two-stage archaeological condition is suggested and considered to be acceptable in this instance. This would comprise firstly, evaluation to clarify the nature and extent of surviving remains, followed, if necessary, by a full investigation. Subject to the imposition of appropriately worded conditions, it is considered that the impact of the development on archaeology will be mitigated and where appropriate enhanced.

### **Public Access and Inclusivity**

230. Developments should be designed and managed to provide for the access needs of all communities, including the particular needs of disabled people as required by policies CS10, DM10.1, DM10.5 and DM10.8 of the Local Plan, policies S1 and S8 of the draft City Plan 2040 and policy D5 of the London Plan. Plan 2040 and policy D5 of the London Plan. In particular, policy DM10.8 requires to achieve an environment that meets the highest standards of accessibility and inclusive design in all development (both new and refurbished), open spaces and streets.
231. Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all

developments (both new and refurbished)". A service provider also has an anticipatory duty under the Act.

#### Arrival at the Site

232. Consideration has been given to the points of arrival at the site and the main Hotel entrance amended following comments. An Access Management Plan (AMP) to for visitors and building users on points of arrival and entrances would be required and would be secured by condition.
233. Arrival at the site has been considered for a number of travel options. The walking distances from key public transport nodes do not exceed 77m without a rest.
234. There is no blue badge parking proposed on site. To accommodate guests arriving to the site via car who require a blue badge bay a valet service will be used alongside the provision of one blue badge parking bay in the vicinity which would be secured within the S106 as an obligation. Further detail regarding the valet service would be secured via AMP.

#### Cycle Provision

235. The long stay cycle entrance for hotel users would be provided to the East of the pocket garden and would be automated. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users. The submitted plans show that a space for larger bicycles would be provided.
236. It is noted that 5% of cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. Wheelchair-accessible sanitary and changing facilities are also necessary. On the submitted plans these appear to be provided in close proximity to the cycle store.

#### Entrance

237. The Access Statement details the entrances to 1-8 Long Lane confirming that they will all be step free, automated and with a minimum clear opening width of at least 1000mm. The primary hotel visitor entrance along Long Lane would be a be a large circle slide door type with an opposing pair of automatically sliding curved doors. Further detail will be secured via condition to ensure the design of the manifestation, thresholds, mat wells and floor finishes designed to inclusive design best practice guidance.
238. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2 Routes from the entrance/lobbies should be logical, clearly defined

and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through condition.

### Vertical Movement

- 239. London Plan D5, (B)5 states 'in all developments where lifts are installed, as a minimum, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building'. 6.2.1 further states that there should be an evacuation lift in addition to fire-fighting lifts. Proposals and the access statement confirm that all lifts will be more than 1100x1400mm with appropriately sized landings and back-up lifts are identified across the site in case of failure.
- 240. The lifts are not sufficient for users of larger mobility vehicles and alternative provision should be identified through the AMP. It is recommended that details of lifts are reserved.
- 241. The proposed good lift would provide access to the bike store and mobility scooter storage point in the basement for hotel employees the detail design would be secured via condition to ensure the lift is designed to accommodate all bike types, including larger recumbent bikes as well as being welcoming and inclusive.

### Horizontal Movement

- 242. Corridor widths and door openings are confirmed as consistent with AD M(2), including sufficient door widths and passing places for wheelchairs and will be subject to detailed design development.

### Terraces and Garden Space

- 243. The areas of landscape have the potential to offer places for rest and recovery, consistent with guidance in PAS 6463: Design for the Mind.
- 244. The detailed design for the private amenity terraces and pocket garden should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition.

### Sanitary Facilities



245. It is confirmed that unisex accessible toilet will be provided at ground floor in close proximity to the hotel reception.

#### Signage and Wayfinding

246. Signage and wayfinding will be important for navigating the site and should be designed with reference to guidance in PAS 6463: Design for the Mind and following the principle of 'two senses'. Details of signage and wayfinding will be secured by condition.

#### Public Access and Inclusivity Conclusion

247. Further design details and an Access Management Plan are proposed to be secured via condition.
248. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

#### Cultural Strategy/Public Art

249. Policy CS11 of the London Plan seeks 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, policy S6 of the Draft City Plan also advises that the contribution to culture offer will be experienced by, *inter alia*, providing, supporting, encouraging access to and further developing a wide range of creative and cultural spaces and facilities across the City. Furthermore, it is stated that all major developments should be supported by a Cultural Plan outlining how the development will contribute to the enrichment and enhancement of the City's cultural offer.
250. To enhance the City's public realm and distinctive identity Policy DM 11.2 encourages the provision of additional art works in appropriate locations.
251. A Cultural Strategy has been submitted with the application, which in association with the submitted Planning Statement, Landscape Statement and Public Art Addendum aim to highlight the cultural initiatives for the site and visualise the public art offer on site.
252. The site is located between the future Museum of London and the Barbican. It is therefore considered being in a nodal point to assist in providing visitor accommodation and also a meaningful culture offer. The applicant has confirmed that this will be achieved through a combination of initiatives carried out by the hotel operator and also through the potential of physical aspects incorporated within the landscaping of the pocket garden.

253. It is noted that the applicant has engaged with local stakeholders including the Barbican Centre, the London Museum and the Guildhall School of Music and Drama and it is stated that as part of the implementation of the Cultural Strategy will commit to further discussions with these parties, as well as The Guildhall School and ensure a long lasting relationship to foster initiatives. This engagement can be secured through an obligation.
254. The Culture Strategy suggests that the hotel operators would proactively support arts organisations and small businesses that would fit to the local neighbourhood and work collaborative with the above-mentioned parties. Arrangements would be set up with local arts organisations providing discounts and complementary accommodation for visiting artists, young companies, international performers, professors and philanthropists, training programmes for employees to familiarise themselves with the local area and arts organisations, supporting marketing initiative by publicising their events and matchmaking of potential arts sponsors with distribution partners. It is also suggested that employment opportunities will be provided to local people, as well as career development programmes. Another initiative would be to provide information leaflets provided by 'Destination City' partners including The Barbican, Museum of London, Guildhall School of Music & Drama, the City of London and others to all visitors and guests to the hotel. The abovementioned initiatives are examples as considered being material cultural and training opportunities for the area. The submission of a detailed Cultural Plan clearly identifying the cultural initiatives of the site will be secured by S106 agreement. An Employment and Skills Plan would also be an obligation to be secured by the S106 agreement.
255. The site has, by reason of its location, design and position of pocket garden, a great potential for the display of high quality public art. The commission would be developed in collaboration with communities and stakeholders within and around the site and reflect the history and the heritage of the area. It is envisaged that the artwork will be site-specific and visible or within the pocket garden. This could be in the centre of the pocket garden and within the eastern wall of the building. The public art would be designed for an outdoor work and the robustness and quality of materials will be a key consideration and would be maintained by the applicant. An important requirement would be the engagement with local artists, local arts initiatives and organisations and local stakeholders. Some examples of potential public art on the eastern wall have been submitted by the applicant including the installation of 2D glass/panel art, a metal sculpture or lighting installation. Artistic metal work is also proposed to be installed on the entrance gates of the servicing yard. These ideas are considered acceptable and would be able to be further developed and secured via a 'public art' obligation in the S106 agreement.

256. The site by reason of its location near visitor attractions and the rail stations, it is also an opportunity area for the provision of wayfinding tools. The provision of clear wayfinding would be secured by condition.
257. It is therefore considered that, subject to a detailed Cultural Plan and Public Art provision secured in the S106 agreement which would establish monitorable deliverables for cultural initiatives and on site public art which would respond to history and culture of the local area and be informed by a continuing dialogue with stakeholders and the local community, the policies referred to above would be complied with.

## **Highways and Transportation**

### Public Transport

258. The site has the highest level of public transport provision with a public transport accessibility level (PTAL) of 6B. Barbican station (Metropolitan, Circle, and Hammersmith & City Lines) is located approximately 60m from the site. Farringdon station and St Paul's station are also located in proximity to the site (less than 600m). These stations provide good connection to destinations across London.
259. There are also 12 day-time bus routes which are available within a 300m walking distance of the site. Bus routes provide access to destinations such as Kings's Cross Station, Oxford Circus and Walthamstow Central. The closest eastbound and westbound bus stops to the site are located approximately 90 metres away.

### Trip generation

260. Within the Transport Assessment a trip generation forecast has been conducted for the site which identifies the net change in trips that would result from the proposed development. The assessment has used TRICS travel data from similar developments within London with similar PTAL ratings which are considered suitable comparator sites.
261. A net trip generation assessment has been undertaken on account of the proposals to replace an existing office use with the proposed hotel use. This assessment identifies that there would be expected to be a net reduction in two-way trips during the AM and PM peak hours.
262. The servicing trip generation of the site has also been forecasted to reduce for the proposed development scenario. The existing building has been calculated to generate approximately 10-12 vehicles per day to service the office and retail elements. The proposed development is forecasted to generate up to 5 deliveries per day. It is therefore considered that the

proposals would result in a reduction of servicing vehicles of 5-7 vehicles per day.

263. It is proposed that a wholesale consolidator would supply general supplies such as consumables, stationery, beverages and non-perishables). A Delivery, Servicing and Waste Management Plan (DSWMP) will be implemented for the hotel to control and manage the number and timing of deliveries arriving and departing the Site, and a daily vehicle cap (five vehicles) will be enforced via obligation.

#### Access

264. Visitor access to the hotel use will be made available from the frontage of the Site onto Long Lane. The hotel entrance point provides access to the hotel lobby which will host a guest lounge and reception.
265. Staff access will be provided via a dedicated staff entrance-controlled gate taken from the north of the outdoor café area leading to a rear staff entrance, located alongside and via the safeguarded access route along the northern boundary of the Site. This access also provides an access route for cyclists, where an internal lift can be accessed internally to reach the basement cycle storage.
266. The existing Site provides two vehicle crossovers. With the proposals only requiring a single access point, one of the existing vehicle crossovers will be removed and as part of the proposed development.
267. Vehicular access will be retained for delivery and servicing vehicles as per the existing situation with vehicles up to and including a 3.5t box van, 4.6t panel van and small refuse vehicle able to service on-site and access and egress the site in forward gear.

#### Drop-Off and Pick Up Activity

268. It was suggested by the applicant within the Transport Statement that "Taxis undertaking pick-up/drop-off activity to the Site will be able to make use of the single yellow line kerbside adjacent to the Site". However, officers have concerns regarding the safety implications of such vehicle manoeuvres in recognition of the advisory cycle lane which runs along the frontage of the site.
269. It was therefore advised to the applicant that pick up/drop-off activity within the frontage of the site would not be permitted and, it should be arranged to be carried out in the vicinity of the site, where road safety can be maintained. There are locations nearby the proposed development, whereas pick up/drop-off can be carried out, without compromising road safety.

270. It is preferred by officers to see mandatory separation of the cycle lane along the frontage of the site, to assist with the safety of cyclists and that, the current loading/unloading restrictions are reviewed. The installation of the mandatory cycle lane (separated by a solid white line) would also prohibit the use of this section of carriageway for drop-off activity and would thereby deliver an additional public benefit for the scheme.
271. The revised traffic order for loading/unloading and the revised cycle arrangements will be delivered as part of the Section 278 works.

### Servicing

272. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing. It is proposed to retain the existing on-site service yard.
273. It is expected that up to 5 servicing vehicle movements a day would be generated by the proposals, and it is considered that one servicing bay is sufficient to accommodate the forecasted demand. All vehicle movements associated with the proposals would take place off the public highway.
274. The existing service yard is constrained and as a result, larger vehicles are unable to access and egress the site in forward gear. The applicant has demonstrated via swept path analysis that 3.5t box vans, 4.6t panel vans and small refuse vehicles can access / egress the site safely; the applicant has accordingly agreed to limiting service vehicles to these sizes and this would be secured by obligation.
275. The applicant has also agreed to limit servicing hour to outside of peak hours to reduce impact on the public highway, so no servicing will take place between 07:00-10:00, 12:00-14:00 and 16:00-19:00 in accordance with policy.
276. A Delivery and Servicing Management Plan would be applied as an Obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1.

### Disabled Motor Vehicle Parking

277. An allocated space on site has not at this point been made for the provision of disabled motor vehicle parking due to the constraints of the ground floor layout and conflict with off street delivery vehicles. It is acknowledged that local disabled parking is available on the local highway as mentioned in the submitted Transport Assessment. However, blue badge bays on the public highway cannot be guaranteed for employees or visitors accessing the proposed development. The blue badge bays less than 50 metres walk to

the building are also limited to a maximum stay of 4 hours, which makes them unsuitable for stays of a longer duration.

278. CoL's Local Plan DM16.5 outlines that's "*designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use.*" TfL's The London Plan T6.5 outlines that "*all non-residential elements should provide access to at least one*" Blue Badge Bay.
279. Therefore, the provision of one blue badge parking bay in the vicinity of the site together with associated valet service to secure movement to and from the site will be secured within the S106 as an obligation.

Cycle Parking

280. London Plan Policy T5 (Cycling) requires cycle parking be provided at least in accordance with the minimum requirements set out within the plan. Policy T5 (Cycling) requires cycle parking to be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and that developments should cater for larger cycles, including adapted cycles for disabled people.
281. The level of cycle parking proposed as part of the development accord with London Plan minimum requirements for long and short stay cycle parking, as shown in the table below.

London Plan long stay cycle parking requirements	Proposed long stay cycle parking	London Plan short stay cycle parking requirements	Proposed short stay cycle parking
10	10	6	6

282. The long stay cycle parking includes the provision of 10 long stay cycle parking spaces, which would be provided as 4 two-tier bike stands (8 spaces), as well as a Sheffield stand, offering space for one larger cycle and one standard cycle.
283. The cycle spaces are provided for both staff and visitors to the hotel. Visitors will be able to use the cycle store by presenting their bicycles to the hotel reception. Staff will then wheel the cycles to the basement accessing the cycle store.
284. The long stay cycle parking is proposed at basement level, which is accessible via a cycle lift, which exceeds the minimum required size of 2.3m x 1.2m as per the London Cycle Design Standards (LCDS). The lifts provided would therefore be sufficient in size to accommodate all types of

cycle and would have the capacity to accommodate more than one cycle and officers are satisfied that it has sufficient capacity.

285. Shower and changing facilities would also be available for staff at basement, with guests of the hotel expected to utilise their private room facilities.
286. The short stay cycle parking (3x Sheffield Stands / 6x spaces) is currently proposed within the public realm pocket park, which does not comprise public highway.
287. Full details of the final cycle storage layout will be secured by condition.

#### Over sailing and basement alterations

288. The scheme does not propose any basement/undersailing or oversailing requirements.

#### Travel Plan

289. Travel Plans are an effective tool for managing visitors, volunteers and employees at a site by helping to promote sustainable transport and raising awareness of their benefits.
290. A Workplace Travel Plan would need to be secured as a section 106 planning obligation in order to meet London Plan policy T4 and Local Plan Policy 16.1. The travel plan would need to be approved by the CoL prior to completion of the proposed works. This would include a requirement for a Travel Plan Co-ordinator to be appointed no less than 3 months before occupation.
291. Transport for London encourages developers to use the TRICS database for trip generation predictions. We will require the applicant to undertake a TRICS after study and provide TfL and the CoL with the results on completion of the development. TfL would then be able to update the TRICS database with the trip generation results for the use categories associated with this development, after the operational surveys and results would be secured by Section 106 agreement as part of the Travel Plan review and monitoring process.

#### Management of Construction Impacts

292. An outline Construction Logistics Plan (CLP) has been prepared by the applicant. The Outline CLP identified an estimated programme length of approximately 3 years.

293. The current document is outline in nature and a detailed CLP would be secured by condition. Details of measures to be adopted must be provided within the detailed CLP which should be prepared following the appointment of a Principal Contractor. The outline document is considered acceptable in principle on the basis that details cannot at this stage be committed to with certainty.
294. The proposed vehicle routes and any on-street construction requirements e.g. pit lanes etc. will also need to be discussed with City Operations officers before the detailed CLP can be discharged. A Road Safety Audit (RSA) is required for any construction logistics proposals to ensure the safety of all users within the vicinity throughout construction.
295. The Applicant has agreed to the provision of a pre-commencement condition to provide a Detailed CLP alongside an RSA and Designer's Response, supporting the CLP.
296. The detailed CLP should consider the following points:
- Construction vehicle routes to and from the site will need to make the most efficient use of the highway network in the Central London Area. Such routes will require discussion with Highways Management.
  - We will expect the Principal Contractor to prepare travel planning guidance to encourage workers to use sustainable transport instead of private motor vehicles.
  - Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).
  - Traffic congestion is already an issue in the CoL, particularly during morning and afternoon/evening peak periods. We will therefore expect construction vehicle movements to be scheduled to avoid 0800 to 0930 and 1600 to 1830 hours on Monday to Friday.
  - Details will be required to describe how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.
  - A Road Safety Audit.
  - The site would be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety (CLOCS) scheme:
  - <http://www.clocs.org.uk/standard-for-clocs/>
297. The CoL needs to ensure that the development can be implemented without being detrimental to amenity or the safe and efficient operation of the highway network in the local area. Therefore, a CLP would be secured via condition to ensure the construction and demolition of the site is in accordance with The London Plan Policy T7 and DM16.1 of the CoL Local Plan. This would provide a mechanism to manage/mitigate the impacts



which the proposed development would have on the local area. The CMP would need to be approved prior to works commencing on site.

Additional TfL comments.

298. In addition to comments already addressed in this report TfL have also requested the following, *“We also recommend schematic, or concept design drawings are produced to show a package of Section 278 (S278) works to support the scheme, enhancing Quietway 11 as required by London Plan policy T5 (Cycling). This should cover both sides of Long Lane between its junctions with Cloth Street and A1 Aldersgate Street. The carriageway should be resurfaced at least.”*
299. While we support TfL’s goal to make improvements to links through the area, it is considered that the scale of improvements requested is beyond what could be reasonably expected of this development. It has however been requested of the applicant that improvements to the on-street cycle facilities are delivered along the site frontage, as is considered reasonable and proportionate to the proposals. These works are discussed in further detail below.
300. TfL also requested the following, *“The existing on-street parking and loading bays across the street on Long Lane should be surveyed for existing levels of occupancy prior to determination. As many of them as possible should be reduced/removed in the final local highway arrangement.”*
301. Whilst the principle of the removal of on-street car parking and loading spaces could be supported by City officers, it is considered that the requested removal is not required or relevant to the proposals / application in this instance.

