

<b>Committee:</b>	<b>Date:</b>
Planning Application Sub-Committee	17 June 2025
<b>Subject:</b> 319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2  24/01262/FULMAJ: Demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels; creation of public realm, including new hard and soft landscaping, external terraces, provision of new servicing facilities and associated access from Southampton Buildings, cycle parking and other associated works.	<b>Public</b>
<b>Ward:</b> Farringdon Without	<b>For Decision</b>
<b>Registered No:</b> 24/01262/FULMAJ	<b>Registered on: 28 November 2024</b>
<b>Conservation Area:</b> Chancery Lane Conservation Area	

## Summary

- (I) The application relates to a site located on the northwest part of the City of London, bordering with the London Borough of Camden to the north, bounded by High Holborn to the north, Southampton Buildings to the southwest and Staple Inn Buildings to the east and it comprises three buildings, namely 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings.
- (II) The site partially (44 Southampton Buildings) lies within the Chancery Lane Conservation Area. To the east are the Staple Inn Buildings (Grade I, II\* and II listed buildings) and associated private gardens. 25 Southampton Buildings and 10 Furnival Street (Grade II\* listed buildings) - former Patent Office - and attached listed railings are to the south.
- (III) Planning permission is sought for the demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels. A pocket park is proposed to the south of the proposed building.
- (IV) The existing seven residential properties are proposed to be provided at an alternative site within the City of London. A separate application has been submitted to determine the relocation of these residential units. This application (Reference no: 24/01323/FULL) proposes the change of use of 1-2 St Andrew's Hill from commercial to seven residential units and is currently under determination.
- (V) An associated Listed Building Consent application (24/01247/LBC) has also been submitted relating to minor works to attached railings and gate piers at Staple Inn Buildings and The Hall, Staple Inn (335 & 336 High Holborn) associated with the development of the application site.

- (VI) Objections have been received from statutory consultees including Historic England and the CAAC in relation to the overall scale and height of the proposed development, which they consider resulting in less than substantial heritage harm to a number of designated heritage assets. The GLA has stated that the development as submitted does not yet fully comply with the London plan; however, remedies are suggested. The GLA stated that the less than substantial harm identified, would be outweighed by the public benefits of the scheme. No objections have been raised by the London Borough of Camden or any other consultees. One letter of objection has been received by a resident raising concerns regarding the proposed land uses, design and the disturbance and pollution during construction. This report has considered these impacts, which are addressed below.
- (VII) The representations received are set out in the main body of the report and are also included in full in the background papers.
- (VIII) The site is within the Central Activities Zone in a highly sustainable location. The proposal would deliver a high quality, office-led development, which will meet growing business needs, supporting and strengthening opportunities for continued collaboration and clustering of businesses and maintaining the City's position as the world's leading international, financial, and professional services centre.
- (IX) The scheme would provide 52,656 sqm (GIA) of office floorspace (Use Class E(g)(i)), which would be flexible, sustainable Grade A office floorspace suitable for circa 3,000-3,200 FTE jobs. The site is within the City's growth modelling and would deliver 1.5% of the required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would significantly contribute to maintaining the City's position as the world's leading international, financial and professional services business centre.
- (X) Levels 01-09 contain office space with larger floorplates at the lower levels, and smaller floorplates in size and depth on the upper floors. The proposed development has been designed so that it would be easily subdivided into two smaller tenancies to suit a wide range of tenants. The proposal would also provide 221sqm of creative affordable workspace available at 50% of market rent, fulfilling the City's vision of providing inclusive workspace.

- (XI) Alongside the office space the proposed an area of 1,923 sqm GIA of cultural/ exhibition/ performance/ learning/ community space, at ground floor and basement levels on the northwest corner of the application site, would combine to create a compelling and inclusive public offer in line with the Destination City agenda. The proposed flexible cultural offer would be focused on the provision of a unique offer of a venue space, namely the Holborn Dome. The venue would include an immersive auditorium, flexible exhibition spaces and areas for community events. The dome design auditorium space has been inspired by the former Knights Templar Church, which once stood at almost at the same position as the proposed Dome. This flexible space would be able to accommodate 300 people for a range of events, from cultural events to physical and digital art exhibitions, product launches events and organisations hires. The spaces around the auditorium offer spaces for workshops, exhibitions, and break-out areas for smaller community-focused events. The retained archaeology, namely the section of the wall foundations of the Knights Templar would offer an exceptional opportunity to tangibly connect the proposed cultural offer with the history of the site. Although smaller in actual size than the existing floorspace, the high quality of the proposed offer would enhance the active frontage along High Holborn and the proposed pocket park, supporting the primary business function of the City and the local community. The provision of a water fountain, as well as a maintenance and management strategy will be secured by condition. The provision of public toilets will be secured via condition and their maintenance and management shall be detailed through a management plan secured via S106 obligation.
- (XII) Architecturally, the proposal would be truly contextual; that is to say, it is the product of thoughtful, crafted and meticulous consideration of its richly historic context to which, in the pleasing variety of all of its elevations, it would offer a series of intelligent and beautifully resolved responses. Above all, it would have a generosity of detailing, materiality and uses that would utterly transform the present standing of this application site in the streetscape. The proposed building would result in a significant aesthetic enhancement to the High Holborn locality and its sophisticated and well-integrated design would raise the standard of contemporary architecture in the area. Equally the remodelled pocket park and upgrading of public routes would create enhanced pleasant places to linger as well as pass through for a range of users seamlessly but meaningfully adding to the public realm network.
- (XIII) The proposal would optimise the use of land, delivering high quality office space, and a multi-layered series of accessible spaces. It would enhance

convenience, comfort and attractiveness in a manner which optimises active travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm. The proposals would constitute thoroughly Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

- (XIV) The proposal would not be of a siting or scale to affect (and so would preserve) the Outstanding Universal Value of the Tower of London. Similarly, it would not be of a siting or scale to affect the characteristics and composition of the majority of strategic views and would preserve those in which it is (faintly) visible. It would comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging elevated public spaces which are also important to the character of the City of London.
- (XV) While LB Camden have raised no concerns about any impacts on heritage assets within their area, there have been concerns from Historic England and the GLA, who have identified less than substantial harm to a range of assets. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus and some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.
- (XVI) Officers consider that, for the reasons set out above, the proposals would cause a slight level of less than substantial harm, and a slight level of enhancement, to the Chancery Lane Conservation Area, a slight level of less than substantial harm to the significance, via setting, of Nos. 8-15 Old Square (grade II), a low level of less than substantial harm to the significance, via setting, of Nos. 12 and 13 Old Buildings (grade I) and a low level of less than substantial harm to the significance, via setting, of Nos. 1 – 7 Stone Buildings (grade I).

- (XVII) Although these harms have been clearly and convincingly justified, and considerably mitigated through good design, the proposal would result in some conflict with the proposal would result in some conflict with Local Plan Policies CS12 ( 2), DM12.1 (1 and 4), DM 12.2 (2) and DM 20.2; emerging City Plan 2040 policies S11 (2), HE1 (1 and 6) ; London Plan Policy HC1 (C) and with the objective set out in Section 66 and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
- (XVIII) Otherwise, the proposals would preserve the significance and contribution of setting of all other heritage assets. The proposals comply with policies CS12 (1, 3, 4 and 5), DM12.1 (2, 3 and 5), DM12.2 (1 and 3), DM12.3, DM12.4 and CS13; Emerging City Plan 2040 S11 (1, 3-5), S 13, HE1 (2-5, 7-9) and HE2 and London Plan HC1 (A,B, D-E).
- (XIX) The harms, enhancements and public benefits are considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report.
- (XX) Giving considerable importance and weight to the desirability of preserving the significance and setting of listed buildings, this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits include a slight level of enhancement to the Chancery Lane Conservation Area. The public benefits include the delivery of growth in a highly sustainable location, the unique offer of a highly compelling mix of cultural/ exhibition/ performance/ learning/ community space across the lower levels of the proposal and public realm offer by the provision of a high quality pocket park. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.
- (XXI) The proposals comply with the required initial steps of archaeology investigation, in accordance with Local Plan DM 12.4, emerging City Plan 2040 HE2 and London Plan HC1, subject to archaeology conditions.
- (XXII) In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking (745 long stay and 71 short stay) and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. The proposals for the enhanced public

highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistics guidance. The building is proposed to be serviced by a single point onto Southampton Buildings. 35 daily trips (or 70 two-way trips) are forecasted following consolidation of deliveries by 50%. This would need to be set out in a delivery and servicing management plan, secured by planning obligation. It is considered at this stage that the proposed servicing arrangement would be acceptable. The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy T5.

- (XXIII) A carbon options study has been carried out based on a thorough understanding of the existing buildings on site and their physical relationships to each other, to establish carbon impacts, opportunities and constraints for environmental sustainability and to inform the intended transformation of the site. Significant carbon savings beyond the GLA's benchmarks would be achievable only by retaining large proportions of the various existing buildings which would result in limitations of the development to connect floor levels through an infill extension and to provide high quality internal floorspaces. The proposed development would optimise the quantity of floorspace for offices and for a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.
- (XXIV) The proposed development would meet the GLA's standard benchmark for upfront carbon and reach close to meet the standard benchmark for life-cycle embodied carbon, with benefits relating to improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in an estimated low energy use intensity (EUI), and a BREEAM "excellent" rating is targeted, aspiring to an "outstanding" rating through detailed design. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021

baseline relating to non-residential buildings, as acknowledged by the GLA, it would (taking account of the mitigation measures proposed) comply with London Plan Policies SI 2, SI 7, Local Plan Policies CS15 and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

- (XXV) In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant.
- (XXVI) It is the view of officers that as a matter of planning judgement, in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, as policy CS1 is complied with, as policies relating to office floor space delivery, would be complied with that, notwithstanding the conflicts with CS12 (Historic Environment) , DM12.1 (Managing Change affecting all heritage assets and spaces); DM12.2 (Development in conservation areas); Emerging City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets) and London Plan HC1 (Heritage Conservation and Growth), the proposals would comply with the Development Plan when considered as a whole.
- (XXVII) In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, that as the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with other relevant design, community, culture, environmental and public realm related policies.
- (XXVIII) The Local Planning Authority must determine the application in accordance with the development plan unless other material considerations indicate otherwise.

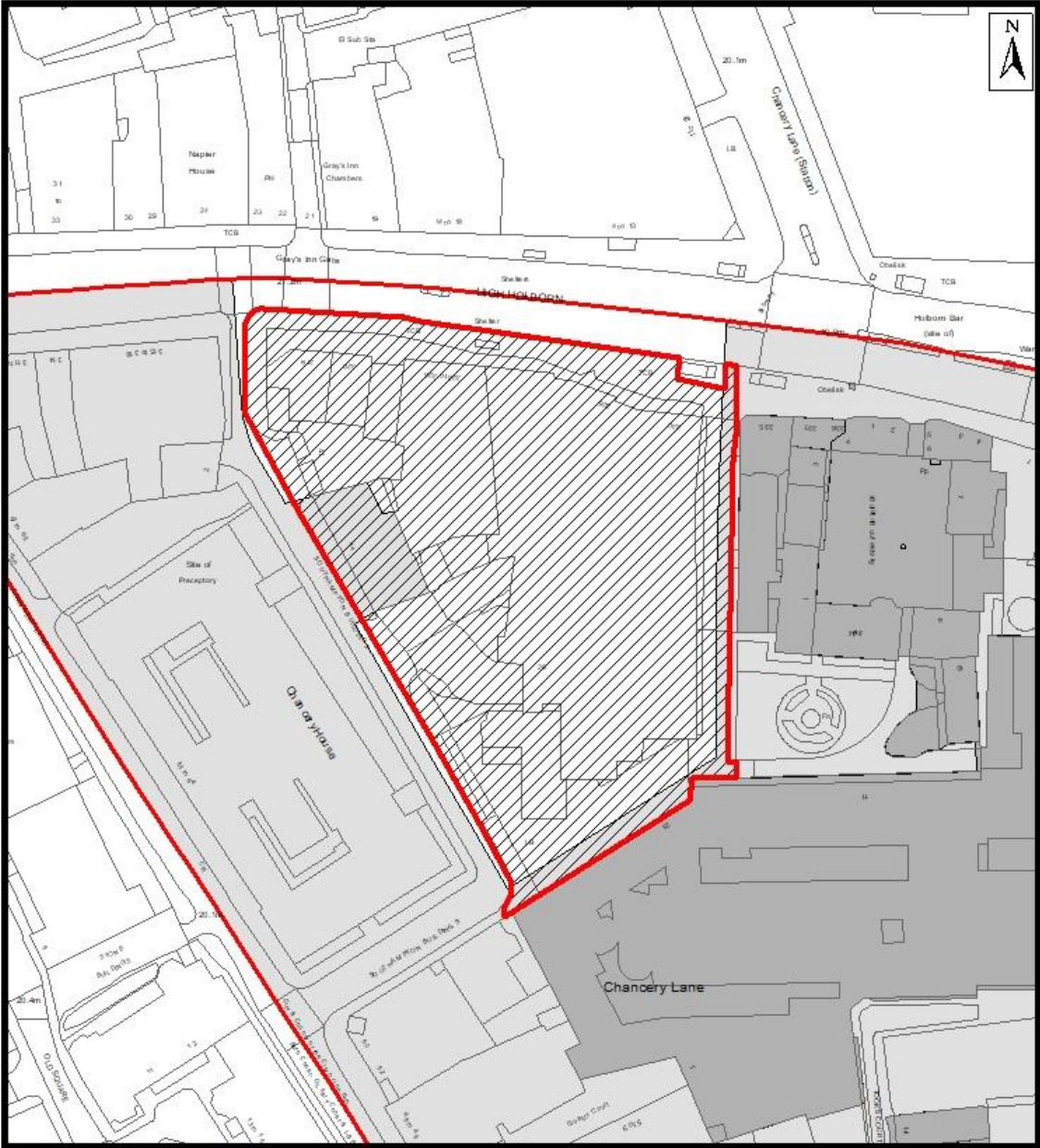


- (XXIX) The scheme would provide benefits through the community infrastructure levy (CIL), improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S106 agreement.
- (XXX) Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
- (XXXI) Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan (such as the proposal before you) without delay.
- (XXXII) As discussed within the main report, the paragraph 215 NPPF heritage balance (and the balance referred to at London Plan policy D9C(d)) is to be struck in favour of the scheme as the public benefits outweigh the less than substantial harm.
- (XXXIII) It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

### **Recommendation**





- (1) That the Planning and Development Director be authorised to issue a decision notice granting planning permission for the above proposal in accordance with the details set out in the attached schedule subject to:
  - (a) The application be referred to the Mayor of London to decide whether to allow the Corporation to grant planning permission as recommended, or to determine the application himself (Article 5(1)(a) of the Town and Country Planning (Mayor of London) Order 2008);
  - (b) Planning obligations and other agreements being entered into under Section 106 of the Town & Country Planning Act 1990 and Section 278 of the Highway Act 1980 in respect of those matters set out in the report, the decision notice not to be issued until the Section 106 obligations have been executed.
- (2) That your Officers be instructed to negotiate and execute obligations in respect of those matters set out in “Planning Obligations” under Section 106 of the Town and Country Planning Act 1990 and any necessary agreement under Section 278 of the Highways Act 1980.
- (3) That members note that land affected by the building which is currently public highway and land over which the public have right of access may need to be stopped up to enable the development to proceed and, upon receipt of the formal application, officers may proceed with arrangements for advertising and (subject to consideration of consultation responses) making of a Stopping-up Order for the area shown marked on the Stopping-up plan annexed to this report under the delegated arrangements approved by the Court of Common Council.

# Site Location Plan



ADDRESS:  
High Holborn

CASE No.  
24/01262/FULMAJ

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



ENVIRONMENT DEPARTMENT



## Site Photos



*Figure 1: Aerial view of the site*



*Figure 2: Heron House, 322 -326 High Holborn, view from High Holborn*





*Figure 3: Holborn Gate, 326-332 High Holborn, view from High Holborn*



*Figure 4: Holborn Gate, (left) view from view Staple Inn Buildings, (right) from Southampton Buildings (southwest corner)*



*Figure 5: 44 Southampton Buildings, (left) front elevation, (right) rear elevation*



*Figure 6: Aerial view of the proposed development*





*Figure 7: Proposed development, view from High Holborn towards the east*



*Figure 8: Proposed development, view from High Holborn towards the west*



*Figure 9: Proposed public realm, (left) proposed pocket park to the south of the proposed building, (right) southeast area along Staple Inn Buildings including reinstated railings*



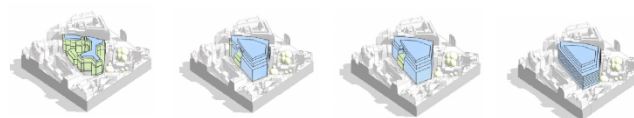
# APPLICATION COVER SHEET

319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2

TOPIC	INFORMATION			
1. HEIGHT	EXISTING		PROPOSED	
	57.4 metres		65.7 metres	
2. FLOORSPACE GIA (SQM)	USES	EXISTING (sqm)	PROPOSED (sqm)	
	Office (Class E)	29,218	Office (Class E)	52,656
	Retail (Class E)	3,044	Retail (Class E)	1,197
	Car Park (Sui Generis)	2,377	Car Park (Sui Generis)	0
	Cultural Space (Sui Generis)	0	Cultural Space (Sui Generis)	1,923
	Residential (Class C3)	573	Residential (Class C3)	0
	Affordable Cultural (Sui Generis)	0	Affordable Cultural (Sui Generis)	221
	TOTAL	35,212	TOTAL	55,997
			TOTAL UPLIFT:	20,785
3. OFFICE PROVISION IN THE CAZ	Existing: 29,218 sqm Proposed: 52,656 sqm			
4. EMPLOYMENT NUMBERS	EXISTING		PROPOSED	
	2,450		Circa 3,000 – 3,200	
5. VEHICLE/CYCLE PARKING	EXISTING		PROPOSED	
	Car parking spaces	90 + 2 blue badge	Car parking spaces	2 blue badge
	Cycle long stay	122	Cycle long stay	745
	Cycle short stay	28	Cycle short stay	71
	Lockers	120	Lockers	498
	Showers	11	Showers	77
	Changing facilities	Yes	Changing facilities	Yes

<b>6. HIGHWAY LOSS/ GAIN</b>	112.6sqm of public highway to be stopped up 114.6sqm of highway to be dedicated Resulting in a net change of +2sqm of public highway	
<b>7. PUBLIC REALM</b>	Proposed pocket park amounting to 643 sqm Existing: 2,314.7sqm Proposed: 2,118.3sqm	
<b>8. STREET TREES</b>	<b>EXISTING</b>	<b>PROPOSED</b>
	4 in total  2 birch trees in planters 1 tree overlapping the site boundary from the pocket park to the south and 1 recently planted cherry tree	4 No. Ginkgo Biloba 4 No. Cornus Mas 4 No. Acer Palmatum 4 No. Magnolia Sieboldii 3 No. Acer Ginnala  1 No. Alnus Glutinosa (Retained) 1 Cherry tree (retained)
<b>9. SERVICING VEHICLE TRIPS</b>	<b>EXISTING</b>	<b>PROPOSED</b>
	89 vehicles per day	35 vehicles per day
<b>10. SERVICING HOURS</b>	No servicing during the hours of 07:00-10:00; 12:00-14:00; and 16:00-19:00	
<b>11. RETAINED FABRIC</b>	0% retention of structure Retention of some basement elements (<0%) to simplify construction works and reduce excavation and temporary works	
<b>12. REGULATED OPERATIONAL CARBON SAVINGS</b>	Improvement against Part L 2021: 11% GLA policy target: 35%	
<b>13. OPERATIONAL CARBON EMISSIONS</b>	75,801 tonnes CO2 over 60 years 1,354 kg CO2 per square meter over 60 years	

14. EMBODIED CARBON EMISSIONS	<div>PROJECT LIFE CYCLE EMISSIONS COMPARED TO GLA BENCHMARKS (RICS V1)</div> <div><div>Embodied Carbon Comparison to Benchmarks</div><table><thead><tr><th>Category</th><th>A1-A5 excl. sequestration</th><th>B-C excl. B6 &amp; B7</th></tr></thead><tbody><tr><td>Application Scheme High Holborn RICS V1 kg CO2e/m2 GIA</td><td>950</td><td>529</td></tr><tr><td>Office WLC Benchmark</td><td>950</td><td>450</td></tr><tr><td>Office WLC Aspirational Benchmark</td><td>600</td><td>370</td></tr></tbody></table></div>	Category	A1-A5 excl. sequestration	B-C excl. B6 & B7	Application Scheme High Holborn RICS V1 kg CO2e/m2 GIA	950	529	Office WLC Benchmark	950	450	Office WLC Aspirational Benchmark	600	370
Category	A1-A5 excl. sequestration	B-C excl. B6 & B7											
Application Scheme High Holborn RICS V1 kg CO2e/m2 GIA	950	529											
Office WLC Benchmark	950	450											
Office WLC Aspirational Benchmark	600	370											
15. WHOLE LIFE - CYCLE CARBON EMISSIONS	<div>Total embodied and operational carbon: 158,615 tonnes CO2</div> <div>Embodied + operational carbon per square meter: 2,833 kg CO2 per sqm</div>												
16. WHOLE LIFE- CYCLE CARBON OPTIONEERING													



Major refurbishment

Transformation +  
New Build

Partial retention of  
44SB + New Build

New Build

Option Reference	Option 1	Option 2	Option 3	Option 4
<b>Project reference period</b>	60	60	60	60
<b>Gross Internal area (GIA) m²</b>	36,004	52,691	53,772	54,671
<b>Net Internal area (NIA) m²</b>	19,611	33,917	36,279	37,171
<b>Change in NIA (compared to existing) m²</b>	0%	73%	85%	90%
<b>Substructure % retained by mass</b>	84%	33%	3%	0%
<b>Superstructure</b> (Frame, Upper floors, Roof, Stairs and ramps)	74%	14%	1%	0%
<b>% retained by mass</b>				
<b>Total WLCA (incl. B6 &amp; pre-demolition)</b> (kgCO <sub>2</sub> e/m² GIA)	<b>1,099</b>	<b>1,392</b>	<b>1,464</b>	<b>1,474</b>
<i>Module B7 is not considered</i>				
<b>Upfront Embodied Carbon (A1-A5)</b> excl. sequestration (kgCO <sub>2</sub> e/m² GIA)	524	813	885	883
<b>In-use &amp; End of Life Embodied Carbon (B-C)</b> excl. B6 & B7 (kgCO <sub>2</sub> e/m² GIA)	408	422	438	449
<b>Estimated Whole Building Operational Carbon for building life time (B6)</b> (kgCO <sub>2</sub> e/m² GIA)	156	132	109	109
<b>Total WLCA (incl. B6 and pre-demolition)</b> (tCO <sub>2</sub> e)	<b>39,552</b>	<b>73,348</b>	<b>78,719</b>	<b>80,569</b>
<i>Module B7 is not considered</i>				
<b>Total existing building demolition</b> (tCO <sub>2</sub> e)	386	1,301	1,741	1,766
<b>Upfront Embodied carbon (A1-A5)</b> (tCO <sub>2</sub> e)	18,866	42,838	47,588	48,274
<b>In-use embodied carbon (B-C)</b> (tCO <sub>2</sub> e)	14,690	22,236	23,552	24,547
<b>Operational Carbon for building life time (B6)</b> (tCO <sub>2</sub> e)	5,610	6,974	5,838	5,982

## 17. BREEAM CERTIFICATION

Targeting minimum rating of 'Excellent', with an aspiration of 'Outstanding'



Policy target: 'excellent' or 'outstanding'

## 18. NABERS UK CERTIFICATION

Targeting an energy efficiency rating of 5 stars (out of 6 possible)  
(compliant with Sustainability SPD recommendation of 5 stars for new build schemes)

## 19. URBAN GREENING FACTOR

0.302

## 20. AIR QUALITY

The development is considered to be Air Quality Neutral for both building and transport emissions.

<b>21. Biodiversity Net Gain</b>	0.63 HU (937.29% increase of HU)
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## **Main Report**

### **Site and Surroundings**

1. The application site is located on the northwest part of the City of London, bordering with the London Borough of Camden to the north, bounded by High Holborn to the north, Southampton Buildings to the southwest and Staple Inn Buildings to the east. It is approximately 0.69 hectares in size, and it comprises three buildings, namely 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings. The existing three buildings contain predominantly office space, with some ground-floor retail, seven residential units, and a public car park at basement level.
2. The surrounding area is of high density, medium rise buildings and is primarily commercial with some residential properties primarily to the north of the application site within Camden. There are also some residential uses to the west of the application site. Immediately to the north of the application site are two commercial and a residential building (7-21 High Holborn). A public House is located to the northwest (22-23 High Holborn). To the east are the Staple Inn Buildings (Grade I, II\* and II listed buildings) and associated private gardens. 25 Southampton Buildings and 10 Furnival Street (Grade II\* listed buildings) - former Patent Office - and attached listed railings are to the south. Chancery House and 311-318 High Holborn are located to the west and are commercial buildings.
3. 44 Southampton Buildings lies within the Chancery Lane Conservation Area; an area characterised by a span of building ages and styles, including medieval survivals and Victorian public buildings, significant historical association with the legal profession and educational establishments and a well-preserved historic street network. The rest of the application site is bounded by Chancery Lane conservation area to the west, south and east. To the northwest is the Bloomsbury Conservation area and to the northeast is the Hatton Garden Conservation Area; both within the boundaries of the London Borough of Camden.
4. The site has multiple historic layers dating back to the 12th century when the first Knights Templar Church was located on the northwest corner of the application site. In 1902, Birkbeck Bank had acquired a significant portion of the

site, consolidating into a single new building. Other than 44 Southampton Buildings, all the existing buildings on the site were demolished in the 1960s.

5. There are several other heritage assets in the vicinity of the site, including:
  - Staple Inn Buildings (Grade I, II\* and II, including listed railings)
  - Prudential Assurance Buildings (Grade II\*)
  - Gatehouse and Cittie of York group (Grade II)
  - Obelisks group (Grade II)
  - Royal Fusiliers War memorial (Grade II\*)
  - Churches on Holborn Viaduct (Grade I and II)
  - No.10 Furnival Street and attached railings and 25 Southampton Buildings and attached railings (Grade II\*)
  - Stone Buildings (Grade I and II)
  - Lincoln's Inn - Old Square group (Grade I and II)
  - Lincoln's Inn - New Square group (Grade II\* and II)
  - Lincoln's Inn - Hall and Library group (Grade II\* and II)
  - Lincoln's Inn Fields - southern group (Grade II\* and II)
  - Lincoln's Inn Fields - western group (Grade I, II\* and II)
  - Lincoln's Inn Fields - northern group (Grade I and II)
  - Buildings to south of Gray's Inn Gardens (Grade II)
  - Gray's Inn Square and South Square group (Grade II\* and II)
  - Buildings around Gray's Inn Gardens (Grade II)
6. The site is located partially located within the foreground of Protected Vista of St Paul's Cathedral Hill view 4A.1, the Background Protected View of St Paul's Cathedral from Greenwich Park view 5A.2 and Blackheath Point view 6A.1.
7. The site comprises three buildings, as stated above. Holborn Gate (326-332 High Holborn), a ten storey building, gained consent in 1964 to be converted to an office building. Heron House (319-325 High Holborn) was constructed in 1968 to designs of ES. Boyer & Partners, following clearance of the site following structural damages during the 2nd World War. 44 Southampton Buildings was constructed in 1913 to designs by Frank M. Elgood and Richardson & Gill. The building has undergone numerous internal and external changes, including refurbishment in 1965. The buildings are primarily in office use, incorporating some retail at ground floor level. Seven residential properties are also located within the site. The total gross internal area (GIA) for all the buildings on the site is 35,211sqm. Heron House and 44 Southampton Buildings

each have a single basement, while Holborn Gate has two levels of basement. An 86 spaces car park is located at the basement of Holborn Gate. Six further parking spaces are located at the basement of Heron House.

8. Holborn Gate, the largest building on the site, benefits from an interesting kinked northern façade, with clear horizontal emphasis in its perimeter, finished in clad with a reflective gold mosaic. Heron House is deeply recessed at ground floor, with five circular structural columns clad in white tile, and with brown tile to the base, from the soffit to the pavement. Above ground the design of the building follows the rhythm of the design of Holborn Gate, finished in ribbed square tiles to the façade. 44 Southampton Buildings has changed considerably since its construction. Other than its façade, which has been retained almost in its original form, the rest of the building has been unsympathetically amended.
9. Externally, the public realm surrounding the site is of low quality. On the site is an existing open space on a raised podium level, opposite the south office entrance, and a newly-created, linear open space following the pedestrianisation of part of Southampton Buildings in 2016. The space at the south-west corner of the site is classed as 'Designated Open Space'. In the Open Spaces Strategy, this area is classed as a Secondary Civic Space. Combined the area of the public realm to the south of the buildings is approximately 720 metres squared.
10. In terms of public transport, the site is located within Public Transport Accessibility Level (PTAL) 6b (excellent), the highest rating available. The scheme is well located to benefit from the numerous transport connections, including Chancery Lane Underground station, which is adjacent to the site, Farringdon Station to the east City Thameslink, Blackfriars and Russell Square, serving London Underground and National Rail services. All areas of the development have convenient access to public bus services. Stops located in front of the site.

### **Relevant Planning History and Background to the Proposal**

11. The most recent and relevant planning history of the site is as follows:
  - a) Heron House:



- 07/00860/FULL - Installation of plant equipment, associated ducting and two louvres each measuring 0.25m by 0.25m. – Planning permission granted.
  - 07/00859/ADVT - Installation and display of (i) an internally illuminated fascia sign measuring 4.3m wide by 0.7m high located at a height above ground of 2.65m, (ii) an internally illuminated projecting sign measuring 0.9m wide by 0.63m high located at a height above ground of 2.65m and (iii) an internally illuminated fascia box to rear elevation measuring 1.8m wide by 0.29m high located at a height above ground of 3.5m. – Advertisement consent granted.
  - 07/00858/FULL - Installation of new shopfront and entrance doors to front elevation. – Planning permission granted.
  - 05/00176/FULL - Application under Section 73 of the Town and Country Planning Act 1990 to vary condition 13 of planning permission dated 22nd June 1962 to provide for revised loading arrangements. – Planning permission granted.
  - 5141BC - Change of use from B1 (Office) use at basement and ground floor level to A1 (Retail) use (595sqm). Rear extension at ground floor level to provide 59sqm of new A1 (Retail) floorspace. New plant enclosure (17sqm) on rear flat roof area. New shopfront to High Holborn frontage. – Planning permission granted.
- b) Holborn Gate:
- 24/00399/FULL - Removal of existing external signage and 2no. ATMs and infill with materials to match the existing materials. – Planning permission granted.
  - 20/00328/ADVT - Installation and display of one non-illuminated acrylic sign measuring 2.02m high by 1m wide at ground floor level. – Advertisement consent granted.
  - 19/01220/ADVT - Installation and display of one non-illuminated acrylic sign measuring 2.02m high by 1m wide at ground floor level. - Advertisement consent granted.
  - 18/00223/FULL - Installation of new shopfront including two new automatic teller machines (ATMs) and an entrance ramp. Planning permission granted.
  - 16/00126/ADVT - Installation and display of two internally illuminated fascia signs each measuring 0.80m in height by 4.1m wide, situated at a height of 2.67m above ground. - Advertisement consent granted.

