

Memo

To Assistant Director (Development Management)
Environment Department
Email: [REDACTED]



From Mrs Claire Callan-Day
Environmental Health Technician
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 29 December 2023

Our Ref 23/04124/NPLN

Your Ref PT_AXT/23/01322/FULMAJ

Subject 38 - 39 Furnival Street London EC4

RE: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Thank you for your memorandum. I have reviewed the application and have the following comments to make:

Before the development hereby permitted shall commence, unless otherwise agreed with the Local Planning Authority, the following works shall be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management (LCRM) guidance and be submitted to City of London for approval with due consideration given to impact of development works (including remediation) on off-site receptors, sustainable development, and future foreseeable events within the development lifespan (e.g., climate change and extreme weather events):

- a) a preliminary risk assessment (PRA) shall be completed to identify the potential for contamination at the site, define the conceptual site model (CSM), and to identify and assess potential contaminant linkages associated with the proposed development.

- b) an intrusive site investigation shall be carried out followed by an appropriate level of risk assessment to establish if the site is affected by contamination and to determine the potential for harm to human health and non-human receptors and pollution of controlled waters and the wider environment (e.g., groundwater dependent terrestrial ecosystems and statutory ecological receptors) associated with the development. The method and extent of this site investigation shall be based on the findings of the preliminary risk assessment (PRA), formulated in accordance with relevant British Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.
- c) A remediation strategy to include details of measures to prevent identified unacceptable risk to receptors from gross contamination (e.g. non aqueous phase liquid, asbestos containing material), soil contamination, pollution of controlled waters, and to bring the site to a condition suitable for the intended use including provisions for long term monitoring where required, shall then be submitted to and approved in writing by the Local Planning Authority before the development commences . 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 and that the site is suitable for its intended use. The development shall proceed in strict accordance with the measures approved.

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, to prevent pollution of the water environment, 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.

Prior to occupation and unless otherwise agreed with the Local Planning Authority, a verification report produced in accordance with LCRM and other associated guidance detailing the remediation measures completed and final condition of the site must be submitted to and approved in writing by the Local Planning Authority.

The developer must include a statement to confirm that the site development is safe, suitable for its intended use, and would not be considered under Part 2A of the Environmental Protection Act 1990.

REASON: To ensure that the development is safe and suitable for its intended use for the future users of the land, neighbouring land, and that risks to controlled waters, property and ecological systems are minimised, in accordance with the Local Plan DM15.8. These details are required prior to occupation in order that appropriate evidence of the remedial works is agreed and accepted by the Local Planning Authority prior to any potential exposure of occupiers or harm to the environment from land contamination.

Should unexpected contamination be identified during development hereby approved, the Local Planning Authority must be notified in writing within five working days. An investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's Land Contamination Risk Management.

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.

I4C 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.

I11C No live or recorded music that can be heard outside the premises shall be played.

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.

I18C No servicing of the premises shall be carried out between the hours of 23:00 on one day and 07:00 on the following day from Monday to Saturday and between 23:00 on Saturday and 07:00 on the following Monday and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.

REASON: To avoid obstruction of the surrounding streets and to safeguard the amenity of the occupiers of adjacent premises, in accordance with the following policies of the Local Plan: DM15.7, DM16.2, DM21.3.

I26 The roof terrace on level 4 hereby permitted shall not be used or accessed between the hours of 20:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank Holidays, other than in the case of emergency.

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

I27 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.

I28 There shall be no promoted events on the premises. A promoted event for this purpose, is an event involving music and dancing where the musical entertainment is provided at any time by a disc jockey or disc jockeys one or some of whom are not employees of the premises licence holder and the event is promoted to the general public.

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

M7D (a) The level of noise emitted from any new plant shall be lower than the existing background level by at least 10 dBA. Noise levels shall be determined at one metre from the window of the nearest noise sensitive premises. The background noise level shall be expressed as the lowest LA90 (10 minutes) during which plant is or may be in operation.
(b) Following installation but before the new plant comes into operation measurements of noise from the new plant must be taken and a report demonstrating that the plant as installed meets the design requirements shall be submitted to and approved in writing by the Local Planning Authority.
(c) All constituent parts of the new plant shall be maintained and replaced in whole or in part as often is required to ensure compliance with the noise levels approved by the Local Planning Authority.

REASON: To protect the amenities of neighbouring residential/commercial occupiers in accordance with the following policies of the Local Plan: DM15.7, DM21.3.

M10F There shall be no demolition on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the demolition process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The demolition shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

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

M11G There shall be no construction on the site until a scheme for protecting nearby residents and commercial occupiers from noise, dust and other environmental effects during construction has been submitted to and approved in writing by the Local Planning Authority. The scheme shall be based on the Department of Markets and Consumer Protection's Code of Practice for Deconstruction and Construction Sites and arrangements for liaison and monitoring (including any agreed monitoring contribution) set out therein. A staged scheme of protective works may be submitted in respect of individual stages of the construction process but no works in any individual stage shall be commenced until the related scheme of protective works has been submitted to and approved in writing by the Local Planning Authority. The development shall not be carried out other than in accordance with the approved scheme (including payment of any agreed monitoring contribution).

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

M19C 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.

M23D Before any piling or construction of basements is commenced a scheme for the provision of sewer vents within the building shall be submitted to and approved in writing by the local planning authority. Unless otherwise agreed in writing by the local planning authority the agreed scheme for the provision of sewer vents shall be implemented and brought into operation before the development is occupied and shall be so maintained for the life of the building.

REASON: To vent sewerage odour from (or substantially from) the development hereby permitted and mitigate any adverse air pollution or environmental conditions in order to protect the amenity of the area in accordance with the following policy of the Local Plan: DM10.1. These details are required prior to piling or construction work commencing in order that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.

M27B No cooking shall take place within any Class E/Sui Generis 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.

M32 Prior to the commencement of development the developer/construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the NRMM Regulations and the inventory of all NRMM used on site shall be maintained and provided to

the Local Planning Authority upon request to demonstrate compliance with the regulations.

REASON: *To reduce the emissions of construction and demolition in accordance with the Mayor of London Control of Dust and Emissions during Construction and Demolition SPG July 2014. Compliance is required to be prior to commencement due to the potential impact at the beginning of the construction.*

M33 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*

Prior to the commencement of the relevant works, a full Lighting Strategy shall be submitted to and approved in writing by the Local Planning Authority, which should include full details of all luminaires, both decorative, functional or ambient (including associated infrastructure), alongside details of the impact of lighting on the public realm, including intensity, uniformity, colour, timings and associated management measures to reduce the impact on light pollution and residential amenity. Detail should be provided for all external, semi-external and public-facing parts of the building and of internal lighting levels and how this has been designed to reduce glare and light trespass. All works pursuant to this consent shall be carried out in accordance with the approved details and lighting strategy.

REASON: *To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7 and emerging policy DE2 of the Draft City Plan 2036*

Regards



Claire Callan-Day
Environmental Health Technician
Environment Department
City of London Corporation




Ms Anastasia Tampouridou
City of London Corporation
Environment Department

Direct Dial: 020 7973 3738

Our ref: P01570345
2 January 2024

Dear Ms Tampouridou

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**38 - 39 FURNIVAL STREET LONDON EC4
Application No. 23/01322/FULMAJ**

Thank you for your letter of 20 December 2023 regarding the above application for planning permission.

The proposed development is close to the scheduled monument of Barnards Inn, a wonderfully preserved building with surviving elements from the medieval and Tudor periods. It is in regular use for public lectures and is a valuable asset to the area. The proposals do not physically affect the Inn and therefore scheduled monument consent will not be required.

Barnards Inn is encapsulated within a mass of more recent buildings, and already quite overshadowed. The proposals in the current application will not compromise the setting of the Inn any further, although care should be taken to ensure access to it remains easily navigated and signage is not impacted, as it is quite tricky to find for first time visitors.

We also suggest that you seek the views of your specialist conservation advisors, as relevant.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. If you would like detailed advice from us, please



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700
HistoricEngland.org.uk





Historic England

contact us to explain your request.

Yours sincerely

Jane Sidell

Inspector of Ancient Monuments
[REDACTED]



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Historic England

Anastasia Tampouridou
City of London PO Box 270
Guildhall
London EC2P 2EJ

Your Ref: 23/01322/FULMAJ
Our Ref: 218461

Contact:
Helen Hawkins



4th January 2024

Dear Ms Tampouridou,

**TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
NATIONAL PLANNING POLICY FRAMEWORK 2021**

38 - 39 Furnival Street London EC4

Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works

Recommend Two Archaeological Conditions

Thank you for your consultation received on 20th December 2023.



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The Greater London Archaeological Advisory Service (GLAAS) gives advice on archaeology and planning. Our advice follows the National Planning Policy Framework (NPPF) and the GLAAS Charter.

Assessment of Significance and Impact

The planning application lies in an area of archaeological interest (Archaeological Priority Area) identified in the Local Plan: [77190] City of London APA

The Kingsway Tunnels lie in an area of archaeological interest, within both the London Borough of Camden and the City of London. As the tunnels are already located at some depth, the impact on potential archaeology of the development is limited to the areas from which the tunnels will be accessed, with new entrances proposed in both Camden and the City. This response relates to archaeology in the City only and a separate response will be provided by GLAAS for Camden.

An archaeological desk-based assessment (Mills Whipp 2023) has been submitted with the planning application. The desk-based assessment highlights that 40-41 Furnival Street was excavated in the 1980s when the current building was constructed. The excavation recorded medieval gravel quarries backfilled with brickearth, a series of 13th-15th Century rubbish pits and a chalk-lined cesspit. The remains of a late 17th Century L-shaped building were excavated on the southern half of the site which may have removed any evidence for the earlier inn. It is likely that all archaeological remains have been removed from 40-41 Furnival Street.