S278 Agreement

302. As part of the outlined alterations to the public highway, the applicant has agreed to enter into a section 278 agreement with the highways authority to improve the existing footways and on-street cycle facilities to provide better surroundings for the new occupiers and pedestrians.
303. The applicant is required to enter into a Section 278 Agreement of the Highways Act 1980, prior to the occupation of the site for the following works, but not limited to:

Long Lane

- Alterations to loading/unloading restrictions within the vicinity of the site and associated traffic orders
- Improvements to the existing cycle lane arrangements to deliver cycle segregation

- Repaving of the existing footways fronting the site in Yorkstone paving
- Repair works to the adjacent highways
- Removal of redundant dropped kerbs
- Provision of crossovers

304. Repairs to the damaged highways following construction works, will be secured through the S278 Agreement.

### CONCLUSIONS

305. The proposals are acceptable in transport terms subject to the necessary conditions and obligations as discussed above.

306. Should planning permission be granted the following S106 planning obligations and conditions, along with a s278, would need to be secured:

- A condition to secure a Construction Logistic Plan (CLP). The Section 106 agreement shall state that the CLP shall be approved prior to any works starting on site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. It should also restrict HGV movement to and from the site to within the hours of 9:30 to 16:30 Monday to Friday, 8 till 13:00 Saturdays and fully restrict movement on Sundays and Bank Holidays unless agreed with the CoL in advance.
- A Section 106 planning obligation to secure a Travel Plan (TP) for the development. The Section 106 agreement shall state that the TP shall be approved prior to the first occupation of the site and the approved plan shall be followed, unless otherwise agreed with the Highway Authority. The Section 106 agreement shall require the applicant to undertake a TRICs after survey and to provide TfL and CoL with a copy of the results as part of the travel plan review and monitoring process.
- A Section 278 agreement to secure highway improvement works and repair works in the vicinity of the site as noted and any other works deemed necessary to integrate highways arrangements.
- A condition requiring the provision of 10 long stay cycle parking spaces, 6 short stay cycle parking for the entire development, designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved, and approval should be reserved by condition.
- A Section 106 planning obligation to secure a Delivery and Servicing Management Plan (DSP). The Section 106 agreement shall state that the SMP shall be approved prior to the first occupation of the site and a consolidation provider should be identified in advance of preparation. The approved plan shall be followed, unless otherwise agreed with the Highway Authority.

### **Environmental Impact of Proposals on Surrounding Area**

307. Local Plan policy DM10.1 requires the design of development and materials used should ensure that unacceptable wind impacts at street level and in

the public realm be avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy 10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Emerging City Plan 2040 Strategic Policy S8 and Policy DE7 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivers improvements in air quality, open space and views.

#### Wind Microclimate

308. Policies DM10.1 of the Local Plan 2015, Policy S8 of the draft City Plan 2040 and Policy D8 of the London Plan seek to optimise wind conditions in and around development sites. The design of development should avoid unacceptable wind conditions.
309. The proposed development is 33.4 metres high and therefore, the recommended approach in accordance with the Wind Microclimate Guidelines is to carry out one type of testing. The applicant has submitted a Wind Microclimate Planning Assessment based on qualitative evaluations of the wind comfort and safety to pedestrians, cyclists and vehicles according to the standard Lawson criteria.
310. For the purposes of this scheme Computational Fluid Dynamics (CFD) simulations or wind tunnel testing should be submitted. The applicant has provided an assessment based on qualitative evaluations from findings from desk top studies and previous wind tunnel and planning studies. Although it is considered that sufficient information has been provided at this stage for the assessment of the wind impacts of the proposed development considering its scale, it is considered that the results of either CFD or tunnel testing shall be secured to the submitted approved by the Local Planning Authority prior to the commencement of the development to ensure that the findings of the qualitative analysis are accurate and to agree the details of any mitigation measures required.
311. 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 Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London, being 5 Comfort Categories defining suitable conditions for frequent sitting, occasional sitting, standing, walking and uncomfortable.
312. A separate safety criterion is also applied to ascertain if there are any safety risks to pedestrians or cyclists.

313. In considering significance and the need for mitigation measures, if resulting on-site wind condition 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 result of development. If wind conditions become windier but remain in a category suitable for intended use, or if there is negligible or beneficial effect, wind mitigation is not required.
314. Both winter and summer seasons have been assessed.
315. Two scenarios have been tested:
- Existing baseline
  - Proposed development in existing surroundings (same as the future surroundings, due to the fact that no future schemes have been identified within 100m from the site)

#### Existing Baseline Conditions

316. The conditions at the existing Site would be classified as acceptable for 'Standing' to 'Walking' use during the windiest season and primarily suitable for 'Occasional Sitting' and 'Standing' use during the summer season. There are no areas where the safety thresholds would expect to be exceeded.

#### Proposed development with existing surrounding conditions

317. The proposed building would be taller than the buildings to the north and south and that immediately adjacent to the west, however, similar or lower to other buildings to the southeast and east.
318. The submitted assessment advises that in the winter, conditions along the Long Lane are expected to be in the 'Standing' range with some local areas of 'Walking' at the corners. These conditions are acceptable for pedestrian access all year round but are too high for regular seating areas in winter.
319. In the summer, conditions are expected to primarily be suitable for 'Occasional Sitting' to 'Standing' use, same as the existing baseline scenario.
320. The main entrance onto Long Lane with the barrel doors in on the south facade of the building will experience some winds from the prevailing south-west winds but is sheltered from secondary north-east winds. Conditions at this entrance will be within the limit for entrances all year round.

321. The main retail entrance fronts the pocket garden to the east of the building and is exposed to 'Walking' conditions in the winter. These conditions are one category above what is required for main entrances. Local landscaping or side screens should be placed on either side of the entrance to provide local shelter.
322. The seating area in the pocket park to the east of the development would be for occasional use in good weather. 'Standing' to 'Occasional Sitting' wind conditions are expected in the summer.
323. There are no areas where the wind speed is expected to exceed the safety threshold.

#### Wind Microclimate Conclusion

324. On the basis of the above, it is noted that the wind conditions are expected to slightly increase from the existing conditions. Subject to appropriate mitigation measures, it is considered that all thoroughfare, entrances and ground-level amenity spaces would be suitable for their intended use. Conditions across the site are acceptable for all other uses, including use by cyclists.
325. Overall, the wind microclimate impact of the proposed development is considered acceptable. A Wind Audit would be secured in the S106 Agreement which would require a post-completion audit to assess and compare the results in the Wind Tunnel test against the result of wind speed assessment carried out in the vicinity of the site over a specified period, to identify if the completed development has material adverse effects.
326. It is considered that the microclimate in and around the site, with regard to wind conditions, would be acceptable in accordance with London Plan Policy D8, Local Plan Policy DM10.1 and draft City Plan policies S8 and DE2, and the guidance contained in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London.

#### Daylight, Sunlight, Overshadowing

327. Policy D6(d) of the London Plan states that the design of development should provide sufficient daylight and sunlight to surrounding housing that is appropriate for its context.
328. Local Plan Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.

329. Draft City Plan Policy DE8 states that development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines.
330. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the Draft City Plan 2040 states when considering on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
331. The BRE guidelines "Site layout planning for daylight and sunlight - A guide to good practice" (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light:
- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. 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 states that diffuse daylighting of an existing building may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
  - **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchens and bedrooms to be less important, but that care should be taken to not block too much sun from these rooms.

#### Interpreting results

332. In undertaking assessments, a judgement can be made as to the level of impact on affected windows and rooms. Where there is *proportionately* a less than 20% change (in VSC, NSL or APSH) the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-

site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

### Overshadowing

333. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces.

### Assessment

334. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the Building Research Establishment (BRE) Guidelines and considered having regard to policy D6 of the London Plan, policy DM 10.7 of the Local Plan and policy DE8 of the draft City Plan. The impact of the development on the nearby residential properties has been assessed. It is noted that all other non-residential properties in the vicinity of the site are of commercial use, apart from a school to the northwest of the site, that they do not have the same expectation for daylight and sunlight as the domestic properties.
335. It is noted that additional information has been submitted by the applicant during the process of the application addressing concerns and comments raised by residents regarding daylight and sunlight impacts.
336. The residential/sensitive use buildings to be considered are those at:
- Griffin Court, 13-17 Long Lane (residential);
  - 3 Hayne Street (residential) (incorrectly labelled as '3 Hayden Street' in Section 5.2);
  - 38-39 Charterhouse Square (nursery/school);
  - 40 Charterhouse Square (school);
  - 12 Carthusian Court (residential);
  - 15 Carthusian Court (residential);
  - 80-83 Long Lane (residential);
  - 78-79 Long Lane (residential);
  - 76 Long Lane (residential);
  - 74-75 Long Lane (residential);
  - 24-25 Middle Street (residential);
  - 23 Middle Street (residential);
  - 22 Middle Street (residential);
  - 15-17 Middle Street (residential);
  - 5 Cloth Street (residential) (incorrectly labelled as '3 Cloth Street');
  - 4-5 Middle Street (residential);
  - Sedon House (residential);

- Lauderdale Place (residential);
- John Trundle Court (residential);
- 41-43 Charterhouse Square (3 separate residential buildings); and
- 18-21 Middle Street (assumed office).

337. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and for non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding the application site fall into the category contemplated by the BRE where occupiers have a reasonable expectation of daylight, and officers do not consider that the surrounding offices have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same policy test requirements as residential premises. The dense urban environment of the City, is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight levels to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground floor and above without the benefit of direct daylight and sunlight.

#### Daylight and Sunlight

338. Daylight has been assessed for both Vertical Sky Component (VSC) and No Sky Line (NSL), these are complementary assessments for daylight: VSC is the measure of daylight hitting a window, NSL assesses the proportion of a room in which the sky can be seen from the working plane. Daylighting will be adversely affected if either the VSC of the NSL guidelines are not met.
339. The BRE criteria state that a window may be adversely affected if the VSC measured at the centre of a window is less than 27% and less than 0.8 times its former value (i.e. experiences a 20% or more reduction.) In terms of NSL, a room may be adversely affected if the daylight distribution (NSL) is reduced beyond 0.8 times its existing area (20% or more reduction).
340. Both the London Plan 2021 and the draft City Plan 2036 require daylight and sunlight to residential buildings to be appropriate to their context, and



this will need to be considered alongside reductions in daylight and sunlight assessed under the BRE methodology.

341. The applicant has submitted a Daylight, Sunlight and Overshadowing report and a Daylight and Sunlight Radiance Addendum. A third party review was then commissioned by the Local Planning Authority to review the findings of the reports. The advisor agrees with the scope of assessment in terms of the properties selected to be reviewed.
342. Of the buildings assessed, the following are considered to fully meet the BRE criteria for daylight and sunlight. This has been agreed with the third party reviewer.
- Griffin Court, 13-17 Long Lane
  - 3 Hayne Street;
  - 38-39 Charterhouse Square – it is noted that as part of the initial Daylight and Sunlight assessment submitted by the applicant this property was assumed to be a mixed-use building including educational and commercial uses. However, a Daylight and Sunlight addendum has been submitted correcting this information. According the plans submitted as part of the approved planning permission for the change of use of the offices to education (19/01239/FULL) the windows on the south elevation from first to third floors serve circulation areas and those on the fourth floor serve a plant room instead of classrooms. Although according to the BRE guidelines these rooms would not need technical assessment, the submitted addendum has assessed all these windows against VSC, NSL and APSH. The results show that all windows meet the VSC and NSL BRE guidelines for daylight. Furthermore, the APSH results show that all rooms retain very good levels of sunlight with the Proposed Development in place, which exceed the BRE guidelines recommended criteria;
  - 40 Charterhouse Square;
  - 15 Carthusian Court;
  - 80-83 Long Lane;
  - 78-79 Long Lane;
  - 76 Long Lane;
  - 74-75 Long Lane;
  - 24-25 Middle Street;
  - 23 Middle Street;
  - 22 Middle Street;
  - 3 Cloth Street;
  - 4-5 Middle Street;
  - Sedon House;
  - John Trundle Court; and
  - 18-21 Middle Street.
343. The impact on the remaining buildings is outlined below.

### 12 Carthusian Court

344. This is a mixed-use property located to the north of the Site. There is residential accommodation from 4th floor upwards of the building.
345. Of the 35 windows assessed, 33 (91%) would meet BRE criteria when assessed against the VSC daylight methodology. The three windows that do not meet the standards experience minor VSC reductions between 20.09% and 24.33% against a BRE target value of 20%, however, retain VSC values between 15.91% and 19.83%.
346. When assessed against the NSL daylight methodology, 21 out of 24 (88%) rooms meet BRE criteria for this assessment. Three rooms (R1/24, R3/24 and R5/24) will experience NSL alterations between 25.3% and 33%. The impacted rooms will retain NSL values between 66% and 73%.
347. The APSH results provided in Appendix 7 confirms that all windows relevant for sunlight assessment meet BRE criteria.
348. Given that the impacted windows experience minor VSC alterations and the rooms retain NSL values that are commensurate of what would be expected within a dense urban environment, it is considered that the impacts on daylight to this property would be acceptable.
349. It is also noted that the differences between the proposed and consented scheme are also minor, with the highest being 1.14% actual reduction in VSC between the two schemes. It is therefore considered that the impact of the development on this property would be acceptable in terms of daylight.

### 15-17 Middle Street

350. This property is located to the south of the application site. This property is registered as residential property in the City's records.
351. When assessed against the VSC daylight methodology, 11 out of 13 (85%) windows meet BRE criteria. The two windows falling short of guidance experience VSC reductions of 20.02% and 20.48% against a BRE target value of 20%, which are considered minor.
352. For NSL, four out of eight (50%) rooms will meet the BRE criteria for this assessment. Two rooms (R2/273 and R1/274) experience minor NSL reductions of 26.5% and 24% respectively against a BRE target value of 20%. The remaining two rooms (R1/272 and R2/272) experience greater NSL transgressions in excess of 40%. These findings are based on assumed layout. Given that only two windows are going to be affected by the proposed development and taking into consideration the dense urban

environment that the property is located, it is considered that the overall daylight impacts will be minor adverse.

- 353. The development in comparison to the consented scheme at 1-12 Long Lane would result in marginal actual reductions in VSC up to 0.41%, which is considered negligible.
- 354. There are no windows that face within 90 degrees due south of the Site relevant for sunlight assessment.

#### 41 Charterhouse Square

- 355. This property is located to the north of the site.
- 356. Of the six windows assessed for VSC, four (67%) will meet BRE criteria. The two windows falling short of guidance experience minor VSC alterations of 22.91% and 26.31% against a BRE target value of 20%. This is considered being a minor adverse impact.
- 357. Three of the four rooms assessed for NSL will meet BRE criteria. The single room falling short of guidance has been identified as a bedroom and will experience a NSL alteration of 56.4%. The room is served by a small single window recessed beneath a roof overhang and therefore, these factors combined with the windows orientation over the Site means that the daylight distribution within the room will inevitably reduce beyond BRE criteria. The Applicant has run a separate assessment whereby the self-obstructing overhangs or balconies have been notionally removed in accordance with paragraph 2.2.13 of the BRE Guidelines. The outcome of this assessment demonstrates that all windows will meet the BRE criteria against the VSC daylight methodology.
- 358. Given that only two windows experience a minor reduction in VSC and that the NSL impacts are isolated to one bedroom, which in accordance with the BRE criteria is not afforded the same amount of protection in terms of daylight, it is considered that the impacts on this property will be acceptable. The actual change in VSC between the proposed and consented schemes is again very minor (1.16% actual reduction the highest).
- 359. The APSH tabular results confirm that all windows relevant for sunlight assessment meet BRE criteria.

#### 42 Charterhouse Square

- 360. This property is located to the north of the application site. The applicant has submitted a daylight sunlight assessment. The assessor has obtained

access to the 2<sup>nd</sup> and 3<sup>rd</sup> floor flats and have used the Land Registry lease plans for the 1<sup>st</sup> floor flat.

361. When assessed against the VSC daylight methodology, two of the 10 windows assessed will meet BRE criteria for this assessment. Of the eight windows falling short of guidance, six will experience minor VSC alterations between 21.13% and 28.39%. The remaining two windows (W28/401 and W34/402) will experience more moderate VSC reductions of 31.48% and 30.86% respectively and will retain VSC values of 13.56% and 14.9% VSC respectively. The windows on the southern side of the building facing the application site are obstructed by overhanging balconies or external stairwells. When the balconies/external obstructions are notionally removed, all eight impacted windows will experience minor VSC alteration between 21.07% and 28.79% and retain VSC values above 19% against a BRE target value of 27%.
362. For NSL, four out of six (67%) rooms meet BRE criteria, excluding the circulation space, as this does not need to be analysed in accordance with paragraph 2.2.2 of the BRE Guidelines. Two rooms identified as living areas experience NSL alterations of 41.3% and 30.8%. Both rooms retain NSL above 58%.
363. The actual reductions in VSC between the proposed and consented scheme are minor, not higher than 1.48%.
364. In relation to sunlight, all windows will meet BRE criteria for annual sunlight. Two windows will see winter sunlight levels reduced to 4%, which is only marginally below the 5% BRE target value for winter sunlight.
365. It is noted that an application (24/00155/FULL) is currently under consideration for some external changes to the third floor flat. Although not required planning permission, some internal changes have been shown on the submitted plans. The internal changes would replace the current office, outside space and hall/ extended living room area to a loggia and solarium. The bedroom on the eastern section of the flat is retained as existing. The applicant in the submitted Daylight and Sunlight addendum has considered the potentially amended layout, assuming that there will be glazing behind the solarium providing light to a kitchen and dining area. There will be two windows experiencing minor VSC alterations of 21.1% and 23.3% against the BRE target value of 20%. These impacts are considered being minor adverse. No NSL reductions will be experienced in the solarium area.

#### 43 Charterhouse Square

366. This property is located to the north of the application site. Outline floorplans for these properties at 1<sup>st</sup> to fourth floors have been found by the assessor

within the lease held by the land registry and the City of London archives. The applicant has confirmed that access to the second floor flat, which is also linked with the third floor, which southern window served a bedroom.