- 14/00812/FULL - i) Change of use of part ground floor from offices (Class B1) to a flexible use for either Class A3 use or Class B1 (414sq.m GEA). ii) Extension of the south office reception for office Class B1 use (6sq.m GEA). (iii) Erection of a portico entrance to the north office reception for office (Class B1) use. (iv) Installation of new roof plant and landscaping of the existing piazza to the south. (v) Installation of new fluted white cladding panels at first floor level on part of the north, south, east and west elevations of the building to replace existing. - Planning permission granted.
- 14/00123/ADVT - Installation and display (i) one internally illuminated fascia sign measuring 0.70m high, 9.53m wide, at a height above ground of 3m (ii) one internally illuminated projecting sign measuring 0.60m high, 0.77m wide, at a height above ground of 3m (iii) three internally illuminated ATM surrounds measuring 2.02m high, 1.04m wide, situated at ground floor level. - Advertisement consent granted.
- 15/00135/FULL - (i) Change of use of part ground floor from offices (Class B1) to a flexible use for either Class A1/A3 use or Class B1 (120 sq m GEA). (ii) Extension of the south office reception for office Class B1 use (6 sq m GEA). (iii) Erection of a portico entrance to the north office reception for office (Class B1) use. (iv) Installation of new roof plant and landscaping of the existing piazza to the south. (v) Installation of new fluted white cladding panels at first floor level on part of the north, south, east and west elevations of the building to replace existing. Amendment to planning permission reference: 14/00812/FULL. – Planning permission granted.
- 12/00596/ADVT - Installation and display of: (i) one internally illuminated fascia sign measuring 0.5m high by 6m wide situated at a height above ground of 3.1m (ii) one internally illuminated fascia sign measuring 0.5m high by 2.8m wide situated at a height above ground of 3.1m (iii) two internally illuminated ATM surrounds measuring 2m high by 1m wide situated at a height above ground of 0.1m (iv) one non-illuminated nameplate measuring 0.9m high by 0.3m wide situated at a height above ground of 0.8m. - Advertisement consent granted.
- 5141BA - Installation of a new shopfront. – Planning Permission Granted.

- c) 44 Southampton Buildings:
    - 18/00559/FULL - Installation of replacement roof top mechanical plant. – Planning permission granted.
    - 5147B - Extensions to existing floors, provision of a new floor, including roof plant, provision of a stair/lift core plus elevational alterations including new entrances (Class B1). - Planning permission granted.
12. It is noted that an application, proposing the change of use of 1-2 St Andrew's Hill from commercial to seven residential units, was submitted under the terms of application reference 24/01323/FULL and is currently under determination. This application has been submitted concurrently with the application being assessed as part of this report (24/01262/FULMAJ) as a land use package to deliver the residential units that would be lost as part of the proposal at High Holborn.
  13. An associated Listed Building Consent application (24/01247/LBC) has also been submitted relating to minor works to attached railings and gate piers at Staple Inn Buildings and The Hall, Staple Inn (335 & 336 High Holborn) associated with the development of the application site.
  14. The following section of the report sets out full details of the proposal.

## **Proposal**

### **24/00021/FULEIA**

15. Planning permission is sought for the demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels; creation of public realm, including new hard and soft landscaping, external terraces, provision of new servicing facilities and associated access from Southampton Buildings, cycle parking and other associated works.

16. The proposed scheme would provide 55,997 sq.m (GIA) of floorspace comprising:
- 52,656sq.m (GIA) of office floorspace (Use Class E(g)(i))
  - 1,197sq.m (GIA) of retail floor space (Use Class E(a)-(b))
  - 1,923sq.m (GIA) flexible cultural/ exhibition/ performance/ learning/ community (Use Classes F1(a)-(e)/ F2(b)/ Sui Generis) uses
  - 221sq.m (GIA) affordable workspace (Use Class E(g)(i)/Sui generis)
17. The existing seven residential properties are proposed to be provided at an alternative site within the City of London. A separate application has been submitted to determine the relocation of these residential units. This matter is further discussed in the 'Principal of Development/ Land Uses' section of the report below.

#### Office Floorspace

18. The proposal seeks comprehensive redevelopment of the site to provide modern, Grade A, energy efficient office floorspace. The office entrance would be recessed in a concave shape and would be located onto the northeast corner of the proposed building. The accommodation would be arranged around a central core. From Level 1 upwards, all the accommodation would be for office use. Levels 1 to 9 contain office space with larger floorplates at the lower levels, and smaller floorplates in size and depth on the upper floors. The majority of the building's column grid is based on a narrow 6m facade grid with a 9m x 9m internal grid. This enables a more flexible floorplate, with reduced number of internal columns.

#### Flexible cultural/ exhibition/ performance/ learning/ community space

19. The flexible space would be provided at lower ground and ground floor levels on the northwest corner of the building. Similar to the office lobby entrance, the entrance to the cultural space would be recessed and in a concave shape to the northwest of the building. The space would include a new cultural venue, the Holborn Dome. Flexible auditorium space for multiple uses accommodating up to 300 people is proposed, alongside complementary exhibition space.

20. The flexible cultural/ exhibition/ performance/ learning/ community space would be open to the public throughout the year, 7 days a week, between 10am and 6pm, excluding Christmas Day, Boxing Day and New Year's Day. Private events or full hire of the space may be permitted outside these public access hours.

#### Retail Floorspace

21. At ground floor level, the proposed development would be occupied by retail units in the middle of the High Holborn frontage and at the south-west corner to Southampton Buildings.

#### Affordable Workspace Floorspace

22. An affordable workspace unit that could be used in association with the cultural venue is also proposed at ground floor which fronts out onto the pocket park to the south of the development.

#### Public Realm

23. The proposed development would alter the existing building line of the buildings, infilling the existing southwest open corner, but also recessing the south façade north, away from the Southampton Buildings to the south to create a new pocket park. The park would introduce new hard and soft landscaping, integrating furniture and timber seating elements in an organic form. A water feature is also proposed on the western part of the pocket park. This will be located within the applicant's ownership boundary. The space would receive a good amount of daylight throughout the day. A route through between Southampton Buildings and Staple Inn Buildings will be maintained. A small area outside the retail unit to the southwest would be used as spill out space. A drinking fountain is proposed to be located within the pocket park. The existing post box would be relocated very close to its current position. The existing cycle stands will be retained, but relocated to the south of the pocket park, so not to obstruct the free flow or interfere with the landscape features.
24. Surrounding the proposed building the width of the public realm would be in some sections reduced, given that the building line would be brought up to the ownership boundary with the public highway. As noted above, the two

entrances to the flexible cultural space and the office lobby area would be recessed.

25. Most of the ground floor public realm uses yorkstone paving slabs to tie into surrounding paving areas. The primary door entrances would be highlighted using natural stone setts. The existing listed gates along Staple Inn Buildings would be retained. Further details regarding the proposed refurbishment and retentions of the listed gates are discussed below, as part of the Listed Building Consent application.
26. Following amendments two of the existing trees on site would be retained. Furthermore, the proposed soft landscaping will introduce four new feature trees and several multi-stem shrubs/trees.
27. The proposed pocket park to the south of the proposed building would measure approximately 643sqm. The new public realm would also include improvements to the public highway, such as improvements to finishes.
28. The building would be progressively reduced from level 7 upwards, creating planted terraces in the recesses. An extensive green roof would be provided at level 10 and a modular green wall on part of the west facade and a trellis green wall to areas of the plant screen on the west and south elevations. The development would achieve Urban Greening Factor score of 0.302 and an increase in the ecological value of the Site with a BNG of 0.69 Biodiversity Units.

### Cycle Parking

29. A total of 745 long stay cycle parking spaces will be provided at basement, level; and 71 short stay cycle parking spaces, at ground and basement level, but also within the proposed pocket park and along Staple Inn Buildings, in addition to the existing Sheffield stands. Associated cyclist facilities would also be provided at basement level, comprising 77 showers and 498 lockers. Internal short stay parking would be accessed off of High Holborn for the cultural space and off of Southampton Buildings for the office element. The long stay cycle access would be onto Southampton Buildings via two cycle lifts providing access to the basement level.

30. Vehicle access is proposed to be provided on Southampton Buildings to the west of the building leading to the accessible parking spaces and loading area at ground level.

### Building design

31. The proposed massing is 10 storeys high with a mezzanine at ground level and external plant space at roof. The tallest part of the mass is located towards the north-east corner. The building steps down towards the south and West. The massing on the outer main facades is split into five segments with deep recesses between. This breaks down the mass into a series of buildings with different facade treatments. The corners of the building are curved to soften its appearance and respond to the surrounding context. Roof terraces are proposed on levels 7 to 9 and several balconies are incorporated to the design of the recesses.
32. The various façade treatments respond to the urban context of the area surrounding the site. The north bays are larger in scale to respond to the larger scale of High Holborn. The east bays respond to the proximity to Staple Inn at lower levels and more exposure to solar gain at upper levels. The northwest block responds with a more horizontal proportion wrapping around the corner. A tighter vertical grid is introduced in the curved bays. The southern facade responds to the conservation area but also directly to the former listed Patent Office opposite, which has a tighter vertical grid. The central north block has bays that are larger in scale due to orientation but also respond to the larger scale of High Holborn. The larger breaks in the central-west façade respond to the breaks in Chancery House opposite. The projecting bays along this facade help break up the longer elevation and provide a vertical rhythm to the facades.
33. The proposed building is a solid masonry building, subdivided into a rhythm of bays and windows. There is a variety around the building but also up the building when considering the base, middle and top of each. The upper levels are more recessive both in their massing setbacks, materiality, and colour. The predominant facade material proposed is masonry. A finer level of detail is provided in the detailing of each façade type and different finishes used. The proposed textures within the spandrel panels draw on the rich detailing found in the diapered and polychromatic brickwork on buildings around the site and historic references.

34. It is noted that since the submission of the application and following consultation responses, minor amendments have been incorporated to the proposed development. The main changes are set out below:
- Raising the corner by one metre so that the clock has more prominence than the plant screen
  - Lowering the plant screen by half a metre to reduce visibility
  - Lowering the BMU by half a metre so that it isn't any more visible
  - Sloping the top 650mm of plant screen 45° to reduce its perceived height
  - Splitting the plant screen into bays so that it matches the style of lower levels
  - Hiding the louvres with a punched screen which matches the design of spandrel
  - Making the clock surround darker to make it more impactful
  - Increasing the width of white around the clock face so that the hour markers and hands are more legible
  - Simplifying the amount of texture of the material around the clock

### **Consultations**

### **Statement of Community Involvement**

35. The applicant has submitted a Statement of Community Involvement prepared by Kanda Consulting. Engagement on the proposals was primarily conducted in three phases between April 2024 and October 2024. Alongside the public engagement there has also been ongoing consultation with the City of London Corporation, Historic England and the Greater London Authority.
36. The first phase of engagement involved discussions with local stakeholders and immediate neighbours to introduce the team, identifying the existing issues with the site and to help shape the emerging vision. The second phase included wider public consultation and presentation of the emerging proposals responding to the comments raised by key stakeholders. The third phase of engagement presented the detailed proposals for the future of the site and how the proposals have evolved in response to the feedback received.



37. The early engagement which took place between 29th April 2024 till 30th May 2024 included a series of workshops with stakeholders and elected members in the local area. The second phase of engagement ran from the 6th June 2024 till 5th July 2024 and involved the distribution of a flyer to 1,564 addresses in the local area, 3 update briefings held with key stakeholders, a virtual exhibition on the emerging ideas and a targeted social media campaign which reached 16,881 people. The third phase of engagement took place from 9th September 2024 until 6th October 2024 and included a flyer to 1,564 addresses in the local area, a virtual exhibition on the emerging ideas and a targeted social media campaign which reached 12,841 people. Throughout the consultation process, a telephone number and email address were supplied by the consulting company providing further information to residents, businesses, and stakeholders on request.
38. The applicant has sought to engage with:
- Local Planning Authority
  - Aldermen
  - Deputies and Members of the Court of Common Council for Farringdon Without Ward in the City of London
  - members representing Holborn and Covent Garden wards in Camden
  - other key local stakeholders, including Historic England, the Greater London Authority, LB Camden and
  - residents
39. Main topics that were discussed during the three phases included the following:
- Sustainability/ Urban Greening
  - Public realm
  - Cultural/ retail use
  - Floor plates
  - Ground floor offer
  - Height
  - Massing
  - Materiality
  - Residential accommodation
  - Security
  - Servicing

40. 14 people attended the drop-in sessions in the first phase and two decided to provide feedback. Within their feedback they supported the redevelopment of the site and its proposed design and land uses.
41. As part of the second phase, qualitative feedback was received by local stakeholders, businesses and residents focusing on the following:
- Although some consultees asked about provision of housing on site, there was support of an office led development. Confirmation was provided that re-provision of the existing residential units was under consideration in an alternative City site.
  - There was a broad level of support for the emerging design of the building, which was considered as an improvement over the existing buildings. A limited number of consultees raised concerns about the impact this would have on the residential properties adjacent to the site, noting this would impact upon key views in the local area. The Applicant explained that the site's additional height has been carefully studied in townscape terms and to limit any potential impacts of residential amenity and is broadly aligned with other developments in the immediate vicinity.
  - Public realm proposals were considered as an improvement over the current open space, which is limitedly used. Assurances were sought that the proposed public realm would not be used for late night music or other events. The Applicant confirmed that there are no plans for late night venue space.
  - Some consultees asked if studio or flexible workspace for local artists could be included as part of the proposals. The Applicant explained in response that the proposals included the provision of community space at ground level, which will be designed to be flexible and therefore could include studio space.
  - Introduction of urban greening was supported by consultees. Management of the proposed terraces and potential impacts on residential amenity were raised. The Applicant explained in response that the terraces will be managed carefully with time limits introduced dictating when the terraces will be open for office tenants.
42. The quantitative feedback from the third phase was again limited, with 4 people providing their feedback online and 10 people attending the drop-in sessions. Mixed response in regard to the building's design were received. The proposals to enhance the public realm, with refreshed landscaping and new urban

greenery have been well received. The proposed cultural offer has gained a good level of support from the majority of consultees.

43. As part of the third phase, qualitative feedback was received focusing on the following:

- The proposed design of the site was well received by the majority of consultees, recognising the proposals represented an improvement over the existing building. It was noted that the proposed materiality for the site was more in keeping with the site's local context. The proposed introduction of the clock face on the north-west corner of the site was also well received.
- The quality of the proposed office space and the long-term economic benefit this will have on this part of the City was recognised. Some consultees did question whether there was sufficient demand for new office space. The Applicant explained the need that is identified in the Local Plan and emerging City Plan.
- Consultees were curious about the retention of the existing retail and financial services providers. Some consultees also noted that the footprint of the proposed retail units at ground level should not be reduced as a result of the proposals. The Applicant confirmed in response that the intention is to keep the retail units at a similar size.
- A number of consultees also raised concerns about the proposed removal of the car park. The Applicant highlighted that this was in line with the City of London Corporation's policies on parking.
- Clarity over the operation of the terraces and how these will be managed to protect the privacy and amenity of local residents was sought. The Applicant responded that the terraces will be conditioned with time limits for when the terraces will be useable by office tenants.
- The proposed cultural use was welcomed by the majority of consultees, with a recognition of the wider benefits for the local area. Some consultees asked whether options to limit the impact of the additional footfall can be explored. The Applicant explained in response that they were open to working with the City of London and Transport for London to ensure queues are managed effectively.
- Several consultees were keen to understand more about the Applicant's decision to demolish the existing building, noting the impact this will have on the levels of embodied carbon. In response, the Applicant noted that a range of design options were developed, representing the full range from refurbishment to new build. These

options were discussed with City of London Planning officers, then analysed for their ability to deliver wellbeing and wider sustainability benefits and minimise carbon impacts against the City's Qualitative Optioneering Assessment, forming part of the Carbon Guidance PAN. It was explained that the assessment has highlighted that, although the full retention may deliver a lower lifecycle carbon impact, the scheme would result in a number of further compromises, such poor operational energy performance, and limited public benefits.

- Some attendees did question the sustainability credentials of the site, given the demolition led approach to construction. It was explained by the Applicant that the team had undergone a comprehensive carbon optioneering exercise.
- The introduction of a new green space as part of the proposals has been welcomed. Some consultees noted that the green space will need to be managed carefully to ensure it remains accessible for the public and well-lit to ensure that the area does not attract anti-social behaviour.
- Several consultees were keen to understand more about the Applicant's plans to mitigate the construction process. The Applicant explained in response that a construction management plan would adhere to the City of London's Code of Construction Practise.
- A number of consultees asked how the site would be serviced during the construction process, noting that the surrounding road network can become very congested in peak times. The Applicant noted in response that a Construction Management Plan will be submitted as part of the planning application.
- consultees asked what the anticipated timelines for the project would be. The Applicant explained in response that subject to planning permission being granted, they anticipated works to be completed by Q4 2030.

#### Statutory Consultation

44. Following receipt of the application by the Local Planning Authority, it has been advertised on site and in the press and has been consulted upon validation in January 2025 for a period of 21 days.

45. Copies of all received letters and emails making representations are attached in full and appended to this report. A summary of the representations received, and the consultation responses is set out in the table below.
46. The applicant has provided detailed responses to matters raised in consultee and third-party responses. The applicant's responses are attached in full and appended to this report.

Consultation responses	
Greater London Authority (Stage 1 letter dated 10 March 2025)	<p><b>The GLA conclusions of the Stage 1 report are set out below:</b></p> <p>London Plan policies on land use principles, urban design, heritage, sustainable development, environmental issues and transport are relevant to this application. Whilst the proposal is supported in principle, the application does not currently comply with these policies, as summarised below:</p> <ul style="list-style-type: none"> <li>• <u>Land use principles</u>: The redevelopment of this CAZ site to provide an office-led mixed-use development, with retail, cultural and community uses at ground level, is supported in land use terms, in line with London Plan Policies SD4, SD5 and E1.</li> </ul> <p><b>Officer response: These points are addressed in the Proposed Uses sections of the report.</b></p> <ul style="list-style-type: none"> <li>• <u>Urban design and heritage</u>: The layout principles are broadly supported. Less than substantial harm has been identified to a number of heritage assets. Subject to agreeing and securing the public benefits, the less than substantial harm identified above would be outweighed by the public benefits of the scheme. An update will be provided at decision making stage.</li> </ul> <p><b>Officer response: These points are addressed in the</b></p>

	<p><b>Architecture, Urban Design and Public Realm, Heritage and Paragraph 215 of the NPPF balancing exercise sections of the report.</b></p> <ul style="list-style-type: none"> <li>• <u>Transport</u>: A gate-line assessment for Chancery Lane Underground Station should be undertaken; a contribution towards accessibility improvements at the Station may be required. A contribution of £120,000 is sought toward improving cycle hire facility in the vicinity of the site. Conditions and obligations should secure details relating to car park management, construction logistics, deliveries and servicing, and travel plan.</li> </ul> <p><b>Officer response: These points are addressed in the Highways and Transportation section of the report.</b></p> <ul style="list-style-type: none"> <li>• <u>Sustainable development (energy, circular economy and whole life cycle carbon matters)</u>: Detailed comments have been circulated to the applicant and the Council regarding energy, circular economy and whole life-cycle carbon matters which should be addressed prior to the Mayor's decision making stage. The submitted energy statement addresses a number of policy requirements however further information is required to address the London Plan's energy hierarchy (be lean, be clean, be green and be seen). For whole life cycle carbon matters, to summarise, further information is required on material quantity, assumptions and end of life scenarios and GWP potential for all life-cycle modules. For the circular economy strategy, to summarise, additional detail should be provided in respect of the design approach, pre-redevelopment audit, design principles, bill of materials, recycling and waste reporting, operational waste and end-of-life strategy.</li> </ul>
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	<p><b>Officer response: These points have been addressed in additional submitted information and are summarised in the Sustainability section of the report.</b></p> <ul style="list-style-type: none"> <li>• <u>Environmental issues (Greening, flood risk and air quality matters):</u> The UGF score is calculated as 0.26, below the target score of 0.3 set by the London Plan. The urban greening proposed should be reviewed, seeking to improve the quality or quantity, to increase the proposal's UGF. While the submitted flood risk assessment generally complies with London Plan Policy SI12, there is the potential for elevated groundwater beneath the site, so groundwater monitoring should be undertaken during winter months to inform the mitigation measures required, to be secured by condition. The Corporation should also ensure that direct engagement should also take place with relevant stakeholders concerning tidal, fluvial and reservoir flood risk. Detailed comments have been circulated to the applicant and the Corporation regarding air quality matters. In summary, further information is required to determine compliance with London Plan air quality policies, and conditions are recommended in relation to construction, construction traffic, control of emissions and the use of the backup generator.</li> </ul> <p><b>Officer response: These points are addressed in the Sustainability and Air Quality sections of the report.</b></p> <p>Recommendation That City of London be advised that the application does not yet comply with the London Plan for the reasons set out in paragraph 76. Possible remedies set out in this report could address these deficiencies.</p>
Historic England	<b>Summary</b>

	<p>The area around Holborn has been associated with the legal profession since the medieval period and remains synonymous with the prestigious courts, inns and chambers. The Inns of Court are one of London's best collections of buildings and squares, representing historic styles of several centuries.</p> <p>The overall scale of the proposed development is likely to be highly visible due to their height, scale and contrasting elevational treatment. It will be particularly apparent in views of and through the Inns of Court in Bloomsbury Conservation Area. Historic England has concerns about these proposals on heritage grounds and recommends that the application be deferred to enable amendments to be made that would address the impacts on the historic environment.</p> <p><b>Proposals and their impact</b></p> <p><b>The scheme</b></p> <p>The proposals are for the demolition of all the buildings on the site of Holborn Gate, Heron House and 44 Southampton Buildings, all of which are within the City of London. Make Architects' scheme seeks to develop a 10-storey mixed-use building to include retail, offices and cultural spaces.</p> <p><b>Impacts</b></p> <p>The site falls within views identified in the London View Management Framework (LVMF) adopted Supplementary Planning Guidance (SPG) issued by the Greater London Authority (GLA) to protect key views of Westminster World Heritage Site and St Paul's Cathedral from public spaces across the capital. The site's location requires the scheme be assessed to understand its impacts on the settings</p>
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	<p>of more distant designated heritage assets in key views of them.</p> <p>LVMF 4A.1 Primrose Hill: the summit looking toward St Paul's Cathedral: The focus of this panoramic view is of the dome, peristyle and western towers of the cathedral. The site is some distance from the cathedral in the view and will have a negligible impact on it.</p> <p>LVMF 5A.2 Greenwich Park: the General Wolfe statue - north-east of the statue: The elevated viewing point in Greenwich Park offers a panoramic view of the City across the River Thames. The proposed development would sit behind existing development and not appear in the view.</p> <p>LVMF 6A.1 Blackheath Point - near the orientation board: the panorama view affords a view of the dome and western towers of the cathedral, with the dome silhouetted against the sky. The development would be within the wider setting but would not be visible from the viewing point.</p> <p>LVMF 16B.2 The South Bank: The development will be screened by existing development and the tree line along the Embankment with a negligible impact on this view.</p> <p><b>Camden</b></p> <p>The increased height, scale and mass of the proposed development would be clearly visible above the roofline of Stone Buildings in the view east from the NW side of Lincoln's Inn Fields. The scale and monumentality of the terrace would be reduced by the height and bulk of the proposal in the backdrop of the composed view. The upper floors of the green roof terrace would sit clearly above part of the roofline of the grade I listed</p>
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	<p>buildings. As they form a perceived boundary to the Inns of Court, this represents a change to the perception of their historic character and that of the wider conservation area. The proposals would, in my view, cause harm to the setting of the listed buildings through development in their setting. From within the Inns of Court, the development will be visible in some views from within the squares. The silhouette of the historic rooflines within Gray's Inn Gardens (at the top of the central pathway steps and west), Gray's Inn Square (north-east corner) and New Square (north-east) are currently admired largely uninterrupted and against clear sky. The new development in their backdrop will alter this and reduce the sense of enclosure within these historic spaces. Given that modern development is largely unseen, this change will have a harmful impact on the setting of the designated heritage assets.</p> <p><b>City of London</b></p> <p>The increased height, scale and bulk of the development will be clearly present on High Holborn. Its highly urban character is long-established, the proposals do not represent a significant change to the setting of the heritage assets here. Any harm would, in my view, be at the lower end of the scale of less than substantial.</p> <p>Historic England Position</p> <p>Historic England has concerns about these proposals on heritage grounds.</p> <p>Harm</p> <p>The overall scale of the proposed development is likely to be highly visible due to their height, scale and contrasting elevational treatment. It will be particularly apparent in views of and through the Inns of Court in Bloomsbury Conservation Area. The harm would arise from the alteration to the</p>
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	<p>existing silhouette of the historic buildings particularly where they are perceived against clear sky from designed historic spaces. This harm, through development within their setting, is of concern to Historic England given the very special historic character of these spaces and the highly graded assets around them. In the language of the NPPF, we consider this harm to be situated in the middle of the range of less than substantial harm.</p> <p>The loss of 44 Southampton Buildings, which contributes to the character and appearance of the Chancery Lane Conservation Area, would also cause harm. Its contribution to the character and appearance of the conservation area should be given weight in the planning balance.</p> <p>Having considered the LVMF views identified, the impact of the development in these views will be limited and Historic England does not wish to raise concerns.</p> <p><b>Reducing harm</b> To address the harm arising from these proposals and in accordance with the policies set out above, we would welcome the reduction in height of the proposed development to minimise the impact of its visual prominence in views from within the Inns of Court and Lincoln's Inn Fields.</p> <p><b>Public benefits</b> The NPPF also states that, if harm is unavoidable, opportunities should be sought for mitigation and enhancement. I recognise that the scheme seeks to deliver public benefits, such as a new cultural space and improvements to the public realm.</p> <p>Consideration should also be given to the WWI memorial on High Holborn, given its proximity to the site and that this development will be seen in</p>
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	<p>conjunction with it, particularly looking west. Should there be any condition or repairs issues, this development presents an opportunity to address these and offer an important public benefit to the heritage of this place.</p> <p><b>Recommendation</b> Historic England has concerns regarding the application on heritage grounds.</p> <p>We recommend that this application be deferred to enable amendments to be made that would address the impacts on the historic environment highlighted above.</p> <p>Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.</p> <p>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.</p> <p><b>Officer Response: It is noted that since the receipt of the above response, amendments have been incorporated to the proposed development, including the reduction of the height of the proposed plant enclosure. These changes are discussed on the Description of Proposal section of the report.</b> <b>The matters raised in the Historic England's response are addressed in the Architecture, Urban Design and Public Realm, Heritage and Strategic Views sections of the report.</b></p>
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	<p><b>TfL is currently undertaking an internal study to assess the feasibility and costs of installing a lift between the street and ticket hall at Chancery Lane. They are also developing an outline business case to provide stair-free access. At this stage the feasibility and costs have not been established, and it is considered that at this point in time it has not been established that such a contribution is necessary to make the development acceptable in planning terms (in order to meet the requirements of the NPPF and Regulation 122 of the Community Infrastructure Levy Regulations 2010).</b></p>
Surveyor to the Fabric St Paul's Cathedral	No comments to make of the proposed scheme.
Historic England, Greater London Archaeological Advisory Service (GLAAS)	<p>The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan 2015 says that all of the City is considered to have archaeological potential, except where there is evidence that archaeological remains have been lost due to deep basement construction or other groundworks.</p> <p>An archaeological desk-based assessment has been submitted with the planning application (MOLA 2024) and an archaeological evaluation comprising window samples was also carried out in advance of the application. Part of the site was excavated in 2000.</p> <p>The desk-based assessment identified that the site is located adjacent to a Roman road and it lies</p>

	<p>within Londinium's western Roman cemetery, as a Roman burial was found in the 2000 excavation.</p> <p>In 1144, the Knights Templar founded their 'Old Temple' under what is now 319-325 High Holborn. The Old Temple was replaced by the New Temple, located further south at what is now Temple, in the late 12th century. The excavation in 2000 found some of the original Old Temple church and a 1m stretch of the church is believed to be preserved in the basement already, to the east of a lift. The window samples carried out in 2024 suggested a low potential for survival for the Old Temple due to high levels of truncation. However, there is still some potential for truncated Roman and medieval material below the current slab, except for in the sub-basement of 326-332 High Holborn which is likely to have removed all archaeological remains.</p> <p>Both the western cemetery and the Old Temple should be recognised as non-designated heritage assets of archaeological interest. The western cemetery is of local-regional significance and the Old Temple could be argued to be of national significance, given its unique nature. The proposed development will entail the need to excavate the archaeological remains in advance of development, which will cause some harm to the heritage assets. However, the presentation of the remains of the Old Temple to the public will provide a positive heritage benefit for the site, in accordance with policy HC1 of the London Plan.</p> <p>A Cultural Plan has also been provided (FutureCity 2024). The plan outlines several heritage benefits for the site, with some relating to the archaeology. A plaque providing the history of the Knights Templar will be provided on the site at street level. The remaining section of wall will be exposed and made visible as a permanent exhibit from within</p>
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	<p>The Holborn Dome Auditorium and could be integrated as part of a permanent exhibition with some interpretation in the Auditorium. Public art around the building explaining and referencing the history of the site is also proposed, including cultural space metalwork, art vitrines on the west, historic plaque, loading bay doors and patent timeline within the landscape.</p> <p>A number of archaeological conditions are recommended for the site. The Section 106 agreement will also need to consider the long term maintenance and upkeep of the Temple remains and exhibition. If further masonry remains of the Temple are found, consideration of preservation and display will also be necessary.</p> <p><u>Recommendations</u></p> <p>The significance of the asset and scale of harm to it is such that the effect can be managed using planning conditions.</p> <p><b>Officer Response: The recommended conditions are included in the conditions schedule. A full assessment of the archaeological implications of the proposal are set out in the Archaeology section of this report.</b></p>
NATS Safeguarding Office	<p>The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.</p> <p><b>Officer Response: Comment Noted.</b></p>
Environmental Health	<p>Raised no objections.</p> <p>Conditions are recommended including a Scheme of protective works during demolition and</p>

	<p>construction, restrictions on servicing hours and roof terrace use hours, noise restrictions, details of fume extraction, details of contamination investigations and non-road machinery.</p> <p><b>Officer Response: Conditions are imposed in line with the Environmental Health Officer's advice.</b></p>
Lead Local Flood Authority	<p>No objection were raised, subject to conditions relating SuDS details and requirements.</p> <p>Initial concerns were raised regarding the calculations of UGF, BNG and the feasibility of the proposed landscaping. Following receipt of clarifications and recalculations from the Applicant, the Environmental Resilience Officer is satisfied that the applicant has taken forward possible greening and ecological measures that are feasible within the scope of the proposal.</p> <p><b>Officer Response: Comment are noted and conditions are imposed as advised.</b></p>
Quality	<p>The proposed development will employ an electric heating and cooling strategy i.e. reversible air source heat pumps (ASHPs). However, a life safety diesel generator is proposed.</p> <p>In addition, servicing and delivery vehicles are expected to significantly increase as a result of the development. The transport assessment states that the proposed site would generate 113 servicing vehicles per day, reduced to 36 per day (a total of 226 and 72 two-way trips per day, respectively). The Delivery and Servicing Management Plan refers to assumptions of 60 and 50% reductions for deliveries. However, the extent of the stated reduction assumed appears to be closer to 70%. The DSP proposes the reduction is achieved by collective procurement and</p>



	<p>consolidation. Therefore, it is necessary that a monitoring system is developed to ensure that the Facilities Management (FM) team will undertake the necessary steps to achieve the stated reductions.</p> <p>Based on the CoL Code of Practice for Deconstruction and Construction Sites, the Site is considered to be a 'high risk' site and therefore appropriate mitigation measures to control dust are to be adopted.</p> <p>Should the development be approved a number of conditions are recommended covering the submission of details for the installation of any generators, combustion flues, Non-Road Mobile Machinery Register and NO2 monitoring strategy.</p> <p><b>Officer Response: The recommended conditions are imposed as requested by the Air Quality Officer.</b></p>
Transport for London (TfL)	<p>Access</p> <p>Pedestrian and cycle access</p> <p>Pedestrian access will be improved by having separate accesses for each element of the scheme which would also improve the permeability of the site and is therefore welcomed.</p> <p>Long stay cycle parking is proposed to be provided via Southampton Buildings via a cycle lift for basement cycle storage area and end-of-trip facilities. Access to the short stay cycle parking for the cultural land uses will be provided via the southern footway on High Holborn, and from Southampton Building for the short-stay office cycle parking. Short stay cycle parking provided on Staple Inn Buildings is accessed on the street.</p> <p>Vehicular Access</p>