At 38-39 Furnival Street impact from a basement, vent shaft and lift has taken place but some archaeological potential remains and therefore further archaeological work is recommended here, in advance of the excavation of the new basement.

The works required for the tunnels themselves will not have an archaeological impact. However, as the tunnels are of high heritage interest, it is recommended that historic building recording is carried out for them in advance of redevelopment. The historic building recording should utilise the digital scans that have already been carried out for the site.

Planning Policies

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 194 says applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest.



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NPPF paragraphs 190 and 197 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.

If you grant planning consent, paragraph 205 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.

Recommendations

I advise 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.

I therefore recommend attaching two conditions as follows:

Condition 1 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.



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Informative 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.

Condition 2

Historic Building Recording

No demolition shall take place until a written scheme of historic building investigation (WSI) has been submitted to and approved by the local planning authority in writing. For buildings that are included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, which shall include the statement of significance and research objectives, and

- A. The programme and methodology of historic building investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works
- B. 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 WSI

Informative: The written scheme of investigation will need to be prepared and implemented by a suitably professionally accredited heritage practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London.

These pre-commencement conditions are necessary to safeguard the archaeological interest on this site. Approval of the WSI before works begin on site provides clarity on what investigations are required, and their timing in relation to the development programme. If the applicant does not agree to these pre-commencement conditions, please let us know their reasons and any alternatives suggested. Without these pre-commencement conditions being imposed the application should be refused as it would not comply with NPPF paragraph 205.

I envisage that the archaeological fieldwork would comprise the following:

Evaluation

An archaeological field evaluation involves exploratory fieldwork to determine if significant



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remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (pre-determination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted.

Historic Building Recording

Historic building recording is an investigation to establish the character, history, dating, form and development of a historic building or structure which normally takes place as a condition of planning permission before any alteration or demolition takes place. The outcome will be an archive and a report which may be published.

You can find more information on archaeology and planning in Greater London on our website.

This response relates solely to archaeological considerations. If necessary, Historic England's Development Advice Team should be consulted separately regarding statutory matters.

Yours sincerely

Helen Hawkins

Archaeology Adviser
Greater London Archaeological Advisory Service
London and South East Region



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From:
To:
Subject: RE: Planning Application Consultation: 23/01322/FULMAJ
Date: 09 January 2024 14:29:16
Attachments: [image001.png](#)
[image002.png](#)

THIS IS AN EXTERNAL EMAIL

Good afternoon,

Application No: 23/01322/FULMAJ

Site address: 38-39 Furnival Street London EC4

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principle bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Thank you for your consultation.

Though we have no objection in principle to the above planning application, there are a number of potential constraints on the redevelopment of a site situated close to London Underground railway infrastructure.

Therefore, we request that the grant of planning permission be subject to conditions to secure the following:

The development hereby permitted shall not commence until the following documents, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority, which:

- a. provide details on the use of scaffold/tall plant i.e cranes and lifting equipment;
- b. accommodate ground movement impact on all identified LU assets arising from the development construction. A Ground Movement Assessment (GMA) should be submitted to TfL IP for approval;
- c. mitigate the effects of noise and vibration arising from the adjoining operations within the railway structures and tunnels;
- d. 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. As shown on Title No. LN170205, London Underground own the Fulwood Place Vent Shaft and other assets located at 31-33 High Holborn;
- e. **demonstrate that** the Fulwood Place Vent Shaft and its ancillary equipment/facilities will not be impacted by the development.
- f. **demonstrate that no ventilation or exhaust gases are discharged into TfL / LUL**

assets or airspace.

g. demonstrate that TfL access to the vent shaft from Fulwood Place is not impeded or altered.

Reason: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with London Plan 2021, draft London Plan policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012

This response is made as Railway Infrastructure Manager under the "Town and Country Planning (Development Management Procedure) Order 2015". It therefore relates only to railway engineering and safety matters. Other parts of TfL may have other comments in line with their own statutory responsibilities.

Kind regards,

Tom Li

Safeguarding Engineer (LU+DLR) | Infrastructure Protection
5 Endeavour Square | 7th Floor Zone B | Westfield Avenue | E20 1JN



-----Original Message-----

From:

Sent: 20 December 2023 16:07

To: Location Enquiries

Subject: Planning Application Consultation: 23/01322/FULMAJ

Dear Sir/Madam

Please see attached consultation under Article 16 of the Town and Country Planning (Development Management Procedure) (England) Order 2015 for 38 - 39 Furnival Street London EC4 .

Reply with your comments to

Kind Regards

Planning Administration

On behalf of

Anastasia Tampouridou
Environment Department

City of London

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Memo

To Assistant Director (Development Management)
Department of the Built Environment

From District Surveyors Office
Department of the Built Environment

Telephone [REDACTED]

Email [REDACTED]

Date 19 January 2024

Our Ref DS/FS23/0045

Your Ref PT_AXT/23/01322/FULMAJ

Subject 38 - 39 Furnival Street London EC4

In response to your request for comments in relation to the fire statement the District Surveyors Office has the following comments to make:

The District Surveyors Office has reviewed the fire statement and has no comments.

The proposal is considered to comply with policies D5 and D12.



Memo

To Assistant Director (Development Management)
Environment Department

From Lead Local Flood Authority
Environment Department

Telephone [REDACTED]

Email [REDACTED]

Date 23/01/2024

Our Ref DS/SUDS24/0001

Your Ref PT_AXT/23/01322/FULMAJ

Subject 38 – 39 Furnival Street London EC4

In response to your request for comments in relation to SUDS/drainage the Lead Local Flood Authority has the following comments to make:

The Lead Local Flood Authority has reviewed the Drainage Strategy and Flood Risk Assessment for the above application and would recommend the following conditions should the application be approved:

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

- (a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, blue roofs, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 1.5 l/s from each outfall and from no more than one distinct outfall, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 25m³;
- (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.

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.



Your ref:
My ref: 24/00040/OBS

Please reply to: Nikki Mitchell
Tel No: [REDACTED]
Email: [REDACTED]

Anastasia Tampouridou
City of London
PO Box 270,
Guildhall,
London
EC2P 2EJ

Town Planning & Building Control
Westminster City Council
PO Box 732
Redhill, RH1 9FL

24 January 2024

Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990

The City Council has now considered the proposals described below and has decided to RAISE NO OBJECTION.

SCHEDULE

Application No.: 24/00040/OBS **Application Date:**
Date Received: 20.12.2023 **Date Amended:** 20.12.2023

Plan Nos: Letter dated 20 December 2024 from the City of London.

Address: 38 - 39 Furnival Street, City Of London, London, EC4A 1JQ

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction

entrance (including principle bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works.

Yours faithfully



Deirdra Armsby
Director of Town Planning & Building Control

Condition(s):

Note:

- The Plain English Crystal Mark applies to those conditions, reasons and informatives in this letter which have an associated reference number with the prefix C, R, X or I.
- The terms 'you' and 'your' include anyone who owns or occupies the land or is involved with the development.
- The terms 'us' and 'we' refer to the Council as local planning authority.



APPLICATION COMMENT FORM

From: Sam Murphy, Environmental Resilience Officer

Application No: 23/01322/FULMAJ

Development Management Case Officer: Anastasia Tampouridou

Site Address: 38 - 40 Furnival Street London EC4A 1JQ And 31 - 33 High Holborn WC1V 6AX

Proposal: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1 (b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

Application Received: Date application submission received: 01 Dec 2023

Request for Comment Received: Date request memo received: 20 Dec 2023

Comment:

Application submission documents relating to climate change resilience and adaptation have been reviewed, including the Sustainability Statement, Energy and Overheating Statement, and FRA & Drainage report.

Overheating and Heat Stress:

Overheating has been considered and mechanisms put in place to reduce this. Solar glazing and mechanical ventilation included in design.

There is consideration of Urban Heat Island reduction through including green infrastructure, primarily through green roofs. Air handling systems will include heat recovery systems to reduce heat expelled to the environment.

Flooding:

The risk from sewer flooding, surface water flooding and groundwater flooding are all low.

Site is designed to accommodate all run-off events up to 100 +40%

SuDS – blue roofs not included but green roofs present. Rainwater harvesting is under consideration in design.

Biodiversity:

The development incorporates some green infrastructure, but is limited by the location. There is a small green roof with species suitable for pollinator species to increase connectivity of other green spaces in the area. No Planting diagram or species list is provided, however it is a small site. It is suggested that a diverse range of planting types be included where

Date &
Initials

APPLICATION COMMENT FORM

possible, using native and wildlife friendly planting. If possible, climate resilient planting should also be considered.

Water Stress:

The development seeks to reduce water demand through water saving measures - fittings, leak detection, automatic shut of control valves.

There is also consideration of rainwater harvesting for sprinkler system and flushing.

Food, Trade, Infrastructure:

Site proposes the deepest bar in UK, with the development close to other amenities. No mention of local sourcing. Meeting GLA 65% Recycling target. Circular economy strategy present.

Pest and Diseases:

No mention of pests and disease considerations. Ventilation for tunnels mentioned for VOCs and health.

Recommendation:

The proposed development **is partially** compliant with Local Plan Policy DM 15.5 (Climate change resilience), Draft City Plan 2036 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2036 Policies CR1 and CR2.