367. For VSC, 6 out of 11 (55%) windows meet the BRE criteria for this assessment. Three windows will experience VSC alterations between 20.66% and 20.81%, only marginally below the BRE target value of 20%. The remaining three windows have low existing VSC values between 12.24% and 15.44% and will be reduced to between 6.42% and 9.15% in the proposed scenario. All windows, apart from that on the top floor, are obstructed by overhanging balconies/fire escapes, when removed, the windows assessed will either meet BRE criteria or experience minor alterations. All windows will retain VSC values between 17% and 27% in this scenario.
368. All but one room will meet BRE criteria when assessed against the NSL daylight methodology. The impacted Living/Kitchen/Diner will experience a minor NSL alteration of 22.3%, which is considered acceptable.
369. In comparison with the consented scheme, the proposed development would result in minor increase in the actual reduction in VSC, not greater than 1.37%.
370. For APSH, one bedroom window serves a bedroom and will see annual sunlight levels reduced to 23% which is marginally below the BRE target value of 25%. In relation to winter sunlight, three windows will see sunlight levels reduced to between 1% and 2% against a BRE target value of 5%. When balconies are removed, all but one window will meet BRE criteria for APSH. The single window falling short of guidance will see winter sunlight levels reduced to 4%, marginally below the BRE target value of 5% for winter sunlight. Taking into account the nature of the urban environment in this area, it is considered that this reduction will be acceptable.
371. When considering the impacts against contextual factors, including the balconies removed assessment and alternative target values for VSC, it is considered that the impacts to and the retained levels of daylight and sunlight are commensurate of what would be experienced within a dense urban environment such as the City of London.

#### Overall impact on 41 to 43 Charterhouse Square

372. It should be noted that although the window map drawing for 41-43 Charterhouse Square was not provided in the originally submitted Daylight and Sunlight Assessment, annotated photographs and images were provided in the body of the report which indicated each window label for 41-43 Charterhouse Square that was assessed and reported on. Following

comments raised by residents the applicant has submitted the window map for these properties.

373. Residents have also produced a set of images suggesting what the view/outlook from their windows would be following the construction of the development. The applicant's daylight and sunlight consultant has responded that *"It is unclear how accurate the overlays on these photographs are, but more importantly, reviewing images such as this are not 'tests' recognised by the BRE guidelines or City Planning Policy. We have carried out quantitative assessments that can be considered against the guidance set out in the BRE guidelines including our alternative target value assessment, which the Building Research Establishment recognise is a principle endorsed by the BRE guidelines"*. The Local Planning Authority can only rely on and assess tests that accord with the BRE guidelines. Officers therefore concur with the consultant's suggestion that the submitted drawings would not be able to be assessed as their accuracy is uncertain and they not aligned with the BRE requirements.
374. The flats at Charterhouse Square have large windows, and normally this would allow adequate daylight with lower vertical sky components, typically in the 18-25% range. However, the apartments are unusually deep in plan (around 20 metres front to back), which means that a greater access to daylight is needed to achieve daylight distribution throughout the depth of the room. In this scenario the parts of the room furthest away from the window would have greater sensitivity to a potential loss of a view of the sky as a result of a reduction in the vertical sky component. Consequently, the increased height and massing proposed as part of the new development would result in larger non-daylight areas on the first and second floors within some of these flats. However, it is noted that the properties are dual aspect, having windows overlooking Charterhouse Square to the north and daylight from that direction would be unaffected by the proposal.
375. Overall, taking account of the impact of the existing balconies/fire escapes on the amount of sky visible from the windows of these apartments, the depth of plan of the rooms that the windows serve, and the fact that the flats are dual aspect, the retained levels of daylight and sunlight would be commensurate what would be experienced within the dense urban environment of the City of London.

#### Lauderdale Place

376. This is a residential building located to the east of the application site and it is a residential building.
377. All windows and rooms assessed will meet BRE criteria when assessed against the VSC and NSL daylight methodologies.

378. In relation to sunlight, it is stated throughout the report that 100% of rooms meet criteria against the APSH sunlight assessment. In accordance with paragraph 3.6 of the BRE Guidelines, sunlight impacts on the neighbouring windows and not rooms should be reported. The reviewer has assessed the sunlight results which confirms that seven windows will fall short of guidance for annual sunlight. All affected windows have low existing annual sunlight levels between 3%-4% against a BRE target value of 25% which are further reduced to between 2-3%. Such alterations would not be noticeable and are disproportionate to the actual impact. All windows assessed will meet BRE criteria for winter sunlight.

#### Comparison of impacts with the consented scheme (18/01020/FULMAJ)

379. It should be noted that the application site benefits from planning permission for an office development at 1-12 Long Lane. The previously consented scheme was resulting in further daylight impacts on Griffin Court (13-17 Long Lane), 38-39 and 40 Charterhouse Square and 80-83 Long Lane. It is noted that the current development meets the BRE criteria for those properties. The reason being is that the current scheme is does not include redevelopment of the building at 9-12 Long Lane.
380. As noted above, the additional impacts on the properties that are affected by the proposed development in comparison with the consented scheme are very minor and are not considered to result in significant further impacts on terms of daylight and sunlight to an extent that would warrant refusal of the application on those grounds.

#### Conclusion

381. Of the buildings assessed, the majority of the surrounding properties would not experience any noticeable reductions in the daylight that they currently receive. The properties that would experience noticeable reductions in daylight are those that are closest and to the north of the application site; 41-43 Charterhouse Square. The impact on daylight to properties in Charterhouse Square can, in part, be attributed to the presence of existing obstructions to windows and the depth of the rooms that the windows serve. Without these obstructions in place the windows in these properties would experience only minor reductions in daylight and would retain good levels of VSC. Considering the urban nature of the City it is considered that the impacts of the development would not be detrimental to the amenity of the nearby residential occupiers to such an extent that would warrant refusal of the application on these grounds..

382. Loss of sunlight it not an issue for many of the properties assessed as many of the windows face northwards. Where windows have been assessed only a small number would experience a loss of sunlight.
383. Overall, the daylight and sunlight impact of the proposed development on neighbouring properties is considered to be acceptable and in accordance with the requirements of Local Plan Policy DM10.7 and DM21.3

#### Sunlight to Amenity Spaces

384. The potential impacts of the Proposed Development on the sunlight availability on surrounding amenity areas has been assessed. A third-party review on the findings of the daylight, sunlight and overshadowing report has also been carried out.
385. The nearest open space to the application site is a courtyard serving 15 Carthusian Court and a public amenity space at Charterhouse Square. It is noted that no detailed overshadowing assessments have been carried on these spaces. The courtyard at 15 Carthusian Court sits in the shadow of the existing surrounding properties, as such, it is unlikely the proposed development will create any additional overshadowing. Charterhouse Square has also been excluded from overshadowing assessments given the separation distance from this Site. It is also noted that there is a public amenity space on the first floor of John Trundle Court located to the east. Given its separation distance from the Site, it is not considered that the development would result in any further overshadowing to this space.

#### Solar Glare

386. Policy D8 of the London Plan, Local Plan policy DM10.1 and draft City Plan 2036 policy DE8 require development to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm.
387. Although no report has been submitted regarding solar glare and convergence, it is considered that due to the design of the building, with vertical rather than sloped, convex or concave facades, the impacts from solar glare or convergence would be limited. Furthermore, the facades of the building are not made of primarily large areas of reflective glass. The elevational design of the building is such that there is a balance between the glazed and bricked elements.
388. For the aforementioned reasons., it is considered that the no further assessment of the solar glare impacts of the development is required, as these are expected to be minimal.



## Thermal Comfort Assessment

389. London Plan Policy D8 and D9 and the emerging City Plan 2040 Policy S8 indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings - wind, daylight, sunlight penetration and temperature conditions around the building and neighbourhood- must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
390. In accordance with the City of London Thermal Comfort Guidelines an outdoor thermal comfort initial planning assessment has been prepared. This report assesses the likely effects of the proposed development on the thermal comfort conditions in the public external spaces arising from the operational phases of the proposed development. Consideration is given to the likely effects of wind, sunlight, air temperature and humidity upon pedestrian comfort.
391. The technique involves merging the effects of wind, air temperature, humidity and solar radiation 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.
392. The Universal Thermal Climate Index (UTCI) categories have been modified for the City of London developments. The usage categories for thermal comfort is set out below and is used to define the categorization of a given location:

Usage Category	% of hours with Acceptable UTCI	Description	Colour
All Season	≥90% in each season	Appropriate for use year-round (e.g. parks).	Green
Seasonal	≥90% spring-autumn AND ≥70% winter	Appropriate for use during most of the year (e.g. outdoor dining).	Purple
Short-term	≥50% in all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.	Cyan
Short-term Seasonal	≥50% spring-autumn AND ≥25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.	Orange
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).	Red

393. Two configurations have been assessed including the following.
- Configuration 1: Existing baseline;
  - Configuration 2: Proposed development in existing surroundings (as these are the same as the future surroundings);

#### Existing Baseline

394. In the Thermal Comfort Assessment, it is stated that for the pedestrian realm immediately surrounding the site, most locations reported conditions in the “Seasonal” category, indicating that thermal conditions are within the acceptable comfort limits for more than 90% of the time during Summer, Autumn, and Spring season. During winter, the combination of higher wind speeds, lower temperatures, and low levels of solar radiation results in the UTCI values lower than 0°C, outside of the desired comfort range of 0-32°C, for about 25% of the time.
395. The area immediately adjacent to the east of the building is predicted to be outside of the acceptable comfort range for more than 50% of the time in Winter, while more than 70% of the time in the other seasons, resulting in “Short term seasonal” comfort category. This is predominantly due to high wind speeds expected at this corner and potentially can be improved by implementing appropriate wind mitigation measures.

#### Proposed development

396. For the proposed development the thermal comfort classification category for the pedestrian realm immediately surrounding the site did not result in a change from the baseline scenario. Most locations reported to be in “seasonal” category as the baseline existing scheme, achieving target acceptable range thermal comfort conditions for more than 90% of the time during Summer, Autumn, and Spring seasons. Frequency of comfort is predicted to reduce to about 75% of the time during Winter season.

397. Similar to the existing baseline the area immediately adjacent to the east of the building is predicted to be windy, resulting in “Short-term seasonal” comfort conditions.
398. With regards to the proposed terraces, thermal conditions are predicted to be in the “Seasonal” category, with about 80% of the winter season being within the acceptable comfort range, and over 90% of the time being in this range for the other seasons. The north facing terrace (point-9) is well-sheltered from wind and within the acceptable range for more than 90% of the time at all seasons, resulting in “All season” category.
399. For the lower level (smaller) terraces of the proposed development in both Configurations 2 and 3, they largely experience comfortable conditions for at least 90% of the duration of all seasons. The predicted year-round comfort grade is ‘All-season’.

#### Thermal Comfort Conclusion

400. The simulations indicate that thermal comfort conditions of the proposed development are very similar to the existing conditions and are suitable for their intended uses.
401. The submitted initial assessment shows that the thermal comfort in and around the site, would be acceptable in accordance with London Plan Policy D8 and Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London. However, a more detailed assessment should be carried out including mitigation studies using the full CoL guidelines. Subject to the imposition of a condition secured this, no objection is raised in terms of Thermal Comfort.

#### Light Pollution

402. Local Plan Policy DM15.7 and draft City Plan 2036 policy DE9 requires that development should incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
403. The proposed development would be predominantly of a traditional masonry construction with punched window openings. External lighting to the building would be limited to the central section of the elevation, towards the corner bookend of the building and a subtle wash of light at the low level of the sixth floor. Smaller lighting will be fitted at low level to the roof terraces. The submitted Sustainability Statement advises that all external lighting will meet the BREEAM requirements to minimise light pollution. It is also advised that lighting not required for safety and security will be turned off out of hours, to the lowest levels compatible with safety and security. External lighting will

comply with BS 5489-1:2013 'Lighting of roads and public amenity areas' to enhance safety and wellbeing in external areas.

404. To ensure that appropriate lighting levels are achieved externally and internally and to mitigate impacts of public realm and nearby residential properties, it is considered pertinent that a condition for the submission of relevant details of a Lighting Strategy and Lighting Concept are submitted for approval. This will have to be submitted prior to the occupation of the building and the details shall accord with the requirements as set out in the Lighting SPD, including but not limiting to details of all external lighting (street, amenity lighting illuminated advertisement etc) and internal lighting visible from the public realm or which could impact to residential amenity and the environment.

#### Overlooking, Privacy, Outlook and Overbearing Impact

405. Policy DM 21.3 of the Local Plan requires all development to be designed to avoid overlooking and seek to protect the privacy to adjacent residential occupiers. The same is reiterated in Policy HS3 of the draft City Plan 2040.
406. The site is surrounded by residential properties. The nearest are located to the north of the site (41-43 Charterhouse) and to the southwest is the flat at 80-83 Long Lane.
407. The proposed development would introduce terraces/balconies on the seven and eighth floors, primarily to the south and east of the building, albeit a recessed balcony is also proposed to the north on the eighth floor.
408. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not, inter alia, immediately overlook residential premises.
409. The majority of the terraces would be accessible via the individual guest rooms, albeit two terraces one on the eighth floor to the south and one on the seventh floor to the east would be available to be accessed by any of the guests. All terraces, including those that would be accessible from any guest of the hotel, are small in size and they would not be able to accommodate large number of crowds.
410. The proposed terraces to the south would overlook the highway. The nearest residential property, the flat at 80-83 Long Lane, would be located to the southeast of the building, approximately 15 metres away from the proposed balconies. Taking into consideration the distance maintained between the properties and the fact that the development would only result in minor oblique views towards the nearest residential property to the

southwest, it is not considered that the development would result in a material increase in overlooking to these neighbouring occupiers.

411. The proposed balcony to the north at eighth floor would be recessed and located more than 25 metres away from the nearest residential properties to the north, 43 Charterhouse. The rest of the residential units will be located further away from the proposed balcony. It is therefore considered that the balcony would not result in unacceptable overlooking or loss of privacy to these neighbouring occupiers.
412. There are further residential properties in the vicinity of the site; however, they are located a further distance away from the proposed development and therefore, it is not considered that the proposed terraces would result in overlooking. The noise impacts of the development are further assessed below in the relevant section of the report.
413. With regards to overbearing impacts, it is considered that the proposed development, although it would result in an increase in massing and height, it would be located a sufficient distance away from the neighbouring residential properties ensuring that no detrimental impacts on residential amenity are caused.

#### Air quality

414. 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 development to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction and transport of construction materials and waste must minimise air quality impacts and all combustion flues should terminate above the roof height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI of the London Plan.
415. An Air Quality Assessment as well as an Air Quality Positive Statement have been submitted with the application providing information about air quality.
416. Overall, there are a number of emission sources that are likely to affect the Application Site and may lead to exceedances of the Air Quality Objectives and World Health Organisation (WHO) guidelines within the local vicinity. It is stated that the proposed development intends to maximise the credits under the Health and Wellbeing Hea 02 section of the BREEAM accreditation scheme, as it is a requirement of the Local Plan. Specifically, the proposed development is targeting the production of an indoor air quality plan and emissions from construction products, such as using materials with

low VOCs (volatile organic compounds) content in accordance with the BREEAM requirements.

417. The submitted assessment advises that mitigation measures for on-site activities and traffic associated construction phases, including demolition works, will be implemented. It is suggested that during construction, the Contractor will be required to implement best practice guidelines for air, dust, and noise pollution on site. Furthermore, the site would be car-free and fully electric, with zero emissions from combustion technology, except for a diesel generator for life safety purposes. The development is air quality neutral in regard to both building and transport emissions. On that basis, it is considered that the proposed development would be unlikely to result in significantly adverse impacts on local air quality.
418. The City's Air Quality Officer has raised no objection subject to conditions in respect of generators, combustion flues, and Non-Road Mobile Machinery Register.
419. In light of the above and subject to conditions, the proposed development would accord with Local plan policy CS15, policies HL2 and DE1 of the draft City Plan 2036 and SI 1 of the London Plan which all seek to improve air quality.

#### Noise and Vibration

420. 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 any noise from plant should be at least 10dBa below background noise levels.
421. An Acoustic Assessment has been submitted which provides an outline assessment of the impact of noise and vibration on the surrounding area considering nearby noise sensitive receptors, including residential properties.
422. The noise climate around the site is mainly affected by road traffic and the nearby rail infrastructure. Other noise sources include mechanical plant serving nearby buildings, intermittent construction noise and occasional aircraft. Noise break-in to the development has also been assessed and sound insulation requirements for the building façades have been specified allowing for the future use of the closest railway tracks.
423. The proposed development includes a main plantroom at basement level, in addition to the roof top plant. In addition to this mechanical services equipment, there will be a generator and smoke extract fans located on the

roof which will be for emergency use only. These will be assessed once details of the equipment are available.

424. The outcome of the noise assessment has resulted in building services noise emission limits for fixed plant associated with the site. Limits have been set at the nearest existing external noise sensitive receptors and the proposed development will not exceed these limits. The Acoustic Assessment advises that the predicted noise emissions would be at least 2dB below the City of London criteria for the nearest residential receptors. To ensure that noise from plant is adequately controlled and minimised, conditions are recommended relating to plant noise and vibration.
425. Generally, in City redevelopment schemes, most noise and vibration issues occur during demolition and early construction phases. Impacts on neighbours from construction will be mitigated by ensuring that the Contractor complies with best practice under the Considerate Constructors Scheme (CCS). Details of noise and vibration mitigation, including control over working hours, types of equipment used, would be included in Schemes of protective works for Demolition and Construction Logistics Plan would be secured by condition.
426. The proposed development would incorporate terraces that would be mainly accessible from individual guest rooms, with the exception of one on the eastern part of the building and one on the southern part, albeit both of small size restricting levels of activity by their size. The development would also include improvements to an existing open area to the east of the site to create a pocket garden.
427. Residents have raised concerns that the proposed terraces would give rise to increased noise nuisance. With regard to the terraces that would be accessible from any hotel guest, although limited in size and capacity, it is considered reasonable that conditions are imposed to ensure that the noise impacts are adequately controlled and minimised. For that reason conditions are recommended relating to live and recorded music, hours of use, the closing of windows and doors to any bar or restaurant at ground floor.
428. With regard to the terraces to individual rooms, it is considered that by reason of their nature and limited size they would not be materially different to residential balconies. It is therefore considered that the potential noise generated by their use would be limited and not unacceptable in a residential area. It would have been unreasonable and unnecessary for a condition to be imposed restricting the hours of use of those terraces to individual rooms.

429. The proposed development will be car free. As a result, all vehicle trips generated by the development will be associated with delivery and servicing. It is expected that up to 5 servicing vehicle movements a day would be generated by the proposals, which would take place within the existing on-site service yard. It is noted that no residential units are located immediately adjacent to the service yard. However, restricted hours for deliveries and servicing will be secured by condition.
430. Subject to the proposed conditions, the proposals would comply with London Plan Policy D13 and D14, Local Plan Policy DM15.7 and draft City Plan 2036 Policy HL3.