	<p>Vehicular access for the disabled parking space and loading bay would be from Southampton Building.</p> <p>It is considered that the proposed access arrangement is principally acceptable.</p> <p><b>Car Parking and access</b>  The proposals will result in the removal of 90 car parking spaces with only two disabled spaces retained with access from Southampton Building. This is strongly supported in a high PTAL location, this is in line with London Plan Plan policy T6. Car Parking.</p> <p>The applicant is encouraged to provide electric vehicle charging points (EVCP) meet the London Plan parking standards; this exact level of provision should be clarified and be secured by condition accordingly. A Parking Management Plan should be secured to regulate the use of the disabled parking spaces.</p> <p><b>Cycle Parking</b>  The provision of 746 long stay and 71 short stay cycle spaces meets the London Plan cycle parking standards, which is welcomed. The details and design of the cycle facility should be secured by condition along with shower and changing facility for the non-residential part of the proposal, in line London Plan Policy T5 Cycling.</p> <p><b>Trip rate &amp; mode share assessment</b>  The trip generation assessment is satisfactory. With the removal of car parking, there is a significant uplift in h public transport, walking and cycling trips with an additional 800 two- way person trips during the AM peak from the existing 911 trips, (1711 overall).</p>
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	<p><b>Public Transport Service Capacity</b>  The proposals would generate an additional 257 Underground, trips with 60% of them assigned to Chancery Lane Station, therefore a gate-line assessment to Chancery Lane Station should be undertaken.</p> <p>It is also considered that a proportion of the 375 rail trips assigned to Farringdon Station should also be re-assigned to Chancery Lane with the expectation that commuters interchange from Elizabeth Lane services.</p> <p>TfL is also exploring the option to provide improve accessibility at Chancery Lane Station with lift access between street level and the ticket hall; if it is deemed feasible, third-party funding to enable its delivery is expected, therefore a contribution may be sought toward this.</p> <p><b>Healthy Streets and Vision Zero</b>  The proposal seeks to stop up a small part of the public highway footway of High Holborn to re-align the proposed building line with other parts of the existing private lane. This is unlikely to have an adverse impact to pedestrian comfort and the operation of bus stop adjacent to the site.</p> <p>The proposal to provide new hard and soft landscaping including new pocket park at ground floor level will enhance public realm within the site, which is supported.</p> <p>An Active Travel Zone (ATZ) assessment has been undertaken; four routes have been studied and it has identified a minor number of local issues City of London may secure improvement from the proposal. TfL also requests that a Nighttime ATZ be undertaken in line with the ATZ guidance.</p>
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	<p>A Pedestrian Level of Comfort (PCL) assessment has also been undertaken for routes in close vicinity of the site, which shows nearly all sections are with good pedestrian level of service, with the except of one where physical constrain would prevent any further improvement.</p> <p>Cycle Hire Docking Station TfL considers that it would be necessary to improve local cycle hire facilities in the vicinity of the site; it is therefore seeking a financial contribution of £120K toward either providing a new cycle hire hub near Holborn Circus or toward enhancing service level in the vicinity of the site.</p> <p>Servicing Servicing will take place from a proposed loading area off Southampton Building. Building occupiers using this loading area should be asked to coordinate their delivery times with the onsite management company to ensure effective use. A Draft Delivery and Servicing Management Plan (DSMP) has been produced alongside with swept paths demonstrating the safe access and egress of 8m servicing vehicle to/ from the site; which is welcomed. While it is supported that the applicant is committed to partial servicing consolidation; clarity is needed on measures to facilitate cargo-bike servicing. The production of the finalised DSMP should be secured would be secured by condition, in line with London Plan policy T7 Delivery, Servicing and Construction.</p> <p>Construction In line with London Plan policy T7 Delivery, Servicing and Construction, it is expected that the Construction Logistics Plan (CLP), produced in line with TfL's latest CLP guidance (DSP) the proposed development would submit and be secured by condition. The applicant shall identify efficient, safe</p>
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	<p>and sustainable arrangements to be employed at each stage of implementation the development to reduce and mitigate impacts of freight vehicle movements arising from the scheme, including impacts on the expeditious movement of traffic, amenity and highway safety. Details should, where relevant, include Freight Operator Recognition Scheme (FORS) or similar accreditation, site access, loading/unloading and parking arrangements, booking systems and timing of arrivals at and departures from the site, vehicular routes, scope for load consolidation and use of alternative modes and measures to reduce risks and impact of collisions with vulnerable road users.</p> <p>Consideration should be given to prioritise pedestrian/ cyclists' safety when developing the finalised CLP, considering narrow streets in the vicinity and activities The final submission and approval of the CLP should nevertheless be conditioned in line with London Plan policy T7 Deliveries, Servicing &amp; Construction.</p> <p>Given the proximity of the Central Line tunnels and Chancery Lane Station, conditions may be required to protect the infrastructure. Further details will be provided.</p> <p><b>Cycle Promotion Plan</b> A Cycle Promotion Plan has been included in the TA submission, as required by the City Additional measures such as cycle training are recommended to promote the uptake of cycling by occupiers. The final Travel Plan should nevertheless be secured by s106 agreement.</p> <p><b>Community Infrastructure Levy</b> The MCIL2 rate for City of London is £80 per square metre.</p>
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	<p><b>Summary</b></p> <p>The following matters should be resolved before the application can be considered in line with the transport policies of the Intend to Publish London Plan;</p> <ol style="list-style-type: none"> <li>1. Provide EVCP to parking spaces, and secure the production of Car Parking Management Plan, regulating the use of disabled spaces.</li> <li>2. Secure the submission and approval of cycle parking details by condition, including provision of larger cycle spaces meeting the minimum London Plan standards (5%).</li> <li>3. Undertake a Night time ATZ and, secure appropriate contribution toward local walking/ cycling/ Healthy Street improvements considering finding of ATZ.</li> <li>4. Review trip generation and distribution in light of comments</li> <li>5. Secure a financial contribution of £120K toward the cycle hire.</li> <li>6. Securing contribution toward Chancery Lane LUL Station accessibility improvement</li> <li>7. Secure the DSP and CLP by conditions.</li> <li>8. Review the Cycle Promotion Plan considering comments.</li> <li>9. Secure appropriate Mayor CIL payment from the proposal toward Crossrail.</li> </ol> <p><b>Officer Response: These matters are addressed in the Highways and Transportation and the Planning Obligations and Community Infrastructure Levy sections of this report. Officers, the applicant and TfL have been in discussions in respect of the matters raised.</b></p> <p><b>With regard to the Night time ATZ and contribution towards local walking/ cycling/ Healthy Street improvements, it is noted that Sections of the ATZ route B will be subject to improvement works as part of this</b></p>
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	<p>development, which will be secured via the S278 works. The rest of the route will be improved as part of upcoming developments in the vicinity of the site, such as the Holborn Viaduct and the Tunnels. As such, it is not considered that a further contribution .</p> <p>TfL is currently undertaking an internal study to assess the feasibility and costs of installing a lift between the street and ticket hall at Chancery Lane. They are also developing an outline business case to provide stair-free access. At this stage the feasibility and costs have not been established, and it is considered that at this point in time it is has not been established that such a contribution is necessary to make the development acceptable in planning terms (in order to meet the requirements of the NPPF and Regulation 122 of the Community Infrastructure Levy Regulations 2010).</p>
Active Travel England	<p>In relation to the above planning consultation and given the role of Transport for London (TfL) in promoting and supporting active travel through the planning process, Active Travel England (ATE) will not be providing detailed comments on development proposals in Greater London at the current time.</p> <p><b>Officer Response: Noted. Transport for London and the Greater London Authority have been consulted on this application.</b></p>
Safeguarding Engineer TfL	<p>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/DLR railway infrastructure. For that reason a number of</p>



	<p>conditions are suggested to secure the submission of further details to safeguard the London Underground/DLR railway infrastructure.</p> <p><b>Officer Response: Comments are noted and the suggested conditions are imposed.</b></p>
Thames Water	<p><b>Waste Comments</b></p> <p>The proposed development is located within 15 metres of a strategic sewer. Thames Water requests piling method statement is provided and secured by condition.</p> <p>There are public sewers crossing or close to the development. If significant work is planned near sewers, it's important that the risk of damage is minimised. Thames Water will need to check that the development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way.</p> <p>Thames Water would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer.</p> <p>Thames Water would advise that with regard to the COMBINED WASTE WATER network infrastructure capacity, there is no objection to the above planning application, based on the information provided.</p> <p><b>Water Comments</b></p> <p>The proposed development is located within 15 metres of a strategic water main. Thames Water therefore request that a piling method statement is provided and secured by condition.</p> <p>There are water mains crossing or close to the development. Thames Water do not permit</p>

	<p>building over or construction within 5 metres of water mains.</p> <p>Thames Water has identified an inability of the existing water network infrastructure to accommodate the needs of this development proposal. Thames Water recommend a condition that requires an infrastructure phasing plan to be agreed by condition.</p> <p><b>Officer Response: The Thames Water advice has been taken into consideration and conditions are included within the recommended conditions schedule.</b></p>
London Borough of Camden	<p>No objection.</p> <p><b>LAND USE:</b> The application proposes a number of uses including office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels. It is for The City of London to determine the acceptability in principle of the proposed uses in accordance with the provisions of the Development Plan. LB Camden has no objections in principle to the proposed uses as these are all broadly acceptable for London's Central Activities Zone and would all be located within the City of London.</p> <p><b>VIEWS:</b> The site is located within the protected vistas outlined in the London View Management Framework (LVMF). It falls within the strategic and wider viewing corridor from Primrose Hill to St Pauls and the background corridor from</p>

	<p>Greenwich and Blackheath to St Pauls views 4A1, 5A2 and 6A1 respectively). It is recommended that the proposal should be considered in line with the LVMF policies in the London Plan and in line with the boroughs own local plan policies in relation to this designation, and no objection is raised by LB Camden.</p> <p><b>HERITAGE:</b></p> <p>The application site is located in close proximity to the boundary with the London Borough of Camden, on the opposite side of High Holborn. The site is located in close proximity to the Bloomsbury Conservation Area to the north and west and Hatton Garden Conservation Area to the north east. To the north lie the Grade II listed buildings at nos. 22 and 23 High Holborn (Cittie of York Public House) which are Grade II listed and no. 142 Holborn (Waterhouse Square) which is Grade II* listed.</p> <p><b>Impact on the conservation area:</b></p> <p>The special character of the Bloomsbury Conservation Area is found in the range and mix of building types and uses and the street layout. The character is not dominated by one particular period or style of building, but rather it is their combination that is of special interest. The existing buildings mainly date from the 1960s with 44 Southampton Buildings dating from the 1910s but undergoing external changes and refurbishment in the 1960s which has significantly altered its appearance. The overall height of the proposed building would be 10 storeys with plant at the upper floors being set back helping to minimise their visibility from street level. Views would be possible along Holborn to the east however the proposed building would be suitable for the local townscape. Other areas of townscape and heritage sensitivity within this part</p>
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	<p>of the conservation area include Gray's Inn to the north which is a Grade II* Listed Registered Park and Garden, Lincoln's Inn Fields to the west which is a Grade II Listed Registered Park and Garden, and Lincoln's Inn New Square to the south west. The verified view document demonstrates that, although the upper part of the new building would be visible from these vantage points, they would be within the background views and would be screened by trees even in winter time. The proposal would not be considered to have a detrimental impact on this part of the Bloomsbury Conservation Area within Camden, so no objection is raised.</p> <p>Impact on significance of listed buildings: There are a number of listed buildings within close proximity to the site including Grade II listed Staple Inn Buildings at no. 335 High Holborn and the Grade II* listed Waterhouse Square. All of the listed buildings are distinct and high quality examples of their type. However, it is the diversity of style and scale of each of the listed buildings in close proximity to each other that result in their varied setting. The current setting for each of the buildings listed is seen in the context of each other and the varied grouping of commercial buildings along High Holborn. The buildings range in age from 16th century to modern 20th century office developments. The settings of the listed buildings are within this dense urban environment and there is limited continuity of styles in the area. The proposal would not harm the significance of any of the listed buildings within Camden, so no objection is raised.</p> <p>AMENITY (DAYLIGHT AND SUNLIGHT): The proposed development is directly to the south of no. 7 High Holborn which is an 8 storey building within Camden and includes commercial uses on</p>
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	<p>the ground floor and residential flats above on the 1st to 7th floors. Following a preapplication consultation with LB Camden, the daylight and sunlight consultants were asked to present the results for this property on a flat by flat basis which has been included in the Daylight and Sunlight Assessment document submitted in support of the application.</p> <p>With regards to daylight, the vertical sky component (VSC) and non-skyline (NSL) have been tested. The BRE recommends using significance criteria which allows clearer understanding of where the more significant impacts are:</p> <p>BRE compliant - negligible  20.1% to 30% reduction - Minor adverse  30.1% to 40% reduction - Moderate adverse  More than 40.1% reduction - Major adverse</p> <p>Of the 172 windows tested serving 79 rooms on the 1st to 7th floors of the building, only 63 (36%) will meet the BRE guidance. The remaining 109 windows (64%) show failures. Where transgressions occur, 69 are minor (between 20% and 29.9% reductions), 16 show a moderate loss (between 30% and 39.9% reduction), and 24 are major (above 40% reduction).</p> <p>The annual probable sunlight hours (APSH) measures the number of hours that direct sunlight reaches unobstructed ground across the whole year and also over the winter period. The main focus is on living rooms.</p> <p>The Annual Probable Sunlight Hours (APSH) assessment shows that 70 of the 79 rooms tested will comply with the BRE guidance. 2 windows will see minor transgressions and 7 windows will experience a major transgression. The rooms which experiences the major transgressions are mainly bedrooms, which are considered less important in the BRE guidance.</p>
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	<p>Daylight - 1st to 5th floors</p> <p>Within the lower floors of the building on the 1st to 5th floors the noted VSC transgressions are minor and are not considered to be significant. Of the 16 noted NSL transgressions, the majority relate to bedrooms. Bedrooms are considered to have lesser significance by the BRE guidance and whilst a number of the bedroom transgressions are major, they are not considered to be particularly detrimental to the enjoyment of the flats in question.</p> <p>Sunlight - 1st to 5th floors</p> <p>The window map illustrates that the majority of the windows within the 1st to 5th floors will experience minor to moderate transgressions. The retained natural sunlight with the proposed development in place is considered acceptable.</p> <p>Daylight - 6th and 7th floors</p> <p>The majority of the windows on these floors will experience moderate to major impacts in terms of daylight. The windows on the 6th and 7th floor of the building are located beneath an overhang. When tested with the overhang removed as per BRE guidance, the effects of the proposed development are minimal. As such, it is clear that the overhang overly affects the natural light to the top floors of the building.</p> <p>Sunlight - 6th and 7th floors</p> <p>The window map illustrates that the majority of windows will remain compliant with the BRE Guidelines. The windows that experience transgressions are predominantly located on these 6th and 7th floors which are affected by the buildings overhang. There are also a number of smaller secondary windows on the 7th floor which</p>
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	<p>have major transgressions. However the rooms are BRE compliant in relation to sunlight due to other mitigating windows.</p> <p><b>AMENITY - PRIVACY / OUTLOOK:</b>  The proposals would not cause undue harm to neighbouring privacy or outlook given the Central London location, and subject to conditions controlling hours of use, plant noise, deliveries and servicing hours, the proposals would not cause undue harm to neighbouring amenity in this regard.</p> <p><b>AMENITY - CONCLUSION:</b>  It is acknowledged that there would be some notable daylight / sunlight impacts to the rooms of the flats in no 7 High Holborn, within Camden. The majority of the daylight / sunlight impacts are generally negligible to moderate and are considered acceptable in the urban context. However a number of flats on the 6th and 7th floors will experience major adverse impacts to living rooms and bedrooms. It has been shown that the overhangs on these floors of the building reduce current natural light access or that otherwise the affected rooms are bedrooms, a room use considered to have a lesser daylight and sunlight need. As such, whilst the reductions in daylight and sunlight appear to be significant percentage changes, this may not fairly represent the experience of the occupants. Overall, it is considered that the retained natural light amenity with the proposed development in place is considered appropriate, and no objection is raised by LB Camden.</p> <p><b>TRANSPORT:</b>  Camden Council recommend any planning permission be subject to transport obligations and conditions including, but not limited to; provision of</p>
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	<p>cycle parking in line with the London Plan standards, car free development, travel plan, delivery and servicing management plan, and construction management plan. Otherwise, no objection is raised by LB Camden from a transport perspective.</p> <p>One letter of objection has been received from Gamages Estate Tenants and Residents Association who are concerned about the principle of the proposed works and uses within the proposed new building. The objection is available to view on Camden Council's website (under the reference number 2025/0227/P). The principle of the works and the uses within the new building would be considered and addressed by the The City of London according to the provisions of the relevant development plan.</p> <p><b>CONCLUSION:</b> The London Borough of Camden therefore raises no objection to the application.</p> <p><b>Officer Response: Comments noted. The matters raised in the LB Camden response are addressed within Proposed Uses, Architecture, Public Realm, Heritage, Daylight and Sunlight, Overlooking and Overbearing impacts, Noise and Transport sections of the report.</b></p> <p><b>The letter of objection received by the LB Camden is noted. The principle of the proposed development and land uses proposed are assessed in the relevant sections of the report.</b></p>
London Borough of Tower Hamlets	No comments.
City of Westminster	No comments.

Royal Borough of Greenwich	No objection.
London Borough of Southwark	No comments.
London Borough of Hackney	No objection.
Conservation Area Advisory Committee	<p>Although the Committee agreed that a number of the issues had been addressed in the revised application, particularly in relation to the open space, the Committee objected strongly to the size and bulk of the building. Members considered that the mass of the building was too large for the proposed site and that it does not relate well to the street scheme and would adversely impact on the character and appearance of the adjacent Conservation Area.</p> <p><b>Officer Response: It should be noted that since the receipt of the above comments from CAAC the scheme has been amended to incorporate changes that address the abovementioned objections. These are explained in the Proposed Development section of the report and are assessed in the Architecture, Public Realm and Heritage sections of the report.</b></p>
Suicide Prevention Officer	<p>The Suicide Prevention Officer was consulted and raised concerns regarding the height of the balustrade of the Level 7 and Level 9 north terraces and the balconies that are proposed on levels 5 to 7 and the incorporation of planters near the balustrade that could be used as a step.</p> <p>It was advised that the height of the abovementioned terraces is increased to 1.8 metres and thorny planting is incorporated to the planters near the balustrades. It was also advised that there should be no movable seating.</p>

	<b>Officer Response: The applicant has provided responses to the abovementioned comments, which are addressed in the Suicide Prevention section of the report.</b>
Counter Terrorism Security Advisor	<p>The Counter Terrorism Security Advisor has reviewed the submitted security details submitted with the application and has had several meetings with the applicant to discuss counter terrorism security and security measures for the site. A document has been submitted to clarify and enhance the counter terrorism recommendations for the site. These cannot be included in this public document as they constitute sensitive information.</p> <p><b>Officer Response: Although a number of recommendations have been suggested, no objection has been raised and it is not considered that the recommendations made would impact on the proposed development as currently presented, or prejudice the decision making.</b></p>
Planning Gateway One	<p>The submitted application does not fall under the remit of Planning Gateway One.</p> <p><b>Officer Response: Comment noted.</b></p>
District Surveyors	<p>Having reviewed the submitted fire statement, no comments have been raised. Policies D5 and D12 have been met.</p> <p><b>Officer Response: Comment noted.</b></p>
Arboricultural Officer	<p>An Arboricultural Impact Assessment (AIA) from Treefellas Arboriculture Limited has been supplied. The AIA states that 3 trees are required to be removed including 2x young privately owned birch trees and a semi mature Alder tree owned by CoL. Since the issue of the AIA an additional cherry tree has also been planted by CoL at the eastern end</p>

	<p>of Southampton Buildings and the tree report will need to be updated to capture this.</p> <p>Policy OS5 within the City Plan recommends that: other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that can attain an equivalent value</p> <p>The CoL owned trees proposed to be removed are in good condition and are planted in tree pits in the ground. It would be preferable for the existing trees to be retained within the proposals or at minimum the existing tree pits to be retained and protected during the development, to be replanted with trees capable of achieving as large a canopy size as is reasonable in this location.</p> <p>The trees within the pocket park are proposed to be within planters connected to the ground. We would query whether any investigations have taken place to determine if the proposed planters can be connected to the ground and if the required soil volumes for the proposed trees are achievable.</p> <p>The proposed trees in the pocket park area are all multistems with the exception of a number of feathered ginkgo trees. The Ginkgo trees are specified at 35-40 cm girth which is too large a size given the conditions and soil volumes that these are being planted into and can be liable to poor establishment and failure. We recommend new trees are planted at a maximum of 20-25 cm girth depending on available soil volumes.</p> <p>It should be noted that the Urban Greening Factor plan shows the proposed trees as Standard trees planted in connected tree pits with a minimum soil</p>
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	<p>volume equivalent to at least two thirds of the projected canopy area of the mature tree. However, the Ground Floor Planting Plan shows the majority of these trees to be multistem trees planted into raised planters with as yet unproven soil volumes. Multi stem trees do not provide the same amount of benefits that larger canopy trees bring, and if sufficient soil volume is not available they may not be able to establish properly.</p> <p>Consideration should be given at this stage that if the stated UGF score cannot be met by delivery of the pocket park as to how this would affect the overall UGF score of this development.</p> <p>The area where the pocket park is proposed is publicly maintained highway and as such these proposals would be delivered and maintained by the City. We would expect maintenance to be dealt with via a commuted sum.</p> <p>Tree sizes, species and tree pit designs should be secured by condition</p> <p>An Arboricultural Method Statement (AMS) should be secured by condition particularly to ensure that the adjacent offsite trees are adequately protected throughout the course of the development.</p> <p><b>Further comments received by the Arboricultural Officer dated 20 May 2025:</b></p> <p>Further to previous discussions an updated Arboricultural Impact Assessment (AIA) from Treefellas Arboriculture Limited has been supplied. T3 the alder tree which was previously proposed to be removed is now to be retained and protected throughout the development.</p>
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	<p>The cherry tree planted by CoL at the eastern end of Southampton Buildings has not been included within the report, the tree report will need to be updated to capture this and the tree report which omits the cherry tree should not become an approved document. It is important that both trees and their planting locations are retained and protected throughout the development, consideration can be given to replanting if necessary at the landscaping stage.</p> <p>The proposed trees in the pocket park area are all multistems with the exception of a number of feathered ginkgo trees. The Ginkgo trees are specified at 35-40 cm girth which is too large a size given the conditions and that these are being planted into and can be liable to poor establishment and failure. We recommend new trees are planted at a maximum of 20-25 cm girth depending on available soil volumes. With suitable irrigation in place this could potentially be increased to 25-30. Details could be secured by condition.</p> <p>The area where the pocket park is proposed is publicly maintained highway and as such these proposals would be delivered and maintained by the City. We would expect maintenance to be dealt with via a commuted sum.</p> <p>Tree sizes, species and tree pit designs should be secured by condition.</p> <p>An Arboricultural Method Statement (AMS) and Tree Protection Plan in accordance with BS5837 should be secured by pre commencement condition to ensure that the trees on site and adjacent offsite trees are adequately protected throughout the course of the development.</p>
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	<b>Officer Response: It is noted that since the submission of the initial comments, discussions have taken place between the Arboricultural Officer and the Applicant's consultants that have led to the landscaping amendments. These are addressed in detail in the 'Urban Greening' section of the report.</b>
London Parks and Gardens	<p>There are three mature trees within Staple Inn Garden which are noted within the Arboricultural Report submitted with the planning application, which are deemed not to be at risk by the proposed development. We would recommend that conditions are attached to the consent that these trees are protected from harm caused by the development.</p> <p><b>Officer Response: Comment noted and the recommended condition is imposed in the conditions' schedule.</b></p>
Cleansing Department	The proposed waste storage and collection facilities would comply with our requirements. This Division will, therefore, raise no objections to this application
Heathrow Safeguarding	Raise no safeguarding objections to the proposed development.

### **Letters of Representation**

47. One letter of objection has been received from members of the public, which is summarised below.

<b>Representations from members of the public (Objections)</b>	<b>Officer's Response to Comments</b>
Loss of the existing retail units which serve the local community.	<p>Comment noted.</p> <p>It is noted that the proposed development would retain a retail element at ground level. The matter is further</p>

	<p>assessed in the 'Provision of Retail Floorspace' section of the report.</p> <p>It is also noted that following the changes to The Town and Country Planning (Use Class) Order 1987 (as amended) in 2020, the replacement of the exiting retail units to café/office/ sport facility/medical services/day nursery or other professional services would not constitute change use. Therefore, the loss of the existing retail units would not be able to be controlled by the Local Planning Authority. This is considered constituting a fallback position to the replacement of an area of the existing retail units to offices.</p>
Disturbance and pollution during construction.	<p>Comments noted. The impact of the development during construction would be controlled by appropriately worded conditions to secure the protection of the amenities of the nearby residents. The matter is further assessed in the 'Environmental Impact of Proposals on Surrounding Area' section of the report.</p>
The proposed building would be a generic uninspired mixed use office block.	<p>Comment noted. As discussed in the report, the applicant has engaged in pre-application discussions with the Local Planning Authorities and key stakeholders. The advice provided through pre-application consultation and engagement has been taken into consideration to inform the design of the proposed building. The design and the visual impact of the development in surrounding area is further assessed in 'Architecture, Urban Design and Heritage' sections of the report</p>
Loss of existing residential units	<p>Comment noted. It is noted that an associated development at 1-2 St Andrew's Hill under the terms of application reference 24/01232/FULL has been submitted, to re-provide the existing residential units at application site. Although this application would be assessed separately under in own merits, the re-provision of the existing residential units would be secured by appropriately worded obligation. This</p>



	matter is further assessed in the ‘Loss/Re-provision of Residential Units’ section of the report.
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## **Policy Context**

48. The Development Plan consists of the London Plan 2021 and the City of London Local Plan 2015. The London Plan and Local Plan policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
49. The City of London (CoL) is preparing a new emerging plan, the City Plan 2040, which has undergone Regulation 19 consultation. The City Plan has been submitted to the Secretary of State and is currently being examined in public. Emerging policies are considered to be a material consideration with limited weight with an increasing degree of weight as the City Plan progresses towards adoption, in accordance with paragraph 49 of the NPPF. The emerging City Plan 2040 policies that are most relevant to the consideration of this case are set out in Appendix B to this report.
50. The City of London (CoL) has prepared a draft plan, the City Plan 2036, which was published for Regulation 19 consultation in early 2021. The City does not intend to proceed with this plan and therefore it is of no or very limited weight and will not be referred to in this report.
51. Government Guidance is contained in the National Planning Policy Framework (NPPF) December 2024 and the Planning Practice Guidance (PPG) which is amended from time to time.
52. The National Planning Policy Framework (NPPF) states at paragraph 2 that “Planning Law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise”. Other relevant sections of the NPPF are set out in the following paragraphs.
53. The NPPF states at paragraph 8 that achieving sustainable development has three overarching objectives, being economic, social and environmental.

54. Paragraph 10 of the NPPF states that “at the heart of the Framework is a presumption in favour of sustainable development. That presumption is set out at paragraph 11. For decision-taking this means:
- a) approving development proposals that accord with an up-to-date development plan without delay; or
  - b) where there are no relevant development plan policies, or the policies which are most important for determining the application are out of date, granting permission unless:
    - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
    - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
55. Paragraph 49 states that local planning authorities may give weight to relevant policies in emerging plans according to:
- a) the stage of preparation of the emerging plan (the more advanced its preparation the greater the weight that may be given);
  - b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given) and
  - c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
56. Chapter 6 of the NPPF seeks to build a strong and competitive economy. Paragraph 85 states that decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, considering both local business needs and wider opportunities for development.
57. Chapter 8 of the NPPF seeks to promote healthy, inclusive and safe places.
58. Paragraph 96 states that planning decisions should aim to achieve healthy, inclusive and safe places which promote social interaction, are safe and accessible and enable and support healthy lifestyles.
59. Paragraph 98 states that planning decision should provide the social, recreational and cultural facilities and services the community needs.

60. Paragraph 104 of the NPPF states that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
61. Chapter 9 of the NPPF seeks to promote sustainable transport. Paragraph 110 states that “*Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health*”.
62. Paragraph 117 states that applications for development should give priority first to pedestrian and cycle movements and second to facilitating access to high quality public transport; it should address the needs of people with disabilities and reduced mobility in relation to all modes of transport; it should create places that are safe, secure and attractive and which minimise the scope for conflicts between pedestrians, cyclists and vehicles; it should allow for the efficient delivery of goods and access by service and emergency vehicles; and it should be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.
63. Paragraph 118 states that “*All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed and monitored*”.
64. Paragraph 125 (c) of the NPPF gives substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.
65. Chapter 12 of the NPPF seeks to achieve well designed places. Paragraph 131 advises that “The creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process

should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.”

66. Paragraph 135 sets out how good design should be achieved including ensuring developments function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development, are visually attractive as a result of good architecture, layout and appropriate and effective landscaping, are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities), establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit; optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space); and create places that are safe, inclusive and accessible and which promote health and wellbeing.
67. Paragraph 136 of the NPPF states that ‘Trees make an important contribution to the character and quality of urban environments and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible...’
68. Paragraph 139 sets out that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.
69. Chapter 14 of the NPPF relates to meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to net-zero by 2050. It should help to; shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

70. Paragraph 164 states that new developments should avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through incorporating green infrastructure and sustainable drainage systems.
71. Paragraph 166 states that, in determining planning applications, local planning authorities should expect new development to comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant that this is not feasible or viable; and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.
72. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Paragraph 187 of the NPPF advises that planning policies and decisions should contribute to and enhance the natural and local environment by, inter alia, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. It is also stated that development should, wherever possible, help to improve local environmental conditions such as air and water quality.
73. Chapter 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 208 of the NPPF advises that Local Planning Authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.
74. Paragraph 210 of the NPPF advises, *"In determining applications, local planning authorities should take account of:*
- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
  - b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

- c) *the desirability of new development making a positive contribution to local character and distinctiveness.*
75. Paragraph 212 of the NPPF advises *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
76. Paragraph 213 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:
- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
  - b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.
77. Paragraph 215 of the NPPF states *“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use”.*
78. Paragraph 216 of the NPPF states *“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”.*
79. Paragraph 212 of the NPPF states *“Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”*

### **Statutory Duties**

80. The Corporation, in determining the planning application has the following main statutory duties to perform:
- To have regard to the provisions of the development plan, so far as material to the application, to local finance considerations and to any other material considerations. (Section 70(2) Town & Country Planning Act 1990);
  - To determine the application in accordance with the development plan unless material considerations indicate otherwise. (Section 38(6) of the Planning and Compulsory Purchase Act 2004).
81. In considering whether to grant planning permission for development which affects a listed building or its setting, to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. (S66 (1) Planning (Listed Buildings and Conservation Areas) Act 1990).
82. In exercising planning functions with respect to buildings or land in a conservation area, there is a statutory duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area. (S72(1) Planning, Listed Buildings and Conservation Areas Act 1990).
83. In considering whether to grant listed building consent the CoL is to have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses (section 16(2) Planning (Listed Buildings and Conservation Areas) Act 1990).