The following condition should also be considered to provide details of how the development has responded to risks from climate change; this condition may be fulfilled by a satisfactory assessment in support of the BREEAM Wst 05 credit:

Prior to the commencement of the development (other than demolition) a Climate Change Resilience Sustainability Statement (CCRSS) shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is resilient and adaptable to predicted climate conditions during the lifetime of the development. The CCRSS shall include details of the climate risks that the development faces (including flooding, 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 and managed in accordance with the approved CCRSS for the life of the development.

SM
23/02/24

Begum, Shupi

From: [REDACTED]
Sent: 29 February 2024 12:44
To: PLN - Comments
Subject: 3rd Party Planning Application - 23/01322/FULMAJ

THIS IS AN EXTERNAL EMAIL

Corporation of London
Department of Planning & Transportation
PO Box 270
Guildhall
London
EC2P 2EJ

Our DTS Ref: 76189
Your Ref: 23/01322/FULMAJ

29 February 2024

Dear Sir/Madam

Re: 38-40 Furnival Street , 31-33 Holborn, City of London, London, -, EC1N 2LE

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "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 sewerage 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 sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cce491b23eb7c4f0e1cb008dc39240ed1%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638448074274475931%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=VYHP1B6ArG%2FmIF16rBhX0B91VjFE40%2BQvhP9d9iDiEo%3D&reserved=0> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cce491b23eb7c4f0e1cb008dc39240ed1%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638448074274484296%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6IjEhaWwiLCJXVCi6Mn0%3D%7C0%7C%7C%7C&sdata=HsYftghutgoHdmgyi1TRjqxqX2bvNMu4VQ4HW7EDRVE%3D&reserved=0>

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. We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing 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%7Cce491b23eb7c4f0e1cb008dc39240ed1%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638448074274490244%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=kJQnWxKkxsbORk6NTYhfo1FX0V8huRCEi7q7E8GLUpo%3D&reserved=0> . Please refer to the Wholesale; Business customers; Groundwater discharges section.

Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

We 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 the following informative attached to the planning permission: "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 . 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%7Cce491b23eb7c4f0e1cb008dc39240ed1%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638448074274494518%7CUnknown%7CTWFpbGZsb3d8eyJWljojMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=USX3k6YgaN7ctJGTTHqKn0bzciz4xkUthA2TbQPYflo%3D&reserved=0> . Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. 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.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings

will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://gbr01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.thameswater.co.uk%2Fdevelopers%2Flarger-scale-developments%2Fplanning-your-development%2Fworking-near-our-pipes&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cce491b23eb7c4f0e1cb008dc39240ed1%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638448074274498531%7CUnknown%7CTWFpbGZsb3d8eyJWljoIMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6I6k1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=GTT2eXYBL2rKdulfsMARxiHbvJGGLmFo4Fes%2Bac%2FeBs%3D&reserved=0> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

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 you're planning significant works near our mains (within 3m) we'll need to check that your 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.

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The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. 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.

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Yours faithfully
Development Planning Department

Development Planning,
Thames Water,
Maple Lodge STW,
Denham Way,
Rickmansworth,

WD3 9SQ

Tel: [REDACTED]

Email: [REDACTED]

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<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.twitter.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cce491b23eb7c4f0e1cb008dc39240ed1%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638448074274515602%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=XuGIVYwDJ1O%2BVJLt5AFC%2FRS3Xuv8Vx0JGw4My%2F%2Bukk%3D&reserved=0> or find us on

<https://gbr01.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.facebook.com%2Fthameswater&data=05%7C02%7CPLNComments%40cityoflondon.gov.uk%7Cce491b23eb7c4f0e1cb008dc39240ed1%7C9fe658cdb3cd405685193222ffa96be8%7C0%7C0%7C638448074274519628%7CUnknown%7CTWFpbGZsb3d8eyJWljoiMC4wLjAwMDAiLCJQIjoiV2luMzliLCJBTiI6Ikk1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=Ew7VhZ6PFaL3HLw1X3r%2FZNP7SOX1tt8A3ahBXfhFiEo%3D&reserved=0>. We're happy to help you 24/7.

Thames Water Limited (company number 2366623) and Thames Water Utilities Limited (company number 2366661) are companies registered in England and Wales, both are registered at Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB. This email is confidential and is intended only for the use of the person it was sent to. Any views or opinions in this email are those of the author and don't necessarily represent those of Thames Water Limited or its subsidiaries. If you aren't the intended recipient of this email, please don't copy, use, forward or disclose its contents to any other person – please destroy and delete the message and any attachments from your system.

Corporation of London Department of Planning & Transportation
PO Box 270 Guildhall London EC2P 2EJ
29 February 2024

Our DTS Ref: 76189 Your Ref:
23/01322/FULMAJ

Dear Sir/Madam

Re: 38-40 Furnival Street , 31-33 Holborn, City of London, London, -, EC1N 2LE

Waste Comments

The proposed development is located within 15 metres of a strategic sewer. Thames Water requests the following condition to be added to any planning permission. "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 sewerage 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 sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

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Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

We 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 the following informative attached to the planning permission: "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. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

Water Comments

On the basis of information provided, Thames Water would advise that with regard to water network infrastructure capacity, we would not have any objection to the above planning application. Thames Water recommend the following informative be attached to this planning permission. 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.

The proposed development is located within 5m of a strategic water main. Thames Water do NOT permit the building over or construction within 5m, of strategic water mains. Thames Water request that the following condition be added to any planning permission. No construction shall take place within 5m of the water main. Information detailing how the developer intends to divert the asset / align the development, so as to prevent the potential for damage to subsurface potable water infrastructure, must be submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any construction must be undertaken in accordance with the terms of the approved information. Unrestricted access must be available at all times for the maintenance and repair of the asset during and after the construction works. Reason: The proposed works will be in close proximity to underground strategic water main, utility infrastructure. The works has the potential to impact on local underground water utility infrastructure. Please read our guide 'working near our assets' to ensure your workings will be in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes> Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk.

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 you're planning significant works near our mains (within 3m) we'll need to check that your 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. <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/working-near-our-pipes>

Thames Water recommend the following informative be attached to this planning permission. 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.

The proposed development is located within 15m of a strategic water main. Thames Water request that the following condition be added to any planning permission. 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. <https://www.thameswater.co.uk/developers/larger-scale->

developments/planning-your-development/working-near-our-pipes Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Yours faithfully

Development Planning Department

Development Planning, Thames Water, Maple Lodge STW, Denham Way, Rickmansworth, WD3 9SQ Tel:020 3577 9998 Email: devcon.team@thameswater.co.uk



City of London Conservation Area Advisory Committee

Department of the Built Environment,
Corporation of London,
P.O. Box 270,
Guildhall,
London EC2P 2EJ

1st March 2024

Dear Sir/Madam,

At its meeting on 15th February 2024 the City of London Conservation Area Advisory Committee considered the following planning application and reached the decision given below:


**C.17 23/01322/FULMAJ - 38 - 40 Furnival Street London EC4A 1JQ and 31 - 33 High Holborn WC1V 6AX
Chancery Lane Conservation Area/Farringdon Without Ward. Ward Club Rep. Lester Hillman.**

Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary).

There were no objections.

I should be glad if you would bring the views of the Committee to the attention of the Planning and Transportation Committee.

Yours faithfully,



Mrs. Julie Fox
Secretary

Anastasia Tampouridou
Corporation Of London
Environmental Department
PO Box 270
London
EC2P 2EJ

Our ref: NE/2024/136831/01
Your ref: 23/01322/FULMAJ
Date: 13 March 2024

Dear Anastasia,

38-40 Furnival Street London EC4A 1JQ

Change of use of existing deep level tunnels (sui generis) to visitor and cultural attraction, including bar (F1(B)(C)); demolition and reconstruction of existing building at 39-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 high Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works

Thank you for consulting us on the above application. Based on a review of the submitted information we have **no comments** on this application however, we can offer the following advice.

Contaminated Land

This development site appears to have been the subject of past industrial activity which poses a risk of pollution to controlled waters.

However, we are unable to provide site-specific advice relating to land contamination as we have recently revised our priorities so that we can focus on:

- Protecting and improving the groundwater that supports existing drinking water supplies
- Groundwater within important aquifers for future supply of drinking water or other environmental use. We recommend that you refer to our published '[Guiding Principles for Land Contamination](#)' which outlines the approach which should be adopted when managing this site's risks to the water environment.

We also advise that you consult with your Environmental Health/Environmental Protection Department for advice on generic aspects of land contamination management. Where planning controls are considered necessary, we recommend that the environmental protection of controlled waters is considered alongside any human health protection requirements. This approach is supported by paragraph 180 of the

Cont/d..



National Planning Policy Framework.

Advice to applicant

Water Resources

Increased water efficiency for all new developments potentially enables more growth with the same water resources. Developers can highlight positive corporate social responsibility messages and the use of technology to help sell their homes. For the homeowner lower water usage also reduces water and energy bills.

We endorse the use of water efficiency measures especially in new developments. Use of technology that ensures efficient use of natural resources could support the environmental benefits of future proposals and could help attract investment to the area. Therefore, water efficient technology, fixtures and fittings should be considered as part of new developments.

We recommend that all new non-residential development of 1000sqm gross floor area or more should meet the BREEAM 'excellent' standards for water consumption.

We also recommend you contact your local planning authority for more information.

Pre Application Advice

Regarding future applications, if you would like us to review a revised technical report prior to a formal submission, outside of a statutory consultation, and/or meet to discuss our position, this will be chargeable in line with our planning advice service. If you wish to request a document review or meeting, please contact our team email address at HNL.SustainablePlaces@environment-agency.gov.uk.

Further information on our charged planning advice service is available at; <https://www.gov.uk/government/publications/planning-advice-environment-agency-standard-terms-and-conditions>.