#### Health Impact Assessment

431. Policy HL9 of the draft City Plan 2040 requires major developments to submit a rapid Health Impact Assessment to assess potential health impacts resulting from proposed developments.
432. Policy GG3 of the London Plan states that *“To improve Londoners’ health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans 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”*.
433. The applicants have submitted a Health Impact Assessment (HIA)/ Healthy City Planning Checklist assessing whether the proposed development would result in health impacts.
434. The submitted checklist sets out a list of questions to address whether matters around active lifestyle, healthy workplaces, safe and vibrant neighbourhoods and access to work and training have been considered for the proposed development. The applicant has considered how the development can achieve those requirements. A summary of how the above can be achieved is provided below:
435. HIA has identified information relating to the following eight key determinants of health:
- The proposed development would provide sufficient long and short stay cycle parking. Therefore, the development would promote sustainable ways of transport.
  - The Site is located within an area of excellent access to public transport, with numerous London Underground stations and services within walking distance.
  - the Proposed Development is car-free.



- The Proposed Development provides publicly accessible open space within the Site.
- The proposed Pocket Garden will provide fully accessible open space to children of all ages and it would replace an existing hard standing area. As such, the overall biodiversity of the site is significantly increased from the existing.
- The Proposed Development provides step free public realm and easy routes into the hotel and retail space.
- The construction project will be registered with the Considerate Constructors Scheme to minimize negative impacts on the local area. The contractor will follow a 'good housekeeping' policy at all times. The provision of a detailed demolition and construction management plan to ensure protection of local amenities will be also secured by condition.
- The Acoustic Assessment submitted with the application, advises that the predicted noise emissions would be at least 2dB below the City of London criteria for the nearest residential receptors.
- The proposed development would be Air Quality Neutral.
- The proposed development would provide step-free and accessible entrances to the building. The main visitor entrance would be a barrel door, which is a fully accessible entrance. Consideration has been given to accessibility and inclusivity across the site.
- The proposed development includes a mixture of accessible and non-accessible green terraces and a pocket garden, maximising the outdoor space.
- Active cooling is specified which will keep the building within acceptable temperatures. Shading will be provided to the pocket garden during the summer months.
- Proposed Development targets a BREEAM Excellent rating.
- The Proposed Development includes internal spaces that could be used as relaxation areas for staff, in addition to staff facilities.
- The proposed development can encourage social interaction in the lounge area of the hotel, as well as the pocket garden.
- The Proposed Development is targeting BREEAM UK NC V6.1. Mat 03 'Responsible Sourcing of Construction Products'. This requires the project team to assess the potential to procure construction products locally.
- The proposed development through the culture offer/public art opportunity will encourage engagement with local artists. Public realm art will be incorporated as well as wayfinding obelisks or maps.

436. It is considered that any potential negative impacts would need to be mitigated during the demolition, construction and operational phases, for example by employment of a scheme for protecting nearby residents from noise, dust and other environmental effects to mitigate dust emissions and address any adverse amenity impacts arising from demolition and construction. It is therefore considered that the impacts would be mitigated so far as possible by the requirements of relevant conditions.

437. Overall, it is considered that the development seeks to improve the health and addresses health inequalities. The residual impact would be acceptable, and the proposals would comply with London Plan policy GG3 and draft City Plan 2036 policy S1.

## **Sustainability**

### Summary of policy and guidance

438. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 and the emerging City Plan 2040 Policy S16 set out the City's support for circular economy principles.
439. Section 2.4 of the Mayor of London's Circular Economy Statements guidance (March 2022) sets out Circular Economy design approaches for existing buildings, with Para. 2.4.1 stating that the 'decision tree' should be followed to inform the design process for the development from the outset. In cases where there are existing buildings on site, the decision tree asks if it is technically possible to retain these buildings in whole or part. If so, the decision tree asks whether the existing building, or parts of these building, are suitable to the requirements of the site. If the answer is 'yes in whole', the guidance indicates that the building should be retained and retrofitted. If the answer is 'yes in part', the guidance indicates that the building should be partially retained and refurbished.
440. London Plan Policy D3 that states that development proposal should take into account the principles of the circular economy. In terms of what optioneering is expected Para. 2.4.5 adds, "When assessing whether existing buildings are suited to the requirements for the site, applicants should robustly explore the options for retaining existing buildings (either wholly or in part). Where disassembly or demolition is proposed, applicants should set out how the options for retaining and reconstructing existing buildings have been explored and discounted; and show that the proposed scheme would be a more environmentally sustainable development".
441. Strategic Objective 2.4 of the emerging City Plan 2040 is "Ensuring that the City is environmentally sustainable and transitions to a net zero carbon City by 2040, taking a 'retrofit first' approach to development". Strategic Policy S8: Design adds that the "*City Corporation will promote innovative, sustainable and inclusive high-quality buildings... through development that...takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options*". Draft City Plan 2040 policy DE1 (Sustainable Design) provides more detail

about the retrofit first approach, the requirement for all major applications to provide whole life-cycle carbon assessments and other sustainability approaches and standards.

442. London Plan Policy SI 2 (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encourages the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment (WLCA). The assessment captures a building's operational carbon emissions (from regulated and unregulated energy use), as well as embodied carbon emissions, (i.e. those associated with raw material extraction, manufacture and transport of building materials and construction) and emissions associated with maintenance, repair, and replacement as well as dismantling, demolition and eventual material disposal. The Circular Economy strategy is therefore closely interlinked, addressing reuse and recycling of existing buildings and materials, as well as the longevity, flexibility, and adaptability of the design proposal.
443. Core Strategic Policy CS15 of the City's Local Plan requires "*all redevelopment proposals to demonstrate the highest feasible and viable sustainability standards in the design, construction, operation and "end of life" phases of development.*"
444. London Plan Policy SI 2 *Minimising greenhouse gas emissions* sets out how major developments should be net-zero carbon by "reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
  - be lean: use less energy and manage demand during operation
  - be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - be seen: monitor, verify and report on energy performance"
445. Policy SI2 also states that "Major development proposals **should calculate and minimise carbon emissions** from any other part of the development, **including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.**" [emphasis added]
446. Development Clause 9.9.2 expands on the priority of the energy hierarchy which is to "***minimise energy demand, and then address how energy will be supplied and renewable technologies incorporated. An important aspect of managing demand will be to reduce peak energy loadings.***" [emphasis added].
447. London Plan Policy SI4 Managing Heat Risk states that "*Development should minimise adverse impacts on the urban heat island through design,*"

*layout, orientation, materials, and the incorporation of green infrastructure. Through an energy strategy, development should demonstrate how they will reduce internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.”*

448. Policy DE1 Sustainable Design in the emerging Local Plan requires that major developments “Achieve a minimum BREEAM rating of ‘excellent’ and aim for ‘outstanding’ against the current, relevant BREEAM criteria at the time of application, **obtaining maximum credits for the City’s priorities** (energy, water, materials, waste and pollution). The **Climate resilience credit should be achieved** for the waste category. [Emphasis added.]

**Existing buildings:**

449. 1-5 Long Lane assumed to have been built in the 1970s. Includes basement, ground, ground mezzanine, and five upper floors. Upper floors previously used as office. Basement, ground and ground mezzanine currently used as shop.
450. 6-8 Long Lane is mid-terrace built in the 1960s. It includes basement, ground, and five upper floors and was previously used as offices. Floor to ceiling heights as based on available surveys are:

<b>Building</b>	<b>Ground floor</b>	<b>Ground floor mezzanine</b>	<b>First floor</b>	<b>Upper floor average</b>
No. 1-5	2.15 – 2.32m	2.19 - 2.4m	2.57m	2.52m
No. 6-8	2.82m	n/a	2.46m	2.29m

**Circular economy:**

451. A pre-redevelopment audit, pre-demolition audit and Circular Economy Statement were submitted as part of the planning application.
452. The pre-redevelopment audit found the existing buildings to be generally in relatively poor condition with windows, services, and roof finishes in need of refurbishment or replacement.
453. The basement structures were not assessed at the time as they were proposed to be retained for reuse. The application proposal is for partial basement retention (~30%).
454. The two existing buildings are internally connected, however the floor plates do not align. Based on the available information, the structure of both buildings is assumed to be a reinforced concrete frame stabilised by the stair core. An absence of existing slab support beams means that any modifications to the slabs or core (e.g. large penetrations) would require

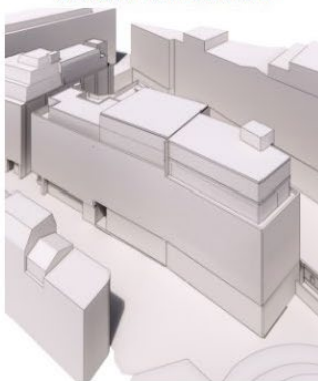
substantial secondary structure to be inserted. Where required, the sizes and locations of secondary structure could have a noticeable impact on the ceiling heights achievable in those areas. The positions of the existing cores have a big impact on the potential configuration and number of bedrooms achievable per floor.

- 455. To achieve minimum headroom for deliveries and usable activation of Ground Floor, the entire mezzanine level of No. 1-5 may need to be removed, significantly undermining structural integrity.
- 456. To meet current requirements for acoustic and thermal performance a high mass façade system (e.g. pre-cast panelised concrete) would likely be required. Increased façade loading on the existing structure would need to be assessed to determine strengthening requirements.

**Carbon options:**

- 457. During pre-application stage, as part of the pre-redevelopment analysis, a carbon options study was undertaken, in line with the City’s Carbon Options Guidance. Three options were explored (see figure below). The study was reviewed during pre-app by environmental design consultancy, Atelier Ten, who confirmed its compliance with the options guidance.

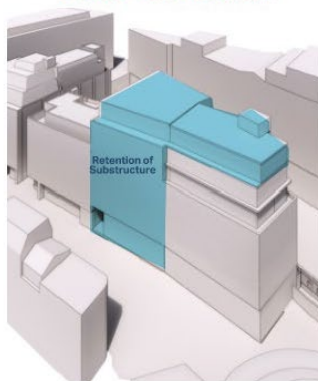
**1. Refurbishment of Existing**  
Retention of both existing buildings  
5 Levels + Plant + Basement



Total GIA: 3,320 m<sup>2</sup>  
Total NIA: 2,816 m<sup>2</sup>  
Total Guestrooms: 64

- Retention of both existing buildings (1-5 & 6-8 Long Lane) Substructure and Superstructure.
- New high-performance facade and MEP upgrades.

**2. Retention of 1 Building**  
Retention of 1-5 Long Lane only  
6 Levels + Plant + Basement

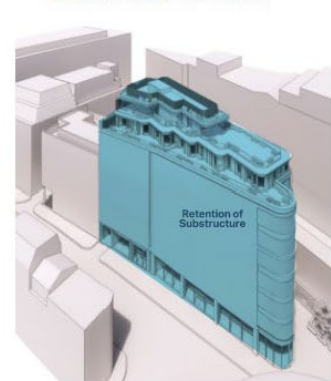


Total GIA: 4,423 m<sup>2</sup>  
Total NIA: 3,815 m<sup>2</sup>  
+999m<sup>2</sup> increase

Total Guestrooms: 91 keys

- Retention of one existing building (1-5 Long Lane) only - Substructure and Superstructure.
- Demolition of 6-8 Long Lane - replaced with a new build structure and increased Basement excavation.
- This option aims to add an additional floor level on the roof of both buildings in an attempt to maximise keys.

**3. Retention of Substructure**  
Demolition & Re-build  
8 Levels + Plant + Basement



Total GIA: 5,242 m<sup>2</sup>  
Total NIA: 4,769 m<sup>2</sup>  
+1,953m<sup>2</sup> increase

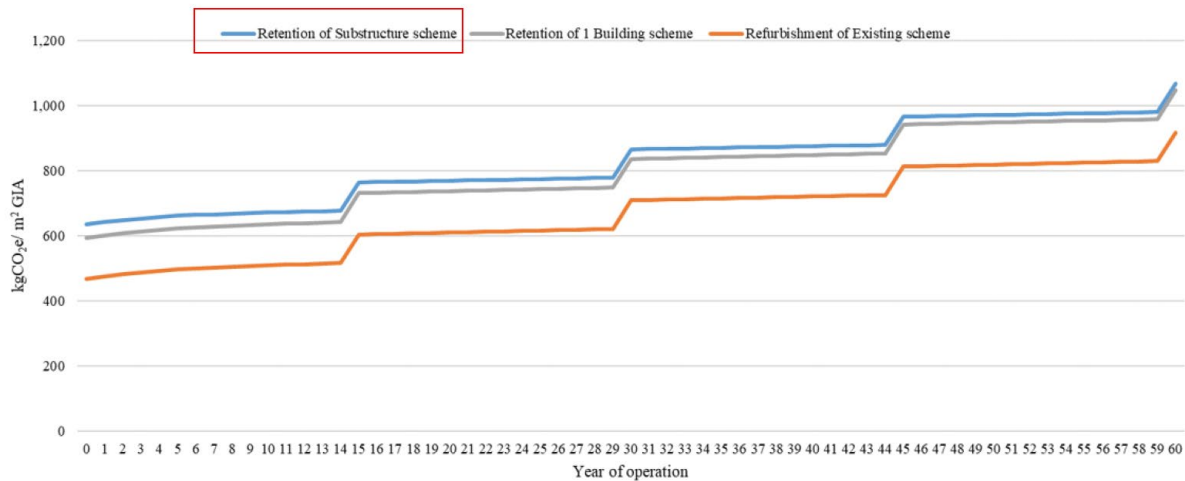
Total Guestrooms: 131 keys

- Demolition of both buildings (1-5 and 6-8 Long Lane) and replacement with new buildings
- Retention, extension and re-enforcement of the existing basement.

458. The table shows the quantitative whole life carbon assessment included in the options assessment.

	<b>Option 1</b> Refurbishment of existing	<b>Option 2</b> Retention of 1 building + extension	<b>Option 3</b> New build
Gross Internal area (GIA) m <sup>2</sup>	3,320	4,423	5,242
Increase in GIA (over existing)	130	1,233	2,052
Number of keys (rooms)	64	91	131
Substructure % retained by mass	95	40	30
Superstructure % retained by mass (frame, upper floors, roof, stairs, ramps)	95	45	0
Superstructure (External walls, Windows and External doors) % retained by area	0	0	0
Upfront Embodied Carbon (A1-A5) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) excl. sequestration	459	585	630
In-use & End of Life Embodied Carbon (B-C) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) excl. B6 & B7	350	354	355
Life-cycle Embodied Carbon (A1-A5, B1-B5, C1-C4) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	809	939	985
Fuel source	Electricity	Electricity	Electricity
Estimated Whole Building Operational Energy Use (kWh/m <sup>2</sup> GIA per year)	120	120	100
Estimated Whole Building Operational Carbon for building lifetime (B6) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	183.6	183.6	153.0
Target EPC rating	B	B	B
Total WLC Intensity (incl. B6 & pre- demolition) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) Module B7 not considered	994	1,135	1,153
Upfront Embodied carbon (A1-A5) (tCO <sub>2</sub> e)	1,525	2,589	3,301
In-use embodied carbon (B-C) (tCO <sub>2</sub> e)	1,162	1,564	1,860
Operational Carbon for building lifetime (B6) (tCO <sub>2</sub> e)	610	812	802
Total WLC (incl. B6 and pre-demolition, excl. B7) (tCO <sub>2</sub> e)	3,300	5,018	6,041

**Whole Life Carbon emissions over 60 years**  
Cumulative results - with decarbonisation (FES falling short)



459. The upfront embodied carbon per m<sup>2</sup> (A1-A5) is 27% higher for Option 2 than Option 1 and 8% higher for Option 3 than Option 2
460. The total upfront embodied carbon (A1-A5) is 70% higher for Option 2 than Option 1 and 28% higher for Option 3 than Option 2
461. The total WLC intensity (rate per m<sup>2</sup>) is 14% higher for Option 2 than Option 1 and 1.6% higher for Option 3 than Option 2.

Full retention was discounted for the following reasons as they were considered too impactful on the quality and operation of a hotel:

- Differing floor levels between buildings would impact accessibility and servicing routes.
- New penetrations would be required for new services. The existing slabs do not have soft spots or zones where introducing new penetrations can easily be designed in.
- Modifications to the slab would require substantial additional structure, likely steel beams and new steel columns, which would have high embodied carbon, and would complicate the space planning and coordination
- The capacity of the existing lifts and size of the stair cores are too small for the proposed use
- Ceiling voids for 1-5 Long Lane were deemed suitable for the provision of concealed ventilation and air-conditioning (as is currently installed) whilst void heights for 6-8 were deemed challenging.
- The layout of the existing floor plates and cores, would impact daylight and views out of the hotel rooms, and compromise the solar and thermal performance

462. Compared to Option 1, Option 2 (retention of no. 1-5) removes the issue of differing floor heights and allows improved circulation and hotel operation as a new primary core could be located in the new build. The whole building would also have greater floor to ceiling heights, only ~100-150mm less than the application proposal. No. 1-5 would still require significant structural alterations for risers and core upgrades with this secondary structure negatively affected servicing design. Officers consider Option 2 to be a feasible option for the site.
463. Although Option 2, would result in reduced carbon emissions (per m2 and in total) and reduced waste the applicant decided to pursue Option 3 (new build) due to the wider benefits of the scheme.
464. The new build enables optimised structural and spatial layout as well as floor to floor/floor to ceiling heights. Optimised floor heights enable greater floor area within very similar massing. Combined with greater flexibility of spatial layout enable, Option 3 is able to provide 40 more keys (rooms) of a more consistent high quality than Option 2.
465. Wider sustainability benefits of Option 3 also include:
- Improved energy demand (estimated at ~17% at Optioneering stage)
  - Increased area of greening
  - Greater outdoor amenity on the roof
  - Greater adaptability for future use

#### Circular Economy strategy of the Development Proposal

466. The pre-demolition report identifies key demolition products and recommends the best approach to reuse / recycling. Due to the type and condition of materials the proposal for reuse is mostly limited to temporary construction purposes. Timber is mentioned as having limited potential for reuse in back of house areas and ceiling tiles are listed as good condition and readily reusable. Products with the greatest impact for recycling include:
- Concrete
  - Steel
  - Blockwork
  - Brickwork
  - Clay Pot (from concrete floor slabs)
467. Soft strip materials were found to be of generally low quality with limited reuse value such as suspended ceiling tiles and fluorescent lighting.
468. The Circular Economy Statement outlines the key circularity targets and commitments for the proposed development. These include:
- Partial retention of the existing sub-structure (basement) of No. 1-5



- Flexibility of floor layout - the proposed column grid can fit within internal partitions is suitable for hotel or residential use
- Façade system at upper levels is designed for easy adaptation and disassembly using mechanical fixings
- Suspended floors – allowing the creation of future openings and ease of disassembly
- Long lasting materials which require little maintenance; brickwork and anodized aluminium should retain original look for 60+ years if well maintained
- Commitment to 20% of building material elements being comprised of recycled or reused content

### **Operational carbon emissions and energy use**

#### **Development Proposal:**

469. The operational emissions are expected to result in 1,697 kg CO<sub>2</sub>/m<sup>2</sup>, which amount to 8,955 tonnes CO<sub>2</sub>-equivalent for the development over a 60-year period, which is ~34% of total whole life carbon emissions.
470. The design includes several measures to reduce the energy demand and operational carbon emissions, in line with the Energy hierarchy set out in the GLA Energy Assessment Guidance 2022, which are set out in more detail below. The development is expected to achieve a total carbon reduction of 13.6% compared to a Building regulations compliant building (Part L 2021). This falls significantly short of the 35% reduction target by the GLA and will therefore require carbon offset payments. Further details are set out in the sections below.