### **Main Considerations**

84. In determining the planning application, consideration has to be taken of the documents accompanying the application, the updated information, the consultation responses, the development plan, and other material considerations including SPGs, SPDs and emerging policy.

85. It is necessary to assess all the policies and proposals in the plan and come to a view as to whether in light of the plan as a whole the proposal does or does not accord with it.
86. The principal issues in considering this application are:
- a) The principle of development, including the appropriateness of the proposed uses (office use, the flexible cultural/ exhibition/ performance/ learning/ community space flexible retain uses and affordable workspace unit), the loss of residential and reduction in retail floor space.
  - b) The economic impacts/benefits of the proposal.
  - c) The impact of the of the development on the character and appearance of the area and the design of the building itself.
  - d) The impact on strategic views in the London Views Management Framework and on other strategic local views.
  - e) The impacts of the proposal on the setting and significance of heritage assets.
  - f) The impact of the proposal on existing public realm and the acceptability of the proposed new public realm.
  - g) The potential impacts of the development on buried archaeology.
  - h) The impacts of the development in terms of accessibility and inclusivity.
  - i) The impacts of the development in highway and transportation terms and cycle parking provision.
  - j) The impact of the development in terms of energy, sustainability and climate change.
  - k) The impact of the development on ecology and net biodiversity gain.
  - l) The environmental impacts of the proposal including wind microclimate, daylight, sunlight and overshadowing, air quality, building resource efficiency, energy consumption and sustainability.
  - m) The impact of the proposed development on the amenity of nearby residential and other occupiers.
  - n) The impacts in terms of security and suicide prevention.
  - o) The outcomes of the Health Impact Assessment.
  - p) The impacts of the development on fire safety.
  - q) An assessment of the public benefits of the proposal and whether they would be sufficient to outweigh any heritage harm.
  - r) Duties under the Public Sector Equality Duty (section 149 of the Equality Act 2010) and The Human Rights.



- s) The requirement for the development to secure financial contributions and other planning obligations.

### **Principle of Development - Economic Considerations**

- 87. The National Planning Policy Framework places significant weight on the need to support economic growth and productivity taking into account both local business needs and wider opportunities for development. Significant weight is to be given to the economic objective (to help build a strong, responsive and competitive economy, as referred to at paragraph 8 of the NPPF). In deciding this application, the weight to be given to the economic benefits will depend on the nature and extent of those benefits in the light of any other planning considerations relevant to the assessment.
- 88. The City of London, as one of the world's leading international financial and business centres, contributes significantly to the national economy and to London's status as a 'World City'. Rankings such as the Global Financial Centres Index (Z/Yen Group) and the Cities of Opportunities series (PwC) consistently score London as the world's leading financial centre, alongside New York. The City is a leading driver of the London and national economies, generating £69 billion in economic output (as measured by Gross Value Added), equivalent to 15% of London's output and 4% of total UK output. The City is a significant and growing centre of employment, providing employment for over 590,000 people.
- 89. The City is the home of many of the world's leading markets. It has world class banking, insurance and maritime industries supported by world class legal, accountancy and other professional services and a growing cluster of technology, media and telecommunications (TMT) businesses. These office-based economic activities have clustered in or near the City to benefit from the economies of scale and in recognition that physical proximity to business customers and rivals can provide a significant competitive advantage.
- 90. Alongside changes in the mix of businesses operating in the City, the City's workspaces are becoming more flexible and able to respond to changing occupier needs. Offices are increasingly being managed in a way which encourages flexible and collaborative working and provides a greater range of complementary facilities to meet workforce needs. There is increasing demand for smaller floor plates and tenant spaces, reflecting this trend and the fact that

many businesses in the City are classed as Small and Medium Sized Enterprises (SMEs). The newly launched Small and Medium Enterprise Strategy (2024) includes the City's strategy to attract and support the growth of SMEs. The London Recharged: Our Vision for London in 2025 report sets out the need to develop London's office stock (including the development of hyper flexible office spaces) to support and motivate small and larger businesses alike to re-enter and flourish in the City.

91. The National Planning Policy Framework establishes a presumption in favour of sustainable development and advises that significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. That policy does not require a decision maker to assign a uniform level of weight- the weight to be ascribed to the economic benefits depends upon the nature and extent of the benefits in the light of any other planning considerations relevant to the assessment. The NPPF (at paragraph 87) also states that planning decisions should recognise and address the specific locational requirements of different sectors.
92. The City lies wholly within London's Central Activity Zone (CAZ) where the London Plan promotes further economic and employment growth. The GLA projects (GLA 2022 London Labour Market Projections), that City of London employment will grow by 176,000 from 2016 to 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
93. The London Plan 2021 strongly supports the renewal of office sites within the CAZ to meet long term demand for offices and support London's continuing function as a World City. The Plan recognises the City of London as a strategic priority and stresses the need 'to sustain and enhance it as a strategically important, globally-oriented financial and business services centre' (policy SD4). CAZ policy and wider London Plan policy acknowledge the need to sustain the City's cluster of economic activity and provide for exemptions from mixed use development in the City in order to achieve this aim.
94. London Plan Policy GG2 sets out the Mayor's good growth policy with regard to making the best use of land. These include prioritising sites which are well connected by existing or planned public transport; proactively explore the

potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling; applying a design-led approach to determine the optimum development capacity of sites; and understanding what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character.

95. London Plan Policy GG5 sets out the Mayor's good growth policy with regard to growing London's economy, to conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, it is important that development, amongst others, promotes the strength and potential of the wider city region; plans for sufficient employment and industrial space in the right locations to support economic development and regeneration; promote and support London's rich heritage and cultural assets, and its role as a 24-hour city; and makes the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity.
96. The London Plan projects future employment growth across London, projecting an increase in City employment of 176,000 between 2016 and 2041, a growth of 31.6%. Further office floorspace would be required in the City to deliver this scale of growth and contribute to the maintenance of London's World City Status.
97. London Plan policy E1 supports the improvement of the quality, flexibility and adaptability of office space of different sizes.
98. In terms of the Local Plan 2015 Strategic Objective 1 seeks to maintain the City's position as the world's leading international financial and business centre. Policy CS1 aims to increase the City's office floorspace by 1,150,000sq.m gross during the period 2011-2026, to provide for an expected growth in workforce of 55,000. The Local Plan, policy DM1.2 further encourages the provision of large office schemes, while DM1.3 encourages the provision of space suitable for SMEs. The Local Plan recognises the benefits that can accrue from a concentration of economic activity and seeks to strengthen the cluster of office activity.

99. The Strategic Priorities of the emerging City Plan 2040 sets out that the City Corporation will facilitate significant growth in office development of the highest quality to meet project economic and employment growth and protecting existing office floorspace to maintain the City's role as a world leading financial and professional services centre and to sustain the City's strategically important cluster of commercial activities within the Central Activities Zone; broadening the City's appeal by ensuring new office developments deliver flexible, healthy working environments and meet the needs of different types of businesses including Small and Medium Enterprises, supporting specialist clusters such as legal and creative industries and promoting a range of complementary uses; creating a more vibrant and diverse retail economy; balancing growth with the protection and enhancement of the City's unique heritage assets and open spaces and creating an inclusive, healthier and safer City for everyone.
100. The emerging City Plan 2040 policy S4 (Offices) states that the City will facilitate significant growth in office development through increasing stock by a minimum of 1,200,000sqm during the period 2021-2040. This floorspace should be adaptable and flexible. Policy OF1 (Office Development) requires offices to be of an outstanding design and an exemplar of sustainability.
101. Despite the uncertainty about the pace and scale of future growth in the City following the immediate impact of Covid-19, the longer term geographical, economic and social fundamentals underpinning demand remain in place and it is expected that the City will continue to be an attractive and sustainable meeting place where people and businesses come together for creative innovation. Local Plan and emerging City Plan 2040 policies seek to facilitate a healthy and inclusive City, new ways of working, improvements in public realm, urban greening and a radical transformation of the City's streets in accordance with these expectations. These aims are also reflected in the Corporations 'Destination City' vision for the square mile.
102. The proposed development would provide a primarily office lead development, providing circa 3,000 to 3,200 number of full time jobs; as well as a material uplift in the office floorspace; namely 23,439 sqm GIA, resulting a total of 52,656 sqm GIA of new Grade A office floorspace. Therefore, the proposed development would deliver on the City's strategic objectives and support its economic role, in accordance with development plan and the emerging City Plan. The anticipated economic benefits of the proposed development are material and significantly weigh in favour of the proposed development.

## **Proposed Uses**

103. This section of the report provides an overview in respect of the layout and proposed mix of uses on the site before appraising the acceptability of the proposed uses:

- 52,656sq.m (GIA) of office floorspace
- 1,197sq.m (GIA) of flexible retail floor space at ground floor level along High Holborn and on the southwest corner of the building
- 1,923sq.m (GIA) flexible cultural/ exhibition/ performance/ learning/ community space at ground floor and basement level on the northwest corner of the building
- 221sq.m (GIA) affordable workspace at ground floor level adjacent to the proposed pocket park to the south of the application site.

104. A breakdown of the existing and proposed uses (GIA) is set out below:

<b>Land Use</b>	<b>Existing</b>	<b>Proposed</b>
Office (Class E(g)(i))	29,218 sqm	52,656 sqm
Display/sale of goods other than hot food (E(a) and (b))	3,044sqm	1,197 sqm
Flexible cultural/ exhibition/ performance/ learning/ community space	0 sqm	1,923 sqm
Creative Affordable workspace	0 sqm	221 sqm
Residential	573 sqm (7 units)	0 sqm (0 units)
Car park	2377sqm	0 sqm
<b>Total</b>	<b>35,212 sqm</b>	<b>55,997 sqm</b>

105. The following sections of the report provide an assessment of the proposed land uses.

## **Provision of Office Accommodation**

106. Strategic Policy CS1 of the City of London Local Plan 2015 and policy E1 of the London Plan seek to ensure that there is sufficient office space to meet demand

and encourage the supply of a range of office accommodation to meet the varied needs of City occupiers. Policy DM 1.3 seeks to promote small and medium sized businesses in the City by encouraging new accommodation suitable for small and medium sized businesses and office designs which are flexible and adaptable to allow for subdivision to meet the needs of such businesses. Similar policy objectives are carried forward into Policies S4 and OF1 of the emerging City Plan 2040.

107. The predominant use of the proposed development is as office space, comprising of 52,656 sq.m (GIA) of Office Floorspace Class E (an uplift of 23,439 sq.m (GIA) of office floorspace on this site. The office space is classified as Grade A office space.
108. Adopted Local Plan Policy CS1 seeks a significant increase in new office floorspace in the City. This policy seeks to deliver 1,150,000sqm of additional office floorspace between 2011 and 2026. The emerging City Plan 2040, in Policy S4, seeks to deliver at least 1.2 million sqm net of new office floorspace in the period between 2021 and 2040. This is based on evidence derived from a study conducted by ARUP/Knight Frank on behalf of the City Corporation, which identified the demand or 1.2 million sqm based on a 'hybrid peak' model of workplace attendance, and demand for 1.9 million sqm where there was a 'return to in-person'. The apparent significant reduction in the City Plan 2040 compared with the previous City Plan 2036 target for office floorspace (2million sqm) is largely due to the passage of time and the significant office floorspace completions in the 2016-2021 period, totalling 835,000sqm. Overall, comparing the City Plan 2036 and City Plan 2040 floorspace targets is indeed similar due to the 2016-2021 period being met by completions.
109. The Offices Topic Paper as part of the evidence base for the City Plan 2040 looks at capacity modelling within areas of the City for an increase in office floorspace. The Site is within the 'rest of City' category, which is modelled at being able to achieve an office floorspace uplift of 145,000 sqm. The proposed development would deliver a considerable amount of this floorspace target providing an uplift of 23,439 sqm delivering approximately 1.5% towards achieving the total office floorspace (1.6 million sqm gross) to be delivered by 2040 as required by the City Plan 2040.
110. Levels 01-09 contain office space with larger floorplates at the lower levels, and smaller floorplates in size and depth on the upper floors. This provides a range of different options to suit tenants' needs. The floorplates provide open-plan

space that wraps around a centre core, maximising natural light. The proposed development has been designed so that it would be easily subdivided into two smaller tenancies to suit a wide range of tenants. The Future of Office Use (June 2023) which formed part of the evidence base for the emerging City Plan stated that *“Long term growth prospects appear good in our scenarios, with the City requiring 6 – 20 million sq ft of additional office space by 2042. Much of this will be high quality office space for smaller employers”*. The proposed development would provide a range of interior and exterior environment amenity and floor area, in accordance with emerging City Plan 2040 Policy S4 which encourages new floorspace to be designed to be flexible to allow adaptation of space for different types and sizes of occupiers.

111. A range of office floorspace is required to meet the future needs of the City’s office occupiers, including provision for incubator, start-ups and co-working space.
112. Policy OF1 of the emerging City Plan 2040 states that office developments should where appropriate, provide a proportion of affordable workspace suitable for SMEs. The proposed development includes the provision of 221 sqm of creative affordable workspace and cultural/community space that will support the growth of SMEs within the City. This affordable workspace is intended for creative enterprises, artist studios, makerspaces, and similar ventures, fostering an environment that encourages innovation and collaboration. There can be potential synergy between this affordable workspace and the Holborn Dome to allow showcasing cultural products created within the workspace at the Dome. This would fulfil the City’s vision to providing inclusive workspace. The S106 agreement would include an obligation to secure and require further details of such provision.
113. The scheme meets the aims of policy E1 of the London Plan, CS1, DM1.2 and DM1.3 of the Local Plan 2015 and S4 of the emerging City Plan 2040 in delivering growth in both office floorspace and employment. The proposals provide for an additional increase in floorspace and subsequent employment opportunity in line with the aspirations for the CAZ and the requirements of the Local Plan and the emerging City Plan. The proposed development would result in a considerable uplift of high quality, flexible Class E office floorspace for the City, contributing to its attractiveness as a world leading international financial and professional services centre.

## Provision of Retail Floorspace

114. Policy DM 1.5 encourages mix commercial uses within office development which contribute to the City's economy and character and provide support services for its businesses, workers and residents. Similar support of other commercial uses particularly at ground and basement levels is also supported by policy OF1 of the emerging City Plan.
115. The site is not within a designated Principal Shopping Centre, but it is located on a Retail Link as defined in the Local Plan 2015. Policy DM 20.2 (Retail Links) aims to encourage the provision and resist the loss of retail frontage and floorspace within the Retail Links. A mix of shops and other retail uses will be encouraged in the Retail Links. However, the emerging City Plan 2040 acknowledges the challenges facing retail following the Covid-19 pandemic, alongside the commercial land use flexibility introduced to the planning system as a result of changes to the Use Classes Order introduced in September 2020. Accordingly, the approach to designating 'Retail Links' is omitted, and the policy focus shifts to the protection of active frontages rather than retail floorspace (except in Principal Shopping Centres).
116. Policy S5 (Retail and active frontages) of the emerging City Plan 2040 states that "*The City Corporation will seek to make the City's retail areas more vibrant, with a greater mix of retail, leisure, entertainment, experience, culture, and other appropriate uses across the City*". The supporting text to policy S5 notes that over the longer term, evidence shows significant demand for growth in retail uses in the City. The City's growing working population and the increasing number of visitors create significant opportunities for improvement to the retail offer, complementing the wider vision for the City to become a destination of choice for visitors.
117. As the proposal would not provide in excess of 2,500 sqm of retail floorspace a retail impact assessment is not required (this approach accords with paragraph 94 of the NPPF)
118. The retail provision within the proposed building comprises two retail areas along High Holborn and on the southwest corner of the proposed building on Southampton Buildings with spill out space on the proposed pocket park, totalling 1,197 sq.m (GIA). The total existing retail floorspace provided on site is 3,044sqm (GIA) and therefore, the total amount of retail space would be



reduced. However, it is noted that the reduction would partially be attributed to a loss of the large quantity of back-of-house space within the existing buildings rather than a reduction in active frontage. Furthermore, part of the frontage along High Holborn would now be occupied by the cultural space and therefore, it would still maintain an active and attractive frontage, introducing pedestrian and visitor movement. It is also considered that the quality of the active frontage would be enhanced and there would be flexibility in utilising the space for different types of retail uses depending on demand.

119. The proposed retail floorspace would be reduced; however, the quantum of active floorspace would be largely maintained. Although by reason of the reduction of the retail floorspace there would be conflict with Local Plan Policy DM20.2, it is noted that the reduction of retail floorspace would be primarily due to the loss of back-of-house space. It should be also noted that retail links have not been carried forward in the retail policy of the Emerging City Plan 2024, namely policy S5, which focuses on the retention of the principal shopping areas. This policy has not been challenged during the examination in public (EIP) and therefore, it can be afforded more weight.
120. In light of the above and considering that the environment of the Retail Link would be enriched and the active frontages would be retained, no objection is raised to the reduction of the retail floorspace, in this instance.
121. A condition is recommended to be imposed to secure retail uses falling within Class E (a/b) as proposed, and to prevent the change to any other use within Class E, to secure the benefits of the proposal.

#### Provision of flexible cultural/ exhibition/ performance/ learning/ community floorspace

122. Policy CS11 of the Local Plan seeks to maintain and enhance the City's contribution to London's world-class cultural status and to enable the City's communities to access a range of arts, heritage and cultural experiences, in accordance with the City Corporation's Visitor Strategy by:
  - *Providing, supporting and further developing a wide range of cultural facilities.*
  - *Maintaining the City's collection of public art and culturally significant objects and commissioning new pieces where appropriate.*

- *Protecting existing cultural facilities where they are need.*
  - *Providing visitor information and raising awareness of the City's cultural and heritage assets.*
  - *Allowing hotel development where it supports the primary business or cultural role of the City.*
123. The emerging City Plan 2040 under policy CV2 will seek opportunities to provide new arts, cultural and leisure facilities that offer unique experiences at different times of the day and week and attract significant numbers of visitors into the City.
124. Local Plan policies CS22 and DM 22.1 support the provision of community services. It is advised that development of *“new social and community facilities should provide flexible, multi-use space suitable for a range of different uses and will be permitted:*
- *where they would not be prejudicial to the business City and where there is no strong economic reason for retaining office use;*
  - *in locations which are convenient to the communities they serve;*
  - *in or near identified residential areas, providing their amenity is safeguarded;*
  - *as part of major mixed-use developments, subject to an assessment of the scale, character, location and impact of the proposal on existing facilities and neighbouring uses.”*
125. Similar requirements are set out in policy HL5 of the Emerging City Plan, which expects the provision of new social and community facilities at flexible, multi-use spaces suitable for a range of uses. These spaces are considered making a significant contribution to people's mental, spiritual and physical wellbeing, sense of community, learning and education.
126. Policy DM 1.5 encourages mix commercial uses within office development. Complementary uses, include within others retailing, leisure, education and health facilities to contribute to the City's economy, character and appearance.
127. Strategic Policy CS22 supports the provision of health, social and educational facilities and opportunities for the City's residents and workers.
128. Functions of state health, education, creativity and cultural activities are also supported by Policy SD4 in the London Plan within the CAZ area.

129. The provision of cultural offers within development proposals is of increasing importance. The City of London contains a huge concentration of arts, leisure, recreation and cultural facilities and spaces that contribute to its uniqueness and complement its primary business function. Destination City is the City Corporation's flagship strategy, that seeks to ensure that the City is a global destination for workers, visitors and residents. It seeks to enhance the Square Mile's leisure and cultural offer by creating a sustainable, innovative, and inclusive ecosystem of culture that celebrates its rich history and heritage and makes it more appealing to visitors as well as the City's working and resident communities.
130. The cultural offer for the proposed site is set out in the submitted Cultural Plan in accordance with policy CV2 of the emerging City Plan 2040. The Cultural Plan for the site was prepared by Future City (November 2024) and informed by research of the historical and geographical context of the site and its surroundings, research of a full cultural audit and mapping of the area within 1.2km, to help inform the development of a cultural offer that would be meaningful and complement site.
131. The proposed development involves the provision of an area of 1,923 sqm GIA of flexible cultural/ exhibition/ performance/ learning/ community space, at ground floor and basement levels at a prominent location on the northwest corner of the application site. This flexible, inclusive and welcoming space would be open to the public 7 days a week between the hours of 10am and 6pm each day of the year, excluding Christmas Day, Boxing Day and New Year's Day.

#### *The Holborn Dome and associated space*

132. The proposed flexible cultural offer would be focused on the provision of a unique offer of a venue space, namely the Holborn Dome. The venue would include an immersive auditorium, flexible exhibition spaces and areas for community events. The dome design auditorium space has been inspired by the former Knights Templar Church, which once stood at almost at the same position as the proposed Dome. This flexible space would be able to accommodate 300 people for a range of events, from cultural events to physical

and digital art exhibitions, product launches events and organisations hires. The spaces around the auditorium offer spaces for workshops, exhibitions, and break-out areas for smaller community-focused events.

133. The Dome, which is the main cultural proposal for the scheme, would measure approximately 200sqm, it would have a height of 9 metres and it would be able to accommodate 190 people seated or alternatively 300 people standing.
134. Supplementing the Auditorium space is a flexible space within the basement level, which has the potential to be used for several different functions. The space would measure 185sqm and it could host exhibitions (physical or digital) which could complement the programmes within the Auditorium. The space has been designed in a flexible way in order to allow for the ability in the future for partitions to create more quiet spaces for cultural and community workshops or areas of reading and research. The space could also serve as breakout space from the Auditorium in the case of bigger events.
135. At ground floor, accessible from High Holborn, an area of 215sqm is proposed as a welcoming space to the Holborn Dome. Contingent to any future cultural occupier, its uses can span from welcoming receptions and hosting audiences that are coming to the Holborn Dome for one of its programmes, or to see a small-scale performance. Depending on the cultural operator this space would have the flexibility to have a food and beverage offer and could also host smaller exhibitions. A set of staircases and lifts on each side will take visitors down to the Auditorium and Exhibition Spaces.
136. To ensure flexibility at implementation and delivery stage of the proposed development, but also to ensure that a level of certainty about the proposed operating model, the Applicant with the Futurecity has developed three different scenarios of cultural occupancy covering two variations of a selected cultural anchor organisation or an Applicant-led cultural management team. The models have been tested with cultural stakeholders and include an education-led organisation, and arts-led organisation or a cultural management team. The details of the cultural operator, programming, financing, management and implementation strategy will be secured via S106 agreement.

### *Retained Archaeology*

137. Within the basement level dedicated for the flexible cultural offer a section of the Knights Templar wall foundations was found, as part of previous works related to 44 Southampton Buildings. Although following investigation by the Museum of London Archaeology it is unlikely that further remains of the Knights Templar have survived, this section of the wall foundations is proposed to be exposed in situ and retained as a permanent exhibit accessed via the Holborn Dome Auditorium. This is considered being an exceptional opportunity to tangibly connect the proposed cultural offer with the history of the site.
138. It is therefore considered that, subject to a S106 obligation to secure a year-round programme which would establish monitorable deliverables in curation of the spaces for cultural, exhibition, performance, learning and community activities, the policies referred to above would be complied with.

#### Public Art

139. To enhance the City's public realm and distinctive identity Policy DM 11.2 encourages the provision of additional art works in appropriate locations.
140. The submitted Cultural Plan includes information about the incorporation of public art on site. It is aimed that a lead artist will be appointed to run a public art programme to uncover the rich history of the Knight Templar, while maximising the identity of the site. The public art would be incorporated externally, at sections of the building at ground floor level along Southampton Buildings, at the proposed pocket park and at the recessed entrance of the cultural offer. Internally the aim is for the public art to form part of the Dome design. To ensure a cohesive and considered approach to public art, the Lead Artist will be embedded within the design team during the development period, allowing for a collaborative approach in shaping the detail of the outline artistic opportunities that have been identified within the Cultural Plan.
141. It is stated that the Lead Artist will conduct thorough research into the history of the Knights Templar and engage with local community and organisations, ensuring that the art produced resonates with both the history and the people of the area.
142. There is an opportunity to use the Dome to commission public art as part of the auditorium's detailed design, as a free to access space to experience public art in association with the Knight Templar history and the existing archaeological

findings that would be exposed for viewing at basement level. The public art within the auditorium could be digital or physical.

143. On the external facades of the building there is opportunity to introduce public art at street level at the entrance to the cultural venue, including metal work as part of the signage and screens. A plaque providing the details about the history of the site can also be installed at street level. The loading bay access doors at Southampton Buildings, particularly the vitrines along the west elevation and the loading bay doors could also be used for displaying public art. Public art could also be imbedded into the hard surfaces and seating at the proposed pocket park. The proposed clock on the northeast corner of the site could also form part of the public art incorporated to the proposed building.
144. The details, programming, engagement and provision of public art would be secured via condition, with the long-term maintenance and management being secured via S106 obligation.

#### *Conclusion*

145. It is considered that the proposal would deliver a compelling new cultural/ exhibition/ performance/ learning/ community offer for the City that would align with the Destination City agenda.
146. The proposals would attract new audiences, alongside the enhanced public realm, contributing to the transformation of this part of High Holborn as a distinctive and contemporary place with multiple offers for all sitting alongside the emerging The Tunnels and recently reimagined Silver Vaults. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place aligning with Destination City.
147. Final details of the operation and marketing of the spaces, uses and public art would be secured through conditions and the S106 agreement through submission of a cultural implementation strategy and cultural space management plan. The proposal would therefore accord with policy CS11, CS22, DM1.5, DM10.3, DM19.3 and DM22.1 of the Local Plan 2015 and policies CV2, HL5, HL7 and DE4 of the emerging City Plan 2040.

#### Loss/Re-provision of Residential Units

148. Boosting the supply of homes goes at the heart of the objectives of the National Planning Policy Framework. Policy H1 of the London Plan requires boroughs to increase housing supply. Policy H8 states that *'Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace'*.
149. Policy DM21.2 of the Local Plan states that *'The net loss of existing housing units will not be allowed except where:*
- *they provide poor amenity to residents which cannot be improved;*
  - *they do not have a separate entrance;*
  - *large scale office development would be prejudiced by the retention of isolated residential units.'*
150. Paragraph 3.21.14 of the policy preamble states that *'Isolated units can suffer poor amenity and can be adversely affected by the operation of the business City. Housing units outside identified residential areas are more likely to suffer noise nuisance and other disturbance due to other non-residential uses being permitted in close proximity, including clubs and pubs. The loss of existing housing may be acceptable, provided it is replaced with an equivalent or greater number of units.'*
151. Emerging City Plan 2040 Policy HS2 carries forward the principles of Policy DM 21.1 but adds that the loss of existing housing units may be acceptable where they are located outside of an identified residential area, and their loss would enable beneficial development for the business City.
152. Seven residential units are currently located within the site, measuring 573sqm. The proposed office-led development does not include the provision of these residential units on site. This is to allow the proposed building to operate more efficiently as a fully commercial building. The site is not within a designated residential area, as set out in the Local Plan or the Emerging City Plan and therefore, the Local Planning Authority can consider the acceptability of the loss or re-provision of these units in an alternative location.
153. Prior to the submission of the application currently under consideration, the Applicant has explored the option of re-providing the lost residential units in an alternative site; namely 1-2 St Andrew's Hill. An application (ref.no.: 24/01232/FULL) for the change of use of the buildings from office to seven residential units is currently under consideration. It is noted that the quantum of residential floorspace at 1-2 St Andrew's Hill exceeds the existing quantum of

floorspace at the application site. 1 -2 St Andrew's Hill is located within an identified residential area in the existing and emerging local policy context and therefore, in principle it represents a suitable location for a residential use. It should be highlighted though that this is not an assessment of the acceptability of the proposed development at St Andrew's Hill, which will be assessed separately under the terms of the submitted application.

154. To ensure that the residential units will be re-provided at St Andrew's Hill or an alternative site, if the proposed development at St Andrew's Hill is not found to be acceptable, an obligation will be included in the S106 agreement. The obligation, which is further discussed below in the relevant section of the report, would secure the re-provision of the existing residential units initially at 1-2 St Andrew's Hill, or at an alternative site, that would have to be located within the City of London and have planning permission approved for seven units that meet the City's policy requirements in terms of design and housing standards and is of equivalent or larger floorspace.
155. In light of the above, and subject to securing the re-provision of the existing residential units in the S106 agreement, the development would not result in net loss of existing housing and would therefore be compliant with the local and London Plan policies.

### **Architecture, Urban Design and Heritage**

156. The relevant policies for consideration include Policies CS10 Design, DM10.1 New Development, DM10.2 Design of Green Roofs and Walls, DM10.3 Roof Gardens and Terraces, DM10.4 Environmental Enhancement, DM10.5 Shopfronts, DM10.6 Advertisements, CS16 Public Transport, Streets and Walkways, DM16.2 Pedestrian Movements, CS19 Open Spaces and Recreation, DM19.1 Additional Open Space and DM19.2 Biodiversity and Urban Greening of the Adopted Local Plan 2015; emerging Policies HL1 Inclusive Buildings and Spaces; S5 Retail and Active Frontages; RE1 Principal Shopping Centres; RE2 Active Frontages; S8 Design; DE2 Design Quality; DE3 Public Realm; DE5 Shopfronts; DE8 Lighting; S10 Active Travel and Healthy Streets and AT1 Pedestrian Movement, Permeability and Wayfinding of the City Plan 2040; Policies D3, D4, D5 and D8 of the London Plan 2021. This is in addition to the relevant sections of the National Planning Policy Framework as well as the National Design Guide.



157. The Site is located to the south of High Holborn, an important east-west route within central London, and it occupies an island site bounded by smaller roads and pedestrian routes on its other sides. The northern frontage of the Site to High Holborn is the most visible part of the Site, and it is more visible from the east than the west along this main road due to a curve in the road's alignment and its cranked building line.
158. The Site is currently occupied by three buildings. These comprise two distinctive but visually heavy and strident post-war buildings, and an early 20th century building of limited merit. The irregular building line of Holborn Gate to Staple Inn Buildings and Southampton Buildings (south), and the incoherent arrangement of the buildings on Southampton Buildings (west), results in weak definition to surrounding streets and unwelcoming, defensive framing to the pedestrianised space to the south of the Site.
159. The largest of the three is known as Holborn Gate, and this has an irregular plan form and elevations which have a strong horizontal emphasis with deep floor bands. Heron House adjoins Holborn Gate on the north-west corner of the Site and has a similar appearance. Together, Holborn Gate and Heron House present a continuous frontage to High Holborn; while this is distinctive due to its cranked building line and the matching deep floor bands, the overall effect is heavy and somewhat monolithic in appearance. More generally, the architecture of these buildings on the Site contrasts jarringly with that of the buildings near them, which tend to be of a finer grain and have greater vertical articulation.
160. No. 44 Southampton Buildings, the third building on the Site, is a smaller early 20th century building, typical of its time and considerably altered in 2000. No. 44 Southampton Buildings falls within the Chancery Lane Conservation Area, as do parts of the public realm within the Site boundary at its southern and eastern edges; the rest of the Site is outside the Conservation Area, and is bounded by it to the east, west and south. None of the three existing buildings on the Site are listed, although the planning application boundary extends to railings on the eastern side of Staple Inn Buildings and to the south of Holborn Gate which are covered by the Grade II listing of Staple Inn Buildings North and South (Nos. 335 and 335 High Holborn) and the Grade II listing of Staple Inn Hall.
161. The immediate surroundings of the Site are varied and include small and medium scale historic buildings as well as medium and large scale post-war

and modern blocks. Listed buildings are located immediately east of the Site in the form of the group at Staple Inn which includes Grade II, Grade II\* and Grade I buildings, directly north of the Site in the form of the Grade II listed Cittie of York and Gatehouse buildings, and immediately south of the Site in the form of the Grade II\* 25 Southampton Buildings. Large post-war and modern buildings in the vicinity include Westgate House immediately east of the Staple Inn Buildings, and the recently completed 150 Holborn to the north-east of the Site.