Final comments

Thank you for contacting us regarding the above application. Our comments are based on our available records and the information submitted to us. Please quote our reference number in any future correspondence. Please provide us with a copy of the decision notice for our records. This would be greatly appreciated.

Should you have any queries regarding this response, please contact me.

Yours sincerely,

Harry Scott
Planning Advisor

E-mail: [REDACTED]
Telephone: [REDACTED]

From: [REDACTED]
To: [REDACTED]
Subject: FW: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn
Date: 18 April 2024 16:06:32
Attachments: [image001.png](#)
[image003.png](#)

From: Varma, Vimal [REDACTED]
Sent: Thursday, April 18, 2024 4:03 PM
To: Tampouridou, Anastasia [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Anastasia,

This was not clear on any drawings previously. This is acceptable.

The proposed waste storage and collections facilities comply with our requirements. Therefore, this division will not object to this application.

Thanks

Vimal

From: Tampouridou, Anastasia [REDACTED]
Sent: Thursday, April 18, 2024 3:51 PM
To: Varma, Vimal [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Vimal,

Please see the attached responses. In short, they've suggested using the round lift shaft outside operational hours which has direct access to the waste store at B1. This route doesn't involve transfer through stairs or corridors. The 820L bins have been proposed instead of the 1,1L to fit through the lift doors.

Kind regards,
Anastasia

From: Varma, Vimal [REDACTED]
Sent: Thursday, April 18, 2024 12:51 PM
To: Tampouridou, Anastasia [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: Re: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Anastasia,

820 bins would not be acceptable as they would also be very heavy to pull up four steps

Thanks

Vimal

From: Tampouridou, Anastasia [REDACTED]
Sent: Thursday, April 18, 2024 12:25 pm
To: Varma, Vimal [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Vimal,

I have sent your comments across and as a first response, they said the strategy is being updated with 820L bins. Just to note that the current waste store we are looking at Figure 3-2 serves the upper ground levels (reception, gift shop, staff accommodation), and the tunnels would be served by a storage space located within the tunnels as shown in Figure 3-1.

However, I have asked them to investigate moving the refuse storage to an area easily accessible from the goods lifts and avoid steps and limited space during transfer. I will be in touch when they get back to me.

Best,
Anastasia

From: Varma, Vimal [REDACTED]
Sent: Thursday, April 18, 2024 12:15 PM
To: Tampouridou, Anastasia [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: Re: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Anastasia,

Happy to place a condition, but if they come back saying we can't change it and will use smaller bins then I won't be pleased. They should find another room as it is a big site.

Thanks

Vimal

From: Tampouridou, Anastasia [REDACTED]
Sent: Thursday, April 18, 2024 11:19:23 AM
To: Varma, Vimal [REDACTED]

Cc: Turner, Lee [REDACTED]

Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Vimal,

Many thanks for confirming acceptance of points 1 and 3.

I understand the area shown in Fig 3-2 area would provide 2x 1,1L for refuse and recycling. I will follow up on your concerns about health and safety and space limitations with the agents. However being conscious of the timeline here, in case we don't receive a response or not a satisfactory solution to this issue, would you consider recommending a condition to secure further details to be provided later on?

Kind regards,
Anastasia

From: Varma, Vimal [REDACTED]

Sent: Wednesday, April 17, 2024 12:51 PM

To: Tampouridou, Anastasia [REDACTED]

Cc: Turner, Lee [REDACTED]

Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Anastasia,

Apologies for the delay.

Points 1 and 3 raised below have been answered and are acceptable.

Can you confirm what size bins will be used for waste store in figure 3.2 below? Pulling up full 1100's up four steps would be a health and safety issue in addition to their being no turning circle or enough door width to take bins through the fire lobby as this is the only route I can see to the goods lift.

Thanks

Vimal

From: Tampouridou, Anastasia [REDACTED]

Sent: Tuesday, April 16, 2024 9:27 AM

To: Varma, Vimal [REDACTED]

Cc: Turner, Lee [REDACTED]

Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Vimal,

I'm sorry for chasing so soon for a response to my previous email, but I'm rather rushed with the committee report. I would appreciate it if you could clarify those points.

Kind regards,
Anastasia

From: Tampouridou, Anastasia
Sent: Tuesday, April 9, 2024 3:58 PM
To: Varma, Vimal [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Vimal,

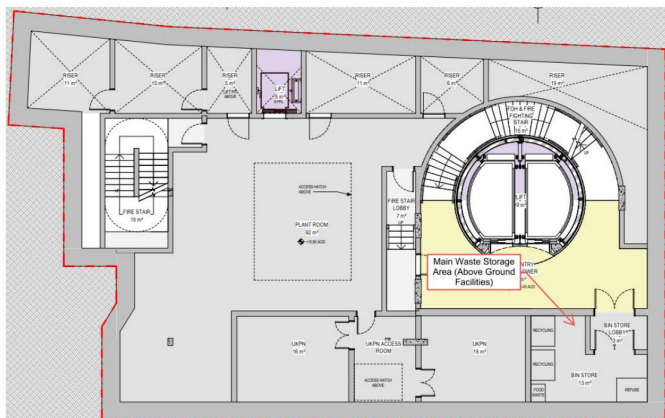
Apologies for getting back to you in such a delay we've been dealing with other main issues for this site.

In response to your first point, can I clarify if you suggest that no trash/bins should be placed outside the building fronting Furnival Street for collection even if this area falls within private land? Just to note the designated 'Bin Presentation Area' sits outside the building line but within the red line of the development.

In terms of your second comment, I have copied the below text from the submitted Waste Management Plan:

*'Due to the two main waste storage areas being provide below ground, the bins will have to be transported by the on-site FM team via the **passenger/good lifts** to an external waste presentation area, which will be the location that they are collected from by the appointed commercial waste contractor.'* (Extract from Waste Management Plan p. 12/23 in WMP) – **The purple lift shown below is the goods lift proposed to transfer waste to ground level. Is this information enough to satisfy CoL requirements?**

Figure 3-2 - Main Waste Storage Area (Above Ground Facilities)



Source: WilkinsonEyre drawing 01820-WEA-01-B1-PD-A-1099

Regarding the last point, I have shared this with Camden but I am not sure how they are dealing

with it. However, this shouldn't be a problem for us.

As part of ongoing discussions regarding highway matters, we've received an updated servicing plan which I attach here for your review. I don't think there are any changes to the waste management but worth having a look.

Could you please have a quick scan of this email and let me know if there are still unsatisfying matters that need to be dealt with under the current application?

Kind regards,
Anastasia

From: Varma, Vimal [REDACTED]
Sent: Thursday, January 25, 2024 10:48 AM
To: Tampouridou, Anastasia [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: Re: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Anastasia,

Not problem, it would be good to see what Camden have to say about the trouble distance for bins.

Thanks

Vimal

From: Tampouridou, Anastasia [REDACTED]
Sent: Thursday, January 25, 2024 9:58:54 AM
To: Varma, Vimal [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Vimal,

Apologies for missing your call yesterday I was out in meetings. I note your comments below which I will revert to the applicant to respond. Fulwood Place is outside City's boundary, Camden is controlling this area so I don't know the answer to your question I am afraid. I have a meeting with Camden case officer in a minute so I can ask that for you.

Kind regards,
Anastasia

From: Varma, Vimal [REDACTED]
Sent: Wednesday, January 24, 2024 2:58 PM
To: Tampouridou, Anastasia [REDACTED]
Cc: Turner, Lee [REDACTED]
Subject: RE: 23/01322/FULMAJ - 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn

Hi Anastasia,

This Division cannot approve the waste storage and collection facilities proposed due to.

1. Waste cannot be placed on the highway for collection as shown for Furnival Street, we deemed area shown to be used as public highway. Can the architect show and confirm bins will be within the curtilage of the building.
2. I cannot see route for bins to travel from basement level to ground floor for Furnival Street. Lift access is required to transport 1100ltr bins to GF.
3. Maximum of 10m is permitted for bins to be transported from waste store to collection vehicle. Fulwood Place is a lot more than 10m. Architects need to look at new location for bin store if vehicle cannot go down Fulwood Place.

Can you confirm if vehicle access is available or restricted for Fulwood Place please.

Thanks

Vimal

From: Tampouridou, Anastasia [REDACTED]
Sent: Tuesday, January 23, 2024 6:45 PM
To: Varma, Vimal [REDACTED]; Turner, Lee
[REDACTED]
Subject: 23/01322/FULMAJ - Feedback required

Hello,

You have been consulted to comment on the planning application for major development at 38 - 40 Furnival Street, EC4A 1JQ and 31 - 33 High Holborn WC1V 6AX.

Following the expiration of the statutory consultation, would it be feasible to issue your comments for the proposed development?

If you are not able to find the necessary documents/information in order to provide comprehensive feedback, please let me know and I will do my best to get that information to you as soon as possible.

Many thanks,
Anastasia



Anastasia Tampouridou | Planning Officer (Development Management)

Environment Department | City of London | Guildhall | London EC2V 7HH



| www.cityoflondon.gov.uk

WINNER | Planning Authority of the Year



Adjei, William

From: PLN - Comments
Subject: FW: 23/01322/FULMAJ - The London Tunnels - TfL City of London Response

From: George Snape
Sent: Friday, April 19, 2024 4:55 PM
To: Tampouridou, Anastasia <
Cc: Hammond, James , Patricio, Taluana
Subject: 23/01322/FULMAJ - The London Tunnels - TfL City of London Response

THIS IS AN EXTERNAL EMAIL

Dear Anastasia,

Many thanks for consulting Transport for London (TfL) Spatial Planning on the above planning application. Please see the comments below.