#### **Be Lean:**

471. Several passive and active design measures are proposed to reduce the energy demand. This includes a fabric-first approach with optimised glazing ratio (35% glazed and 65% solid), and a high performing thermal envelope proposed. The glazing ratio was carefully designed to balance the space heating demand in winter with the solar gain and associated cooling demand in summer.
472. Low energy lighting will be used to reduce the energy demand and avoid unnecessary heat generation.
473. Mechanical ventilation is proposed for all occupied building areas and will include heat recovery. Natural ventilation is deemed unsuitable for bedrooms due to pollution and noise levels caused by proximity to railway line and busy road. Instead each room will have an individual MVHR unit rather than using a centralised air handling system as this will save plant space and reduce distribution. MVHR was determined to be the lowest carbon option during design development.

474. Guest rooms will have individual user control over lighting and heating/cooling which will affect the energy use outside the full influence of the service design.
475. All spaces will include the use of water-efficient fixtures and fittings including WCs with low flush volume, flow reducers in the taps of wash hand basins and aerated shower heads in changing rooms, to limit overall water consumption. These measures will also help reduce hot water demand.
- Hot water is produced using air source heat pumps (ASHPs)
  - Wastewater heat recovery is proposed in all guest rooms. The exact system/specification will be developed during detailed design stages.
476. For the proposed scheme, hot water demand is estimated to account for ~87% of total energy demand. Hot water demand as a high percentage of energy use is typical for hotels.
477. Wastewater heat recovery has not been factored into the energy use calculations provided at application stage. These calculations will be revised at detailed design stage and a reduction in energy use is expected.
478. Despite the energy efficiency measures proposed at the Be Lean stage, the carbon emissions are 36.6% higher compared to a Part L 2021 building regulations compliant building. This is due to the high impact of hot water demand of a hotel that is deemed underestimated compared to the notional building ('Buildings other than dwellings') that does not differentiate between different use types in the Part L 2021 methodology. The need for hot water storage is large for hotels, and with that the associated losses from the tanks which severely affect the energy efficiency (Be lean stage) of the proposed hotel. However, the space heating, auxiliary and lighting demands are between 16-53% reduced from the notional demands, and the energy efficiency measures would achieve 9% carbon emissions savings when excluding the hot water storage requirement.

Be Clean:

479. The proposed development is in close proximity to the existing Citigen District Heat Network and conversations with Citigen are ongoing regarding a potential connection. If the building was to connect to the existing network, it would result in an approximate increase in carbon emissions of 12%, due to the relatively high carbon emission factors of the current heat network and therefore a connection at this stage is not desired by the applicants. However, space has been allocated in the basement, to provide a future connection to the network when the decarbonisation plan is further developed. Details of the future connection strategy are required by condition.

480. In the meantime, building services will operate on an independent system, using ASHPs for heating (see Be Green).

Be Green:

481. Space heating and hot water demand will be met through the same hybrid variable refrigerant flow (HVRF) system using ASHPs.

482. A small area of PV panels is proposed (10.8m<sup>2</sup>) and are accounted for in the Energy Strategy at a conservative estimated efficiency of 20%, which would generate approximately 2,070 kWh/yr. The efficiency rate will be revised during developed design stage when panels have been specified. The amount of PV and efficiency rate will be reassessed as part of detailed design.

483. The ASHPs and PV panels combined will achieve an 49.9% reduction in carbon emissions, leading to a total reduction of 13.6% below a Part L 2021 building compliant building, falling short of the 35% reduction target by the GLA. However, the GLA acknowledges that it is currently challenging to achieve this level of reduction under the Part L 2021 regulations and a significant reduction can be achieved. Offset payments will be required for the remaining emissions.

484. *Table 1: Operational energy reduction for the proposed development:*

	Regulated emissions (tCO <sub>2</sub> e per annum)	CO <sub>2</sub> savings (tCO <sub>2</sub> e per annum)	Carbon reduction (%)
Baseline (Part L 2021)	76	-	-
Be Lean	103	-27	-36.3%
Be Clean	103	0	0.0%
Be Green	65	38	49.9%
<b>Total reduction</b>	-	10	13.6%

EUI:

485. The estimated whole building EUI for the proposed development is 208kWh/m<sup>2</sup>/year (GIA). This is well above the GLA target of 55 kWh/m<sup>2</sup>/year for hotels, but the sustainability consultants note that the 55kWh/m<sup>2</sup> target is not recognised a recognised industry target. The services engineers' own analysis based on previous projects suggests a target of ~190 kWh/m<sup>2</sup> would be more appropriate for hotels.

486. The estimated space heating demand is 6.73kWh/m<sup>2</sup>/year (GIA), which is below the GLA target of 15 kWh/m<sup>2</sup>/year. This equates to 4% of the overall regulated energy demand for the building.

487. With the aim of further reducing energy use, Long Lane has undertaken operational energy consumption modelling to identify appropriate actions to reduce performance gap between predicted and actual performance.
488. An updated Energy strategy to include savings from wastewater heat recovery and an increase in area of PV will be required by condition.

**Whole Lifecycle carbon:**

489. Total WLC emissions of the proposed development over a 60-year period are estimated to be 17,747 tCO<sub>2</sub>e (3,363 kgCO<sub>2</sub>e/m<sup>2</sup> GIA) (inc. B6 and B7, inc. sequestration). The operational carbon impact contributes to ~34% of the whole life carbon emissions, while the embodied carbon impact contributes to approximately 66% of the total emissions. Upfront embodied carbon comprises of 4,608 tonnes of CO<sub>2</sub>-equivalent and the remaining material emissions add up 3,952 tonnes CO<sub>2</sub>-equivalents over the lifetime of the building. More detailed analysis is presented below.

Building Aspect	A1 – A5 (excl. sequestration)	B – C (excl. B6 & B7)	A – C (excl. B6 & B7, inc. sequestration)
Whole development	873	749	1578
GLA benchmarks for residential use			
GLA standard baseline	850	350	1200
GLA aspirational baseline	500	300	800

490. The table above sets out the embodied carbon emissions per life-cycle module per square metre of the proposed development, in comparison against the GLA benchmarks for residential use, as there are no benchmarks for hotels specifically. It shows that emissions are expected to be higher than the GLA standard targets for all life-cycle modules.
491. Upfront embodied carbon emissions are close to but just higher than the GLA standard benchmark. Emissions for the substructure (basement and foundations) are in line with the GLA aspirational benchmark enabled by the partial retention of the existing substructure.
492. Emissions for the frame are slightly higher than the benchmarks (7% > standard, 12% > aspirational). The shape of the site and constraints caused by the close proximity to the train line and existing foundations result in the requirement for cantilevers and transfer structures to achieve the proposed design. More vibration control is required for a hotel than an office. All of these factors affect carbon efficiency. Further rationalisation of transfer structures is thought to be possible and will be explored at detailed design stage.
493. The impact of furniture, fittings, and equipment (FFE) is four times higher than the current GLA benchmarks, but the WLC assessment is calculated based on a fully fit-out hotel whereas the benchmarks were developed for shell & core / Cat A unfurnished apartment buildings.
494. The embodied carbon for the in-use stage of the building, which includes emissions associated with maintenance and repair works, are twice as high as the GLA standard target. This is in part due to the GLA benchmarks being designed for residential buildings and not hotels which have a greater level of wear and tear particularly on internal finishes and FFE. These elements are likely to require more replacement cycles thereby adding embodied carbon. Long life materials are being prioritised by the applicant. Frequent remodelling should be avoided. The embodied carbon of partitions is 96% higher than the current GLA (residential) benchmarks, attributed to the increased number of partitions and

increased acoustic requirements which increase the amount of plasterboard and insulation required.

495. Embodied emissions should be further optimised in the following design stages through the use of durable materials, sustainable procurement and enabling deconstruction (for maintenance and reducing demolition waste at end of life).
496. Design measures that have been incorporated in the application proposal to minimise emissions include:
- **Partial retention** of the existing basement structure
  - **Grid** - optimised grid and column locations with beneficial perimeter slab cantilevers, for enhanced slab efficiency to minimise the volume of material required across the floors and reduce demand on the substructure and foundations.
  - **Concrete specification** - the stage 2 design uses 50% cement substitution to reduce embodied carbon.
  - **Upper Storeys** - lightweight metal proposed at the top of the façade reduces heavy structural requirements at stepped back levels.
  - **Internal finishes** - high carbon materials such as terrazzo and suspended ceilings are minimised within the project.
497. Further carbon reduction opportunities will be explored in the further design phases, such as:
- Optimise the structural design to reduce concrete and reinforcement volumes
  - Reduce the number and extent of carbon intensive transfer structures over the service yard and hotel/retail entrances by shortening spans
  - Higher cement replacement ratios in the concrete elements
  - Lower carbon alternatives for the highest impact in façade elements such as the aluminium rainscreen and steel framing system
  - Extend the façade's service life to 60 years to reduce emissions associated with repair and replacement
  - Low carbon partitions and doors.
498. The development proposal demonstrates a good approach to the core principles of energy reductions, prioritising high-performing building fabric, an appropriate solid to glazed ratio, and heat recovery in the heating and hot water systems. Fully electric plant and PV panels further support the reduction of operational emissions. The submitted optioneering and whole life-cycle carbon information demonstrates compliance with the GLA Whole Life-Cycle Assessment guidance and draft City Plan 2040 policy DE1.

**BREEAM:**

499. A BREEAM pre-assessment has been undertaken for the new development in line with the BREEAM UK New Construction 2018 methodology. The pre-assessment indicates that that the scheme is currently targeting a BREEAM 'Excellent' rating (77.8%).
500. A review was undertaken to see if the rating could be increased to 'Outstanding' rating but due to various limitations, this is not deemed possible. The most onerous of these limitations is explained to include the minimum requirement for 'Outstanding' for Ene 01 - Six credits (Energy performance) and Four credits (Prediction of operational energy consumption).
501. The pre-assessment shows that the scheme is on track to achieve a high number of credits in CoL's priority areas of Materials, Pollution and Waste. A moderate number of credits will be achieved for the priority area Energy and water. Only 1 of 5 Wat 01, *efficiency of the buildings water consumption*, credits are targeted - the Sustainability statement reports that Water credits are typically challenging to achieve in hotels. To enhance the score for materials, further optimisation of the building services should be explored during the detailed design phases.
502. The Wst 05 credit – Adaptation to Climate Change is a priority for the development. A Climate Change Workshop was undertaken by the project team at Stage 2 to ensure climate resilience was designed in from the appropriate time.
503. The BREEAM pre-assessment results comply with Local Plan Policy CS15 and emerging City Plan 2040 Policy DE1. A post-construction BREEAM assessment is required by condition.

**Urban greening and biodiversity:**

504. A range of urban greening measures on the building and in an existing pocket park (immediately adjacent) are proposed, comprising of:
- On the building:
- 215 m<sup>2</sup> of intensive green roof or vegetation over structure. Substrate minimum settled depth of 150mm;
  - 17 m<sup>2</sup> Flower-rich perennial planting;
  - Green terraces
- In the pocket park:
- 61 m<sup>2</sup> of standard trees planted in connected tree pits in the pocket park, with a minimum soil volume equivalent to at least two thirds of the projected canopy area of the mature tree;
  - 20 m<sup>2</sup> Green wall – modular system or climbers rooted in soil.
  - Pavilion green roof

505. Planting is spread across ground level, roofs and balconies, and includes green walls, all helping to create a green corridor across the site. The pocket park would create an integrated and welcoming piece of public realm offering shade from tree cover, significantly improving the existing amenity and greening.
506. A UGF of 0.323 (GLA assessment or 0.361 City assessment weighting) is targeted for the proposed development, thereby meeting the urban greening requirements for the site. The landscape strategy has been designed by a specialist consultant and a separate report submitted. Plans have been submitted, indicating the location and size of proposed greening.
507. A Biodiversity Net Gain (BNG) Assessment was undertaken, using the Statutory Biodiversity Metric. With the proposed greening, the development will achieve a biodiversity net gain of +13,587% biodiversity net gain in habitat units meeting statutory requirements.
508. To further improve the biodiversity of the site, bird and bat boxes are proposed as well as pollinator posts and bee bricks to further support the target species and pollinators in the city.
509. Rainwater harvesting is proposed to be used for irrigation and flushing toilets.
510. The planting strategy aims to create a low maintenance, climate resilient scheme with rich biodiversity and habitat provision suitable for pollinator species.
511. Green roof measures include: Loggeries and natural deadwood to provide respite for insects and pollinators; bug hotels; bird baths; areas of bare sand for solitary bees and other insects/pollinators to nest.
512. The pocket park is designed to be a green refuge for visitors and will include raised metal planters with timber seating arranged beneath and alongside the trees. The landscape strategy specifies tree species atypical for City streets to increase biodiversity and interest beyond the site. The planting is designed to change throughout the seasons with a long flowering season from spring through to autumn. Trellises will space for climbing plants.
513. A management and maintenance strategy is included in the Landscape Design and Access strategy. This should be reviewed to ensure it covers the lifetime of the development.
514. An updated landscaping strategy, including updated UGF and biodiversity scores, details on plant species and biodiversity measures such as bird



boxes, consideration of future impacts of emerging pests and diseases, and an ecological management strategy is required by condition.

**Climate resilience:**

**Flood resilience**

515. A flood risk assessment was undertaken in accordance with the NPPF. The development does not increase flood risk to the site or the surrounding area and is considered safe from the risk of flooding for its lifetime.
516. The 9<sup>th</sup> floor has a dual function green/blue roof which will reduce peak runoff from the building. The proposed surface water management will see an improvement on the existing site of over 76% on the 1 in 1 year storm and 94% for the 1 in 100-year storm (including +40% allowance for climate change).

**Sustainability Conclusion**

517. Whilst the proposed development would result in full redevelopment of the buildings and therefore, higher whole life-cycle carbon emissions compared to the options with higher level of retention, alternative light and major refurbishment options were explored and they were also reviewed by a third-party expert, who confirmed that the optioneering has been carried out in compliance with the City of London Corporation's ("CoL") Carbon Options Guidance. It is considered that the redevelopment option would have the opportunity for more efficient floor to floor heights (and servicing zone), an optimised structural grid and improved core layout which would provide greater spatial and operational efficiency and offer more efficient and flexible commercial space. The redevelopment would also be able to offer additional, wider environmental benefits including an uplift in greening and biodiversity, end of trip facilities supporting active travel, and greater climate resilience including reduced risk of overheating and flood risk. The development proposal would be fully electric utilising air source heat pumps, wastewater heat recovery and PV panels all supporting emissions reduction and it would achieve BREEAM 'Excellent'.

**Security**

518. The application is supported by a Security Needs Assessment, which ascertains and highlights the main threats, threat actors, site vulnerabilities, and resultant risks posed to the development from criminal elements. It also provides a series of high-level recommendations to assist in reducing these risks.
519. Some of the main operational requirements addressing the security needs, as identified in the Security Needs Assessment are summarised below:
- Provision of appropriate staff training to promote a security minded culture and awareness

- Development of appropriate policies and procedures to manage unwanted activity and respond to nearby serious threats
  - Provision of active and natural surveillance and appropriate lighting
  - Application of the principles of Crime Prevention Through Environmental Design (CPTED) to support safety and security across the external spaces
  - Provision of means of controlling access to all points of entry and physical security to authorised users only
  - Provision of physical security measures between private terraces to prevent unauthorised access.
  - Provision of communication capability on the external hotel lobby door to manage guest access outside of hours.
  - Provision of secure luggage storage
  - Provision of the ability for hotel front of house staff to summon support from security personnel and provision for appropriate space requirements for security
  - Provision of a minimum of three points of locking on internal cycle storage.
520. Further details of the overall security strategy will be required by condition and 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.
521. The proposal, subject to conditions and S106 obligations is considered to be in accordance with policy DM3.2 and draft City Plan strategic policy S2 and policies SA1 and SA3.

### **Fire Statement**

522. London Plan policy D12 requires that in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety.
523. A Fire Statement has been submitted outlining the fire safety strategy for the proposed hotel. The building is proposed to be provided with a number of fire safety measures. These would include the adoption of an evacuation strategy, the provision of two dedicated evacuation lifts to be used to assist occupants who cannot evacuate independently using the stairs and the provision of an automatic fire detection and alarm system. Elements of structure will achieve a period of 90 minutes fire resistance and compartment floors will achieve a period of at least 90 minutes fire resistance. Two escape cores are proposed serving the premises; one of the cores is designed as a fire-fighting shaft and the other an escape stair. The fire-fighting shaft comprises a fire-fighting stair, fire-fighting lobby and

fire-fighting lift and an evacuation lift. The fire-fighting shaft can be accessed from street level. The fire-fighting shaft would be provided with a smoke ventilation system. The second core comprises of an escape stair and an evacuation lift connected by a protected lobby.

524. The City's District Surveyor has reviewed the submitted fire statement and advised that the fire statement is acceptable and the proposal is considered to generally comply with policies D5 and D12. However, there is no information regarding provision of fire hydrants and it is recommended dealing with this by way of condition. It is therefore considered that the statement adequately covers the relevant fire aspects of the design and is in accordance with policies D5 and D12 of the London Plan. The Fire Statement is adequate for the planning stage and is secured by condition, including the provision of fire hydrants as requested by the City's District Surveyor.