## **Architecture**

162. The proposed development is for a new 9 storey building, including a mezzanine at ground level and external plant space at roof level, and containing office accommodation, retail/ food and beverage uses, public cultural space and public realm works.
163. The plan would take the form of an irregular quadrilateral, mirroring the shape of the site, with rounded corners and a series of wide indents at various points around the building line. At ground level, the building line at the north-east and northwest corners of the site would be recessed in a concave shape to provide entrances to the office lobby and cultural space respectively. The building line would be recessed from the southern frontage on Level 7, the western and north-western corner on Level 8, and from most of the main building line below on Level 9, other than at the north-eastern corner, such that the footprint of the building would be progressively reduced from Level 7 upwards. Terraces would be located in the areas created by the recesses from the main building line below.
164. The accommodation would be arranged around a central core. From Level 1 upwards, all the accommodation would be for office use, other than areas for plant on Levels 9 and 10. The roof level would include PVs and a BMU. The ground floor level, would be occupied by retail units in the middle of the High Holborn frontage and at the south-west corner to Southampton Buildings (west and south), an office lobby at the north-eastern corner to High Holborn and Staple Inn Buildings, an entrance to the cultural space at the northwestern corner to High Holborn and Southampton Buildings (west), office space at the south-eastern corner to Staple Inn Buildings and Southampton Buildings (south) and affordable cultural space to Southampton Buildings (south). A loading bay, cycle entrance and UKPN room would be located along the Southampton Buildings (west) frontage. Two basement levels would include

further accommodation for the cultural space at the north-west corner of the plan, retail space in the middle of the High Holborn frontage, and plant and cycle storage.

165. Through extensive pre-application discussions officers directed the applicants to work through a number of massing iterations in order to find a suitable proposal for the site. The height and bulk of the proposals was significantly reduced during this process to one more appropriate for this location. Additional amendments included and were not limited to: introducing setbacks at the upper floors to minimise the bulk and volume at the top of the building and subdue any sense of overbearing; the inclusion of recessed bays; and variations of facades to break down the scale of elevations; and the curving of the corners to soften the impact of the building yet still allowing a sense of robustness.
166. Other modifications included the inclusion of a civic clock on the northeastern corner, provision of enhanced areas of seating and a number of design modifications to the façade details, fenestration and materiality. The scheme has evolved and been scrutinised in accordance with the relevant parts of London Plan D4. The design quality will be secured through to the detailed construction stage via design conditions including samples and mock up details and the applicant design team will maintain ongoing involvement secured through the Section 106.
167. Following comments from Historic England, the GLA and an objection from the City of London Conservation Area Advisory Committee (which are discussed in further detail within the heritage section of this report), further amendments have been made to the design of the scheme. These changes have focused on reducing the visibility of the plant screen, through a reduction in its height by 500mm and sloping the top 650mm of the screen to 45 degrees to further reduce its perceived height and to catch the light to give a different appearance. In addition, adjustments have been made to the clock to make it more legible and noticeable changing colouration, proportions and raising the height by 1000mm to reinforce its prominence in longer views looking westward towards Holborn.
168. The architectural approach, finishes, materials and exceptional level of detail are considered to be of high quality, responsive to the surroundings and reflective of the rich townscape that surrounds the site. The GLA Stage 1 letter supports the architectural approach noting the approach to breaking down

massing into defined modules to respond to the sites character and context and welcomes the long lasting robust terracotta and stone materials.

**Bulk, Height and Massing:**

169. The disposition of the final massing and bulk has followed a design-led approach considering townscape impacts. The development has been designed to respond to locations of existing residential amenity, visual experiences including local views including those from surrounding conservation areas and the immediate surrounding context of the site. The GLA Stage 1 letter supports the approach noting the proposed massing and height have evolved through an iterative design process, with due regard to minimising townscape impacts to key identified local views, notably from Lincoln Inn Fields and New Square. The GLA is supportive of the resulting strategy of stepping the roofline towards the northeast corner.
170. While the height and scale of the new building within the proposed development would be greater than that of the existing buildings, it would be comparable with that of other large floorplate and modern buildings along High Holborn / Holborn and would be appropriate for the site's location on this main route within central London. The massing would logically step up towards the north-east corner, reflecting its position on the main road of High Holborn and its particular visibility in views. The distinct articulation of this corner as a circular element emerging from the main body of the building, with a clock at Level 09, would take advantage of its potential to act as a landmark on the approach from the east and the exit from Chancery Lane London Underground Station. The massing would appropriately step down towards the south and west, in the direction of buildings which are typically of a lower scale than those along High Holborn, and in the direction of sensitive townscape views from Lincoln's Inn and Staple Inn Gardens.
171. The massing is further broken down in the plan form which through wide indents which are expressed as external single width recessed bays, clad with reflective and profiled black terracotta, or metal panels to the balconies. There would be planters on every other floor of these recessed bays on the northern façade, and balconies on every other floor on the western and eastern frontages. Ribbed matte black terracotta cladding would cloak these curved bays on the recessed parts of Levels 07 and 08, set between inset areas in a different

texture. A green wall would wrap around much of Level 09. The set-back plant areas at Level 10 would be covered with articulated louvres in a light grey finish and climbing plants on tensile wires would be set in front along the southern and north-west frontages, to create a form of green wall at this level as well.

172. The manner in which the elevations would be divided into a series of related but differently expressed facades would help to break up the scale of the development, reinforcing a sense of different blocks, and ensuring a visually interesting appearance overall. The overall form, with its rounded corners, would also relate well to nearby buildings and represent a softer visual presence than the existing angular corners of Holborn Gate and Heron House.

#### Expression and Materiality:

173. There has been a considered approach to the design detail of the proposal, with the architectural language led by the variety and richness found within the three Conservation Areas which sit around the site. The proposed building will comprise a robust, masonry building with a strong base grounding a variety of meticulously crafted facades meticulously crafted– each responsive to the proposed uses of the building and the varied contexts that sit opposite the different elevations of the building.
174. The base of the proposed building would be clearly defined with a dark red terracotta materiality and grey pink granite plinth which would be expressed differently to the rest of the building. The base of the building responds to the rusticated plinths found on the bases of buildings within the surrounding area that often differentiate from the upper levels. This materiality would be of a high quality, pertinent given its presence at ground floor level where the building is most closely interacted with, whilst its expressive nature reflects the rich architectural vernacular of the surrounds.
175. A number of recessed black terracotta bays would break up the elevations into a series of different blocks. The facades of these blocks would generally take the form of a grid composed of horizontal and vertical elements in a variety of different coloured terracotta or brick with glazing and spandrel panels in between. The facades would vary in respect of the type of grid employed, although a 6m width to each bay would be used for the main parts of each façade, and the profile of the horizontal and vertical elements of the frame. A similar size would also be used for the radial corners to maintain a relationship

with the linear bays. This has been led by an assessment of the townscape of the surrounding conservation areas where many of the historic buildings have a similar vertical emphasis.

176. The various facades of the building relate to their orientations as well as the architectural context of the areas that they face towards creating a varied yet complementary mix of styles. Each block would be articulated with rich detailing providing visual interest and breaking down the large building into a more attractive, dynamic and responsive piece of townscape that is visually interesting. Differing textures are proposed on elements of each block which have been inspired by the diapered and polychromatic brickwork on buildings within the surrounding vicinity of the site.

#### Northeastern Block to High Holborn and Staple Inn

177. The northeastern block facing towards High Holborn and Staple Inn would host the main office entrance to the building, with a dark red terracotta and brick façade that is articulated by vertical and horizontal frames with a distinctive angular chamfer with horizontal banding. Whilst the ground and central floors would be defined by 6m wide bays, the upper two stories of the main body of the bay would have a reduced 3m wide grid, forming narrower double storey bays which crown the upper levels of the building with an appropriate terminus. The use of a darker red materiality for this block is inspired by the proximity of this elevation to 335-336 High Holborn and Waterhouse Square.
178. The block contains hosts the primary focal point of the proposed building, a civic clock on the northeastern corner with visibility in views looking westward from Holborn Circus, acting as an eye-catching focal point along the street. The clock would be the tallest point of the building, projecting above the main façade line, and acts as a prominent point demarking the Chancery Lane tube station which sits below as a central node of activity within the surrounding area. The clock tower would be defined by rich articulation including hit and miss brickwork at the top with a curved lozenge shaped feature running up the entire building above the entrance dissected by angled horizontal bands. This acts as a focal point to signal the main entrance to the offices within the building, enhancing legibility.
179. The civic clock would project from the façade with a dark surround to enhance its legibility in longer views with a white surround to ensure that the clock face

markers are clear. The clock would sit at the top of the vertical band which helps emphasise the clock within longer views and connects the feature with the windows below.

180. At ground, the main office entrance would sit within a colonnade at the base of the clock tower feature with the textured finish of the recessed bays wrapping around to a gold/bronze patinated metal soffit as a nod to the distinctive reflective soffits of the existing building at the site. The final design details would be secured via way of condition.
181. An additional setback storey would sit above this block which would have a matte black terracotta finish with a stepped recessed façade, which would read recessively and subordinate to the main façade.

#### Central North Block to High Holborn

182. The north block would form the primary frontage facing onto High Holborn and as such contains larger bays to reflect the nature of this busy throughfare with projecting bays responding to the adjacent 318 High Holborn as well as the Cittie of Yorke and Gray's Inn entrances that sit opposite. The façade would be defined by vertical piers with profiled finishes to create a vertical emphasis that projects above the parapet of the block to provide a broken skyline reminiscent of the chimneystacks visible in the surrounding vicinity.
183. A trio of projecting bays would alternate with flat bays flush with the façade undulating and faced in a light pink terracotta, providing depth and articulation. The proposed oriel windows curve out from the main facade and run from Levels 01-07 stopping short of the top floor. The spandrels of both the oriel windows and flat bays would have a profiled finish every other floor to provide further visual richness to this elevation. Balconies are introduced above the projecting bays with the Level 08 facade set back. This provides further variation to the main shoulder line of this block. The spandrel panels also alternate up the building between profiled and flat finish. This articulates the facade into double storey bays. The glazing mullions and transoms have a deep chamfered profile reminiscent of the profiled stone and ceramic mullions as well as the transoms found in surrounding buildings.
184. At base, vertical piers would frame each of the bays with a dark red terracotta finish with vertical articulation and granite skirting. Four of the bays would be

associated with a retail unit whilst one would be associated with the cycle hub to provide a mixed range of animation to the street along this frontage. The retail unit would have its entrance on the eastern side close to the Tube station entrance, whilst the cycle hub would be located to the west close to the new cultural use. The three central bays at base would comprise projecting shopfronts to allow for window displays to provide further activation to the street, with stallrisers reducing the amount of glazing in keeping with the wider traditional architectural language of the surrounds. Each bay would have projecting signage boards, but final details of signage would be secured via advertisement consent.

#### Northwestern Block to High Holborn and Southampton Buildings

185. The northwestern block which faces onto High Holborn and Southampton Buildings would host the new cultural venue at base, with office accommodation above. This bay will take the form of a gentle curve to provide a focal point responding to the entrance to the City of London at the junction of Chancery Lane to the west of the site. The large radiused corner helps transition the acute angles of the frontages found along High Holborn and Southampton Buildings in addition to evoking the form of the Knights Templar church once located on the site. The block would be symmetrically flanked by recessed façade bays.
186. At base, the block would have a dark red terracotta textured façade with granite skirting. The detailing of this element has been led from the precedence of the former building found on this part of the site, with a latticed effect, providing depth and visual interest with a more expressive character to help delineate the new Holborn Dome cultural space which would sit within this block.
187. The main entrance would be setback within a colonnade providing a more generous and sheltered area of public realm, with three central archways providing access. The archways would be adorned with a decorative metalwork which would host the signage for the cultural venue inspired by ironmongery signage found within the surrounds. The use of the archways provides a playful reference to the rich townscape found beyond the site where archways are often found to provide passageways and entrances to buildings. The remaining arches would provide shopfronts for the ground floor community space with integrated seating set within the deep recessed façade.



188. Above, the block would have a light buff terracotta / brick finish with each bay having horizontal and vertical frames – this block would have a more horizontal focus to emphasise the gentler curve of the façade. Fluted terracotta spandrels would add further interest, with narrow vertical frames adding an additional layer of detail on the central trio of bays of the block. The vertical piers would project above the façade datum adding further visual interest, with additional storeys and terraces set back above behind the façade in a dark materiality to appear more recessive and subordinate.

#### Central West Block to Southampton Buildings

189. The elevation along Southampton Buildings would mirror that of the central northern block along High Holborn – but would be a storey lower, and the base of the block would accommodate the building's servicing infrastructure. The base would still hold vertical bays but with louvered areas and art vitrines. In addition, a plaque detailing the history of the site would be incorporated within one of the bays.
190. Within the dark red terracotta plinths, inset reclaimed Portland stone would mirror the datum found at Chancery House opposite and provides additional variation and visual interest along this elevation. The stone would be reclaimed from the existing building at 44 Southampton Buildings. Lightwells would be integrated into the facades, with railings having a bespoke arched detailed design.
191. The upper floors would have a light pink terracotta façade with an alternating rhythm of flat and projecting bays with vertical bands of oriel windows and occasional balconies to provide outdoor amenity space for the office occupiers. Additional floors and terraces would sit above in a dark materiality to ensure subordination.

#### Southern Block to Southampton Buildings

192. The southern elevation would be set back from the listed former Patent Office to provide a new wider square to the south of the site, which would in turn open up new views through to Staple Inn Gardens from the west. Full details of the new landscaped public realm are set out within the Urban Design section below.

193. As with the rest of the building, the base would be defined by a darker red terracotta materiality with arched openings providing a more collegiate appearance which reflects the character of the surrounding Inns. These openings would be double height rounded step arched bays, with a split at mezzanine level for integrated signage. Some of the bays would have integrated seating. Two of the bays would be given to the corner retail unit, with the two middle arches providing access into the affordable workspace and the final two arches providing access to ground floor office space. The different uses would provide a new active and animated frontage onto the new square.
194. On the upper floors, the materiality would be of a lighter buff appearance to reflect the materiality found in the townscape to the south of the site. Given the more historic and modest scale character found to the south of the site, the windows have been reduced in size on this elevation which would also help reduce unwanted heat gain. The horizontal frames divide each storey at the corners but stop short at two mid-levels creating double storey bays. The vertical frames follow a tighter 3m module and the spandrel panels extend upwards to the mid transom increasing the solidity in the facade.
195. The vertical piers extend above the parapets of the façade on this elevation, with alternating piers projecting higher than the mid bay piers to create a more varied roof line responding to the architecture of the surrounds. At the crown of the building, there will be an additional three storeys above this block which would be set back twice with terraces and finished in a darker materiality to ensure subordination.

#### Recessed Bays and the Crown

196. The recessed bays which break the blocks apart would contrast with the reds and pinks, with a reflective black terracotta which would read recessively against the coloured facades. The façade would be profiled to add additional depth and articulation, whilst balconies would be located on alternating floors. The soffits to the balconies would be finished in gold metal, referencing the current gold tiled soffits in the existing building.
197. The darker materiality would run up the building and form the materiality of the set back storeys at Levels 7 and 8. The finish here would be matte with bay windows either single and double height and ribbed profiles providing

articulation. At level 9, the terrace facing façade would take the form of a green wall softening the top of the building and providing a more verdant character to the amenity terraces. The plant at roof level would be screened by louvers, with a lightweight materiality providing a more recessive appearance.

198. The breaking down of the massing and stepping back at higher levels would provide opportunities for green roofs and roof terraces creating significant urban greening. These elements are compliant with Local Plan policies CS10, DM10.2 and DM10.3. Final detailed design of the terraces is to be conditioned to ensure compliance with the City of London Corporation Preventing Suicides in High Rise Buildings and Structures planning advice note. The balustrading has been integrated into the wider design of the building and is considered to be acceptable.
199. Appropriate lighting, in accordance with Local Plan Policy DM 10.1, would deliver a sensitive and co-ordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the context, responding to public safety and enhancing the unique character of the City by night. A detailed Lighting Strategy would be subject to condition to ensure final detail, including from, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with guidance in the City Lighting Strategy. The proposed public realm lighting strategy would provide low level illumination to architectural and landscape features, to enhance the pedestrian experience and improve safety.
200. A high-quality signage strategy for the proposal would be required and would be secured via condition.

## Urban Design and Public Realm

### Summary of Public Realm Proposals

201. The proposed development delivers a vibrant mix of uses at ground level, activating the public realm with enhanced landscaping. A new cultural destination, affordable workspace, and flexible retail units support community engagement and local amenities. Together, these elements form a dynamic, inclusive destination that prioritises safety, accessibility, and user experience, attracting a diverse mix of visitors and workers.

202. When taking into account the existing public realm around the site, there would be a slight reduction in usable public realm provided by 21.2m<sup>2</sup>. However, the proposal would significantly improve the public realm in and around the site, including:
203. Upgrades to ground floor public realm, including improved surfacing, enhanced retail frontages, reinstated seating along Staple Inn Buildings, and new seating within open space at the High Holborn corner.
204. A new pocket park to the south of the site, activated by retail frontage and enriched with seating, planting, and a multifunctional water feature that doubles as a performance space.
205. Whilst the proposed scheme results in a small reduction of 21.2m<sup>2</sup> in usable public realm—from 2,314.7m<sup>2</sup> to 2,118.3m<sup>2</sup>— this is accompanied by a substantial improvement in quality, usability and coherence. Footways increase from 866.3m<sup>2</sup> to 1,034.1m<sup>2</sup>, while the southeastern area sees a modest uplift from 142.7m<sup>2</sup> to 146.0m<sup>2</sup>. The southern planted area remains at 642.9m<sup>2</sup>, but offers significant improvements including level access, high-quality space with planting, seating, and a water feature. An extra public space is provided within the office entrance colonnade at 95.9m<sup>2</sup> and a 53.5m<sup>2</sup> space within the entrance colonnade for the Holborn Dome cultural space. Smaller elements such as seating recesses (11.4m<sup>2</sup>), pocket park pavement recesses (14.5m<sup>2</sup>), and public building recesses (19.7m<sup>2</sup>) are retained with enhanced finishes. Several poor quality or under used spaces—such as loading bays (57.2m<sup>2</sup>), undercrofts (65.8m<sup>2</sup>), and access points—are either removed or upgraded accounting for the minor 21.2m<sup>2</sup> reduction in usable public realm. Overall, the proposal transforms the public realm from a series of fragmented, inconsistent spaces into a cohesive and high-quality environment.
206. Giving consideration to the above, the proposals represent compliance with London Plan (2021) Policies D3, D4, D8, G1, G5, T1, and T2; City of London Local Plan (2015) Policies CS10, CS15, CS16, DM10.1, DM10.2, DM10.3, DM10.4, DM10.5, DM10.8, DM15.5, DM16.2, DM19.1, and DM19.2; Emerging City Plan 2040 Policies S10, S14, AT1, AT3, S8 and DE2; as well as the City of London Public Realm SPD and the City Public Realm Toolkit. The creation of new public spaces and improvements to the existing public spaces comply with policy, the public realm proposals are considered by officers to be a benefit of the scheme, weighing in its favour. The proposals would represent a substantial public realm offer to the City.

## Ground Floor Public Realm

207. The layout of the ground floor of the High Holborn of the site would largely retain the existing active frontage and different uses contributing to the variety of activity found along High Holborn and contributing to its role as a Principal Shopping Centre as designated within the emerging Local Plan Policy RE1. The retention of these existing active frontages, alongside the addition of new further areas of animation to both the northern and southern blocks would help generate additional activity at ground floor level, positively stitching the site into the wider urban grain.
208. From the north, access is provided via the pedestrian route along Staple Inn Buildings or from Chancery Lane Station. The design features active frontages along High Holborn, including clearly defined office entrances, a prominent retail unit, and a cultural hub marked by arched gateways at the northwest corner, forming a strong plinth that anchors the curved building form—reflecting the historic footprint of the Knights Templar Church. The GLA Stage 1 letter welcomes the new cultural spaces linked to the site’s historic association and notes its potential to anchor the proposals into the wider public realm network and its legible location on High Holborn.
209. From the south, the pocket park serves as both a landscape feature and arrival space, maintaining east–west circulation while offering a tranquil green oasis for rest and reflection. The GLA supports the pocket park and its addition to the local public realm network. In the northern section, most existing street furniture is retained, complemented by additional timber seating with back and armrests within building recesses to enhance comfort and accessibility. The improvements to the public space would contribute to an urban structure characteristic of the city, with streets, courts and public spaces which are welcoming, convenient to use and attractive. The proposals would comply with London Plan Policy D3 and D8 Local Plan Policies CS10, DM10.1 and DM10.4, by offering spaces that positively respond to the character, distinctiveness, scale and appearance of the City’s Public Realm.
210. High-quality materials unify the ground floor landscape. Yorkstone paving slabs are used throughout to match the surrounding context, while natural stone setts radiate out from key doorways, emphasising entrances and reflecting the building’s geometry. The entire structure sits on a continuous granite plinth, with

distinctive paving between columns that marks transition zones and enhances the arrival experience. This would be a betterment to the existing poor quality confusing mix of paving found in the existing space. Material selection follows the City's palette of simple, high-quality finishes, in line with the City Public Realm SPD and City of London Public Realm Toolkit.

#### Pocket Park to the South

211. A new southern pocket park at ground level enhances the City of London's green network, offering a tranquil public garden with diverse ornamental planting. The existing building featured irregular terraces to the south of the building with no level access, resulting in a fragmented and incoherent public space. The new development adopts a streamlined building line to create a cohesive pocket park that maximizes the south-facing aspect.
212. The landscape concept, inspired by the lost rivers of Holborn, uses sinuous planters, paving, and planting to create a dynamic pocket park encouraging social interaction and quiet retreat. It activates the ground floor and public realm with varied seating including benches integrated into the planter edges and flexible spaces for groups or intimate gatherings. Adjacent to the pocket park, a south-facing café is proposed, providing inviting opportunities for al fresco dining. A programmable water feature serves as a dynamic focal point for seasonal events, which can be turned off to accommodate street performances. This approach is supported by City of London Local Plan 2015 policies DM10.1 (Public Realm) and DM10.5 (Open Spaces), as well as emerging City Plan 2040 policies CR3 (Public Realm) and CR4 (Open Space), all of which promote high quality, inclusive public spaces that foster community engagement and vibrant street life.
213. The pocket park's materiality features repurposed Yorkstone slabs complemented by 200x100mm Yorkstone setts forming an organic central paving band. The water feature, a key landscape element, is outlined with smaller 100x100mm Yorkstone setts and natural stone banding to maintain material consistency and clearly define the arrival space. Gentle slopes around the water feature ensure smooth level transitions, while an open, accessible path width accommodates wheelchairs, walkers, and strollers. The organically shaped grey granite planters feature a variety of integrated timber slat seating options at different heights, including some with arm and backrests, provide comfort and accessibility, with ample space for wheelchair manoeuvring. This

material and design approach aligns with City of London Local Plan 2015 policies DM10.1 (Public Realm), DM10.4 (Accessibility), and DM10.5 (Open Spaces), which promote high-quality, inclusive, and accessible public environments.

- 214. The planting design evokes a woodland glade, using a rich, low-maintenance mix of drought-tolerant species with flowering understory plants, seasonal bulbs, specimen shrubs, and multi stem trees. The planting strategy prioritizes biodiversity and trans seasonal interest, using the City of London Biodiversity Action Plan 2016-2020 as a benchmark to improve an area of ecological deficiency. It supports the City's 'Sites of Importance' by creating habitats for target species through bird and bat boxes, pollinator planting, bee blocks, and bug hotels.
- 215. The landscaping strategy has been developed to address site constraints by using raised planters to mound up soil depths and support ornamental planting. Further detailed surveys are required to confirm below-ground conditions, with soil depth and planter details to be secured through conditions to ensure the viability of the proposed planting.

#### Urban Greening

- 216. The proposal includes extensive urban greening, including the pocket park to the south and landscaped terraces on levels 07–09 and a biodiverse green roof on level 10. In line with the 2021 London Urban Greening Factor (Policy G5), the development achieves a UGF score of 0.308, exceeding the 0.3 target, calculated to include part of the pocket park that lies within the red line private ownership boundary and this is discussed in detail elsewhere in the report.
- 217. The long, linear terraces on levels 07 and 08 provide intimate, flexible outdoor spaces framed by raised planters and fluted architectural elements, featuring ornamental, seasonally dynamic planting that enhances occupant well-being and design continuity. Level 09, integrated with the building's architectural grid, offers prairie and woodland planting themes and modular green walls. The biodiverse green roof on level 10 supports diverse native habitats including wildflowers, sedum, stones, logs, and shallow pools—alongside a tensile-wire green wall, contributing to ecological resilience, urban cooling, and visual amenity.

218. Full details of the landscape designs, including planting specification, and strategies for furniture, lighting, hard surfaces and maintenance, will be conditioned to ensure the designs are of a high quality and resilient in this context. The proposed urban greening is well designed and contributes to the overall quality and character of the proposed buildings, and public realm and is considered to be compliant with London Plan policies D3, D8, G1, G5 and SI13, and City of London Local Plan (2015) Policies DM10.2, DM10.4, CS15, DM15.5, DM19.2.

### Lighting

219. The public realm lighting strategy provides a cohesive atmosphere across the cultural space, retail facades, and the pocket park. Discreet uplights and LED grazers highlight the architectural features of The Holborn Dome and retail façades, enhancing visibility and form without glare. In the pocket park, integrated lighting beneath planters, seating, ensures safety and wayfinding, while low-level bollard lights softly illuminate planting. The water feature includes static white and optional RGB lighting for events. Together, these elements create a welcoming, well-lit environment that enhances the night-time experience.
220. The proposed lighting strategy is in accordance with Local Plan Policy DM10.1 and would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City at night. Irrespective of the approved drawings, a detailed lighting strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with the guidance set out within the City of London Lighting Strategy.

### Transport Related Urban Design Considerations

221. The proposal would optimise Healthy Streets goals by creating a destination for a broad demographic of pedestrians. It would be accessible and welcoming to all, reachable on foot from numerous public transport systems. The proposal



would have excellent public transport connectivity and would incorporate 66 short stay and 822 long stay cycle parking spaces. 46 of the short-stay cycle parking spaces will be located within the building at ground level accessed via High Holborn for public use, 20 in Basement level 1 for office users, and 5 additional spaces in the landscaped area east of the building, to replace existing stands. The proposals make it possible for a majority of visitors to walk, cycle or use public transport to access the proposal, all in accordance with, Policies T1(B) and T2 of the London Plan, as well as CS10 (4,5), CS16 (3ii), DM10.4 (2,8) DM10.8(2) DM16.3 of the Local Plan policies and S10, AT1 (1,2,4) AT3(1), S8(1,2), DE2 (2) of the emerging City Plan.

222. The Hostile Vehicle Mitigation (HVM) strategy integrates discreet security measures into the public realm, using planters, seating, and bollards as protective elements at key gathering points such as the Cultural Hub entrance and Southampton Buildings Road. Structural hardening within the building footprint provides additional resilience, ensuring robust yet visually integrated protection in line with the Security Needs Assessment and City of London Police guidance.

#### Public Realm Conclusion

223. The High Holborn scheme delivers a thoughtfully designed and inclusive public realm that significantly enhances the character and functionality of this part of the City. Through the introduction of high-quality materials, a vibrant new pocket park, and complementary cultural uses, the proposals create a welcoming and accessible environment that supports social interaction, celebrates local heritage, and improves everyday experience. The design integrates greening, security, and active ground floor uses, offering lasting benefits for the community, workers, and visitors alike
224. Whilst the proposal would see a slight reduction in public realm of around 21.2m<sup>2</sup>, much of the existing public realm is poor quality and not sufficient to pause and rest. Much of the space is empty pavements primarily for movement, servicing areas and other harsh environments that do not contribute to placemaking. The new public space would have planting, water features and new colonnades to provide all weather shading. On balance, the slight loss of quantum of space is considered to be mitigated by the enhanced public realm quality and improved streetscapes.

225. The proposal would deliver green infrastructure, optimising the quantum and planting palette in a manner which is human-centred, seeking to improve health and wellbeing, landscaping in the public space would transform what is currently a hardscaped environment. Final details, including planting palettes, specifications and fit out, are reserved by condition with the intent to optimise the inherent biodiversity and wellbeing benefits, in accordance with London Plan Policy D3 and D8 and Local Plan Policies CS10, DM10.1 and DM10.4.
226. An appropriate management, curation and programming of the public realm, both internal and external, would be ensured via section 106. A Public Realm Management Plan will ensure the spaces achieve the highest standard of inclusive design for a diverse range of users, whilst ensuring that appropriate management arrangements are in place which maximise public access and minimise rules governing the space in accordance with London Plan Policy D8(H) and guidance in the Public London Charter.

#### Outdoor Amenity Space and Landscaping Design

227. The proposed development would incorporate a number of outdoor amenity space terraces including two long linear roof terrace spaces at Levels 07 and 08 and a larger space at Level 09. The spaces at Levels 07 and 08 would have intermittent garden pockets and benches designed to host a range of activities including outdoor meetings, social gatherings or quiet refuge. Level 09 will be larger and would incorporate a number of programmable spaces to maximise outdoor space usage.
228. At Level 10 an extensive biodiverse roof with rich wild flower planting would help enhance local biodiversity, with a number of additional habitats to be incorporated within the design to support species.
229. Notwithstanding the approved drawings, the final details of the landscaping including full planting specifications, hard and soft materials, furniture, maintenance regime and irrigation, in accordance with the City of London Technical Toolkit, will be conditioned to ensure that the design and materials are of a high quality, so the landscape thrives and is of acceptable design quality and is full inclusive.

230. Appropriate lighting, in accordance with Local Plan Policy DM10.1, would deliver a sensitive and coordinated lighting strategy integrated into the overall design, minimising light pollution, respecting the historic context, responding to public safety and enhancing the unique character of the City at night. Irrespective of the approved drawings, a detailed lighting strategy would be subject to condition to ensure final detail, including form, quantum, scale, uniformity, colour temperature and intensity are delivered in a sensitive manner in accordance with the guidance set out within the City of London Lighting Strategy.

#### Conclusion on Architecture and Urban Design

231. Overall, the proposal would be truly contextual; that is to say, it is the product of thoughtful and meticulous consideration of its richly historic context to which, in the pleasing variety of all of its elevations, it would offer a series of intelligent and beautifully resolved responses. Above all, it would have a generosity of detailing, materiality and uses that would utterly transform the present standing of this application site in the streetscape.
232. The ground floors of the building would become more outward facing with new areas of active frontage across them all except for the discreet servicing bay to Southampton Buildings; the proposal would create new focal points for culture, commercial and retail spaces; these would be cleverly expressed in a series of sympathetic, contextual architectural forms; and all complemented by an attractive more usable, people focussed accessible and higher quality pocket park and more pleasant pub routes. In this, the proposals would optimise the use of land, whilst dramatically improving the interface of the application site with its surroundings.
233. As such, the proposal is considered to be a very clear-cut example of Good Growth by design. It would make the best use of land, following a design-led approach that optimises site capacity to accommodate a commercial development alongside ground floor retail, food & beverage and cultural uses which would contribute to the Destination City objectives and support the regeneration of High Holborn. The proposals are considered to be in accordance with London Plan Policies SD4 and SD6.
234. The proposal would comply with all relevant design policies including Local Plan Policies CS 10 and DM 10.1, DM10.4, emerging City Plan Policy S8 and DE2 and London Plan D3, the policies contained in the NPPF and guidance in the

National Design Guide, contextualized by the London Plan Good Growth objectives, GG1-6. The proposals would also align with the objectives of Destination City by improving the public realm and creating a new sense of place in this part of the City of London.