Access

Access to the site would be gained via two access points. One access would be gained via Fulwood Place (located in the LB of Camden), whilst the other access would be gained via number 38-41 Furnival Street (located within the City of London boundary). The first entrance would be the main access for staff, VIP guests, school children and public visitors to the bar. Whilst the second and main access for visitors would be via Furnival Street. Both access streets form part of the borough highway. Nethertheless, the closest section of the Strategic Road Network (SRN) is the A40 High Holborn and Holborn. The closest section of the Transport for London Road Network (TLRN) is the A201 Farringdon Street which is approximately 380m to the east of the site.

It is noted that pedestrian access would be gained via both locations, with cyclist access for staff being provided via Furnival Street and Fulwood Place. There would be no vehiclular access, with blue badge, delivery and servicing being proposed on the public highway. Both access points fall within the local planning authority highway and therefore they are best placed to discuss pedestrian management and safety in this regard.

Pedestrian Comfort

The applicant has provided PCL assessment which TfL deem acceptable on this occasion, subject to the local planning authority agreement.

PT Impact

The impact of the proposal is incremental taking on Chancery Lane station taking account of the base situation, future year and sensitivity assessments. TfL suggests that wayfinding measures in the station would help people exiting the station more easily will help offset this impact (and improve their experience of the venue), as would way finding on street to help people find the destination, and on return raise awareness of proximity to other destinations and public transport, improving their experience.

Cycle Parking

Whilst the revised quantum's is deemed acceptable for long and short stay cycle parking, further work should be carried out to improve the long stay design and access.

Car Parking

The applicant is not proposing any regular car parking for the site. Apart from an additional on street blue badge parking bay to the south of the Furnvial Street access point. Subject to both LPA's deeming the location and

operation of the bay being acceptable, TfL consider this appropriate. However, the applicant is encouraged to identify blue badge locations on the Camden access point.

Taxi Access

Proposed taxi pick up/ drop off is proposed to be from Holborn. However it is not clear how or if taxi's/ private hire vehicles would be restricted from accessing Furnival Street and clarity is sought on that.

Coach Access

TfL have concerns over the proposed coach parking strategy. Whilst it may be considered by the applicant that one on street bay may be sufficient, it is considered that a more robust plan should be provided. TfL Coach colleagues have highlighted that a current plan could lead to illegal parking on street which in turn would impact safety and operation of Holborn. It has been suggested that coaches could use Bedford Row as an official parking bay or consider the provision of a bay on northbound element of Kingsway. Further discussion on this element should be provided and the relevant review mechanisms in the travel plan and operational strategy should be put in place to allow amendments where deemed necessary.

Delivery and Servicing

The provision of the Delivery and Servicing Plan is welcomed. TfL have concerns over the feasible operation of the Delivery and Servicing Plan particularly on Furnival Street and clarification is sought on how this will be managed. The final DSP should also consider when the needs of the occupier may change for special events etc. The final DSP should be secured via condition.

Construction Logistics

TfL acknowledge the Outline Construction Logistics Plan, but has serious concerns over the proposed management, operation and feasibility of carrying out this plan. This should have the earliest engagement in order to provide suitable mitigation as this may impact pedestrian, bus operations and London Underground Infrastructure. TfL recommends that the access proposal is supported by a road safety audit, also that for pedestrian and cycle routing during construction, these should subject to detail assessment in accord with Construction Logistics and Community Safety standard and appropriate pedestrian comfort levels.

The final Construction Logistics Plan should be provided in accordance with TfL guidance and discharged in consultation with TfL.

Wayfinding

Given the size, scale and nature of the development, the applicant should provide a Wayfinding Strategy, and this should be secured via condition. This should include updates to wider Legible London Signage and the provision of additional signage where appropriate on street and potentially within LU Stations. This should be agreed in prior to determination.

Travel Plan

TfL welcome the provision of the revised travel plan which includes a range of soft and hard measures. Suggested additional measures which may form part of their travel plan could be the provision of a wayfinding strategy which would encourage people to walk from key transport nodes and to reduce pedestrian congestion in key locations. Another measure which could be included as part of the plan and/or upon review of the plans, could be to incorporate Santander Cycle Hire with tickets. TfL offer innovative ways to work with business to provide sustainable transport options such as this. Given the site is well served via cycle hire and cycling infrastructure, this could be a suitable option.

Operational Management Strategy

The applicant should provide an operational management plan which should be secured via condition. This should provide sufficient mechanisms and proposals which can adapt to once the venue is operational.

Dockless Bikes

TfL request the City of London and the LB of Camden work with the dockless bike providers to provide a no parking zone surrounding the access locations. Whilst this is not within the control of the future occupier, the reason behind

this request is due to the constraint nature of the access points and potential implications of the bikes being in these inconvenient locations.

Cycle Hire

On this occasion TfL are not requesting a cycle hire contributions given the expect impact of the development will be outside of peak hours when the system experiences most pressure. However measures mentioned above via the Travel Plan should be secured appropriately.

Infrastructure Protection

The applicant should demonstrate the relevant infrastructure protection requirements have been met for London Underground assets and infrastructure, with the relevant conditions secured via condition.

Please do not hesitate to contact me if you have any further queries.

Kind regards,
George

George Snape | Area Planner
TfL Spatial Planning (North) | City Planning
Tel:

Level 8 (8Y3), 5 Endeavour Square, Westfield Avenue, Stratford E20 1JN

For more information regarding the TfL Spatial Planning team, including TfL's *Transport assessment best practice guidance* and pre-application advice please visit

<https://tfl.gov.uk/info-for/urban-planning-and-construction/our-role-in-planning?intcmp=3484>

This message has been scanned for malware by Forcepoint. www.forcepoint.com

Anastasia Tampouridou,
Planning Officer,
Development Management,
City of London
Sent by email to [REDACTED]

The London Fire Commissioner is the
fire and rescue authority for London

Date 22 April 2024
Our Ref 00/267317
Your Ref 23/01322/FULMAJ

Dear Madam,

RECORD OF CONSULTATION/ADVICE GIVEN

TOWN AND COUNTRY PLANNING ACT 1990

SCOPE OF WORKS: Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1(b)(c)); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principal visitor attraction pedestrian entrance at ground floor, with ancillary retail at first and second floor levels and ancillary offices at third and fourth levels, excavation of additional basement levels at 40-41 Furnival Street and 38-39 Furnival Street, and widening of lift shaft at 38-39 Furnival Street; creation of new, pedestrian entrance at 31-33 High Holborn, to provide secondary visitor attraction entrance (including principal bar entrance), deepening of lift shaft at 31-33 High Holborn; provision of ancillary cycle parking, substation, servicing and plant, and other associated works (Duplicate application submitted to the London Borough of Camden as the site area extends across the borough boundary)

PREMISES ADDRESS: 38-40 Furnival Street, EC4A 1JQ and 31-33 High Holborn, WC1V 6AX

DOCUMENTS REVIEWED:

'The London Tunnels – 23. Fire Statement',
(WSP, TLT-WSP-XX-XX-ST-FI-00001, First Issue, 30/11/2023)
Email correspondence between Anastasia Tampouridou (Planning Officer, City of London) and London Fire Brigade officers, dated between 23/01/2024 and 18/04/2024

PLANS REVIEWED:

'The London Tunnels – 7. Application Drawings (Tunnels General Arrangement)',
(Wilkinson Eyre, drawing pack, 30/11/2023, various drawing nos.)

The London Fire Commissioner (the Commissioner) is the fire and rescue authority for London. The Commissioner is responsible for enforcing the Regulatory Reform (Fire Safety) Order 2005 (The Order) in London.

London Fire Brigade (LFB) has been consulted with regard to the above-mentioned premises and makes the following comments/observations:

LFB will also be submitting a planning representation, amended as applicable, to the London Borough of Camden as a duplicate planning application has been received (Camden planning application ref. 2023/ 5013/ P), due to the proposals spanning two local authority areas.

General fire safety design approach and consultation with key stakeholders

1. We note that the proposed fire safety design involves a range of elements that cannot meet the recommendations of guidance supporting Part B of the Building Regulations, such as Approved Document B, Volume 2 and BS 9999:2017. Therefore, we understand that a performance-based design approach will be adopted for the overall fire safety design and elements where it is not possible to independently apply the recommendations of relevant established guidance.

We understand that it is proposed that the methodology outlined in BS 7974:2019 will be applied and we support this approach. As part of this methodology, a Qualitative Design Review (QDR) process should be undertaken and LFB would expect to be involved in this process as a key stakeholder, both in our capacity as an emergency response agency for fires and other emergencies but also as the future enforcing authority for The Order. However, we should emphasise that it cannot be assumed that following any particular methodology, in and of itself, automatically leads to acceptable solutions or outcomes. The detail of any risks identified, and decisions made, may need revision throughout the design and construction phases as previously unknown circumstances arise, and may not be easily or suitably resolved.

One of the main important factors in any such fire engineering framework or QDR is the 'What if' study (BS 7974:2019 clause 5.5.3 refers) which includes assessment of system failures or foreseeable events which may negatively impact on the fire safety of the proposal.

2. We note that the aforementioned fire statement/planning fire safety strategy document, and the appended 'Fire Engineering - Basis of Design' makes reference to BS 9992 as one of the fire safety codes of practice relevant to the design. Whilst we note that it has been acknowledged that the proposals do not conform to this code of practice, we advise that caution is taken if applying the recommendations of BS 9992 to tunnels that do not form part of railway infrastructure. Whilst some of the recommendations of the code of practice may be applicable, the assumptions made for sub-surface railway infrastructure in particular are quite different than those for other types of purpose group/occupancy. For example, is it permissible when seeking to conform to the recommendations in BS 9992 to omit smoke ventilation from parts of sub-surface stations, whereas Approved Document B and BS 9999 recommend that basements over 3m in depth and/or 200m² should be provided with smoke ventilation. The omission of smoke ventilation from some parts of sub-surface railway infrastructure is premised upon control of the fire reaction properties of materials considerably more onerous than expected by Building Regulations guidance for other types of occupancy and also a significantly different occupancy profile; it should not be assumed that these characteristics, and thus the recommendations given in BS 9992, are applicable to assembly and recreation purpose groups or places of entertainment.