### **Land contamination**

525. Policy DM 15.8 of the Local Plan states that *"Where development involves ground works or the creation of open spaces, developers will be expected to carry out a detailed site investigation to establish whether the site is contaminated and to determine the potential for pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and prevent potential adverse impacts of the development on human and non-human receptors, land or water quality."* The same requirements are also set out in Policy HL4 of the City Plan.
526. The application is supported by a Geo-environmental Preliminary Risk Assessment. A site inspection was carried out in November and no potentially significant sources of contaminants of concern, or any visual evidence was noted. It is stated that small volumes of hazardous substances (industrial biocide and sodium nitrite) associated with treatment of the building's water system were observed on the fifth floor and basement of 6-8 Long Lane. Given the limited volumes, these are not considered a potential source of contaminants of concern.
527. Although the site was historically occupied by a timber yard, which may have given rise to land contamination, it is stated that the site has not been classified as a contaminated land under Part 2A of the Environmental Protection Act 1990 nor has it currently been identified for further review under the City's Contaminated Land Strategy. Furthermore, the excavation to accommodate the existing basements of 1-8 Long Lane would have removed a significant proportion of any potentially contaminated soils.

528. The Geo-environmental Preliminary Risk Assessment suggests that in areas of the site covered by buildings or hardstanding the risks to future on site human health receptors via the pathways of dermal contact and ingestion will be mitigated as the hardstanding will provide an adequate pathway break between the future site user and any potential contaminants. There is considered to be limited potential for ground gas or volatile vapours that could impact future site users via inhalation. As the site is understood to be situated above the Hackney Gravel Member, there is considered to be a potential for the on-site lateral migration of contaminants originating from off-site potential sources of contamination via groundwater.
529. It is recommended that any the potential for these linkages to be active is confirmed through a Phase 2 Geo-Environmental Site Investigation. This will be secured by condition. Other recommendations include the submission of a preliminary desk based UXO assessment and a refurbishment / demolition asbestos survey, due to the known presence of asbestos within the building.
530. The Environmental Health Officer has been consulted and has suggested the imposition of conditions to ensure the submission of a detailed site investigation to establish if the site is contaminated and to determine the potential for pollution of the water environment, the submission of an investigation and risk 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 and the submission of an investigation and risk assessment in case contamination is found on site. Where remediation is required this would have to completed and a verification report to be submitted to the Local Planning Authority for approval.
531. It is considered that subject to the imposition of the abovementioned conditions, the development would be acceptable and in accordance with Policy DM 15.8 of the Local Plan and Policy HL4 of the City Plan.

#### **CIL and Planning Obligations**

532. 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.
533. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.

534. 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 will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).

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

#### MCIL2

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£288,903.48	£277,347.34	£11,556.14

#### City CIL and S106 Planning Obligations

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£153,900.00	£146,205.00	£7,695.00
<b>City Planning Obligations</b>			
Affordable Housing	£102,600.00	£101,574.00	£1,026.00
Local, Training, Skills and Job Brokerage	£61,560.00	£60,944.40	£615.60
Carbon Reduction Shortfall ( <i>as designed</i> ) <i>Not indexed</i>	£185,250.00	£185,250.00	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£50,000	£50,000	£0
Security Measures Contribution (Eastern City Cluster)	£0	£0	£0
S106 Monitoring Charge	£2,750.00	£0	£2,750.00

<b>Total liability in accordance with the City of London's policies</b>	<b>£506,060.00</b>	<b>£493,973.40</b>	<b>£12,086.60</b>
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#### City's Planning Obligations

536. The obligations set out below are required in accordance with the City's Planning Obligations 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.

- Highway Reparation and other Highways Obligations

*(Highways Schedule of Condition Survey, site access, consents, licences etc)*

- Local Procurement Strategy
- Employment and Skills Plan (*Demolition / Construction / End Use-for hotels*)
- Delivery and Servicing Management Plan (*including Consolidation*)
- Travel Plan (*including Cycling Promotion Plan*)
- Construction Monitoring Cost (*£30,935 - First Year of development and £25,760 for subsequent years*)
- Carbon Offsetting
- 'Be Seen' Energy Performance Monitoring
- Section 278 Agreement (*CoL*)
- Public Realm Space (*Specifications, Public Access & Management Plan*)
- Public Art
- Cultural Plan

537. I request that I be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.

538. The scope of the s278 agreement may include, but is not limited to alterations to loading/unloading restrictions within the vicinity of the site, improvements to the existing cycle lane arrangements, repaving of the existing footways, repair works to the adjacent highways, removal of redundant dropped kerbs and the provision of vehicle crossovers.

#### Monitoring and Administrative Costs

539. 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.

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

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

541. The City, as a public authority must, in the exercise of its functions, have due regard to the need to:

- Eliminate discrimination, harassment, 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.

542. The characteristics protected by the Equality Act are age, disability, gender, reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation.

543. As discussed above, in the relevant section of the report, the applicant has submitted a Statement of Community Involvement (SCI) including a targeted programme of consultation, which sought to understand the needs of the local community. The applicant has also engaged with key stakeholders and has conducted briefings with local stakeholders, including the Barbican Association, Culture Mile and Charterhouse and the Culture Mile BID. Engagement with the Ward members had also taken place. It is considered that the public consultation carried out by the applicant was inclusive and relevant in the context of the Equalities Act.

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

545. It is the view of officers that a decision to grant permission would remove or minimise disadvantages suffered by persons who suffer from a disability and in particular mobility impairment by providing enhanced and accessible public realm. Given that no blue badge bay can be provided on site, suitable arrangements shall be put in place and secured by S106 agreement to secure the provision of a blue badge parking bay at near the application site and suitable valet service to and from the hotel for disabled people. The

provision of accessible floorspace and minimum 10% accessible guest rooms within the proposed hotel would advance equality of opportunity.

### **Human Rights Act 1998**

546. It is unlawful for the City, as a public authority, to act in a way which is incompatible with a Convention right (being the rights set out in the European Convention on Human Rights (“ECHR”)).
547. Insofar as the grant of planning permission will result in interference with the right to private and family life (Article 8 of the ECHR) including by causing harm to the residential amenity of those living in nearby residential properties, it is the view of officers that such interference is proportionate, in the public interest and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole. Although it is recognised that the development would have some impact on the amenities of the nearby residents, by way of loss of light and noise and disturbance during constructions, it is not considered that the proposal would result in unacceptable impact on the existing use of nearby residential properties to an extent that would warrant refusal of the application on those grounds. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE8 of the draft City Plan 2036.
548. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including by interference arising through impact on daylight and sunlight or other impact on adjoining properties, it is the view of officers that such interference, in these circumstances, is proportionate and strikes a fair balance between the interests of the owner of the site, those living nearby and the community as a whole.

### **Conclusions and Overall Planning Balance**

549. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan 2040 and considering all other material considerations.
550. The proposed development comprises the demolition of existing office buildings at 1-8 Long Lane to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with provision of cycle parking, associated servicing, plant, amenity terraces, pocket garden with landscaping and other associated works.



551. It is noted that a redevelopment office scheme was previously approved at 1-12 Long Lane. The current proposal does not include the building at 9-12 Long Lane; however, the overall massing and height of the building at 1-8 Long Lane almost follows the same building line as the previously approved scheme.
552. The site lies within the North of the City, a Key City Place as defined within Core Strategic Policy CS5 and within a rejuvenation area. Policy CS5 supports implementing proposals for the rejuvenation, intensification and further improvement of this area. Criterion 9 of the policy also requires further enhancing the distinctive character of the Smithfield area by retaining a range of buildings for accommodating a mix of uses.
553. The site would result in loss of existing office floorspace. The Applicant has justified the loss of office at the site by the submission of a Viability Assessment which was independently reviewed. It is considered that the loss of office floorspace, and the proposed hotel use, in this location, would not compromise the primary business function of the City. Hotels are supported as a strategic function of the Central Activities Zone (CAZ) and the London Plan states that 58,000 rooms for serviced accommodation will be required in London by 2041. The need for visitor accommodation is also reinforced in the CoL Visitor Accommodation Sector Commercial Needs Study, dated January 2023, which identified a demand capacity for an additional 350 rooms per annum in City of London to 2037. It is therefore considered that the hotel would contribute to the balance and mix of uses in the area and would offer complimentary facilities to be accessed by the public.
554. The proposed development would also provide a total of 167sqm GIA of flexible retail floorspace (Class E(a)/(b)). Active retail frontage would be retained across the ground floor along Long Lane. The application site is located within a retail link. It is therefore considered that the proposed retail provision, would provide a better-quality retail provision which would enhance the environment of the Retail Link and would provide retail units enabling an active frontage in an area which currently lacks animation.
555. Public art and several cultural initiatives, such discounts and complementary accommodation for visiting artists, young companies and international performers, training programmes for employees to familiarise themselves with the local area and arts organisations and supporting marketing initiative by publicising their events are proposed to be delivered on site. The site is located between the future Museum of London and the Barbican and it is therefore considered being in a nodal point to assist in providing visitor accommodation and also meaningful culture offer. On that basis and subject to obligations, these provisions would be maximise the benefits of the scheme.

556. The disposition of the final massing and bulk has followed a design-led approach considering macro and local townscape impacts with multiple pre-application negotiations to mitigate adverse impacts. The stepped massing, highly articulated design, materials, varied tones of colour and curved form would introduce a well-considered, refined, neighbourly architectural set piece. The proposals would also enhance the overall quality and character of this key pedestrian space, providing enhanced landscaping and greater areas of greening and seating. The proposals are considered to be in accordance with Local Plan Policies CS5: North of the City; Emerging City Plan Policy S23; and London Plan Policies SD4, SD6 and E10.
557. It is considered the proposal would constitute Good Growth by design in accordance with Local Plan Policies CS 10 and DM 10.1, emerging City Plan Policy S23 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the objectives of Destination City by improving the public realm and creating a new sense of place in this part of the City of London.
558. The proposal would deliver a transformative new building for the area. It would result in a diverse mix of use, transforming an underutilised site with little active ground floor uses and limited accessible public realm into a new commercial hub for the City and London. It would deliver an enhanced public realm, enhancing convenience, comfort and attractiveness in a manner which optimises active travel and the City's public realm objectives.
559. Overall, it is considered that the proposed hotel use would make the best use of land, following a design-led approach that optimises the site capacity to accommodate a high-quality hotel development alongside a ground floor retail use in close proximity to several cultural attractions and improved public realm which would contribute to the Destination City objectives and would assist in the rejuvenation of the North of the City, enhancing the distinctive and mixed character of the Smithfield area.
560. In heritage terms, the proposals, by way of impact on setting, would preserve the significance of heritage assets and slightly enhance the setting of the Smithfield Conservation Area.
561. The building has been designed around the delivery of optimal microclimatic conditions, as well as creating opportunities for urban greening and accessible amenity spaces, such as the pocket garden to the east of the building.
562. In terms of accessibility, a step free access would be provided along with 10% accessible bedrooms. Accessible changing facilities and sanitary

facilities are also provided. Although an allocated space on site has not at this point been made for the provision of disabled motor vehicle parking, the provision of one blue badge parking bay in the vicinity of the site with associated valet service to secure movement to that from the site would be secured within the S106 as an obligation.

563. In term of public transport provision, the site has the highest level of public transport accessibility level (PTAL) of 6B. The proposals would result in a reduction of servicing vehicles of 5-7 vehicles per day, requiring a maximum of 5 servicing vehicle trips a day. In terms of drop-off and pick-up activity, it is noted that following discussion with the applicant, no pick up / drop-off activity would be permitted in front of the site. Segregation of cycle facilities installed along the frontage of the site to assist with the safety of cyclists. These highway improvements would be secured through Section 278 works.
564. The proposed development would provide London Policy compliant cycle parking facilities for both staff and visitors, namely 10 long stay and 6 short stay cycle parking spaces.
565. With regard to impacts on daylight and sunlight, of the buildings assessed, the majority of the surrounding properties would not experience any noticeable reductions. The properties that would experience noticeable reductions in daylight are those that are closest and to the north of the application site; 41-43 Charterhouse Square. The impacts on these properties are mainly attributed to the presence of existing obstructions to windows and the depth of the rooms that the windows serve. Considering that these properties are dual aspect, having windows fronting Charterhouse Square and the taking into account the urban nature of the City it is considered that the impacts of the development would not be such detrimental to the amenity of the nearby residential occupiers to an extent that would warrant refusal of the application on these grounds.
566. The development by reason of its sufficient separation distance to the nearest residential properties is not considered to result in unacceptable overlooking or overshadowing impacts. In terms of noise impacts, residents have raised concerns that the proposed terraces would give rise to increased noise nuisance. It is noted that the terraces, with the exception of two that would be accessible from any hotel guest, albeit not publicly accessible, would be terraces to individual rooms. Conditions are imposed restricting the hours of use to those terraces that would be accessible to all hotel guests. However, by reason of their nature, the proposed terraces to the individual rooms are not considered being different to a residential balcony and they are not considered to give rise to unacceptable levels of noise and disturbance. Negative impacts during construction would be controlled as far as possible by the implementation of Schemes of protective

works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein.

567. The scheme would provide benefits through CIL for improvements to local training, skills and job brokerage, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement
568. Whilst the proposed development would result in full redevelopment of the buildings and therefore, in higher whole life-cycle carbon emissions compared to retention scenarios, alternative light and major refurbishment options were explored and they were also reviewed by a third-party expert, who confirmed that the optioneering has been carried out in compliance with the City Corporation's ("CoL") Carbon Options Guidance. It is considered that the redevelopment option would have the opportunity for greater floor to ceiling heights and an optimised structural grid layout throughout the whole development which would provide greater spatial and operational efficiency and offer higher quality and more flexible commercial space, and it would result in the most effective use of the land. The redevelopment would also be able to offer additional, wider environmental benefits including significant uplift in greening and biodiversity, end of trip facilities supporting active travel, and greater climate resilience including reduced risk of overheating and flood risk, it would be fully electric utilising air source heat pumps and PV panels and it would achieve BREEAM 'Excellent'. Therefore is considered to be the preferred long-term option.
569. Currently the site provides very limited urban greening. The proposed development will deliver considered urban greening through a number of soft landscaped terraces and balconies, achieving an urban greening factor (UGF) score of 0.323 / 0.361 (using the London Plan and CoL factors respectively). The Proposed Development will result in a net biodiversity gain of over 13,586%.
570. Objections have been received primarily focusing on impacts from the increased massing and height of the development, including daylight and sunlight impacts, impacts generated by the introduction of terraces, such as noise and overlooking impacts, as well as impacts on the free flow of traffic and the pedestrian and cyclists safety. Other concerns raised also relate to the visual impact of the proposed development, which is considered being out of keeping with the wider area. It is noted that additional and correcting information has been provided by the applicant during the process of the application in relation to the daylight and sunlight assessment. Discussions have also been focused on highways and transport issues to address the concerns around traffic and safety. A couple of representations supporting the proposed hotel use have been received.

571. The scheme would provide benefits through CIL for improvements to local training, skills and job brokerage, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured in the S106 Agreement.
572. It is almost always the case that where major development proposals come forward there is at least some degree of non-compliance with planning policies, and in arriving at a decision 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.
573. The Local Planning Authority must determine the application in accordance with the Development Plan unless other material considerations indicate otherwise.
574. The additional material considerations are as follows:
- Securing a development within the City that would provide land uses which support the diversification, vitality and growth of the City as a world class business destination;
  - Provision of high-quality public realm at ground floor and urban greening at ground and roof level;
  - Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM 'Excellent' and reduce waste;
  - The proposed building would result in an aesthetic enhancement to the Long Lane and slightly enhance the Smithfield Conservation Area.
  - The proposed development would provide meaningful public art on site and a number of cultural initiatives.
575. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as material planning considerations weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the Schedule attached.

## **Appendix A** **Background Papers**

### Representations:

10/02/24 - 20:00	Mr Nils Fischer	Online	Objection
13/02/24 - 15:40	Smithfield Market Tenants' Association	Email	Unstated
21/02/24 - 17:38	Peter Golob	Email	Unstated
24/02/24 - 17:42	Mr Alberto Garciga	Online	Objection
25/02/24 - 11:16	Dr Mary Chard	Online	Objection
25/02/24 - 11:18	Mrs Lesley Steward	Online	Objection
25/02/24 - 11:24	Mrs A Resident	Online	Objection
25/02/24 - 12:51	Dr Clare Wood	Online	Objection
25/02/24 - 13:05	Ms Judith Brown	Online	Objection
25/02/24 - 13:18	Ann George	Online	Objection
25/02/24 - 13:29	Dr James Backhouse	Online	Objection
25/02/24 - 14:41	Dr Patricia Marsden	Online	Objection
25/02/24 - 15:58	Mr Paul Morgan	Online	Objection
26/02/24 - 14:41	Mr Nigel Bolt	Online	Objection
26/02/24 - 15:27	Pauli e Fasoli	Online	Objection
26/02/24 - 20:42	Ms Ida May	Online	Objection
26/02/24 - 21:08	Mr Sash Manev	Online	Objection
27/02/24 - 06:53	Mrs HELEN CLIFFORD	Online	Objection
27/02/24 - 21:37	Ms Nora Vitola-Jones	Online	Neutral
27/02/24 - 22:12	Nora Vitola-Jones	Online	Objection
28/02/24 - 14:56	Mr david Lawrence	Online	Objection
28/02/24 - 16:38	Mrs Sally Woodward	Online	Objection
28/02/24 - 21:11	Dr Michael Pike	Online	Objection
29/02/24 - 08:19	Mr Richard Tomkins	Online	Objection
29/02/24 - 17:57	Mrs Sarah Mann	Online	Objection
01/03/24 - 00:54	Dr Nicholas Deakin	Online	Objection
04/03/24 - 18:38	Peter Burrows	Online	Objection
28/03/24 - 09:17	Peter Golob and Others	Email	Objection
17/04/24 - 10:24	Mr Jonathan Vaughan	Online	Support
19/04/24 - 12:59	Mr Tom Elliott	Online	Support
21/04/24 - 18:20	Peter Golob and Others	Email	Objection
08/05/24 - 18:21	Peter Golob	Email	Objection
19/05/24 - 20:17	Peter Golob	Email	Objection

## **Appendix B**

### **London Plan Policies**

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy E11 Skills and opportunities for all
- Policy HC1 Heritage conservation and growth
- Policy HC2 World Heritage Sites
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI 8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction

### **Relevant GLA Supplementary Planning Guidance (SPG):**

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

### **Local Plan Supplementary Planning Guidance**

- Air Quality SPD (CoL, July 2017);
- Archaeology and Development Guidance SPD (CoL, July 2017);
- City of London Lighting SPD (CoL, October 2023);
- City Public Realm SPD (CoL, July 2016);
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014);
- Open Space Strategy SPD (CoL, January 2015);
- Protected Views SPD (CoL, January 2012);
- Planning Advice Notes on Sunlight City of London Wind Guidelines (2019);
- City of London Thermal Comfort Guidelines (2020)
- Planning Obligations SPD (CoL, May 2021)
- Office Use SPD (CoL, January 2015)

### **Relevant Draft City Plan 2040 Policies**

- Policy S1 Healthy and inclusive city
- Policy HL1 Inclusive buildings and spaces
- Policy HL2 Air quality
- Policy HL3 Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5 Location and protection of social and community facilities
- Policy HL9 Health Impact Assessments
- Policy S2 Safe and Secure City
- Policy SA1 Publicly Accessible Places
- Policy SA3 Designing in security
- Policy HS3 Residential environment
- Policy S4 Offices
- Policy OF1 Office development
- Policy OF2 Protection of Existing Office Floorspace
- Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy S6 Culture and Visitors
- Policy CV2 Provision of Arts, Culture and Leisure Facilities



- Policy CV3 Provision of Visitor Facilities
- CV5 Evening and Night-time Economy
- Policy CV6 Public Art
- Policy S7 Infrastructure and Utilities
- Policy S8 Design
- Policy DE1 Sustainability Design
- Policy DE2 Design Quality
- Policy DE3 Public realm
- Policy DE5 Shopfronts
- Policy DE7 Daylight and sunlight
- Policy DE8 Lighting
- Policy S9 Transport and Servicing
- Policy VT1 The impacts of development on transport
- Policy VT2 Freight and servicing
- Policy VT3 Vehicle Parking
- Policy S10 Active travel and healthy streets
- Policy AT1 Pedestrian movement
- Policy AT2 Active travel including cycling
- Policy AT3 Cycle parking
- Policy S11 Historic environment
- Policy HE1 Managing change to Historic Environment
- Policy HE2 Ancient monuments and archaeology
- Policy S13 Protected Views
- Policy S14 Open spaces and green infrastructure
- Policy OS1 Protection and Provision of Open Spaces
- Policy OS2 City Urban greening
- Policy OS3 Biodiversity
- Policy OS4 Biodiversity Net Gain
- Policy OS5 Trees
- Policy S15 Climate resilience and flood risk
- Policy CR1 Overheating and Urban Heat Island effect
- Policy CR3 Sustainable drainage systems (SuDS)
- Policy S16 Circular economy and waste
- Policy CE1 Zero Waste City
- Policy S23 Smithfield and Barbican Key Area of Change
- Policy S26 Planning contributions

### **Relevant Local Plan Policies**

#### ***CS1 Provide additional offices***

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

#### ***CS2 Utilities infrastructure***

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

### ***CS3 Security and Safety***

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.