235. Irrespective of the approved drawings, full details of the frontages, design and materiality of the public realm improvements, and way-finding strategy are reserved for condition to ensure these are well-detailed and are useable. The development has had regard for Local Plan Policy DM 3.2 and the Mayor's Public London Charter promoting a safe, inclusive and welcoming environment.

### **Strategic Views and Heritage**

236. London Plan policies HC3 and HC4, Local Plan 2015 Policy CS13 and emerging City Plan 2040 policies S12 and S13 all seek to protect and enhance significant City and London views of important buildings, townscapes and skylines. These policies seek to implement the Mayor's London View Management Framework (LVMF) SPG (the SPG), protect and enhance views of historic City Landmarks and Skyline Features and secure an appropriate setting and backdrop to the Tower of London.
237. A Built Heritage, Townscape and Visual Impact Assessment has been prepared and submitted as part of the application documents. This has been supplemented by additional imagery during the planning application's assessment.
238. The proposal is of a scale which would curtail the potential for it to appear in the vast majority of strategic views. For clarity, the application site is located in the west of the City, at considerable distance from the World Heritage Site. Intervisibility between the two has been tested in the TVIA, confirming that the proposal would have no visual relationship with and would therefore have no potential for impact upon the World Heritage Site.

### **London View Management Framework (LVMF)**

239. The application site lies in the Background Wider Setting Consultation Area of LVMF 5A.2 (Greenwich Park) and is clipped on the north-east corner by LVMF 4A.1 (Primrose Hill) and LVMF 6A.1 (Blackheath Point). However, because of

its siting and scale, the proposal would be invisible in all of these views, with no potential for impact on them.

#### LVMF16B.1 and 16B.2 Gabriels Wharf

- 240. The proposal would be glimpsed from these two assessment points, located together on the viewing platform at Gabriel's Wharf. St Paul's Cathedral is identified as the sole strategically important landmark (SIL), whilst other noteworthy elements of the view include St Bride's Church and Temple Gardens.
- 241. The visual management guidance describes the dominance of the river in the foreground, with those buildings on the north side providing a rich and intricate skyline. Reference is made to the subtle transition of scale between the Temples and the more recent commercial development on Fleet Street/Ludgate. Sited at some distance from the Cathedral in this view the development would be very largely screened by the existing development and treeline along the Embankment. When not in leaf, there would be a modicum of visibility of the upper levels through the trees; but this would be such that the proposal would be difficult to discern and, accordingly, would make no evident or obvious change to the character or composition of the view.
- 242. It is considered, then, that in baseline and cumulative scenarios the proposal would preserve the pre-eminence of the open prospect over the river and skyline presence of the Temples and other Victorian/Edwardian buildings defining the Victoria Embankment. The proposal would preserve the ability to recognise and appreciate St Paul's as the SIL, which would remain the pre-eminent focus, its townscape presence preserved in accordance with paragraphs 280-283 of the LVMF SPG.
- 243. Overall, the proposal would not harm the characteristics and composition of the strategic view and its landmark elements, including the ability to recognise and appreciate St Paul's as the SIL and Temples in accordance with paras 68-70 of the SPG.

#### Summary of impacts on LVMF Strategic Views

- 244. The proposal would be of a scale that would not affect the majority of these views; it would preserve the character and composition of the views affected in

accordance with Local Plan Policy CS 13, draft City Plan 2040 Policy S13 and London Plan 2021 policy HC4 and guidance contained in the LMVF SPG.

#### City of London Strategic Views

245. The City of London Protected Views SPD provides guidance on the St Pauls Heights code, relevant (LVMF) Strategic Views, views from and to the Monument, views to and from the Tower of London World Heritage Site and views of historic City landmarks and skyline features. The site is not located within St Pauls Heights Policy Area, the Monument Views Policy area or the Local Setting of the Tower of London. The SPD identifies Historic City Landmarks and Skyline Features and there would be no impact on any these. The SPD supports Local Plan Policy CS 13, draft City Plan 2040 Policy S13 and London Plan 2021 policy HC3 and guidance contained in the LMVF SPG.

#### St Paul's Heights & Viewing Points

246. The application site is nearly a kilometre away from the Cathedral. It is not within the policy area, and the proposal would not be of a scale to appear in or affect the identified viewing points in the Protected Views SPD (Figure 3).
247. The proposal would be slightly visible from the Golden Gallery and Stone Gallery of St. Paul's. Looking westwards from the viewing platform the development would largely be screened by the Salisbury Square development. There would be a small amount of visibility of the uppermost storeys of the southern block the articulated green roof of which would be an unobtrusive addition and minimal change on the skyline.

#### The Monument

248. The Protected Views SPD identifies views of and approaches to the Monument which are deemed important to the strategic character and identity of the City. The proposal is not in the defined Immediate Setting of the Monument and would have no impact on those identified views of/approaches to the Monument as identified in the Protected Views SPD. It would be outside the field of view scope of all the Monument Views.

#### Other Borough Strategic Views:

249. Relevant views from the London Borough of Camden have been considered; the siting and scale of the proposal would not affect them.

City Landmarks and Skyline Features, Views of:

250. The proposal would not affect any views of historic City Landmarks and skyline Features.

Conclusion on Strategic Views

251. Because of its siting and scale, the proposal would not have the potential to affect, and so would preserve, all the relevant strategic views and the settings of the strategic landmarks discussed above. It would therefore comply with Local Plan policy CS13, emerging City Plan 2040 policy S13, London Plan Policy HC4, GLA LVMF SPG and City of London Protected Views SPD.

## **Heritage**

### **Non-Designated Heritage Asset assessment**

252. Non-designated heritage assets are buildings, monuments, sites, places, areas, or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.
253. The guidance in Historic England's Advice Note 7: Local Heritage Listing has been used to assess whether the buildings on the site have the potential for non-designated heritage asset status. The criteria are: asset type; age; rarity; architectural and historic interest; group value; archaeological interest; historic interest; landmark status.

No. 44 Southampton Buildings

254. A C20 office building of unremarkable typology, age or rarity. It has a slight degree of architectural interest through its vaguely neo-Georgian style and classical execution, and a vague sense of group value, architecturally, with the Silver Vaults opposite. It possesses no known notable associations, nor is it of an age, to qualify it for historic interest, and it possesses no archaeological interest or landmark status.

Heron House and No. 333 High Holborn

255. Offices of 1969 and 1968 by E.S. Boyer and Partners and Gordon Charratou (respectively). These C20 office buildings are of unremarkable typology, age or rarity. They are not considered to be of sufficient quality in design, detailing or materials to overcome their architectural singularity, which makes for a jarring series of contrasts with the surrounding buildings; as such, they are not considered to possess any architectural interest.
256. However, being of very similar execution, they have group value within themselves (though this is very self-contained and considered inherently unremarkable) and the aforementioned singularity gives them landmark status to a slight degree. Whilst their site has historic and archaeological associations through its connection with the Knights Templar and potential surviving remains of their first church, these associations belong to the site and the subterranean archaeology, not the buildings above; they are therefore not considered to possess historic or archaeological interest.
257. Overall, the buildings satisfy two of the seven criteria to slight degrees. They are accordingly not considered to qualify for non-designated heritage asset status and their demolition is unobjectionable from this point of view.

Direct and Indirect Impacts

Chancery Lane Conservation Area

Significance:

258. The application site is partly within, but largely outside, the Chancery Lane Conservation Area. That part within consists of 44 Southampton Buildings, with the CA boundary drawn specifically to include it. The remainder of the site borders the CA to the west, south and east.
259. The character, appearance and significance of the conservation area are summarised in the adopted SPD (2016) in the following attributes:
1. An exceptional span of building ages and styles, resulting in a townscape of arresting contrasts;
  2. Significant historic associations with the legal profession, with origins as a centre for medieval legal administration;
  3. The collegiate surroundings of Staple Inn and Barnard's Inn, which incorporate rare secular medieval survivals;



4. A historic association with educational establishments that has persisted to the present time (e.g. the Inns of Court, Birkbeck College, King's College London);
  5. The site of the Knights Templars' first precinct and church in London (at Southampton Buildings);
  6. A well-preserved and easily legible historic street network;
  7. Monumental 19th century Victorian public buildings in a range of styles;
  8. One important early act of conservation (Staple Inn north range) and several buildings of varying periods associated with a single company's patronage (Prudential Assurance Co.);
  9. Well-considered 21st century insertions into a historic context.
260. Of these, it is considered that the relevant attributes for consideration are 1, 3, 5, 7, 8 and 9. The proposals would not affect the CA's associations as listed under attributes 2 and 4, nor the street network as detailed under 6. Of the identified views in the SPD, the proposal would affect views 3, 9 and 14, although as the SPD makes clear this is not an exhaustive list of views.
261. Historic England and the GLA consider that harm would be caused by the proposals to the conservation area. The City of London's Conservation Area Advisory Committee considers that the proposal would adversely impact on the character and appearance of the Conservation Area.
262. That part of the site within the CA boundary, 44 Southampton Buildings, is described by the SPD as having 'a stripped classical frontage of brick with stone dressings, traditional in appearance, though its shallow window reveals give the frontage a flat appearance.' The inference is that this building is not considered a particularly noteworthy or positive contributor to the conservation area, although this must be balanced against the fact that the CA boundary has clearly been specifically drawn to include it, the inference of which being that the building was at one time considered of sufficient quality to merit inclusion in a CA.
263. For the purposes of this assessment, to build on the brief description in the SPD, the building is considered to be of an unremarkable C20 age and architectural character, being simply detailed and faintly anonymous in design; the building has clearly been altered, further reducing the original coherence and integrity it might once have had. It is not known to possess notable associations, uses or anything else that might lend it historic interest. Architecturally, it has a vague affinity with the Silver Vaults opposite, but

otherwise reads as a rather isolated outlier in views up and down Southampton Buildings, seemingly disconnected from the CA.

- 264. As such, it is considered to make a very modest contribution towards attribute 1 of the CA's overall character, appearance and significance. The proposal would demolish the building. In view of its very modest contribution to the CA, this demolition would result in an equally modest level of harm to the CA. This harm would be at the slight end of the less than substantial spectrum.
- 265. It would be replaced by a building of an accomplished, high-quality architectural character, with a generosity of detailing, materiality and general richness that would significantly improve the aesthetic quality of the area.
- 266. In views up and down Southampton Buildings, the scheme would present a more unified, coherent and high-quality series of elevations both within and immediately framing the CA. They would frame the Silver Vaults, Former Patent Office and other relevant CA buildings in a way which would be complementary, distinct and without being overbearing despite the general (though relatively small) increase in scale across the site. The quality of these elevations is considered to be such that the overall effect would be a modest enhancement of attributes 1 and 9 of the CA.
- 267. In summary, the direct impact of the development would be to cause a slight level of harm and a slight level of enhancement.
- 268. Turning to the other indirect impacts, of those sides of the proposals which face into and frame other parts of the CA, the proposal would provide a high quality, coherent and thoughtful new backdrop to views from the east out of Staple Inn, replacing the dynamic, jagged elevations of the existing building with more calmly articulated designs of more contextual materials and additional planting; the effect would be to preserve relevant attributes 1 and 3 and therefore the character, appearance and significance of the CA in this area.
- 269. There would be a similar effect in westerly views along High Holborn, with the scheme replacing a jagged and incongruous existing building with a more thoughtful and contextual design with a prominent corner clock playing on the architectural vouge for such devices in the C19; though the scheme would be an increase in scale and height over the existing building, it would provide a convincing bookend to the Staple Inn main range set-piece and its neighbouring

buildings, thereby preserving attributes 1, 7 and 8 and therefore the character, appearance and significance of the CA in this area.

270. Similarly, again, in views of the southern parts of the scheme, it would relate satisfactorily to both Staple Inn and the Former Patent Office, providing a generous tranche of new landscaping which would enhance and increase the available public realm in this area. In scale, design and materials the scheme would be an appropriate neighbour to these buildings and would preserve attributes 1, 7 and 9.
271. Although a less tangible effect, the proposal would better reveal and celebrate the presence of the first Templar church on the site, and in doing so would be a modest enhancement of attribute 5.
272. Overall, the proposal would result in a slight level of harm to the CA, but also slight levels of enhancement. This harm and these enhancements are carried through into and considered within the 215 balancing exercise and overall planning balance at the end of this report.

### **Indirect Impacts**

#### **Group: Staple Inn Buildings**

273. These buildings at Staple Inn are located adjacent to each other in an area between High Holborn to the north and Southampton Buildings to the south, immediately east of the Site. They can be considered to form a group given their location adjacent to each other and shared setting, similar position relative to the Site, and similar appearance and historic origins in some cases.

#### **335-336 High Holborn Staple Inn Buildings North and South (Grade II)**

##### *Significance:*

274. These are red brick offices with terracotta dressings and granite faced ground floor, dating from c. 1903 with later alterations. This is derived from architectural interest as a handsome building with fine terracotta and brick facades and

attached wrought iron railings, and is of historic interest as an early 20th century office building, designed by Waterhouse.

337 – 338 High Holborn (II\*) and 1-4 Holborn Bars (Grade I)

*Significance:*

275. 337-338 are two chambers and later shops, with a timber frame front elevation to High Holborn and brick rear under a tiled, gable. Company), and the structure was largely rebuilt in facsimile by Sir Edward Maufe in 1954-5. Nos. 1-4 Holborn Bars adjoins which are four chambers with later shops, three storeys tall with attic, with a timber frame elevation to High Holborn and brick rear under a tiled, gabled roof. The front elevation comprises a symmetrical front of five gable bays with bargeboards to the gables, overhanging jetties. The rear of these buildings from Nos. 4, 5 and 6 Staple Inn (separately listed).
276. Significance is derived from their combined architectural interest as a set piece of timber framed houses with black timbers and white infill in Tudor style, both with largely symmetrical frontages, and with the frontage at Nos. 337-338 under two gabled bays and that at Nos. 1-4 Holborn Bars under five gabled bays. They are of historic interest as 16th century houses – a unique example in London – built originally for Vincent Engham, Principal of the Inn, with a number of other interventions over the years including by Waterhouse.

4,5, and 6 Staple Inn and attached pump (Grade I)

*Significance:*

277. This is a terrace of three chambers formed by the rear of Nos. 337-338 High Holborn and Nos. 1-4 Holborn Bars. A lead water pump with brick and stone base is attached to No. 6. These are of architectural interest as brick faced buildings attached to the Tudor style frontages of Nos. 337-338 High Holborn and Nos. 1-4 Holborn Bars to High Holborn and forming the northern part of a Staple inn Court courtyard surrounded by similar properties. They are of historic interest as properties of 16th century origin, with a number of other interventions over the years including by Waterhouse

1,2 and 3 Staple Inn Institute of Actuaries and railings (west side )7 and 8 Staple Inn (East side) and railings (II )and 9 and 10 Staple Inn (South side) (Grade II)

*Significance:*

278. The Institute of Actuaries (Nos, 7 and 8 Staple Inn and Nos. 9 and 10 Staple Inn are of architectural interest as Georgian-era brick buildings forming the western, eastern and southern sides respectively of Staple Inn Court (with Nos. 4, 5 and 6 on the northern side). They are of historic interest as properties of Georgian origin, with a number of other interventions over the years, and associated with the development of the area for the legal and actuarial professions.

4,5, and 6 Staple Inn and attached pump (I) 7 and 8 Staple Inn (East side) and railings (II) and 9 and 10 Staple Inn (South side) (Grade II)

*Significance:*

279. This is a terrace of three chambers formed by the rear of Nos. 337-338 High Holborn and Nos. 1-4 Holborn Bars. A lead water pump with brick and stone base is attached to No. 6.. These are of architectural interest as brick faced buildings attached to the Tudor style frontages of Nos. 337-338 High Holborn and Nos. 1-4 Holborn Bars to High Holborn and forming the northern part of a courtyard (Staple Inn Court) surrounded by similar properties. They are of historic interest as properties of 16th century origin, with a number of other interventions over the years including by Waterhouse

The Hall and attached railings (Grade II)

*Significance:*

280. The Hall is of architectural interest as a 16th century banqueting hall in Gothic style, forming part of the southern side of Staple Inn Court, and of historic interest for its association with the Inn of Chancery.

*Collective contribution of setting:*

281. The collective contribution of their setting is as follows:

- The listed buildings within this group form an interrelated ensemble with physical, visual, historic and functional relationships to each other. The primary contribution made by setting to the heritage significance of each individual building derives from the other buildings in the group and their arrangement as an ensemble with relationships to High Holborn to the north and Staple Inn Buildings to the east, to the internal courtyard of Staple Inn Court, and to Staple Inn Gardens to the south.
- The location of 337-338 High Holborn, 1-4 Holborn Bars and Staple Inn Buildings North and South Nos. 335-336 facing the historic route of High Holborn is an aspect of setting that contributes to the heritage significance of the group.
- The separately listed Obelisks, Royal Fusiliers War Memorial and Prudential Assurance Buildings along High Holborn are noted as having group value with these buildings in the list description for the War Memorial.
- The Prudential Assurance Building, as a building by Waterhouse, has particular historic links with the Staple Inn group due to the involvement of Waterhouse in works involving them, and in particular with Staple Inn Buildings North and South as a building entirely by Waterhouse.
- The courtyard provides a strong sense of enclosure and confinement, such that there is little visibility of development beyond when in this part of the immediate setting of these listed buildings, however, the existing Holborn Gate building within the Site is visible in views looking upwards from within the courtyard. The courtyard includes large mature trees which further limit views to the surroundings.
- The Hall, Nos. 7 and 8, and Nos. 9 and 10 Staple Inn are also appreciated to varying extents from the Staple Inn Gardens to the south, which are more open in character, and views outwards take in a mix of buildings including the existing nine storey Holborn Gate building on the Site to the west. Both the internal courtyard and the gardens to the south are private owned and not accessible to the public.
- The modern and larger scale aspects of the settings of these listed buildings – including the existing Holborn Gate and Heron House buildings immediately adjacent – do not contribute to their heritage significance, nor do they detract from it.

*Impacts:*

282. The GLA have identified that the proposed development would cause a low to medium level of less than substantial harm to the assets within this group, however, Officers have reached a differing conclusion on the impacts to these assets and Historic England have not raised concerns in relation to the proposals impact on this group.
283. Within views looking westward along High Holborn (HTVIA Views 17 and 18), the proposed development would result in an increase in height – however, there is already existing larger commercial buildings either side of the Staple Inn group of buildings and further along the busy thoroughfare of High Holborn. As such, the scale and appearance of the proposed development is entirely in accordance with the established townscape setting of the listed buildings.
284. The introduction of curved corners, particularly on the north eastern side of the building, helps the proposed development sit more comfortably against the listed buildings and softens the impact of the proposals – particularly against Grade II Nos.335 – 336 High Holborn as seen within HTVIA View 19. The inclusion of a sympathetic palette of materials when compared with the existing building, alongside breaking down the façade into multiple sections, further softens the impact of the building and makes for a more contextual development as evidenced in HTVIA views 21 and 26 looking east along High Holborn and from within the garden of Staple Inn.
285. Giving consideration to the above, Officers consider that the proposed development would not harm the setting nor the significance of the assets which make up this group.

#### No.25 Southampton Buildings (Grade II\*)

##### *Significance:*

286. Library and Offices of 1890-1912 by the Office of Works' principal architect, Sir John Taylor. The present complex also incorporates three bays of the elevation of an earlier structure, Staple Inn Chambers, which was designed and built in 1842-43 for the Taxing Masters in Chancery by the London-based architects Wigg and Pownall. Architecturally the buildings are of considerable interest: the complex is formed of six distinct blocks with different architectural treatments. The principal architectural interest of the building lies in the surviving interior

spaces, such as the atrium Reading Room with two gallery floors with decorative ironwork and Corinthian columns. Further interest is derived from the building facades which display handsome Victorian and Edwardian architectural detailing. The Furnival Street and Southampton Buildings façades are particularly elaborate in their architectural detailing and make a positive contribution to the historic commercial character of Holborn. Significant historic interest is also derived from its function as the reading room and offices for the Patent Office, a government body established in 1852 to grant patents, trademarks and design rights.

#### *Contribution of Setting:*

287. The buildings are located within a dense network of narrow streets and squares with frontages to Furnival Street, Took's Court, Southampton Buildings and the gardens associated with the listed Staple Inn Building. The surrounding area is characterised by large institutional and commercial premises, such as the Inn of Court and the setting contributes to the understanding of its historical interest as a Patent Office and Library. In the 19th century the commercial character of the area developed with the construction of large-scale office buildings with impressive street frontages. This is illustrated by the former Patent Office, the Public Record Office to the south on Chancery Lane (also by Sir Henry Tanner) and the Prudential Assurance offices to the north on High Holborn. There has been piecemeal redevelopment throughout Furnival Street and the surrounding area that has eroded the historic character of the area; however, these are generally respectful in scale and function.
288. The modern and larger scale aspects of the settings of these listed buildings – including the existing Holborn Gate and Heron House buildings immediately adjacent do not contribute to the heritage significance, nor do they detract from it from Southampton Buildings.

#### *Impact:*

289. The GLA have identified a low to middle level of less than substantial harm to this asset, however, Officers have reached a differing conclusion on the impact and Historic England have not raised any concerns in relation to the impacts of the proposal on this asset.



290. The proposed development would be a prominent feature to the north of this asset, which has its principal elevation facing towards the site. The treatment of the base of the proposed development would result in a change to the character of the streetscape opposite this asset. The distinctive arched frontages with dark red terracotta materiality to the base of the building would provide a new active animated ground floor opposite the building which would enliven the street scene.
291. As a result of the infilling of the existing public space on the south western corner of the development site, views of this asset from the north western side of Southampton Buildings (HTVIA View 24) would be significantly obscured – but the building can still be appreciated. However, open space would be redistributed to the southern side of the site in front of the asset (HTVIA View 25) to create a new open space with planting, trees, seating and a water feature. This would provide enhanced views and perspectives of the asset through the creation of a new verdant space for pedestrians to pause and take time out opposite the asset.
292. The contemporary, expressive nature of the proposed development would contrast against the historic traditional façade of this asset. However, the asset derives its principal significance from its exterior façade which fronts the southern elevation of the site and would be best appreciated in closer views when one is orientated away from the development site.
293. It is considered that the proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a heritage asset. It is also considered that there would be some benefits (albeit not related to heritage significance) in the opening up and creating more active frontages and public realm with seating and planting which would allow more direct enhanced views to the listed building.

#### The former Prudential Assurance Building on High Holborn (Grade II\*)

##### *Significance:*

294. The office building was constructed between 1885 and 1901 to designs by Alfred Waterhouse. In 1930-32, the building was altered and extended by EM

Joseph. The building is Gothic Revival in style and constructed in a distinct combination of granite, red brick and red terracotta. The building occupies an entire urban block within Waterhouse Square, with its principal façade to High Holborn. The building has a complex floor plan with an interconnected series of courtyards within the block. The Prudential offices occupy the former site of Furnival's Inn, one of Holborn's Inns of Court, demolished in 1897.

295. The office building has a historical interest as the headquarters of the Prudential Assurance, Investment and Loan Association, founded in 1848. The building was extended over several years and designed to reflect the prestige of the company. The building has further associations with architect Alfred Waterhouse, who was responsible for well-known works such as the Natural History Museum and Eaton Hall. The architectural interest of the building derives from its imposing street presence on High Holborn and its high level of Gothic detailing. The building is a fine example of purpose-built commercial office architecture, designed to reflect the values of the company it housed. The building has strong national associations with other Prudential Assurance offices, demonstrating a national company identity.

#### *Contribution of Setting:*

296. The setting of the Prudential Office building contributes positively to its significance in its visual and spatial relationship with other large commercial and institutional sites on and around High Holborn. The Prudential Office building holds a prominent position on Holborn and the primary façade can be appreciated in its entirety. There are fragments of the historic streetscape that once characterised this commercial centre on the south side of High Holborn, which contribute to an understanding of the development of Holborn in the late 19th century. To the east and west of the listed building, there is modern commercial development of a contrasting style and materiality, which detract from the architectural and historic interest of the building. Holborn Gate and Heron House are further to the west and do not contribute to the heritage significance, nor do they detract from it from the Prudential Buildings.

#### *Impact:*

297. The GLA have identified a very low level of less than substantial harm to this asset, however, Officers have reached a differing conclusion on the impact and

Historic England have not raised any concerns in relation to the impacts of the proposal on this asset.

298. The proposed development would be a new prominent addition to the skyline to the south of this asset, which would be readily visible in views from outside the asset and looking both east and west along High Holborn. With views from the west looking east, HTVIA View 20, the proposed development would result in an increase in height and massing against the asset when compared to the existing, however, there would still be sufficient sky space around the assets distinctive roofline to appreciate it within longer views. The use of a paler buff materiality on the north western corner would contrast with the striking red materiality of the asset, emphasising its ornate detailing and expressive brickwork better.
299. Whilst the proposal would form a larger new addition within the setting of this asset, would not affect the ability to appreciate significance. The scale and appearance of the proposed development is entirely in accordance with the established townscape setting of the listed building. The curved corners softens the impact of the building, whilst the red materiality provides a nod to this asset and its context.
300. Giving consideration to the above, the proposed development would have a neutral impact and would not harm the setting of the listed building or affect the ability to appreciate its significance as a designated heritage asset.

Gatehouse, High Holborn, and the Cittie of Yorke Public House, High Holborn, both listed Grade II (LB Camden):

301. These buildings adjoin one another on the opposite side of High Holborn to the application site. Whilst the buildings have a differing appearance and detailing, they match one another in height. They are considered to form a group together given their location adjacent to each other and shared setting and similar position relative to the site.

Gatehouse, High Holborn (Grade II)

*Significance:*

302. A four storey gatehouse with attic dating from 1583 and rebuilt in 1965. There is a carriage way with elliptical arch over at ground floor, with smaller round-headed arch to footway to the west. An oriel window rises from first to third floor, with a niche set to each side on each floor. There is a parapet at the top, and the northern façade is finished in brick. Its principal historic interest derives from being a 16th century gatehouse building incorporating a carriageway entrance.

Cittie of York Public House, High Holborn (Grade II)

*Significance:*

303. A four storey public house in a Neo-Tudor style, mostly dating back from 1923-24, providing an example of an early 20th century public house. The pub sits on the site of an earlier wine shop with a public house on the site dating back from 1430, although there is few traces of pre-20th century fabric. The decorative symmetrical front elevation with a large ornamental clock located between two sets of bay windows and the interior is also considered to be of historic interest.

*Collective Contribution of Setting:*

304. The collective contribution of setting is as follows:
- The listed buildings within this group form an interrelated ensemble with physical, visual, historic and functional relationships to each other. The location of both assets facing the historic route of High Holborn is an aspect of setting that contributes to the heritage significance of the group.
  - The buildings immediately to the east of Gatehouse and west of the Cittie of York are both modern seven storey buildings. As a result, although the Gatehouse and the Cittie of York date from different periods and are of different appearances and uses, visually they appear as a pair of older buildings of the same height framed by taller modern buildings. They form a positive aspect of each other's setting.
  - Beyond the assets, the character of High Holborn is mixed with modern and historic buildings set side by side with surrounding taller and modern buildings – including the subject site – forming an immediate part of the assets settings but not contributing towards their significance.

*Impact:*

305. The GLA have identified a very low level of less than substantial harm to these assets, however, Officers have reached a differing conclusion on the impact and neither Historic England nor LB Camden have not raised any concerns in relation to the impacts on the proposal on this asset.
306. The proposed development would sit on the opposite side of the road and would be read clearly distinct and separate from the two listed buildings. The additional height and scale of the proposals would be comparable with other large commercial buildings within the surrounds, whilst the new entrance to the cultural space within the development site would see an increased amount of public space to appreciate these two assets from the south.
307. Overall, the detailed design of the proposal would complement this diverse setting and its massing would not detract from the listed building's significance. The proposal would preserve the special architectural and historic interest and heritage significance of this group including the contribution made by setting.

Lincoln's Inn group (LB Camden)

12 and 13 Old Buildings (Grade I)

Significance

308. Terraced barristers' chambers of 1534 with later alterations, of brown brick with later sash windows, with gables and chimneystacks forming a distinctive roofline. The buildings are of architectural interest for their rare C16 style, fabric and features, particularly the gables and chimneystacks which particularly reveal their origins, as well as some of the later alterations such as the sash windows which illustrate how they have adapted to serve the same use; they are of historic interest for their age and rarity and considerable roots in and associations with the past communities and many notables of Lincoln's Inn.

Setting

309. Like many such enclaves, these buildings are experienced as part of a self-contained, very well-preserved grouping of legal buildings of differing ages, styles harmonised by a shared function and overall consistency of aesthetic, spirit and feeling. This is the quality of setting shared amongst all the buildings in the Lincoln's Inn complex, each contributing to the other's setting, the overall

experience combining to be something more than the sum of the parts. In this context, Nos. 12 and 13 Old Buildings draw considerably on their setting within the complex to support their architectural and historic interest.

310. They are seen only from within the Lincoln's Inn complex and the viewing experiences within this place are transportational – such is the constancy of use and consistency of aesthetic that they appear to be unpunctured by the modern world. An example of this is the way that, in some of the best views of these buildings from New Square, their distinctive roofline of gables and chimneys is silhouetted against the sky.

#### Impact

311. The GLA consider that harm would be caused by the proposals to the significance, via setting, of these buildings. Historic England and LB Camden consider no harm would be caused.
312. In close and oblique views looking at or past the buildings the proposal would not be visible. In the longer views from the SW in New Square, the proposal would appear substantively behind the buildings, removing the clear sky backing to their distinctive roofline of gables and chimneys; slightly blurring the ability to read and appreciate them, puncturing that illusory, removed-from-the-world quality that is such an important quality of their setting. The impact would be mitigated by the careful massing and greening of the upper levels of the proposal, but an impact there still would be, a low level of less than substantial harm.

#### Nos. 8 – 15 Old Square (Grade II)

#### Significance

313. Terraced barristers' chambers of 1874 by Sir George Gilbert Scott (Nos. 8-10) and 1878-86 by J. Oldrid Scott (Nos. 11-15), all in a Tudor style. The buildings are of architectural interest for their Victorian Tudor revival style, executed to a high quality of design and materials, and historical interest for their associations with Scott and their origins and purpose as part of the ancient Lincoln's Inn complex.

#### Setting

314. Like many such enclaves, these buildings are experienced as part of a self-contained, very well-preserved grouping of legal buildings of differing ages, styles harmonised by a shared function and overall consistency of aesthetic

and of spirit and feeling. This is the quality of setting shared amongst all the buildings in the Lincoln's Inn complex, each contributing to the other's setting, the overall experience combining to be something more than the sum of the parts. In this context, 11-15 Old Square draw considerably on their setting within the complex to support their architectural and historic interest.

315. The viewing experiences within this place are transportational – such is the constancy of use and consistency of aesthetic that they appear to be unpunctured by the modern world. An example of this is the way that in views into Old Square past the Chapel from New Square, the rooflines and chimneys of Nos. 13-15 are seen against clear sky.
316. Views up and down Chancery Lane of the east elevations of the buildings, where they are seen as part of the wider City beyond, make a neutral contribution to significance.

#### Impact

317. The GLA consider that harm would be caused by the proposals to the significance, via setting, of these buildings. Historic England and LB Camden consider no harm would be caused.
318. In virtually all viewing experiences there would be limited to nil intervisibility between these buildings and the proposal. The exception would be in the aforementioned views from New Square, where the upper levels would appear behind the chimneys of Nos. 13-15 to varying degrees, depriving them momentarily of their clear sky backing. Although this would be mitigated by the greening of these levels, and the height has been lowered through pre-app negotiation to below the apex of each chimney in certain views, there would still be a puncturing of the overall quality of setting described above, and a slight level of less than substantial harm as a result.