It is our expectation—subject to the outcome of the performance-based design process and associated stakeholder engagement—that suitable smoke ventilation/control systems will be provided, in conjunction with suitable and compatible automatic fire suppression systems. Smoke ventilation/control systems and automatic fire suppression systems, when suitably designed, installed, commissioned and maintained, provide benefits in terms of occupant and firefighter safety as well as assisting with achieving objectives related to protection of property and the environment and maintenance of business continuity.

Critical fire safety design issues that LFB would expect to be addressed as the design is developed

LFB wish to highlight a number of fire safety design issues that we would expect to be addressed as the fire safety design process progresses. This is not intended to be exhaustive. We note that LFB representatives have attended two meetings with representatives of City of London and the planning applicant on 11/09/2023 and 19/04/2024 and discussions at these meetings, although not recorded in meeting notes/minutes, as well as the aforementioned correspondence with City of London, have informed the content of our representation.

Extended travel distances for occupant means of escape and firefighter access/intervention

3. We note that the nature of the existing tunnel infrastructure is such that travel distances for occupant means of escape in case of fires and other emergencies but also travel and hose laying distances for firefighter access/intervention will be significantly extended beyond the distances recommended within guidance.

We understand that extended means of escape travel distances are intended to be addressed by undertaking evacuation analysis using fire and evacuation modelling (ASET/RSET analysis). As we understand that part of the proposals includes a bar/licensed premises, the means of escape design should consider the effects of intoxication upon occupants.

We understand that extended hose laying distances are proposed to be addressed by providing an enhanced dry fire main system, similar to that provided for sub-surface railway tunnel infrastructure and we expect to be consulted further as the design progresses, including as part of any QDR process, which may take place prior to a statutory Building Regulations consultation with LFB. Of particular importance is the principle that firefighters should not be expected to connect to any fire main landing valve outlet in the compartment of fire origin.

In addition to means of escape and hose laying distances, we would also expect the design to consider the added physiological demands that are placed upon firefighters when carrying heavy equipment whilst wearing personal and respiratory protective equipment over distances extended beyond the recommendations of guidance.

It is not only horizontal firefighting intervention that needs further consideration – it is also required for vertical firefighting intervention. Our current understanding is that the lift shaft(s) only serve ground (the entrance to the premises) and basement (the premises themselves). This arrangement does not permit us to implement our standard basement firefighting procedure – a safe system of work which allows for approach from above the fire. Intermediate firefighting and bridgehead lobbies may be required in the vertical shaft(s), and it is unclear if this is possible.

Inclusive design and means of escape for persons with relevant protected characteristics

4. It is our expectation that the fire safety design should provide equitable means of escape for all building users, including persons with relevant protected characteristics. The design should consider persons of restricted mobility who may be unable to use stairs.

We understand that evacuation lifts and disabled refuge areas are proposed. It is our expectation that there should be sufficient evacuation and firefighters lifts such that, in the event of either type of lift becoming unavailable (for example, due to a fault or planned maintenance), one of each type of lift will remain available for their respective uses. It should be assumed that firefighters will take control of the firefighters lift(s) upon arrival at an incident and that this may occur prior to the conclusion of the evacuation phase for premises of this nature.

Furthermore, given the depth of the premises from access level and the fact that occupants other than persons of restricted mobility may experience difficulty in evacuating upwards over a height in excess of 30m, we would recommend that consideration be given to providing

additional evacuation lift capacity and this should be taken into account when undertaking the evacuation lift capacity assessment expected under London Plan 2021 Policy D5(B5).

Radio communications coverage for firefighters and other emergency responders

5. In order to be able to commit firefighters in response to incidents in all types of environments, our safe systems of work require that radio communications are possible between command and control points (which may be at a distance from the access point at fire and rescue service access level) and firefighters working in the risk area. This is especially critical for deep sub-surface infrastructure of this nature.

We understand that means for incident ground communications will be addressed in future design stages and we would expect to be directly consulted in relation to this. LFB will be able to advise on the specification of the proposed Distributed Antennae System. We would expect this to allow use of both LFB incident ground analogue/digital radios, used by firefighters committed to the incident and whilst wearing self-contained breathing apparatus, but also radio equipment used by other emergency responders such as the London Ambulance Service, Metropolitan Police Service and City of London Police.

Electric Powered Personal Vehicles

6. LFB have experienced a significant increase in the number of fires resulting from the failure of lithium-ion powered electric vehicles, especially Electric Powered Personal Vehicles (EPPVs) such as e-bikes, e-scooters and other e-mobility devices. Fire incidents involving EPPVs pose a unique hazard, both to escaping occupants, who may be exposed to a rapidly growing fire and release of toxic and combustible gases potentially creating an untenable and/or explosive atmosphere, as well as to firefighters, who may experience difficulty in extinguishing a fire involving lithium-ion batteries subject to thermal runaway. These unique hazards are compounded when occurring in enclosed spaces such as tunnels.

We understand that some EPPVs may be present and we would expect these, as well as any battery energy storage systems proposed, to be explicitly addressed as part of the fire safety design process.

Construction phase fire safety

7. All of the above considerations, which we reiterate are not intended to be exhaustive, should be independently considered for the construction phase. For example, it is critical that suitable means of escape is provided for construction operatives and that radio communications and water supplies are provided for firefighters.

The relevant aspects may be addressed as part of a separate construction phase fire strategy and the responsible person(s) will also need to produce and review a suitable and sufficient fire risk assessment to demonstrate compliance with The Order during construction. This is in addition to the statutory obligations of the relevant duty holders under The Construction (Design and Management) Regulations 2015.

In relation to all of the above items, whilst we are not experts in Town and Country Planning legislation and it is not appropriate for us to advise on conditions to be applied by the planning authority when granting planning permission, we note that it is unlikely that London Plan 2021 Policies D12 and D5 can be considered to have been met without assurances being sought that the design will progress in consultation with LFB and other emergency services. It may be appropriate to include planning conditions in relation to the above items as per the example conditions given in Appendix 5 of the London Plan Guidance: Fire Safety, issued by the GLA in February 2022.

Any queries regarding this letter should be addressed to FSR-AdminSupport@london-fire.gov.uk. If you are dissatisfied in any way with the response given, please ask to speak to the Team Leader quoting our reference.

Yours faithfully,



Assistant Commissioner (Fire Safety)

There is clear evidence that Automatic Water Fire Suppression Systems (AWFSS) can reduce the number of deaths and injuries from fire, as well as reducing the risk to firefighters.

The London Fire Brigade strongly encourages those who design, construct and approve residential and commercial buildings, to go beyond the minimum expectation of compliance and include AWFSS in a wider variety of buildings. There are also additional benefits to the inclusion of AWFSS in terms of property protection, environmental protection and business continuity.

Further guidance can be found on the Brigade's website.

From: Russell Pengelly
Sent: Thursday, May 16, 2024 12:46 PM
To: Tampouridou, Anastasia
Cc: Ronald Henry
Subject: RE: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

Hi Anastasia,

Subject to any matters that the CTSA may raise, I'm quite happy with the response and the fact that we can resolve other issues at the detailed design stage.

Best wishes
Russ

From: Tampouridou, Anastasia
Sent: Thursday, May 16, 2024 12:28 PM
To: Russell Pengelly
Cc: Ronald Henry
Subject: RE: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

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Hello! Just chasing some response for the below. I am sending my report to committee next week and would be good to know if City Police raises no objections.

From: Tampouridou, Anastasia
Sent: Thursday, April 18, 2024 6:31 PM
To: Russell Pengelly
Cc: Ronald Henry
Subject: RE: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

Hi Russell,

Please see the responses from the agents in red below.

If there are any further concerns or objections to the current proposal please could you let me know asap as we're getting this across committee? If there are no further comments, please also let me know so I can note down that City Police considers the application acceptable with any conditions you would like me to consider if so.

Kindred regards,
Anastasia

From: Russell Pengelly
Sent: Thursday, February 15, 2024 10:29 AM
To: Tampouridou, Anastasia
Cc: Ronald Henry
Subject: Re: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

Hi Anastasia,

There are a couple of comments to make on this one:

1. The proposed external security to the venue was discussed and I recommended a minimum standard of PAS24 LPS1175. If they chose to opt for the European standard of EN1627, the RC2 would not be sufficient to meet the standards of PAS24, they would have to look at RC3 as a minimum. **Noted, we can ensure this is captured at the more detailed design stage.**
2. The entrance at Fulwood Place and the bar entrance onto the main attraction space has closed for the evening is problematic, when looking from an emergency service response perspective. The limited space within the lifts and stairs would severely limit, police, fire and ambulance access to the site. The lifts currently hold a maximum of 4 people each and there is no way on earth that an ambulance stretcher would reach the tunnels, unless they accessed via the main entrance, which would be some considerable distance. **The lifts would be much larger than currently onsite today (allowing for 12 people rather than the 4 people).**
3. My final point is that there is currently no reference to the ability to close the tunnel system to after hours drinkers, which was specifically highlighted in the meeting with WSP. I may have missed it, but there is potential for a client at the bar to wander off into the main tunnel system unless there are security doors introduced to limit permeability once the main venue has closed. **The area outside of the bar will be physically locked off to prevent bar patrons getting access to any area outside of the bar space.**

Any issues, please let me know.