### ***CS4 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 Design***

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.

### ***CS11 Visitor, arts 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 Historic environment***

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.

### ***CS13 Protected 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 Sustainable development and climate change***

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

### ***CS16 Public transport, streets and walkways***

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.

### ***CS17 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).

### ***CS18 Flood risk***

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

### ***CS19 Open spaces and recreation***

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

### ***CS20 Retailing***

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.

### ***CS21 Housing***

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

### ***CS22 Social infrastructure and opportunity***

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.

### ***Policy DM 1.1 Protection of office accommodation***

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

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

### ***DM1.5 Mixed uses in commercial areas***

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

### ***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.

### ***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.

### ***DM3.3 Crowded places***

On all major developments, applicants will be required to satisfy principles and standards that address the issues of crowded places and counter-terrorism, by:

- a) conducting a full risk assessment;
- b) keeping access points to the development to a minimum;
- c) ensuring that public realm and pedestrian permeability associated with a building or site is not adversely impacted, and that design considers the application of Hostile Vehicle Mitigation measures at an early stage;
- d) ensuring early consultation with the City of London Police on risk mitigation measures;
- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

#### ***DM3.4 Traffic management***

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

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

#### ***DM3.5 Night-time entertainment***

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

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

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

#### ***DM10.1 New development***

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

- a) the bulk and massing of schemes are appropriate in relation to their surroundings and have due regard to the general scale, height, building

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

### ***DM10.2 Design of green roofs and walls***

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

### ***DM10.3 Roof gardens and terraces***

- 1) To encourage high quality roof gardens and terraces where they do not:
  - a) immediately overlook residential premises;
  - b) adversely affect rooflines or roof profiles;
  - c) result in the loss of historic or locally distinctive roof forms, features or coverings;

- d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

#### ***DM10.4 Environmental enhancement***

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

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

#### ***DM10.5 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; 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.

### ***DM11.2 Public Art***

To enhance the City's public realm and distinctive identity by:

- a) protecting existing works of art and other objects of cultural significance and encouraging the provision of additional works in appropriate locations;
- b) ensuring that financial provision is made for the future maintenance of new public art;
- c) requiring the appropriate reinstatement or re-siting of art works and other objects of cultural significance when buildings are redeveloped.

### ***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.

### ***DM12.3 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.

#### ***DM15.4 Offsetting carbon emissions***

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

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

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

#### ***DM15.5 Climate change resilience***

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

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

#### ***DM15.6 Air quality***

1. Developers will be required to consider the impact of their proposals on air quality and, where appropriate, provide an Air Quality Impact Assessment.
2. Development that would result in deterioration of the City's nitrogen dioxide or PM10 pollution levels will be resisted.
3. Major developments will be required to maximise credits for the pollution section of the BREEAM or Code for Sustainable Homes assessment relating to on-site emissions of oxides of nitrogen (NOx).
4. Developers will be encouraged to install non-combustion low and zero carbon energy technology. A detailed air quality impact assessment will be required for combustion based low and zero carbon technologies, such as CHP plant and biomass or biofuel boilers, and necessary mitigation must be approved by the City Corporation.
5. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts.
6. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

#### ***DM15.7 Noise and light pollution***

1. Developers will be required to consider the impact of their developments on the noise environment and where appropriate provide a noise assessment. The layout, orientation, design and use of buildings should ensure that operational noise does not adversely affect neighbours, particularly noise-sensitive land uses such as housing, hospitals, schools and quiet open spaces.
2. Any potential noise conflict between existing activities and new development should be minimised. Where the avoidance of noise conflicts is impractical, mitigation measures such as noise attenuation and restrictions on operating hours will be implemented through appropriate planning conditions.
3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance in the vicinity of the development.
4. Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment.

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

### ***DM15.8 Contaminated land and water quality***

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

### ***DM16.1 Transport impacts of development***

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

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

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

### ***DM16.2 Pedestrian movement***

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

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

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

3. Routes of historic importance should be safeguarded as part of the City's characteristic pattern of lanes, alleys and courts, including the route's historic alignment and width.
4. The replacement of a route over which pedestrians have rights, with one to which the public have access only with permission will not normally be acceptable.
5. Public access across private land will be encouraged where it enhances the connectivity, legibility and capacity of the City's street network. Spaces should be designed so that signage is not necessary and it is clear to the public that access is allowed.
6. The creation of new pedestrian rights of way will be encouraged where this would improve movement and contribute to the character of an area, taking into consideration pedestrian routes and movement in neighbouring areas and boroughs, where relevant.

#### ***DM16.3 Cycle parking***

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

#### ***DM16.4 Encouraging active travel***

1. Ancillary facilities must be provided within new and refurbished buildings to support active transport modes such as walking, cycling and running. All commercial development should make sufficient provision for showers, changing areas and lockers/storage to cater for employees wishing to engage in active travel.
2. Where facilities are to be shared with a number of activities they should be conveniently located to serve all proposed activities.

#### ***DM16.5 Parking and servicing standards***

1. Developments in the City should be car-free except for designated Blue Badge spaces. Where other car parking is exceptionally provided it must not exceed London Plan's standards.
2. Designated parking must be provided for Blue Badge holders within developments in conformity with London Plan requirements and must be marked out and reserved at all times for their use. Disabled parking spaces must be at least 2.4m wide and at least 4.8m long and with

reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

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

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

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

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

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

### ***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.

### ***DM19.1 Additional open space***

1. Major commercial and residential developments should provide new and enhanced open space where possible. Where on-site provision is not feasible, new or enhanced open space should be provided near the site, or elsewhere in the City.
2. New open space should:
  - a) be publicly accessible where feasible; this may be achieved through a legal agreement;
  - b) provide a high quality environment;
  - c) incorporate soft landscaping and Sustainable Drainage Systems, where practicable;
  - d) have regard to biodiversity and the creation of green corridors;
  - e) have regard to acoustic design to minimise noise and create tranquil spaces.
3. The use of vacant development sites to provide open space for a temporary period will be encouraged where feasible and appropriate.

### ***DM19.2 Biodiversity and urban greening***

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

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

#### ***DM20.4 Retail unit sizes***

1. Proposals for new retail uses should provide a variety of unit sizes compatible with the character of the area in which they are situated.
2. Major retail units (over 1,000sq.m) will be encouraged in PSCs and, where appropriate, in the Retail Links in accordance with the sequential test.

#### ***DM21.3 Residential environment***

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;
  - b) requiring new development near existing dwellings to demonstrate adequate mitigation measures to address detrimental impact.
2. Noise-generating uses should be sited away from residential uses, where possible. Where residential and other uses are located within the same development or area, adequate noise mitigation measures must be provided and, where required, planning conditions will be imposed to protect residential amenity.
3. All development proposals should be designed to avoid overlooking and seek to protect the privacy, day lighting and sun lighting levels to adjacent residential accommodation.
4. All new residential development proposals must demonstrate how potential adverse noise impacts on and between dwellings will be mitigated by housing layout, design and materials.
5. The cumulative impact of individual developments on the amenity of existing residents will be considered.

## SCHEDULE

APPLICATION: 23/01417/FULMAJ

1-8 Long Lane, London, EC1A 9HF

**Demolition of existing buildings to basement level and construction of a nine storey plus basement level building for hotel use (Class C1) with retail (Class E(a) / E(b)) use at part ground and basement levels together with ancillary cycle parking, associated servicing, plant, amenity terraces, landscaping and other associated works.**

## CONDITIONS

### Time limit

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.

### Sustainability

2. (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 commencement of the development, excluding demolition: a detailed Circular Economy Statement shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The development shall be carried out in accordance with the approved details and operated & managed in accordance with the approved details throughout the lifecycle of the development.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages reuse and reduces waste in accordance with the following policies in the Development Plan and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 - Draft City Plan 2036; S16, CEW 1. These details are required prior to demolition and construction work commencing in order

to establish the extent of recycling and minimised waste from the time that demolition and construction starts.

3. No later than 3 months after completion of the buildings at 1-8 Long Lane, a post-construction 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.

4. Prior to the commencement of the development, excluding demolition of the development a detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the Whole Life-Cycle Carbon emissions savings of the development achieve at least the GLA benchmarks and setting out further opportunities to achieve the GLA's Aspirational 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 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 Page 146 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.

5. Once the as-built design has been completed (upon commencement of RIBA Stage 6) and prior to the development being occupied, a post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the WLC carbon emission figures for all

life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.

Reason: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.

6. Prior to the commencement of the development, excluding demolition of the development 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.

7. Within 6 months of completion of the development 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.

8. Prior to the commencement of development, excluding demolition, details of the façade system confirming the detailed design in relation

to reducing the embodied carbon impact and waste across all life-cycle stages that would result from the proposed facade type, materials, construction method and replacement cycles is required to be submitted to and approved in writing by the Local Planning Authority. The development shall be carried out in accordance with the approved drawings.

REASON: To demonstrate that embodied carbon emissions have been minimised and that the development is sustainable in accordance with the following policy of the Local Plan policies: CS15, DM15.1, DM15.2 and Draft City Plan 2036 policies DE1 and CE1.

9. The development shall be designed to allow for connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site.

REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4.

10. Within 6 months of completion of the development details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species, scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2036 policy OS2 City Greening and OS3 Biodiversity.

11. Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted to the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management.

REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Draft City Plan 2036 policy OS3 Biodiversity.

12. Post construction BREEAM assessments for all uses, demonstrating that at least a target rating of 'Excellent' has been achieved, 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.

## SUDS

13. 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, schematic and layout drawings for the proposed SuDS components including but not limited to: attenuation systems (including blue roofs), rainwater pipework, flow control devices, pumps, design for system exceedance, design for ongoing maintenance including silt removal; surface water flow rates shall be restricted to no greater than 1.7 l/s, provision should be made for an attenuation volume capacity capable of achieving this;
  - (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.

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

REASON: To improve sustainability, reduce flood risk and reduce water runoff rates in accordance with the following policy of the Local Plan: DM18.1, DM18.2 and DM18.3.

15. No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface water infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground water utility infrastructure. Piling has the potential to

impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. Should you require further information please contact Thames Water. Email: [developer.services@thameswater.co.uk](mailto:developer.services@thameswater.co.uk).

16. Before any construction works hereby permitted are begun details of rainwater harvesting and grey water recycling systems shall be submitted to and approved in writing by the local planning authority.

REASON: To improve sustainability and reduce flood risk by reducing potable water demands and water run-off rates in accordance with the following policy of the Local Plan: CS18. These details are required prior to construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

### Greening/Landscaping

17. Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:
  - a) Details of all soft landscaping, including the position, size and types of all planting and details of their respective planting beds;
  - b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium;
  - c) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation;
  - d) Details of the method of irrigation and nutrient delivery systems;
  - e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures;
  - f) Details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual;
  - g) Details of landscape lighting;
  - h) A management and maintenance Plan (including ecological management) for all proposed landscaping; and
  - i) Details of permanent wayfinding features and other installations.

All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development



shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

All unbuilt and built surfaces, including the ground floor and roof levels landscaping, shall be treated in accordance with a landscaping scheme, including details of:

- i) Irrigation;
- ii) Provision for harvesting rainwater run-off from road to supplement irrigation;
- iii) Spot heights for ground levels around planting pit;
- iv) Soil;
- v) Planting pit size and construction;
- vi) Tree guards; and
- vii) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development
- viii) the green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;
- ix) the incorporation of blue roofs into roof surfaces;
- x) the landscaping of the public realm;

All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, DM10.5 and emerging policies DE2, DE6 and HE1 of the Draft City Plan 2040.

### Environmental Health

18. No part of the roof areas except those shown as roof terraces on the drawings hereby approved shall be used or accessed by occupiers of the building, other than in the case of emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

19. The roof terraces, other than those accessed via individual guest rooms, hereby permitted shall not be used or accessed between the hours of 21:00 on one day and 07:00 on the following day.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

20. No amplified or other music shall be played on the roof terraces.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

21. The restaurant/bar/takeaway uses hereby permitted shall not be open to customers between the hours of (23:00) on one day and (07:00) on the following day.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

22. Self-closing mechanisms must be fitted on the doors at Ground Floor before the Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) use commences and shall be retained for the life of the premises. The doors must not be left open except in an emergency or for maintenance purposes.

REASON: To safeguard the amenity of the adjoining premises and the area generally in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

23. (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 most affected noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which the 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.

24. 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 and should include the provision of noise mitigation measures in the periphery of site in the form of an acoustic insulation sheeting. 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.

25. 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 and should include the provision of noise mitigation measures in the periphery of site in the form of an acoustic insulation sheeting. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

REASON: In the interests of public safety and to ensure a minimal effect on the amenities of neighbouring premises and the transport network in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to demolition in order that the impact on amenities is minimised from the time that the construction starts.

26. Before any works thereby affected are begun, a scheme shall be submitted to and approved in writing by the Local Planning Authority

which specifies the fume extract arrangements, materials and construction methods to be used to avoid noise and/or odour penetration to the upper floors from the restaurant use. Flues must terminate at roof level or an agreed high level location which will not give rise to nuisance to other occupiers of the building or adjacent buildings. The details approved must be implemented before the restaurant use takes place.

REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3.

27. 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

28. Before the development hereby permitted is begun a detailed site investigation shall be carried out to establish if the site is contaminated and to determine the potential for pollution of the water environment. The method and extent of this site investigation shall be agreed in writing with the Local Planning Authority prior to commencement of the work. Details of measures to prevent pollution of ground and surface water, including provisions for monitoring, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences. The development shall proceed in strict accordance with the measures approved.

REASON: To prevent pollution of the water environment in accordance with the following policy of the Local Plan: DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

29. No work except demolition to basement slab level shall take place until an investigation and risk assessment has been undertaken to establish if the site is contaminated and to determine the potential for pollution in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.  
Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and to the natural and historical environment must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation

scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

**REASON:** 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 Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

30. Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'. Where remediation is necessary a detailed remediation scheme to bring the site to a condition suitable for the intended use must be submitted to and approved in writing by the Local Planning Authority. Unless otherwise agreed in writing by the Local Planning Authority the remediation scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation. Following completion of measures identified in the approved remediation scheme a verification report must be submitted to and approved in writing of the Local Planning Authority.

**REASON:** 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 Local Plan DM15.8. These details are required prior to commencement in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

31. No cooking shall take place within any Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) 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. Flues must terminate at roof level or an agreed high level location which will not

give rise to nuisance to other occupiers of the building or adjacent buildings. 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.

32. All parts of the ventilation and extraction equipment including the odour control systems installed shall be cleaned, serviced and maintained in accordance with Section 5 of 'Control of Odour & Noise from Commercial Kitchen Extract Systems' dated September 2018 by EMAQ+ (or any subsequent updated version). A record of all such cleaning, servicing and maintenance shall be maintained and kept on site and upon request provided to the Local Planning Authority to demonstrate compliance.

Reason: To protect the occupiers of existing and adjoining premises and public amenity in accordance with Policies DM 10.1, DM 15.7 and DM 21.3.

### Archaeology

33. No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

- a) The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- b) Where appropriate, details of a programme for delivering related positive public benefits
- c) The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

34. No development shall take place until details of the foundation design and construction method to protect archaeological remains have been submitted and approved in writing by the local planning authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.

### Transportation

35. Demolition works shall not begin until a Deconstruction Logistics Plan to manage all freight vehicle movements to and from the site during deconstruction of the existing building(s) has been submitted to and approved in writing by the Local Planning Authority. The Deconstruction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The demolition shall not be carried out otherwise than in accordance with the approved Deconstruction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that demolition works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1. These details are required prior to demolition work commencing in order that the impact on the transport network is minimised from the time that demolition starts.

36. Construction works shall not begin until a Construction Logistics Plan to manage all freight vehicle movements to and from the site during construction of the development has been submitted to and approved in writing by the Local Planning Authority. The Construction Logistics Plan shall be completed in accordance with the Mayor of London's Construction Logistics Plan Guidance dated July 2017 and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. The development shall not be carried out otherwise than in accordance with the approved Construction Logistics Plan or any approved amendments thereto as may be agreed in writing by the Local Planning Authority.

REASON: To ensure that construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan:

DM15.6, DM16.1. These details are required prior to construction work commencing in order that the impact on the transport network is minimised from the time that construction starts.