#### Nos. 1 – 7 Stone Buildings (Grade I)

#### Significance

319. Seven chambers dating variously from 1780 (Nos. 1 and 2), 1775 (Nos. 3-6) and 1845 (No. 7). Nos. 1&2 and Nos. 3-6 were built to the designs of Sir Robert Taylor, and No. 7 to the designs of Philip Hardwick. They are of clear architectural interest as skilfully designed and executed monumental commercial classical buildings of this period, and of clear historical interest for

their associations with those two important architects of that period and for their place and status in the continuum of the Lincoln's Inn complex.

#### Setting

320. The buildings form part of a narrow cul-de-sac framed by another complementary range of similar style, age and appearance; this area of setting makes a positive contribution to the significance of the listed buildings through affinities in age, date, style and scale. Although these viewing experiences are less illusory and leafy than those from deeper into the Lincoln's Inn complex, having a more straightforwardly urban character, they still have an immersive quality, with the modern city momentarily in abeyance.
321. The buildings also have a distinctive street presence to Lincoln's Inn, providing the terminus of views looking east along the north side of Lincoln's Inn Fields. Whilst they have this presence in more general urban viewing experiences, they are set back at some remove from the street and very largely screened by mature and well established trees. When the trees are not in leaf the buildings are visible in a series of distant to close views along the north side of Lincoln's Inn and have a clear sky backdrop in these. These viewing experiences are more incidental, the buildings competing for attention with the wider city of which they are part, but this area of setting still makes a moderate contribution to significance.

#### Impact

322. Historic England and the GLA consider that harm would be caused by the proposals to the significance, via setting, of these buildings. LB Camden considers that no harm would be caused.
323. In the self-contained views from within Stone Buildings the proposal would not be seen. Instead, it would be visible in and would affect the viewing sequence along the north side of Lincoln's Inn Fields. In the longer of these views, the proposal would remove the clear sky backdrop to the buildings and appear as a backdrop to them; but at this distance the proposal would not so much be harm as the introduction of another layer of the city.
324. At closer quarters, however, the proposal would be a prominent new modern element rising up from behind the buildings and interrupting their roofline. At this distance the other elements of cityscape surrounding have reduced in number, increasing the viewer's focus on the buildings themselves; at this range the effect of the proposal, which would appear and be felt to be close



behind the buildings, would be less of a layering of urban forms and more of an intrusion. There would be harm arising through its disruption of the buildings' roofline and puncturing of its otherwise historic setting. This harm would be mitigated by the careful design of the upper levels and their greening, but a low level of less than substantial harm would still be caused.

#### Gray's Inn (LB Camden)

#### Gray's Inn Registered Park and Garden (RPG) (grade II\*)

##### Significance/Setting

325. C16 walks and gardens laid out under the direction of Francis Bacon, with later alterations from the C18 onwards. The RPG is clearly of significance as an early surviving landscape set-piece which has evolved to serve the Inn while maintaining its green and open character despite centuries of later change; it draws little by way of significance from its largely urbanised setting.

##### Impact

326. Historic England and the GLA consider that harm would be caused by the proposals to the significance, via setting, of this RPG. LB Camden considers that no harm would be caused.
327. For the most part, the upper storeys of the proposals would be visible but clearly held at some remove from the RPG; they would appear behind the layers of modern buildings already visible beyond the RPG; consequently, they would appear disassociated from the RPG with no potential for impact in most views. Where the proposals are most starkly visible, in relation to the listed buildings named below, there would be a potential for impact and this has been assessed. The below conclusions on the listed buildings would be the same for the RPG, the setting and significance of which would be preserved.

#### The Hall (grade I)

##### Significance

328. Hall of 1558, incorporating earlier fabric, remodelled in the C19 and restored after the second world war by Sir Edwin Maufe. The building is of great historic interest for its great age, rarity and multifarious associations; and great architectural interest for the layering of styles, quality of execution and rarity of its fabric.

## The Chapel (grade II)

### Significance

329. Chapel of 1955 with C17 fabric by Sir Edwin Maufe. The building is of historic interest for its age and associations and architectural interest as a good work by Maufe with a layering of styles and fabrics.

## No. 1 Gray's Inn Square (grade II\*)

### Significance

330. Chambers of 1676, restored 1948. The building is of historic interest for its age and associations and of architectural interest as a good example of C17 barristers' chambers.

### Collective contribution of setting

331. The buildings frame the south end of Gray's Inn Square in a manner typical of the Inns of Court; each contributes to the others' setting as a group of key buildings of an Inn illustrating how such complexes worked; also in how they illustrate the retiring and secluding character of such complexes. The low scale of the Chapel and Hall mean that the upper storeys of buildings beyond the complex are visible in views of them; this 'wider setting' of the visible modern city makes a neutral contribution to significance.

### Impact

332. Historic England and the GLA consider that harm would be caused by the proposals to the significance, via setting, of these buildings. LB Camden considers that no harm would be caused.
333. In views looking south from within Gray's Inn Square, the proposals would be clearly visible above the rooflines of the Hall and the Chapel, introducing a prominent new element in these views. It would appear beyond the layer of modern development already visible above them, at a more distant remove, and would clearly read as another element of the visible modern city beyond. The upper storeys of the masonry elevations to High Holborn, including the clock, and the green topmost storeys would be visible. These would be a high quality backdrop to the views in question. The layered effect thereby created would ensure the proposal, while prominent, would be separated and disassociated from the group of listed buildings in the foreground and would maintain the layered quality of the views as existing. As such, they would preserve the settings and significance of the listed buildings.

#### Bloomsbury Conservation Area (LB Camden)

334. A sprawling conservation area of great interest for the way in which it illustrates London's expansion to the north and west of the ancient City and the nascent West End, most strongly characterised by fine C18 and C19 streets of stock-brick terraces, of a quintessentially 'London' character, engulfing the earlier Inns of Court and other establishments that had existed in these once-suburban areas; the conservation area also contains many fine examples of later buildings and developments from every architectural period subsequent. Where it borders with other conservation areas it draws a modest contribution from these settings towards its significance; where it does not the contribution is neutral.
335. Historic England and the GLA consider that the proposals would harm the setting of the conservation area. LB Camden does not consider that harm would be caused.
336. Due to its scale and location to the east of the conservation area, in a densely built-up location, the proposal would have highly specific and localised visibility from within and in relation only to Sub-Area 9 of the conservation area. These instances of visibility are addressed in the assessments relating to buildings in the LB of Camden, above, which are also in the conservation area. The impacts described and the conclusions reached in the above assessments would be the same for the conservation area, having regard to the overarching statement of significance set out in the preceding paragraph.

#### Other Designated Heritage Assets

337. The definition of setting is the extent to which an asset is 'experienced,' which is not geographically set and can change over time, relating to more than just a direct visual influence. Given the dense central London location, the site is potentially within the setting of an enormous amount of heritage assets, and it would be disproportionate and unrealistic to assess them all.
338. Officers have undertaken a scoping exercise to explore the intervisibility quality of association/disassociation of the proposals with designated heritage assets in the surrounding locality, to discern the potential for impacts. This assessment is in accordance with paragraph 200 of the NPPF and is deemed proportionate

and no more than is sufficient to understand the potential impact of the proposal on its significance.

339. Some assets were scoped in and these have been fully assessed above. In accordance with paragraph 201 of the NPPF a number of heritage assets were scoped out of further assessment, accounting for their significance and contribution of setting to that significance.
340. This is because they either would have nil to very limited intervisibility with the proposals, with any perceptible visual change amount to a *de minimis* visual effect, or because there would be clear visual disassociation between the asset and the proposal, with the latter being, while visible, clearly belonging to background layers of modern city development – a presence that might be seen but crucially not *felt* as part of the experience of the significance or setting of that asset.
341. In all cases it was, for these reasons, judged by officers that the proposals would have no potential impact. In some cases, these include assets which the GLA consider would be harmed by the proposals; but officers for the aforementioned reasons take a different, proportionate view. The assets scoped out include:

Lincoln's Inn (other buildings)

Nos. 16-23 Old Buildings (grade I), Gatehouse (grade II), No. 24 Old Buildings (grade II), Old Hall (grade I), the Chapel (grade I) – very limited to nil intervisibility; disassociation.

Nos. 8-11 Stone Buildings (grade I)

Old Square remaining group (unlisted)

New Square group (grade II\* and grade II)

New Hall and Library (both grade II\*)

All other listed features including but not limited to pumps, lodges, memorials and railings

Lincoln's Inn Fields

Registered Park and Garden

Lincoln's Inn Fields southern group including the Royal College of Surgeons (Grade II\*) the remainder Grade II;

Lincoln's Inn Fields western group including Lindsey House (Grade I), Nos 57 and 58 and No 65 and Powis House (Grade II\*) the remainder Grade II

Lincoln's Inn Fields northern group including the Sir John Soane Museum (Grade I) the remainder Grade II;

Gray's Inn

No. 1 South Square (grade II)

Gray's Inn Square No. 1 (grade II\*), Nos. 6, 7 and 8 (grade II\*), Nos. 12, 13 and 14 (grade II\*)

Verulam Buildings Nos. 1 – 5 (grade II)

Raymond Buildings Nos. 1 – 6 (grade II)

Nos. 2 and 5 Field Court (grade II)

All other listed features including but not limited to pumps, lodges, memorials and railings

#### Heritage Conclusion

342. The proposals have been assessed against Local Plan Policies CS12, DM12.1, DM12.2, DM12.3 and DM12.5, draft City Plan 2040 policies S11 and HE1, London Plan Policy HC1 and the relevant NPPF paragraphs.
343. Of the relevant listed buildings assessed above, there has been special regard given to the desirability of preserving the setting and significance and any features of special architectural or historic interest which they possess, under s.16 and s.66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
344. Considerable importance and weight has been attached to and special attention has been paid to the desirability of preserving or enhancing the character or appearance of the Chancery Lane conservation area under s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as amended.
345. While LB Camden have raised no concerns about any impacts on heritage assets within their area, there have been concerns from Historic England and the GLA, who have identified less than substantial harm to a range of assets. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus and some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.
346. Officers consider that, for the reasons set out above, the proposals would cause a slight level of less than substantial harm to the Chancery Lane Conservation

Area, a slight level of less than substantial harm to the significance, via setting, of Nos. 8-15 Old Square (grade II), a low level of less than substantial harm to the significance, via setting, of Nos. 12 and 13 Old Buildings (grade I) and a low level of less than substantial harm to the significance, via setting, of Nos. 1 – 7 Stone Buildings (grade I).

- 347. The proposals would result in a slight level of enhancement to the Chancery Lane Conservation Area.
- 348. Although these harms have been clearly and convincingly justified, and considerably mitigated through good design, the proposal would result in some conflict with Local Plan Policies CS12 ( 2), DM12.1 (1 and 4), and DM 12.2 (2) ; emerging City Plan 2040 policies S11 (2), HE1 (1 and 6) ; London Plan Policy HC1 (C) and with the objective set out in Section 66 and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
- 349. Otherwise, the proposals would preserve the significance and contribution of setting of all other aforementioned heritage assets. The proposals comply with policies CS12 (1, 3, 4 and 5), DM12.1 (2, 3 and 5), DM12.2 (1 and 3), DM12.3, DM12.4 and CS13 (3); Emerging City Plan 2040 S11 (1, 3-5), S 13 (3), HE1 (2-5, 7-9) and HE2.
- 350. The harms, enhancements and public benefits are considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report.

#### Archaeology

- 351. Section 16 of the NPPF and Policy HC1 of the London Plan recognise the positive contribution of heritage assets of all kinds and the conservation of archaeological interest is a material planning consideration. Paragraph 200 of the NPPF states that applicants should provide an archaeological assessment if the development could affect a heritage asset of archaeological interest.
- 352. The proposed development is in an area of archaeological interest. The City of London was founded almost two thousand years ago, and London has been Britain's largest and most important urban settlement for most of that time. Consequently, the City of London Local Plan states that all of the City is considered to have archaeological potential, except where there is evidence

- that archaeological remains have been lost due to deep basement construction or other groundworks.
353. The application is accompanied by an archaeological desk-based assessment (MOLA, July 2023), which aims to identify the presence of any known or likely buried heritage assets, describe the significance of such assets, assess the likely impacts upon the significance of the assets arising from the proposal and where considered necessary, provide recommendations for further assessment and/or mitigation aimed at reducing or removing completely any adverse impacts upon buried heritage assets.
354. The desk-based assessment identified that the site is located adjacent to a Roman road and it lies within Londinium's western Roman cemetery, as a Roman burial was found in the 2000 excavation.
355. In 1144, the Knights Templar founded their 'Old Temple' under what is now 319-325 High Holborn. The Old Temple was replaced by the New Temple, located further south at what is now Temple, in the late 12th century. The excavation in 2000 found some of the original Old Temple church and a 1m stretch of the church is believed to be preserved in the basement already, to the east of a lift. The window samples carried out in 2024 suggested a low potential for survival for the Old Temple due to high levels of truncation. However, there is still some potential for truncated Roman and medieval material below the current slab, except for in the sub-basement of 326-332 High Holborn which is likely to have removed all archaeological remains.
356. Both the western cemetery and the Old Temple should be recognised as non-designated heritage assets of archaeological interest. The western cemetery is of local-regional significance and the Old Temple could be argued to be of national significance, given its unique nature. The proposed development will entail the need to excavate the archaeological remains in advance of development, which will cause some harm to the heritage assets. However, the presentation of the remains of the Old Temple to the public will provide a positive heritage benefit for the site, in accordance with policy HC1 of the London Plan.
357. A Cultural Plan has also been provided outlining several heritage benefits for the site, with some relating to the archaeology. A plaque providing the history of the Knights Templar will be provided on the site at street level. The remaining section of wall will be exposed and made visible as a permanent exhibit from within The Holborn Dome Auditorium and could be integrated as

part of a permanent exhibition with some interpretation in the Auditorium. Public art around the building explaining and referencing the history of the site is also proposed, including cultural space metalwork, art vitrines on the west, historic plaque, loading bay doors and patent timeline within the landscape.

358. Historic England GLAAS was consulted and a number of archaeological conditions are recommended for the site. The Section 106 agreement will also secure the long-term maintenance and upkeep of the Temple remains and exhibition. If further masonry remains of the Temple are found, consideration of preservation and display will also be necessary. Overall, it is considered that subject to the imposition of conditions and planning obligations, the harm to the archaeological assets would be able to be managed.
359. Subject to compliance with the recommended conditions, the proposals comply with the required initial steps of archaeology investigation Local Plan Policy DM 12.4, emerging City Plan 2040 HE2, HE1 and London Plan HC1.

#### Access and Inclusivity

##### Policy Context

360. Accessible and inclusive design is covered by NPPF paras 96 and 135, London Plan 2021 Policy D5, Local Plan 2015 Policy DM 10.8 and City Plan 2040 – Revised Proposed Submission Draft HL1. Policies require the highest standards of accessible and inclusive design, securing development that is welcoming, safe and easy to use without disabling barriers, undue effort, separation, or special treatment.
361. Local Plan policy DM 10.8 requires “to achieve an environment that meets the highest standards of accessibility and inclusive design in all developments (both new and refurbished)”. A service provider also has an anticipatory duty under the Act.

##### Arrival at the Site

362. The site is well-served by public transport and including buses from High Holborn and Grays Inn Road, national rail from Farringdon and London underground from Chancery Lane, Holborn and Farringdon, it is noted that only the latter station is step-free. The walking distances from Farringdon Station exceed the recommended 50m without a rest and it is therefore recommended that resting points with accessible seating are proposed wherever possible at



maximum intervals of 50m along the approaches to the building from key points of arrivals. A travel plan would be secured via a Section 106 agreement to detail how disabled visitors could request support to get to/from this site if required. Further details of the travel plan are set in the Transport and Highways section of this report.

- 363. Integrated seating has been accommodated within the facade, predominantly located near the entrance to the cultural space and facing the pocket park, allowing for opportunities to stop and rest. Further detail will be secured via condition.
- 364. Noting that public transport is not accessible to some users, suitable drop-off points are recommended in best practice guidance BS 8300. No specific drop-off points are identified however informal drop-off is anticipated along High Holborn and Southampton Buildings which would be within 50m of all entrances of the building. It is recommended that details of secure drop-off on firm and level ground are reserved by condition and secured through Section S278 works.
- 365. Two accessible parking space are proposed on site located within with the loading bay which would serve the office, cultural space and retail. The cultural and retail use would access the building from the parking spaces by either using the cycle entrance or exiting the building and moving around the building externally. Office users would be able to access the office core internal via two double swing doors and a single swing door, all doors on route should be automated to easy movement through the space. Further details of management and design of this entry point and Electric Vehicle Charging (EVCP) would be included within an IAMP and S106.
- 366. Continuing provision of the existing Blue Badge spaces in the area during construction is important provided it is safe for use and it is recommended that details are reserved of how this continuous provision will be secured through the Deconstruction and Construction Logistic Plan.

#### Entrances

- 367. London Plan D5 requires entrances to be easily identifiable and to allow independent use without separation. All entrances to the development would be step free, automated and with a minimum clear opening width of at least 1000mm. Further detail will be secured via condition to ensure the design of the

manifestation, thresholds, mat wells and floor finishes, and door furniture are designed to in line with inclusive-design best practice guidance.

368. Both the primary office entrance and cultural entrance are located on prominent corners of the building and are setback from the busy throughfare of Holborn. The entrance doors are circular sliding doors which can be used by a wide range of users. Providing entrances into the building which is easily identifiable and allows a wide range of users to use the entrances independently without additional effort, separation or special treatment.
369. Reception facilities should be consistent with AD M(2): 3.6 and BS 8300 8.6.2 Routes from the entrance/lobbies should be logical, clearly defined and unobstructed, with adequate and sufficient circulation space. Reception area desks should be positioned away from the entrance to minimise noise, with lowered counter sections, appropriate hearing enhancement systems and the surface of the reception area should be slip resistant. Details would be provided through IAMP.
370. An Inclusive Access Management Plan (IAMP) for visitors and building users on points of arrival and entrances would be required and would be secured by condition.

#### Cycle and End of Trip Facilities

371. The long and short stay cycle parking would be accommodated within the basement and is access via Southampton Buildings. The internal access to the cycle store is via cycle lift, two lifts are provided. All gates and doors along the route would be automated sized in accordance with Approved Document M and corridors would be sized accordingly to allow a minimal 1500mm clear width. The Access Advisor has advised that controls should meet best practice guidance as set out in BS 8300 (2) 8.2.3 to be accessible to a range of users.
372. Further short stay cycle facilities would be provided along High Holborn in close proximity to the Cultural entrance and retail unit. The entrance would comprise automated sliding doors with a clear width exceeding 1000mm.
373. It is noted that 5% of long stay cycle spaces should be suitable for larger cycles in order to meet London Plan 2021 Policy T5B and London Cycling Design Standards 8.2.1 guidance. These larger spaces have been distributed across the different cycle stores, each use class will have its own dedicated bike store. Full details of the cycle stand types and the setting out of the bike store, and

end of trip facilities are reserved for condition to ensure these are well-detailed and are useable promoting a safe, inclusive and welcoming environment.

374. Routes from the cycle stores to EoT facilities and into the primary accommodation would be logical and doors along routes would be automated or power assisted. Accessible EoT facilities would be provided centrally within the building close to all the cycle stores, providing, accessible showers, toilets and lockers, further detail would be secured by condition.

#### Public Realm and Amenity Terraces

375. Terraces and external spaces have the opportunity to create areas of calm and engagement with nature. They should allow easy and step-free access for a range of people. Paths should be slip-free and allow room for people using wheelchairs to pass and options for lone, or grouped seating, shelter and planting that is not highly scented and does not result in unwelcome touch. Seating should be at a range of heights and provide recesses in seating lines to allow wheelchair users or people with assistance animals to sit alongside companions, options for seating with backs and armrests for support when rising, as well as a wheelchair user to transfer.
376. The detailed design for pocket park and terraces should meet best practice guidance as set out in BS 8300-1:2018 to be accessible to a range of users. It is noted that the details of hard and soft landscaping will be secured by condition, and that details on how the planting specification would be inclusive is provided.
377. The terraces are accessed via single leaf swing doors which should have a minimum clear opening consistent with AD M 2, table 2 and diagram 9. Where a non-powered door is necessary the opening force should not be more than 30N from the closed position to 30 degree open and not more than 22.5N from 30-60 degrees of the opening cycle (AD M 2, 2.13). Further detail of terrace doors will be secured via IAMP.
378. Spend areas for assistance animals are not currently identified but will be reserved by condition. It recommended that details of all landscaping are reserved by condition including surface materials, planting, seating (with options to include seating with backs and arm rests for support).

#### Sanitary Facilities

379. It is confirmed that an accessible toilet will be provided within the ground floor office reception lobby prior to the security line and the typical office floor will cluster the toilet provision around the central core, providing both ambulant and accessible toilets.
380. The cultural space provides accessible and ambulant toilets at ground and basement level. Further detail will be secured via condition regarding the accommodation of baby changing facilities and a Changing Places facility.
381. The sanitary facilities for the retail will be provided by end user and are not covered by this application.
382. A mixture of left- and right-hand transfer options should be provided throughout the building to accommodate a wider range of users. Further detail will be secured via condition.

#### Signage and Wayfinding

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

#### Inclusive Procurement and Co-curation

384. As part of the Cultural Implementation Strategy secured in the S106 agreement, details of Inclusive Procurement should be set out, including but not limited to opportunities of co-creation / co-curation, partnerships with artists from underrepresented groups, as well as opportunities for volunteering, training and mentoring for underrepresented groups of people.

#### Access and Inclusivity Conclusion

385. The proposal has been designed to ensure that the site meets the highest standard of inclusive design in order for the proposed office use, cultural venue and retail offer to fulfil their goal of being an inclusive and welcoming place to work, play and visit high accessibility standards and inclusive environments and practices are essential. Great consideration has been given as to how to improve the landscaping within the new pocket park and the arrival experience

to the building in order to secure the optimal solution for the greatest range of building users. Subject to further design details and an Inclusive Access Management Plan, it is considered that the proposal accords with the access related policies outlined above.

386. Overall, and subject to the imposition of conditions, the proposal would accord with the access policies outlined above.

## Highways and Transportation

### Background

387. The existing site comprises of three buildings at 326-332 High Holborn and 319-325 High Holborn (Heron House), 26 Southampton Buildings (Holborn Gate), 44 Southampton Buildings, covering 35,212 sqm gross internal area (GIA) of mainly office use, as well as ground floor retails and 7 residential dwellings on the upper floors. On the basement level of the existing, a car park with 90 car parking spaces, known as the Holborn Gate Car Park, has access from Southampton Buildings.
388. The proposed development is for the demolition of existing buildings and reconstruction of a ground level and 9 upper storey building, containing commercial floorspace on the upper levels and commercial and cultural uses at ground and lower ground floor.
389. The existing and the proposed areas with land uses are shown on the Table 1.1 below:

Land Use	Existing	Proposed (GIA)	Proposed (GEA)
Office (Class E(g)(i))	29,218 sqm	52,656 sqm	55,166 sqm
Display/sale of goods other than hot food (E(a) and (b))	3,044sqm	1,197 sqm	622 retail food+ 622 retail non-food
Flexible cultural/ exhibition/ performance/	0 sqm	1,923 sqm	

learning/ community space			2,239 sqm
Affordable workspace	0 sqm	221 sqm	
Residential	573 sqm (7 units)	0 sqm (0 units)	0 sqm (0 units)
Car park	2377sqm	0 sqm	0 sqm
<b>Total</b>	<b>35,212 sqm</b>	<b>55,997 sqm</b>	<b>58,648 sqm</b>

Table 1.1 Proposed Land Uses showing GIA and GEA for existing and proposed

#### Highways Network and Site Accessibility

390. The development is bounded by High Holborn to the North, Staple Inn Buildings to the East and, Southampton Buildings to the West and South. The site is within the CoL and borders the London Borough of Camden to the North. A40 High Holborn facilitates east-west traffic movements along the north of the Site and changes its name to Holborn to the east of the site.
391. Public Transport Accessibility Level (PTAL) for this development is 6b, which is the highest PTAL level. This score was derived using TfL's WebCAT service.
392. Parking restrictions operate on the nearby streets from Monday to Friday, 7AM to 7PM, and Saturday, from 7AM to 11AM (except Christmas Day, Good Friday or Bank Holiday).

#### Site Access

393. The vehicle access is proposed from Southampton Buildings to serve the service yard, which facilitates the disabled parking and activities associated with deliveries/servicing /waste/recycling.
394. Changes to the vehicular access on which the CoL is the Highway Authority (HA), require separate approval. To enable this proposal the applicant must enter into the s278 with the HA and agree to cover full costs to implement the works required. The submission must be supported with the Road Safety Audit (RSA).
395. The proposed cycle access is from the Southampton Buildings for the long stay and High Holborn for the short stay.

396. Pedestrian access is proposed to be separate for each land use included. For office use, pedestrian accesses are at the corner of High Holborn, Staple Inn Buildings and two accesses on the Southampton Buildings. For the retail unit, fronting the High Holborn the pedestrian access is from there, whereas the retail unit at the southwest corner has two accesses proposed from the Southampton Buildings.
397. The cultural land use will have pedestrian access at the corner of High Holborn and Southampton Buildings.

#### Pedestrian Comfort Levels (PCL) and Pedestrian Trip Generation

398. The Pedestrian Comfort Level (PCL) assessment was included in the TA to determine the existing and proposed levels. The levels range from A to E to represent differing levels of suitability in terms of pedestrian movements and categorised as: comfortable, acceptable, at risk and unacceptable/uncomfortable. For office and retail development, PCL level C, is at risk whereas the level below that is unacceptable, requiring highways improvements and widening of the footways or crossings.
399. The existing PCL's levels for the 10 selected points in the vicinity are shown on the figure 10 below.



Figure 1: Selected sites for the PCL assessments

400. Pedestrian surveys were conducted on the February 2024 to record the flows and use this data to compile the existing PCL levels, with highest flows chosen to account for the worst-case scenario.

Assessment Site	Footway Clear Width (m)	AM peak	Lunch time peak	PM peak
1	6.1	A-	A-	A-
2	6	A-	A-	A-
3	4.4	B+	B+	A-
4	3.5	B+	B	B+
5	7.8	A	A-	A
6	2.7	A	A	A+
7	1.4	F	F	F
8	5.2	A+	A+	A+
9	1.8	A	A	A



Table. 1.2 Existing PCL's, site (1-9)

401. Site 7 scores an F regardless of the level of pedestrian flows because this section is lower than the minimum clear width required of 1.5m. The constrained at this location is because of the existing gate which is outside of the Applicant's control, therefore this is considered acceptable.
402. Site 10 includes PCL's for the pedestrian crossing with levels presented below.

Assessment site	Pedestrian crossing clear width	Available space to queue			Queues on the crossing		
		AM peak	Lunch time peak	PM peak	AM peak	Lunch time peak	PM peak
Site 10 (Ped crossing)	2.4 m	A	A-	A	A	A	A

Table. 1.3 Existing PCL's at site 10, pedestrian crossing

403. Taking into the account all trips generated as the result of this proposal and adding committed schemes nearby at 1 Little New St and Kingsway Tunnels, the proposed trips and the PCL levels are derived and are shown on the Table 1.3. Further information on the proposed trip generation by travel modes, including trip distribution and reasoning on the assumptions can be found on the TA.
404. The proposed development trips have been assigned based on public transport availability and have been proportionately distributed based on the probability of such movements taking place.
405. PCL scores for streets of this type (for Office and Retail streets) are classified as follows: for level A to B is Comfortable; level B- to C+ is Acceptable.
406. All PCL levels are higher than level B-, with the exception of the Site 7 which had level F at the existing scenario and cannot be improved. The proposed PCLs show that there are minor differences from existing to the future scenario, that is, cases with and without this development.

Assessment Site	Footway Clear Width (m)	AM peak	Lunch time peak	PM peak
1	3.7	B+	B	A-
2	2.7	B-	C+	A-
3	2.8	B	C+	B+
4	2.9	B	B-	B
5	4.4	B+	B	A-
6	2.7	A	A	A+
7	1.4	F	F	F
8	4.5	A+	A+	A+
9	3.1	A+	A	A
10	2.4 crossing and island width	A	B+	A

Table. 1.3 Proposed PCL's, site (1-10)

#### Car parking

407. The existing development site has 90 off-street parking spaces, out of which 2 are accessible car parking spaces.
408. Policy T6 of the London Plan, sets out car parking standards and strategic direction to facilitate new developments with the appropriate levels of parking. The disabled persons parking for Blue Badge holders must be provided in accordance with, Policy T6.5 for Non-residential elements of the development. The policy indicates the levels of provisions to be in accordance with the Table 10.6, to ensure that all non-residential parts of a development provide access to at least one, on or off-street, disabled parking bay.
409. A car-free development has no standard parking but must provide parking for the disabled people.
410. This proposal is car free development with 2 disabled car parking spaces on the ground level, within the service yard and accessed through the Southampton buildings.
411. The spaces have an additional 1.2 m strip on both sides to ensure that the disabled drivers can get in and out of the car easily. To comply with policy both spaces must have passive Electric Vehicle Charging Point (EVCP). There are

no details submitted at this stage, nevertheless a s106 obligation will ensure that this is included.

- 412. The general arrangement, ground floor plan, shows the position of the two disabled car parking spaces. It is not clear if there are gradients at any section or the whole area is at the same level. The applicant is required to submit further details for this area.
- 413. Two on-street car parking spaces are proposed to be removed and allocated nearby to allow for creating the vehicular access for service yard, shown on the drawing ref: 294009-ARP-ATR-103 rev A. The width of the proposed crossover is considered wider than necessary. Nevertheless, details of such matters are part of the s278 agreement and require HA approval and require the feasibility study and are subject to change. In the event that parking spaces cannot be reallocated as proposed, the applicant is required to contribute annually for the suspension of the two parking bays and contribute towards the study to find a permanent and suitable location and costs associated with relocating of the parking bays nearby elsewhere.
- 414. On the public highway nearby there are few disabled parking bays located on the Southampton Buildings and Furnival Street. The demand and occupancy levels for the spaces mentioned were not surveyed.
- 415. It is very likely that parking demand on public streets will increase as a result of this development. A proposal with two disabled parking spaces for a mixed-use development, fulfils the policy requirement for the disabled parking, and on-street parking may not be suitable for some staff/or visitors of this development, due to restrictions on the use of the Blue/Red badge permits.
- 416. Having accepted that the demand for disabled car parking coming from this development is not known until full occupation and it can vary considerably during days/months/years following the occupation, in order to bring this proposal fully in line with the adopted policies a Travel Plan (TP) is required and recommended to be secured through the s106 agreement.
- 417. The foundation of the TP is to support disabled people (staff and visitors) of this development through different measures, in order to make to make this development inclusive. Each disabled staff to have a tailored travel plan when they join any occupiers of this development, followed by supporting them on how to get to/from work with different initiatives.

418. Similarly, disabled visitors of this development could request support to get to/and from this site, if the public transport is lacking to meet their needs. Not all nearby underground stations have step-free access, which means that some users of this development may require additional support. Measures such as arranging a pick-up from a nearby underground station with step free access, or pre-arranged locations must be considered and could form part of the travel plan measures to support the disabled people.
419. The applicant is required to keep records and manage the demand for the disabled car parking spaces. In addition, details on facilitating alternatives to car parking for disabled users (staff and visitors) for all land uses included in this development, will form part of the TP. The action plan with initiatives is to be submitted for review to the LPA annually.
420. Further details would be secured under the S.106 to include management and the criteria for use of the Accessible Car Parking Spaces and shall include the following:
- The two blue badge car parking spaces to be available at all times to occupiers and visitors of this proposal.
  - Responsibility for allocation of the car parking space, enforcement of parking contraventions- details are required.
  - Criteria for applying to use the disabled car parking space(s), details on how the decision is made if more than two users are requiring the parking space for the same slot.
  - Using the blue badge car parking space must be free of charge, in perpetuity, for employees of the building and other users of this building.
  - Passive Electric Vehicle Charging (EVC) point to be included with the plan to make it active.
  - Keep records of the car parking demand and occupancy levels. Upon request, the applicant is required to submit records to the LPA.