Best wishes
Russell

PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub
City of London Police (Bishopsgate Police Station)182 Bishopsgate, London, EC2M 4NP



From: Tampouridou, Anastasia
Sent: Monday, January 29, 2024 09:48
To: Russell Pengelly; Kelly Hemmisse
Cc: Ronald Henry
Subject: RE: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

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Hi Russell,

The report is attached.

Kind regards,
Anastasia

From: Russell Pengelly
Sent: Friday, January 26, 2024 6:14 PM
To: Tampouridou, Anastasia; Kelly Hemmisse
Cc: Ronald Henry
Subject: RE: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

Hi Anastasia

Just to confirm its the same, could you please send across the report so that I can review it with Ron.

Sorry for the delayed response.

Best wishes
Russ

PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub
City of London Police (Bishopsgate Police Station)182 Bishopsgate, London, EC2M 4NP



From: Tampouridou, Anastasia
Sent: Monday, January 22, 2024 10:54
To: Kelly Hemmisse; Russell Pengelly
Cc: Ronald Henry
Subject: RE: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

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Hi Kelly,

Thank you for letting me know. I am a bit concerned about the timeline here as we are approaching the end of the consultation and I don't know which documents you have to availability. The applicant submitted a Security Report which is not available online for safety reasons so please do let me know if this hasn't been shared with you as it definitely needs your review.

Kind regards,
Anastasia

From: Kelly Hemmisse
Sent: Monday, January 22, 2024 8:49 AM
To: Tampouridou, Anastasia; Russell Pengelly
Cc: Ronald Henry
Subject: RE: New Visitor Attraction at Farnival St - City Police/Counter-terrorism consultation

Morning,

Ron Henry is dealing with this from a CTSA point of view - please can you include him in any future correspondence.

Many thanks.

Kelly Hemmisse LCSD (PWA / H&C)

Counter Terrorism Security Advisor
Counter Terrorism City of London Police

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From: Tampouridou, Anastasia
Sent: Friday, January 20, 2024, 9:37 AM
To: Russell Pengelly; Kelly Hemmisse
Subject: RE: New Visitor Attraction at Furnival St.-City Police/Counter-terrorism consultation

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Hi both,

Just following up on my previous email. Conscious that statutory consultation for this application expires soon and I haven't heard from you yet. I don't know if you have access to the documents you need to review, could you please kindly reply to me?

Kind regards,
Anastasia

From: Tampouridou, Anastasia
Sent: Thursday, January 4, 2024 8:30 AM
To: Russell Pengelly; Kelly Hemmisse
Subject: RE: New Visitor Attraction at Furnival St.-City Police/Counter-terrorism consultation

Hi Russell and Kelly,

I hope you had a great break.

Following our previous discussions about the tunnels scheme, an application has been submitted and validated before Christmas. Hopefully, you should have received the consultation letters. For safety reasons, the Security Report is not visible to the public. Has the applicant shared this with you or should I send it to you through a safe channel for your assessment?

Kind regards,
Anastasia

From: Russell Pengelly
Sent: Friday, December 1, 2023 1:28 PM
To: Tampouridou, Anastasia; Kelly Hemmisse
Subject: Re: New Visitor Attraction at Furnival St.-City Police/Counter-terrorism consultation

Hi Anastasia,

I'm glad they've got their application in now.

I would say that we have met with the owners and their Security team at WSP and I have already raised concerns with the developer and WSP about the underground bar. This relates to their lack of security check ability and accessibility at the Fulwood Place entrance off Holborn. I will email this over to the MPS DOCO for comment too.

This entrance in particular does have it's challenges, relating to queuing, people flow and access for emergency services should the need arise. The lift at this point is incapable of taking more than 4 people and would not be capable of housing a stretcher for the ambulance service. I would like to see the fire safety risk matrix for safe exiting of visitors at the Fulwood Place site.

PC Russell Pengelly

Design Out Crime Officer/Architectural Liaison Officer - ASB/Crime Prevention Advisor

Partnerships and Prevention Hub

City of London Police (Bishopsgate Police Station)182 Bishopsgate, London, EC2M 4NP



From: Tampouridou, Anastasia
Sent: Thursday, November 30, 2023 12:55
To: Kelly Hemmisse; Russell Pengelly
Subject: New Visitor Attraction at Furnival St.-City Police/Counter-terrorism consultation

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Dear Katy and Russell,

I hope this email finds you well.

I am a Planning Officer dealing with The London Tunnels project, which recently came to press. Here is a [link](#) to their website which takes you through the project. We have finalised the pre-application discussions and an application will be submitted imminently (maybe today), so I thought it'd be good to introduce you to this case as you would be consulted. I must apologise for the length of this email, I tried my best to provide the relevant information for your best knowledge.

By way of background, the applicant has recently purchased Kingsway Tunnels (existing name) to repurpose them. The tunnels were used as a government communications centre during WWII. The tunnels have two existing access shafts, located at Fulwood Place and Furnival Street. As such, the Site straddles the border of both the City of London and the London Borough of Camden. In addition to the existing tunnels and lift shafts, there is also above-ground infrastructure associated with the Development including:

- Fulwood Place headhouse (Camden)
- 79 and 40 Furnival Street (City of London)

Key transport facilities in the vicinity of the Site include Chancery Lane Underground Station, Farringdon Station and City Thameslink.

The proposed Development includes the use of the deep level tunnels for a visitor and cultural attraction, including bar. The proposed Development will involve the above-ground demolition of the existing buildings and structures at 79 and 40 Furnival Street, and the construction of a mixed-use building to comprise ancillary offices and retail, in connection with the visitor attraction use (space for staff, gift shop, security and ticketing facilities). The main entrance to the visitor attraction will be located at Furnival Street in the City of London. The proposal includes public realm improvement works (including pavement extension in front of the recessed City entrance and installation of bollards) and cycle parking facilities along High Holborn. An X-ray scan portal would be placed in the corridor after people register at the tickets desk (please refer to below CP plan). Fulwood Place would form a secondary entrance mainly used for school trips, bar visitors and emergency egress, with vehicles expected to use Bedford Row to the rear for pick-ups/drop-offs.

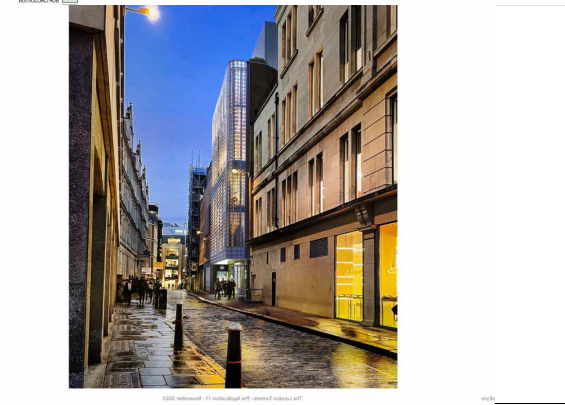
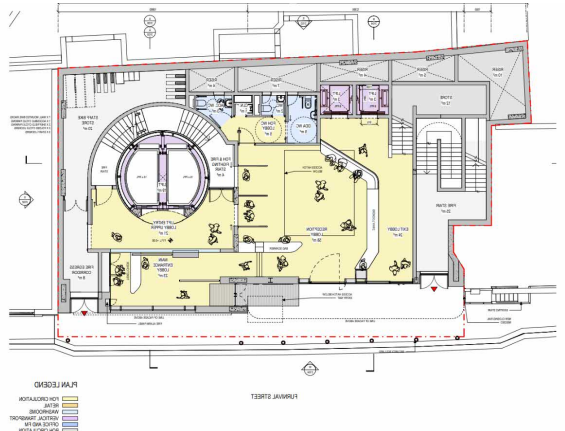
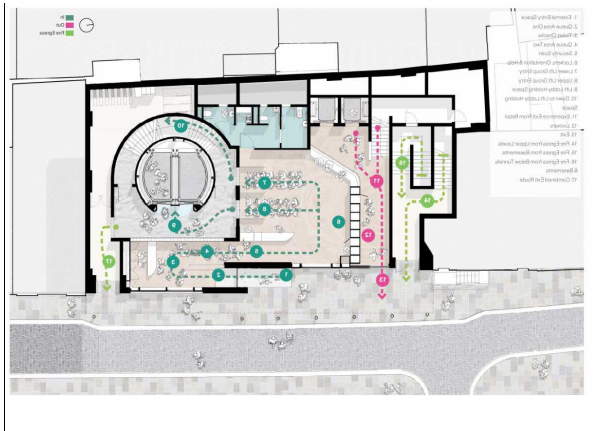
In terms of maximum occupancy, the estimate is to have up to 750 people inside the tunnels at peak hours. It is expected to have groups of 60 people entering the tunnels every 5 minutes and spending up to 60 minutes until they leave. Entrance and egress are to be achieved via Furnival St. Part of the tunnels would host private events (i.e London Fashion Week) which would affect artwork on special days.

I have attached site location plans and below are snippets of the ground floor plans at Furnival Street for ease of reference.

I am happy to chat this through in a call if you wish. Any comments/concerns at this stage are welcomed.

Kind regards,
Anastasia

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From: James Lerpiniere <[REDACTED]>
Sent: Friday, May 17, 2024 2:26 PM
To: Tampouridou, Anastasia <[REDACTED]>
Cc: Ronald Henry <[REDACTED]>
Subject: RE: Tunnels Site Visit

Hi Anastasia,

Yes, all looks OK from our side, thank-you.