37. Prior to the commencement of the Section 278 design works a Pedestrian Comfort Level Assessment shall be submitted to and approved in writing by the Local Planning Authority. The Assessment shall meet Transport for London guidelines in order to confirm the impact of the development prior to agreeing highways mitigation.

REASON: To ensure that pedestrian movement is facilitated by the provision of suitable pedestrian routes around the site in accordance with the following Local Plan policies: DM 16.1 and DM 16.2.

38. Prior to the commencement of works including demolition, a site condition survey of the adjacent highways 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. Proposed finished floor levels at basement and threshold ground floor (threshold review) levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in accordance with the approved levels 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.

39. Permanently installed pedal cycle racks shall be provided and maintained on the site throughout the life of the buildings sufficient to accommodate a minimum of 10 long stay spaces and 6 short stay spaces. All doors on the access to the parking area shall be automated, push button or pressure pad operated. The cycle parking provided on the site must remain ancillary to the use of the buildings and must be available at all times throughout the life of the buildings 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, and emerging policy AT3 of the Draft City Plan 2036.



40. A minimum of 5% of the long stay cycle spaces shall be accessible for larger cycles, including adapted cycles for disabled people.

REASON: To ensure that satisfactory provision is made for people with disabilities in accordance with Local Plan policy DM10.8, London Plan policy TS cycling, emerging City Plan policy 6.3.24.

41. A minimum of 3 showers and 34 lockers shall be provided adjacent to the bicycle parking areas and changing facilities and maintained throughout the life of the building for the use of occupiers of the building in accordance with the approved plans.

REASON: To make travel by cycle more convenient in order to encourage greater use of cycles by commuters in accordance with the following policy of the Local Plan: DM16.4.

42. Goods, including fuel, delivered or collected by vehicles arriving at or departing from the building shall not be accepted or dispatched unless the vehicles are unloaded or loaded within the curtilage of the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM16.1, DM16.5, DM21.3.

43. Details of a Servicing Management Plan 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 prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Servicing Management Plan (or any amended Servicing Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.

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.

44. Minimum of one electric charging point must be provided within the delivery and servicing area and retained for the life of the building.

REASON: To further improve the sustainability and efficiency of travel in, to, from and through the City in accordance with the following policy of the Local Plan: CS16.

TfL

45. Before the demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have

been submitted to and approved in writing by the local planning authority.

- a) Site specific Risk Assessments and Method Statements (RAMS) for any activities which TfL may deem to be a risk to London Underground (LU). Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.
- b) Demonstrate that the design allows for any EMC emissions from LU's tunnel tracks and adjacent electrical equipment.
- c) Details of any changes in loading to LU's infrastructure because of the works or temporary works
- d) Written confirmation will be required from Thames Water that any increased drainage or sewage from the site will not be discharged directly or indirectly into LU's drainage system.
- e) Accommodate the location of the existing LU infrastructure.
- f) There should be no opening windows, roof gardens or balconies facing the LU elevation.
- g) Demonstrate access to elevations of the proposed building adjacent to the property boundary with LU can be undertaken without recourse to entering LU land or airspace.
- h) Demonstrate that there will at no time be any potential security risk to LU's railway, property or structures.
- i) Provide a proposal for future maintenance of the building facade.
- j) No works to commence near or on the boundary with London Underground assets until any party wall agreements required with TfL Engineering, TfL Property or TfL Legal have been agreed and signed by all parties.
- k) Mitigate the effects of noise and vibration arising from the adjoining railway operations and maintenance within their structures and land.
- l) No claims to be made against TfL or LU by the Local Authority (e.g. The Royal Borough of Kensington and Chelsea), purchasers, tenants, occupants or lessees of the development for any noise or vibration resulting from LU running, operating and maintaining the adjacent railway
- m) No works to commence on any part of TfL/LU Property or in it's airspace until any agreements required with TfL Engineering, TfL Property or TfL Legal have been agreed and signed by all parties.
- n) Landscaping to be agreed in accordance with the London Underground landscaping standard.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

46. Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
  - a) Prior to commencement of each phase of the development, provide detailed design for foundations, basement and ground floor

- structures, or for any other structures below ground level, including piling (temporary and permanent)
- b) Site specific Risk Assessments and Method Statements (RAMS) for any activities (groundworks, piling) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing.
- c) Details of any changes in loading to LU's infrastructure considering sequence of temporary and permanent works
- d) A ground movement assessment/Impact assessment will be required for substructure.
- e) No support to be taken from LU's land or structures.
- f) Completion of a glare and glint study to ensure no vision impairment to the drivers on the operational railway from the construction, or any lighting.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

47. Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
- a) Provide detailed design for all superstructure works (temporary and permanent)
  - b) Provide details on the erection and use of tall plant (e.g. tower cranes, mobile cranes and piling rigs) and scaffolding prior to commencement of works
  - c) Tower Crane base design (including certification), Risk Assessment and Method Statement for siting, erection, lifting arrangements, operational procedure (including any radio communications), jacking up, derigging in addition to plans for elevation, loads, radius, slew restrictions and collapse radius. No cranes should be erected or dismantled until LU Engineer's approval has been obtained in writing.
  - d) Site specific Risk Assessments and Method Statements (RAMS) for any activities (craneage, scaffolding, use of tall plant) which TfL may deem to be a risk to LU. Individual RAMS should be issued a minimum of 6 weeks prior to the individual activity commencing
  - e) Details of any changes in loading to LU's infrastructure because of the works or temporary works
  - f) Ground movement assessment/impact assessment will be required.
  - g) Structure monitoring and track monitoring duration of construction works if required.
  - h) No glare or glint to be shed onto the railway from the construction, the completed structure, or any lighting.
  - i) No support to be taken from LU's land or structures.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with

London Plan policy T3 and 'Land for Industry and Transport'  
Supplementary Planning Guidance 2012.

48. Before the Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.
- a) Site specific Risk Assessments and Method Statements (RAMS) for any activities scaffolding tall plant use and demolition plant.
  - b) A ground movement analysis will be required for demolition only.
  - c) Structure monitoring and track monitoring duration of construction works if required.
  - d) Full consultation with TfL Engineering Infrastructure Protection to agree demolition, and site remedial methodologies.
  - e) No support to be taken from LU's land or structures.
  - f) No glare or glint to be shed onto the railway from the construction, or any lighting.

REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

49. None of the development hereby permitted shall be commenced until detailed design and construction method statements for all of the ground floor structures, foundations and basements and for any other structures below ground level, including piling, any temporary works, and site investigations, have been submitted to and approved in writing by the Local Planning Authority which:
- a) Accommodate the Elizabeth line infrastructure, including any temporary works associated with the Elizabeth line (formerly known as Crossrail);
  - b) Mitigate the effects on the Elizabeth line, of ground movement arising from the development. The development shall be carried out in all respects in accordance with the approved design and method statements.

All structures and works comprised within the development hereby permitted which are required this condition shall be completed, in their entirety, before any part of the building[s] hereby permitted is/are occupied.

Reason: To ensure that the development does not impact on existing Crossrail transport infrastructure, in accordance with London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.

#### Wind

50. No development other than demolition shall take place until the detailed design of all wind mitigation measures based on the findings of either

Computational Fluid Dynamics (CFD) or Wind Tunnel Testing has been submitted to and approved in writing by the Local Planning Authority. These details shall include the size and appearance of any features, the size and appearance of any planting containers, trees species, planting medium and irrigation systems. No part of the building shall be occupied until the approved wind mitigation measures have been implemented unless the Local Planning Authority agrees otherwise in writing. The said wind mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with the following policies of the Local Plan: DM10.1, DM16.1, DM16.2. 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.

### Thermal Comfort

51. No development other than demolition shall take place until the detailed design of all thermal comfort mitigation measures based on the findings of a detailed Thermal Comfort Assessment has been submitted to and approved in writing by the Local Planning Authority. The said thermal comfort mitigation measures shall be retained in place for the life of the building unless otherwise agreed by the Local Planning Authority.

REASON: In order to ensure that the proposed development does not have a detrimental impact on the amenities of the area in accordance with London Plan Policy D8 and Policy D9 and emerging City Plan policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London. 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.

### Road vehicle attack measures

52. 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, 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 are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2.

### Lighting

53. Prior to the commencement of the relevant works, a Lighting Strategy and a Technical Lighting Design shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:

- a) lighting layout/s;
- b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure);
- c) a lighting control methodology;
- d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;
- e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass;
- f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.
- g) details of aviation lights including locations

Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15, emerging policies DE1, DE2 and HL3 of the Draft City Plan 2036 and the City of London Lighting SPD 2023.

54. Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.

REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1.

55. There shall be no high level external lighting of the external facades.

REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for

environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 , CS15.

### Design

56. Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:

- a) Particulars and samples of the materials to be used on all external surfaces of the building including external ground level and upper level surfaces;
- b) Construction of 1:1 sample material and facade panels of agreed sections of the facades;
- c) Details of the proposed new façade including typical details of the fenestration, entrances and shopfronts at a scale of no less than 1:20;
- d) Detailed drawings of a scale no less than 1:20, in plan, section and elevation, of agreed typical bays;
- e) Details of awnings;
- f) Details of signage for all aspects of the building;
- g) Details of soffits, privacy screens, handrails and balustrades;
- h) Details of terraces;
- i) Details of gates and fencing;
- j) Details of rooftop including any plant equipment and the roofscape;
- k) Details of the integration of M&E and building services into the external envelope;
- l) Details of external ducts, vents, louvres and extracts;
- m) Details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences at roof level including within the plant room; and
- n) Details of access to the roof for cleaning and maintenance, including details of mansafe equipment

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, DMI0.1, DMI0.5, DM12.2.

57. Notwithstanding the details shown on the drawings, before any works thereby affected are begun, details of measures to prevent jumping or falling from the development shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.

REASON: In the interests of safety in accordance with the following policies of the draft City Plan 2036: DE2 and DE5.

58. Before any works thereby affected are begun detailed plans, elevations and sections including spot heights of the roof level shall be submitted to and approved in writing by the Local Planning Authority to ensure sufficient design quality and the protection of the heritage significance of surrounding designated heritage assets.

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 and to ensure design quality and the protection of the heritage significance of surrounding designated heritage assets in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.3, CS13 and emerging policies SE1, DE2, DE6 and HE1 of the Draft City Plan 2036.

### Accessibility

59. Before any construction work hereby permitted are begun, details of the proposed lifts shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. 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.

60. Prior to the occupation of the buildings, details of an Access Management Plan shall be submitted to and approved in writing by the local planning authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. 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.

61. Prior to the commencement of works including demolition, a site condition survey of the adjacent highways 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. Proposed finished floor levels at basement and threshold ground floor (threshold review) levels in relation to the existing Ordnance Datum levels of the adjoining streets and open spaces, must be submitted and agreed with the Highways Authority. The development shall be carried out in



accordance with the approved levels 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.

62. Before any construction work hereby permitted are begun, a scheme indicating the provision to be made for disabled people to gain access to all areas shall be submitted to and approved in writing by the Local Planning Authority. The agreed scheme shall be implemented in accordance with the approved details before the development hereby permitted is brought into use.

REASON: To ensure that the development will be accessible for people with disabilities in accordance with the following policy of the Local Plan: DM10.8. 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.

63. The threshold of the private public realm and public route entrances shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

#### Waste Management Plan

64. A Waste Management Plan to include details of backloading of waste onto delivery vehicles from the consolidation centre shall be submitted to and approved in writing by the Local Planning Authority prior to the first occupation of the development hereby permitted. The building facilities shall thereafter be operated in accordance with the approved Waste Management Plan (or any amended Waste Management Plan that may be approved from time to time by the Local Planning Authority) for the life of the building.

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.

#### Air Quality

65. 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. Where it is not possible to deploy alternatives, any diesel generators must be the latest Euro Stage available. 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 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.

66. 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.

67. Prior to the commencement of the 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 (or any updates thereof), Local Plan Policy DM15.6 and London Plan Policy SI1D. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.

### Fire Hydrants

68. No development other than demolition shall take place until details of fire hydrants have been submitted to and approved in writing by the Local Planning Authority. The development shall then be implemented in accordance with the approved details and be retained as such in perpetuity.

REASON: in the interest of fire safety, in accordance with policies D5 and D12 of the London Plan.

### Compliance

69. No doors, gates or windows at ground floor level shall open over the public highway.

REASON: In the interests of public safety.

70. 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

71. The threshold of the vehicular access point shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

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

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

73. The threshold of the private public realm and public route entrances shall be at the same level as the rear of the adjoining footway.

REASON: To maintain a level passage for pedestrians in accordance with the following policies of the Local Plan: DM10.8, DM16.2.

74. The development shall provide:

- a) 5,110 sq.m of hotel floorspace (Class C1);
- b) 167 sq.m of retail/café/restaurant (Class E(a) and (b))

REASON: To ensure the development is carried out in accordance with the approved plans.

75. 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:

- 11246-EPR-ZZ-XX-DR-A-TP-0001 P1
- 11246-EPR-ZZ-XX-DR-A-TP-0010 P1
- 11246-EPR-00-B1-DR-A-TP-0099 P1
- 11246-EPR-00-GF-DR-A-TP-0100 P2
- 11246-EPR-00-01-DR-A-TP-0101 P1
- 11246-EPR-00-02-DR-A-TP-0102 P1

11246-EPR-00-03-DR-A-TP-0103 P1  
11246-EPR-00-04-DR-A-TP-0104 P1  
11246-EPR-00-05-DR-A-TP-0105 P1  
11246-EPR-ZZ-XX-DR-A-TP-0400 P1  
11246-EPR-ZZ-SO-DR-A-TP-0401 P1  
11246-EPR-ZZ-NO-DR-A-TP-0402 P1  
11246-EPR-ZZ-WE-DR-A-TP-0403 P1  
11246-EPR-ZZ-EA-DR-A-TP-0404 P1  
11246-EPR-ZZ-XX-DR-A-TP-0500 P1  
11246-EPR-00-B1-DR-A-TP-0299 P1  
11246-EPR-00-GF-DR-A-TP-0300 P1  
11246-EPR-00-01-DR-A-TP-0301 P1  
11246-EPR-00-02-DR-A-TP-0302 P1  
11246-EPR-00-03-DR-A-TP-0303 P1  
11246-EPR-00-04-DR-A-TP-0304 P1  
11246-EPR-00-05-DR-A-TP-0305 P1  
11246-EPR-ZZ-SO-DR-A-TP-0421 P1  
11246-EPR-ZZ-NO-DR-A-TP-0422 P1  
11246-EPR-ZZ-WE-DR-A-TP-0423 P1  
11246-EPR-ZZ-EA-DR-A-TP-0424 P1  
11246-EPR-ZZ-XX-DR-A-TP-0520 P1  
11246-EPR-00-B1-DR-A-TP-0199 P2  
11246-EPR-00-GF-DR-A-TP-0200 P4  
11246-EPR-00-01-DR-A-TP-0201 P2  
11246-EPR-00-02-DR-A-TP-0202 P2  
11246-EPR-00-03-DR-A-TP-0203 P2  
11246-EPR-00-04-DR-A-TP-0204 P2  
11246-EPR-00-05-DR-A-TP-0205 P2  
11246-EPR-00-06-DR-A-TP-0206 P2  
11246-EPR-00-07-DR-A-TP-0207 P4  
11246-EPR-00-08-DR-A-TP-0208 P4  
11246-EPR-00-09-DR-A-TP-0209 P2  
11246-EPR-ZZ-XX-DR-A-TP-0410 P3  
11246-EPR-ZZ-SO-DR-A-TP-0411 P4  
11246-EPR-ZZ-NO-DR-A-TP-0412 P4  
11246-EPR-ZZ-WE-DR-A-TP-0413 P3  
11246-EPR-ZZ-EA-DR-A-TP-0414 P3  
11246-EPR-ZZ-XX-DR-A-TP-0510 P1  
11246-EPR-ZZ-XX-DR-A-TP-0511 P2  
11246-EPR-ZZ-XX-DR-A-TP-0512 P1  
11246-EPR-ZZ-XX-DR-A-TP-0513 P1  
11246-EPR-ZZ-XX-DR-A-TP-0514 P1

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 A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk). Application forms should be completed on line via <https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.thameswater.co.uk%2F&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7C79bb749481fb4aebb01c08dc265fae0d%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638427439639442980%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=rGcgQXRzTRNW RQBpRG%2Bpqnld0yLT1E01iZQ1YDGWcxo%3D&reserved=0>. Please refer to the Wholesale; Business customers; Groundwater discharges section.
- 2 Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.
- 3 The Developer is recommended to assess and mitigate the possible effects of noise and vibration arising from the operation of the Elizabeth line.
- 4 The applicant is advised to contact TfL Infrastructure Protection in advance of preparation of final design and associated method statements, in particular with regard to: demolition; drainage; excavation; construction methods; tall plant: scaffolding: security; boundary treatment; safety barriers; landscaping and lighting. A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.
- 5 A Party Wall notice will be required to be served to Transport for London Infrastructure Protection in advance of carrying out any works near or on a party wall.
- 6 Written schemes of investigation will need to be prepared and implemented by a suitably professionally accredited archaeological practice in accordance with Historic England's Guidelines for

Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 7 Small refuse vehicle is expectable on this proposal but architects are reminded to work with standard RVC dimensions.
- 8 Waste store to be built to BS5906 specifications.
- 9 Waste bins cannot be left on the highway for collection.
- 10 **Roof Gardens**  
The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP.  
In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.
- 11 **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.
- 12 **Generators and combustion plant**  
Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here:  
Medium combustion plant and specified generators: environmental permits - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **Background Papers**

31/01/24 - 09:54	Network Rail	External
05/02/24 - 08:19	District Surveyors Office	Internal
05/02/24 - 15:33	Thames Water	External
08/02/24 - 13:35	Historic England	External

09/02/24 - 08:04	Contract and Drainage Service	Internal
09/02/24 - 10:37	Transport For London	External
12/02/24 - 15:08	Planning Obligations	Internal
14/02/24 - 14:58	Transport For London	External
16/02/24 - 15:06	Historic England	External
19/02/24 - 16:00	Environmental Health	Internal
19/02/24 - 16:45	Lead Local Flood Authority	Internal
21/02/24 - 14:30	Transport For London	External
28/02/24 - 09:30	Barbican Association	External
02/03/24 - 22:48	Community Facilities Manager	Internal
05/03/24 - 14:20	Transport For London	Internal
25/03/24 - 12:56	Air Quality Officer	External
18/04/24 - 13:49	Environmental Resilience	Internal