Kind regards
James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
[REDACTED]

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From: Tampouridou, Anastasia <[REDACTED]>
Sent: Thursday, May 16, 2024 3:15 PM
To: James Lerpiniere <[REDACTED]>
Cc: Ronald Henry <[REDACTED]>
Subject: RE: Tunnels Site Visit

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Hi James,

I was just following up from your previous email. I am sending my report to committee Members next week, which supports the application proposal, and wanted to clarify that all look okay from your side. I have shared your advice with the developer and I have recommended an informative to go in the Decision Notice for the developer to consult CTSA as the plans evolve. Is this in your satisfaction?

Kind regards,
Anastasia

From: James Lerpiniere [REDACTED]
Sent: Wednesday, February 21, 2024 12:04 PM
To: Tampouridou, Anastasia [REDACTED]
Cc: Ronald Henry [REDACTED]
Subject: Tunnels Site Visit

Hi Anastasia,

Please see attached my CTSA report for the new tunnel attraction on Fulwood Place. I don't have any major concerns however I have included some advice for the client if you wouldn't mind forwarding this on. Should you have any questions please don't hesitate to make contact.

Kind regards,
James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
[REDACTED]

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From: James Lerpiniere
Sent: Monday, February 19, 2024 4:22 PM
To: Tampouridou, Anastasia [REDACTED]
Subject: RE: Tunnels Site Visit

Hi Anastasia

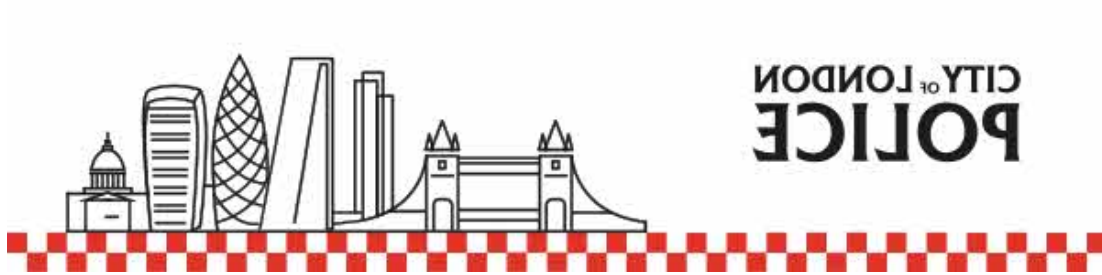
No I don't envisage any major issues, and I can get my report turned around this week if this is needed.

Kind regards
James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
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From: Tampouridou, Anastasia <[REDACTED]>
Sent: Monday, February 19, 2024 3:59 PM
To: James Lerpiniere <[REDACTED]>
Subject: RE: Tunnels Site Visit

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Hi James,

I note you're going on site tomorrow. When do you think you'd be able to issue your comments? I am a bit tight on timelines here with committee approaching and being conscious yours is a sensitive matter for this land use. Are there any major concerns you may already have?

Kind regards,
Anastasia

From: James Lerpiniere <[REDACTED]>
Sent: Tuesday, February 6, 2024 1:44 PM
To: Tampouridou, Anastasia <[REDACTED]>
Subject: RE: Tunnels Site Visit

I may have a visit to the site on the 20th (I'm just awaiting confirmation) so a meeting on MS Teams next week may not be needed. Thankyou though, really appreciated.

Kindest regards

James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
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From: Tampouridou, Anastasia [REDACTED]
Sent: Tuesday, February 6, 2024 1:35 PM
To: James Lerpiniere [REDACTED]
Subject: RE: Tunnels Site Visit

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Hi James,

Yes of course. Regarding your previous email, we can do a meeting sometime next week if you are available on Tuesday? Feel free to send me an MS invite. I am on leave as of this afternoon and for the rest of the week.

Kind regards,
Anastasia

From: James Lerpiniere [REDACTED]
Sent: Tuesday, February 6, 2024 1:32 PM
To: Tampouridou, Anastasia [REDACTED]
Subject: FW: Tunnels Site Visit

Hi again Anastasia

I have just received this from Louisa – would you like me to respond?

Thanks
James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
[REDACTED]

www.cityoflondon.police.uk

www.twitter.com/citypolice



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From: Louisa Smith [REDACTED]
Sent: Tuesday, February 6, 2024 10:59 AM
To: James Lerpiniere [REDACTED]; Tampouridou, Anastasia [REDACTED];
[REDACTED]; Peter Bovill [REDACTED];
Gabriella Bexson [REDACTED]
Subject: RE: Tunnels Site Visit

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Hi James

There is availability on the following – might this work for you?

Feb 20th at 8.15, 10.00 1.00, 2.30 and 3.45.

Kind regards,
Louisa

LOUISA SMITH
ASSOCIATE

Montagu Evans LLP, 70 St Mary Axe, London, EC3A 8BE
[REDACTED]



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From: James Lerpiniere [REDACTED]
Sent: Monday, January 29, 2024 3:25 PM

To: Tampouridou, Anastasia [REDACTED]; Louisa Smith [REDACTED]; Peter Bovill [REDACTED]
Subject: RE: Tunnels Site Visit

Hi all,

Do we have any update on a date to attend this venue please?

Many thanks in advance.
James

James Lerpiniere LCGI
Counter Terrorism Security Advisor
Counter Terrorism | City of London Police
[REDACTED]

w www.cityoflondon.police.uk
t www.twitter.com/citypolice



From: Tampouridou, Anastasia [REDACTED]
Sent: Tuesday, January 23, 2024 11:48 AM
To: Louisa Smith [REDACTED]; Peter Bovill [REDACTED]
Cc: James Lerpiniere [REDACTED]
Subject: Tunnels Site Visit

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Hi both,

James is the counter-terrorism security advisor reviewing this application. He would like to visit the site including going down the tunnels as part of his assessment. Could you please get in touch with the applicant to make arrangements for this to happen?

I will follow up with a separate email with other updates.

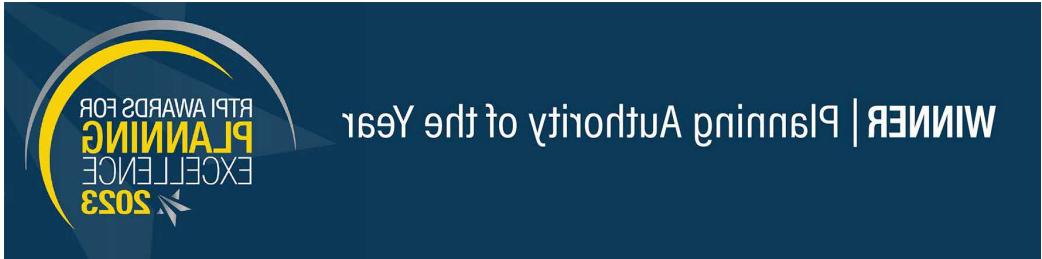
Kind regards,
Anastasia



Anastasia Tampouridou | Planning Officer (Development Management)
Environment Department | City of London | Guildhall | London EC2V 7HH



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From: Munday, Tim [REDACTED]
Sent: Wednesday, May 22, 2024 1:23 PM
To: Tampouridou, Anastasia [REDACTED]
Cc: Bell, Harriet [REDACTED]; Penn, Joseph [REDACTED];
Pundsack, Mark [REDACTED]; Binstead, James
[REDACTED]
Subject: RE: PD14490 - The London Tunnels - Flood Evacuation Plan

Hi Anastasia,

Thank you for sharing this. In reference to my previous email, I think what has been supplied does now address the issues raised.

As LPA there is a specific requirement in the NPPF to agree to egress and access routes, these include both the internal and external routes. Those which have been identified go through unflooded areas and therefore our guidance suggests that these routes should be accepted.

This development is a special case due to the subterranean nature of the development. They have now assessed this against the routes, and the risk is primarily residual (i.e. it is defended against and will only result if those defences fail). The two routes with distinct exit points helps to mitigate this risk yet further. I would therefore consider this development to meet the policy in this area (flood egress and access).

Let me know if you need anything further,

Thanks

Tim Munday MEng ACGI MCIWEM
Lead Environmental Resilience Officer



District Surveyor's Office
Environment Department
City of London Corporation

[REDACTED]

From: Tampouridou, Anastasia [REDACTED]
Sent: Wednesday, May 15, 2024 12:59 PM
To: Bell, Harriet [REDACTED]; Penn, Joseph [REDACTED];
Pundsack, Mark [REDACTED]; Munday, Tim
[REDACTED]
Subject: FW: PD14490 - The London Tunnels - Flood Evacuation Plan

Hi all – I appreciate this came very late. I am not sure who should be looking at it, I've CC'd Harriet, Mark and Tim as it feels you should be aware of it. Application ref 23/01322/FULMAJ (the tunnels scheme).

Many thanks,
Anastasia

From: Louisa Smith <[REDACTED]>
Sent: Wednesday, May 15, 2024 11:53 AM
To: Tampouridou, Anastasia <[REDACTED]>; Sam FitzPatrick <[REDACTED]>
Cc: Peter Bovill <[REDACTED]>; Gabriella Bexson <[REDACTED]>; Alex Nesti <[REDACTED]>
Subject: PD14490 - The London Tunnels - Flood Evacuation Plan

THIS IS AN EXTERNAL EMAIL

Good morning Anastasia & Sam

As requested, please find attached a Flood Evacuation Plan for the London Tunnels.

Please let us know if you have any queries.

Kind regards
Louisa

LOUISA SMITH
ASSOCIATE

Montagu Evans LLP, 70 St Mary Axe, London, EC3A 8BE
[REDACTED]



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