#### Cycle parking

421. Policy DM 16.3 of the Local Plan, requires applicants to provide on-site cycle parking spaces in accordance with the London Plan standards and exceed the standards when feasible.

422. The London Plan, Policy T5 Cycling, indicates that development proposals should remove barriers to cycling and create a healthy environment in which people choose to cycle, through:
- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure.
  - securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards.
423. The level of cycle provision is dependent on the location of the proposed development.
424. The City of London (CoL) is within the area where higher minimum cycle parking standards apply. This proposal includes a total of 816 cycle parking spaces, 745 (long stay) and 71 (short stay). Policy T5 of the London Plan includes cycle parking standards for different land uses.
425. The table 1.4 below, shows the standard requirements in compliance with the London Plan and the provision

Use Class	Floor Area sqm (GEA)	Long Stay	Short Stay
Former B1 business offices	55,166	1 space per 75 sqm (GEA) <b>736</b>	First 5k sqm=1 spaces per 500sqm; thereafter 1 space per 5k sqm (GEA) <b>21</b>
Former A1 food retail above 100sqm	622	1 space per 175 sqm gross external area (GEA) <b>4</b>	first 750 sqm: 1 space per 20 sqm; thereafter: 1 space per 150 sqm (GEA) <b>32</b>
Former A1 non- food retail above 100sqm	622	first 1000 sqm: 1 space per 250 sqm thereafter: 1 space per 1000 sqm (GEA) <b>3</b>	first 1000 sqm: 1 space per 60 sqm; thereafter: 1 space per 500 sqm (GEA) <b>11</b>
Former D2, other affordable workspace	2,239	1 space per 8 FTE staff <b>2</b>	1 per 30 seats

			<b>7</b>
<b>Total</b>	<b>58,648 sqm</b>	<b>745</b>	<b>71</b>

Table 1.4 The proposed cycle parking

426. The location of the long stay cycle parking for office use is proposed to be split between basement level 1 and basement level 2, and accessed through the lift. The TA contains drawings showing the areas dedicated for the long stay cycle parking for office and retail use at basement level 1, and for the culture use located on the basement level 2.
427. The end-of-trip facilities, such as, showers, lockers and changing facilities, are provided on the basement levels for the respective land uses.
428. The location of the short stay cycle spaces are as follows: 46 short-stay cycle parking spaces will be provided within the building at ground level, accessed via High Holborn, further 20 short-stay cycle parking spaces for the office use are provided at Basement level one, and 5 will be provided in the landscape surrounding the building. In addition, existing Sheffield stands currently provided on Staple Inn Buildings are proposed to be rearranged and if feasible, further stands to be provided.
429. Entrances and lifts used by cyclists must be large enough to ensure that cyclists can be fully accommodated.
430. Further details are required to understand the journey of the cyclists form entering this development to the areas dedicated for the cycle parking. There was limited information on the how visitors will be able to access the spaces provided and how the developer is proposing to encourage that they come using cycling as a mode of transport. Nevertheless, such details to be covered and part of the Travel Plan- Cycle Promotion Plan.
431. It is also recommended that some of the cycle parking spaces to be made larger for the cargo bikes, facilitating the deliveries/servicing.
432. The proposed cycle parking by type is: 76 Sheffield stands (10%); 558 two tier racks (75%); 74 folding locker type (10%) and oversized 37 (5%).
433. Further details to be provided and secured by a Condition on the location of each cycle parking space. The cycle parking type with its dimensions, must be

in compliance with the London Cycling Design Standards, with all spaces provided prior to occupation and kept thereafter.

434. In addition, this proposal includes cycle facilities that is 498 lockers, and 77 showers located at the basement level 1 and 2.
435. Provision of the lockers represents 2 per 3 long stay cycle parking spaces, in compliance with the London Plan, whereas 77 showers are slightly higher than 10%.
436. The second principle of the TP is promoting cycle parking and its facilities. The TP to contain initiatives in form of the action plan with SMART targets. The targets for the cycle parking to be agreed with the CoL and are expected to be achieved within the 5 years. The applicant is required to submit the annual report for review, as part of the TP secured via S.106.
437. In addition to the above, TfL will be looking into improvements to cycle hire in the vicinity of the site. This will involve enhancing existing locations nearby and exploring the installation of new cycle hubs, supported by a Section 106 contribution.

#### Trip Generation for Deliveries and Servicing

438. The CoL Transport Strategy and the emerging City Plan 2040, Strategic Policy S9, Transport and Servicing, section 4, states that 'The City's, transport infrastructure will be maintained and improved, by minimising road danger, congestion, and reducing vehicle emissions by:
439. Designing and managing streets in accordance with the City of London Street hierarchy;
- Minimising the impact of freight and servicing trips through such measures as the provision of on-site servicing facilities, the timing of deliveries outside peak hours, the adoption of area-wide solutions, freight consolidation and promoting deliveries by foot or bicycle;
  - Facilitating essential traffic, including emergency service vehicles, buses, freight and private transport for people with particular access needs, whilst minimising the environmental impact of these modes;
  - Requiring the provision of infrastructure for alternative-fuel vehicles and zero emissions vehicles, such as off-street vehicle charging points.

440. In addition, part of this Policy, states that developers must demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, promoting best practice such as direct vision standards, and zero vision policies to minimise danger of travel and servicing, including through the use of river transport. This is in line with adopted policies of the Local Plan 2015, Strategic Policy CS16.
441. Delivery and servicing are proposed to be undertaken off the public highway at a dedicated area within the development, accessed via Southampton Buildings. The area accommodates three loading bays, two of which are for vehicles up to 8m in size, and the other can fit a vehicle up to 6m.
442. Refuse/recycling is stored in the waste room located within the basement. This application was supported with supplementary document within the TA, part 4 of 4, detailing the strategy for the Delivery, Servicing and Waste Management Plan. Swept path drawings for three types of vehicles show that vehicles of the proposed size can manoeuvre in and out of the spaces reserved for such activities. Although the swept paths for vehicles used by the CoL refuse collections are shown, this does not mean an acceptance to do collections from the enclosed space.
443. Two of the existing parking spaces on–street will have to be removed to create the access to the service yard. Subject to feasibility the removed parking bays will be relocated elsewhere. The applicant is required enter into the s278 for such works and fully fund the changes required.
444. In line with recent applications approved by the CoL, trips generated for servicing/deliveries activities are based on the assumption that 0.22 deliveries are required per 100sqm for Class E (office use), whereas for retail use the rate is calculated at 1.35 per 100sqm.
445. When this methodology is applied to this proposal with [52,656 sqm GIA] of office space, it is estimated to generate 116 trips per day, whereas for [1,196 sqm GIA] retail/commercial use, trips estimated are 16 per day, making a total of 132 trips per day, thus covering the main land uses of this proposed development.



446. If 50% of consolidation is applied the number of trips becomes 66 trips per day, covering all activities associated with delivery and servicing. Taking into account that for each delivery two trips are required, one IN and one OUT movement, the expected number of deliveries and servicing (includes refuse recycling), is 33 within the 24h period.
447. The table below shows the modal split, 2-way trips required (office and retail) covering both scenarios: with and without consolidation.

<b>Mode</b>	<b>% Modal split (office)</b>	<b>Trips No consolidation</b>	<b>Trips With 50% consolidation</b>	<b>% Modal split (retail)</b>	<b>Trips No consolidation</b>	<b>Trips With consolidation</b>	<b>Deliveries Total development*</b>
Motorcycle /scooter	4	5	4	0	0	0	2
Car	34	40	20	25	4	2	11
LGV	53	61	30	25	4	2	16
Rigid 3 axle (HGV)	9	10	4	50	8	4	4
Rigid 4 axle (HGV)	0	0	0	0	0	0	0
<b>Total</b>	100	<b>116</b>	<b>58</b>	100	16	<b>8</b>	<b>33</b>

\*some numbers in the column adjusted to even numbers, representing the 2 way trips.

Table 1.5: Total trips on deliveries/servicing with refuse and recycling

448. The TA notes that forecast is 35 vehicles per day, which is acceptable, acknowledging that the proposed development has the culture use as well, which is not accounted for on the table 1.5

449. In conclusion, a total of 35 deliveries per day is required to facilitate this development, and this is acceptable and aligns with other recent CoL's planning approvals.
450. Nevertheless, this level of acceptance is subject to the criteria that trips are reduced by 50% using the consolidation centres and that number of deliveries/servicing trips is capped with its proposed mix as shown on table 1.5.
451. In addition, a booking system is required that manages and allocates delivery/servicing slots for all land uses of this development, criteria which is secured via S.106. The reason is to ensure that safety is maintained on the public highway at the peak times and no queuing is present in and around the vicinity. Delivery and servicing vehicle trips are allowed outside of peak hours of 07:00 – 10:00; 12:00 – 14:00; and 16:00 – 19:00. In addition, further night time restrictions apply if the development is near residential properties.
452. The booking system must keep records of all trips generated following the occupation and data kept thereafter. The records to be presented to the CoL upon request to ensure compliance.
453. To ensure no conflicts with delivery/ servicing activities and to comply with the criteria on the hours of use, it is recommended that collection of refuse/recycling is part of the same system that manages the slots for the delivery and servicing. Allocated slots for refuse/recycling can then be reviewed periodically to suit different parts of this proposal but must be done with prior agreement to all parties occupying this development. This ensures that loading/parking area is managed within the allocated times, and it facilitates different requirements.
454. A Delivery and Servicing Management Plan (DSMP) is to be secured through the s106 agreement.

#### Demolition/Construction Logistics Plan (CLP)

455. The London Plan, Policy T7 on deliveries, servicing and construction, indicates that developments must address their impacts during the construction phase and following the occupation after the site is operational.
456. Policy D16.1 of the Local Plan supporting paragraph 3.16.11 and the emerging City Plan 2040 Policy VT1 state that Construction Logistics Plans (CLP) will be required for all major developments, or refurbishments and for any

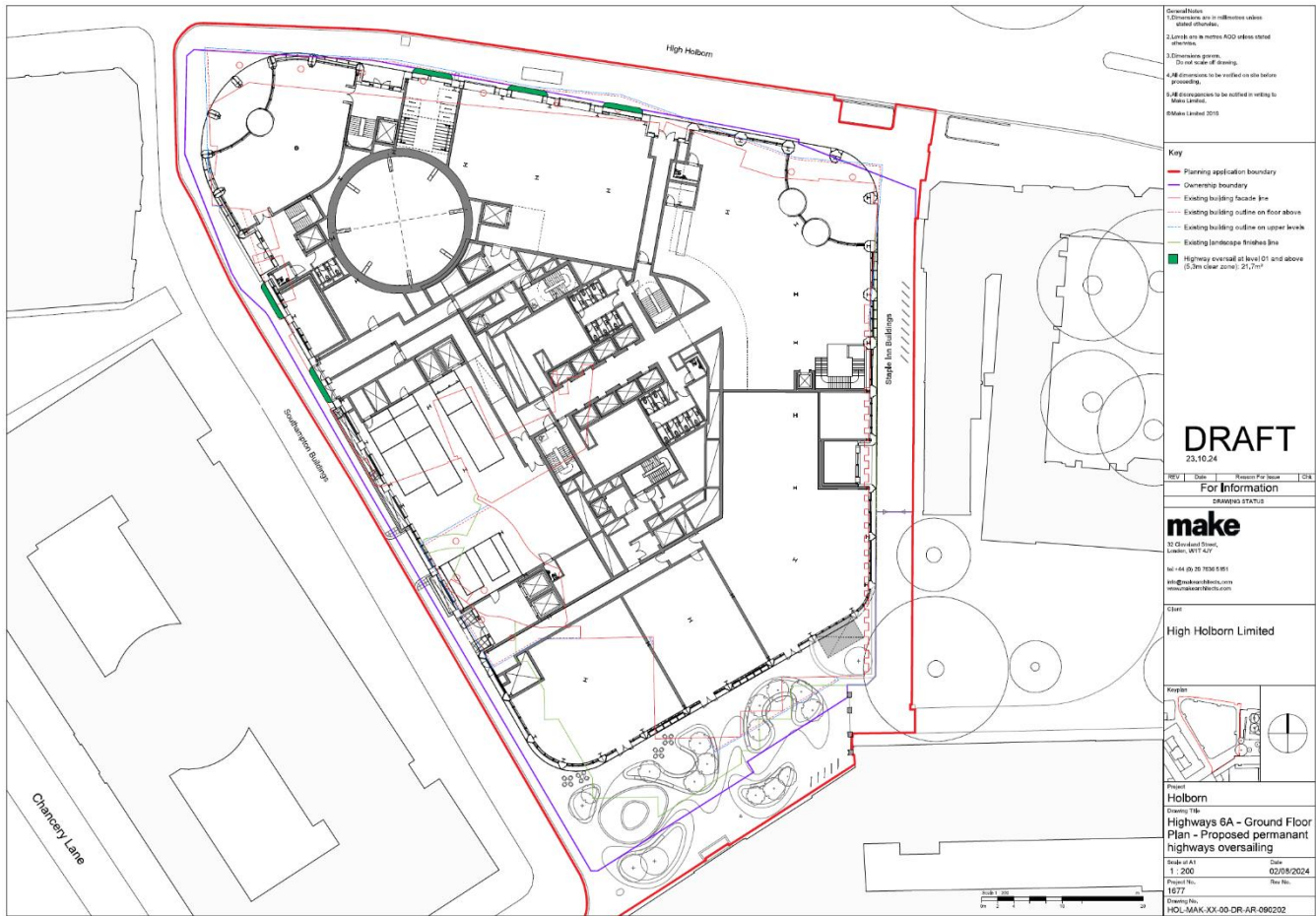
developments that would have a significant impact on the transport network during construction.

- 457. Although an outline document was submitted, CLP- detailed plan to be developed in accordance with TfL guidance and the latest standards once a Principal Contractor has been appointed.
- 458. The submitted document to comply with measures set out in the City Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines. The detailed plan to show how construction vehicles will be managed during the demolition and construction phase, and in line with the principles of three Rs, that is, Reduce, Re-time and Re-mode. Deliveries and other activities generating vehicle trips that are related to the demolition and construction phase are required to be done outside peak hours: 7:00 – 10:00, 12:00 – 14:00 and 16:00 – 19:00.
- 459. The detailed CLP to be submitted to approved by CoL prior to the start of the demolition/ construction of this proposal. Restrictions would apply on timings associated with vehicle trips during the demolition/ construction phase.

#### Oversailing/Undersailing

- 460. Structures that permanently oversail the public highway must be licensed by the local highway authority, typically in accordance with Section 177 of the Highways Act 1980.
- 461. The proposed development will oversail the street-level public footway in some locations around the building. Drawing number HOL-MAK-XX-00-DR-AR-090202 Rev - 'Highways 6A – Groundfloor plan – Proposed Permanent highways oversailing', has been prepared to illustrate the proposed oversailing. The attached plan can be found attached to the TA document where it shows, in green, the sections of the building that will oversail at level 01.
- 462. The proposed oversail of the public highway is to be greater than 1m from the edge of the carriageway and have a minimum vertical clearance of 5.3m. It is advised that the vertical clearance for any projection over the public highway be 5.7m. Any oversail below this requirement will require a Departure from Standard (DfS) when applying for the required Approval in Principle (AiP) from the Highway Authority.

463. Should planning permission be granted, an Approval In Principle (AIP) would be required. The AIP is a construction compliance certificate for all highway structures, such as bridges and canopies. This will need to be set as a condition, provided the proposed oversailing is considered acceptable in principle.
464. Structures that permanently undersail below the public highway must be licensed by the local highway authority, typically in accordance with Section 179 of the Highways Act 1980. The proposed development does not propose to undersail the public highway.



Highway Boundary - Stopping Up and Adoption

465. As the highway authority, the City of London has the power to stop up areas designated as highway land by making orders known as 'stopping up' orders.

The term 'stopping up' means that once such an order is made, the highway land ceases to be a maintainable highway at public expense and is extinguished in law. The land can then be enclosed or developed, subject to any necessary planning consent.

- 466. Section 247 of the Town & Country Planning Act 1990 empowers the City of London to make an order authorising the stopping up or diversion of a highway if it is satisfied that it is necessary to do so to enable development to be carried out. That process would be carried out under separate procedures from the considerations of the applications currently before you.
- 467. Areas of privately owned land can alternatively be 'offered up' for adoption as public highway, for instance, for the creation of a new 'estate road' to be adopted and maintained by the local authority.
- 468. As a result of the proposals, sections of the highways within Southampton Buildings, Staple Inn Buildings and High Holborn will need to be stopped up. Private areas within Southampton Buildings, Staple Inn Buildings and High Holborn are to be adopted, under a Section 38 Agreement of the Highway Act 1980. The area to be stopped up is 112.6m<sup>2</sup> and to be adopted 114.6m<sup>2</sup>.
- 469. A draft stopping-up/adoption plan, drawing number: HOL-MAK-XX-00-DR-AR-090199 Rev – 'Highways 3A – Ground floor Plan – Proposed Stopping Up', and drawing number HOL-MAK-XX-00-DR-AR-090200 Rev – 'Highways 4A- Ground Floor Plan – Proposed Dedication', respectively has been produced by the applicant illustrating the proposed changes. It is noted that this plan is preliminary and will be subject to further refinement to address maintenance and public liabilities. The process to formalise stopping-up orders can only be made at the appropriate point; notwithstanding, the plans are considered acceptable in principle at this stage.

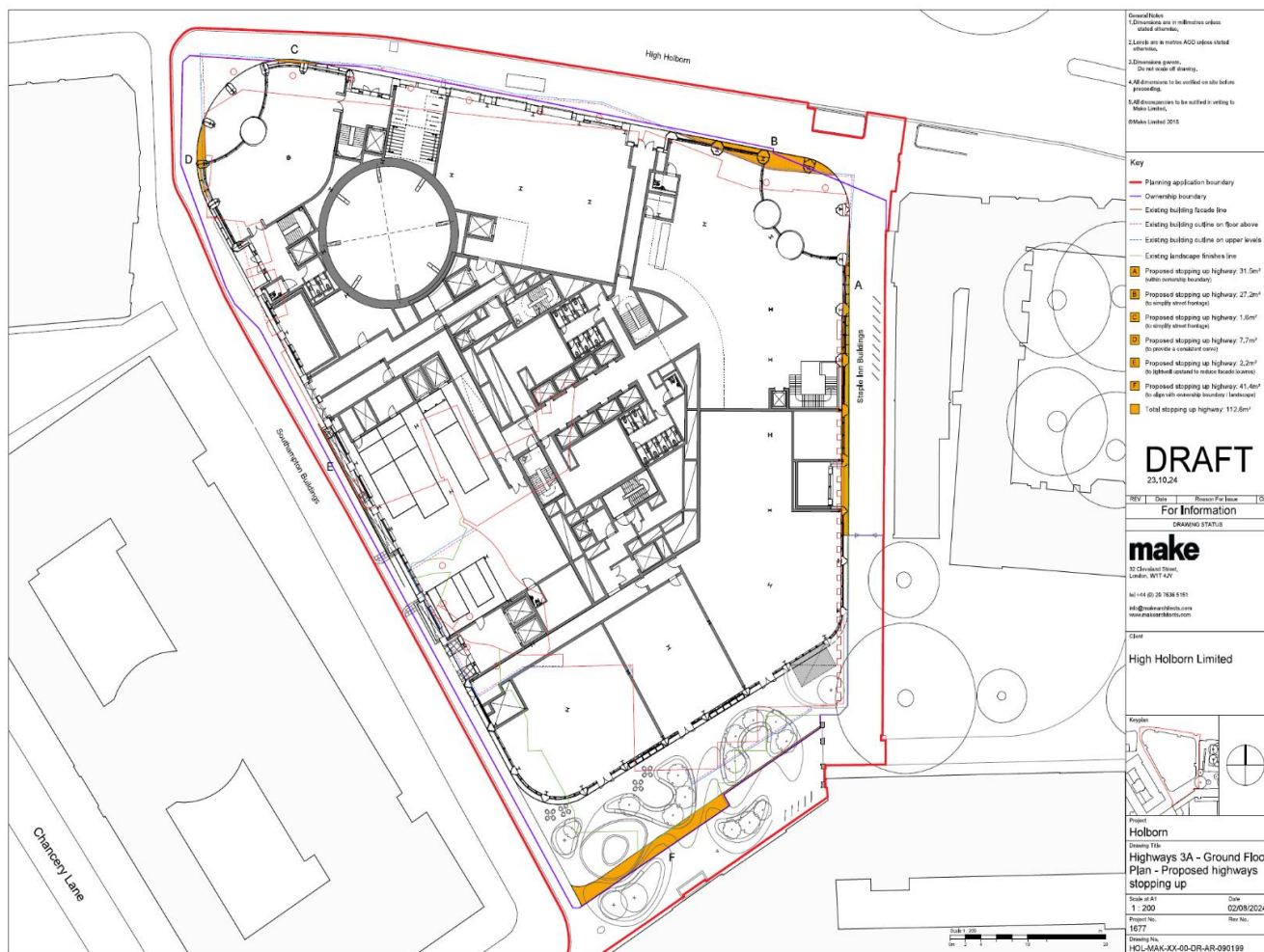


Fig. 1.3 Proposed Stopping up plan

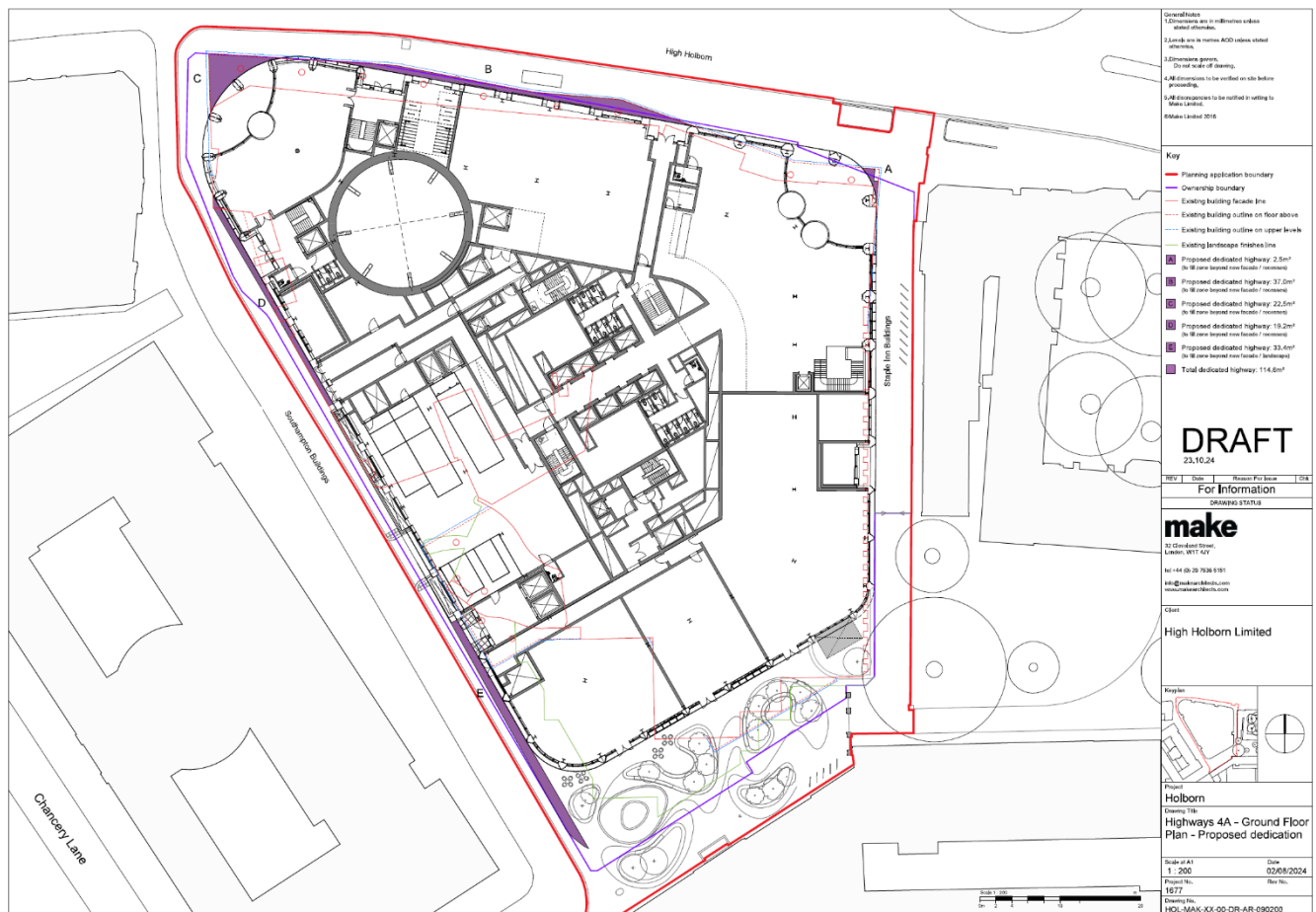


Fig. 1.4 Proposed Dedication Plan

## Section 278/38 – Highways Works

470. As part of these proposals, plans to enhance the public areas and the highways within the vicinity of the site are included. It is acknowledged that this site location has high pedestrian flows, which can currently be accommodated within the existing highways network.
471. The necessary highway works to mitigate the impact of the development and improve the pedestrian experience (including post-construction) will be carried out as part of a Section 278/38 Agreement of the Highways Act 1980, in alignment with the City's requirements and aspirations for the area.
472. In line with the consented scheme, public realm improvements south of the site are proposed. The Transport Assessment contains a drawing (Ref: 294009-

ARP-ATR-013-A Rev B) showing shaded in blue the proposed works within the adjacent highways of the planning application site are (and not limited to):

Southampton Buildings

- Creation of a new vehicle crossover.
- Removal of redundant vehicle crossovers and reinstatement of footway.

473. Repaving of the adjacent footways to the application site, as per the City's approved pallet of materials and design guidelines.
- Provision of road markings and associated traffic orders associated with the relocation of the car parking spaces.

474. Resurfacing of the carriageways.

475. Removal of redundant street furniture.

Southampton Buildings Pocket Park

- Introduction of hard and soft landscaping including public seating subject to design and feasibility study.
- Introduction of greenery subject to feasibility study.

476. Repaving of footways adjacent to the application site, as per the City's approved pallet of materials and design guidelines.

477. Improvement to drainage works.

Staple Inn Buildings

- Repaving of footways adjacent to the application site, as per the City's approved pallet of materials and design guidelines.
- Improvement to footway drainage works, as required.

High Holborn

478. Resurfacing of the carriageways and provision of road markings adjacent to the planning application site.

479. Repaving of footways adjacent to the application site, as per the City's approved pallet of materials and design guidelines.



- Improvements to highways drainage, if required.

480. Removal of redundant street furniture.

#### Recommendation

481. The scheme benefits from high levels of public transport accessibility, would be car-free and it promotes cycling and walking as sustainable modes of transport.

482. The proposal is considered acceptable, subject to the recommended planning conditions and S106 obligations.

483. Should the planning permission be granted, the following conditions along with the proposed Section 278 works and Section 38 Agreement, would need to be secured:

- A planning condition requiring the provision of 816 cycle parking spaces for the entire development designed to London Cycle Design Standards and the ongoing retention of these facilities, details of which will need to be submitted and approved by the LPA.
- A planning condition to secure the detailed Deconstruction and Construction Logistics Plan (DCLP). The condition shall state that the detailed DCLP shall be required to be approved prior to any works starting on site. Highways licences should not be sought until the DCLP has been approved by the planning authority.
- A S106 obligation to secure a Delivery and Servicing Management Plan (DSMP) including details as referenced within this report (but not limited to). The clause shall state that the DSMP shall be approved prior to the first occupation of the site and the approved plan shall be adhered to.
- A S106 obligation to secure an Accessible Car Park Management Plan (ACPMP) including details of how the accessible parking spaces will be managed to accommodate the users and their requirements.
- A S106 obligation to secure a Travel Plan (TP) for the development. The obligation shall state that the TP shall be approved prior to the first occupation of the site and the approved travel plan shall be followed for 5 years, unless otherwise agreed with the Highway Authority.

484. Subject to the conditions and planning obligations set out above, the proposal would accord with transportation policies including London Plan policies, Policy

T1 Strategic Approach to Transport, Policy T2 Healthy Streets, Policy T4 Assessing and Mitigating Transport Impacts, T5 Cycle Parking, T6 Car Parking, T7 Deliveries, Servicing and Construction.

485. It accords with the Local Plan 2015 Policy DM 16.1, 16.2, 16.3, 16.4, and 16.5, as well as DM3.2. It also accords with the draft City Plan 2040 Policies AT1, AT2, AT3, VT1, VT2 and VT3. As such, the proposals are considered acceptable in transport terms.

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

486. Local Plan policy DM10.1 requires the design of development, and materials used to ensure that unacceptable wind impacts at street level and in the public realm are avoided, and to avoid intrusive solar glare effects and to minimise light pollution. Policy DM10.7 is to resist development which will noticeably reduce daylight and sunlight to nearby dwellings and open spaces. Draft City Plan 2040 Strategic Policy S8 and Policy DE2 requires development to optimise microclimatic conditions addressing solar glare, daylight and sunlight, wind conditions and thermal comfort.

### **Wind Microclimate**

487. In accordance with the City of London requirements, a Computational Fluid Dynamics (CFD) analysis has been undertaken to predict the local wind environment associated with the completed development and the resulting pedestrian comfort within and immediately surrounding the site. No wind tunnel testing has been carried out, but this is line with the City of London's Advice Note, Wind Microclimatic Guidelines for Developments in the City of London, given that the height of the building from street level will not exceed 25 metres in height.
488. Wind conditions are compared with the intended pedestrian use of the various locations, including carriageways, footways, buildings entrances, bus stops, ground and terrace level amenity spaces. The assessment uses the wind comfort criteria, referred to as the City Lawson Criteria in the Planning Advice Note, Wind Microclimate Guidelines for Developments in the City of London,

being five Comfort Categories defining conditions suitable for: frequent sitting, occasional sitting, standing, walking and uncomfortable.

489. Microclimate conditions were established using a high resolution CFD model, extending 400m radius from the Site.
490. The assessment was graded against the Lawson Comfort and Safety Criteria, as shown in the below tables. Comfort categories are based on the level of wind speed exceedance for 5% of each season, and safety categories are based on the level of wind speed exceedance for 1.9 hours per year.

Table 01: Lawson Comfort Criteria (City of London variant)

KEY	COMFORT CATEGORY	MEAN WIND SPEED (5% EXCEEDANCE)	DESCRIPTION
	Frequent Sitting	2.5 m/s	Acceptable for frequent outdoor sitting use, e.g. restaurant, café.
	Occasional Sitting	4 m/s	Acceptable for occasional outdoor seating, e.g. general public outdoor spaces, balconies/terraces intended for occasional use, etc.
	Standing	6 m/s	Acceptable for entrances, bus stops, covered walkways or passageways beneath buildings.
	Walking	8 m/s	Acceptable for external pavements, walkways.
	Uncomfortable	>8 m/s	Not comfortable for regular pedestrian access

Table 02: Lawson Safety Criteria (City of London variant)

KEY	SAFETY CATEGORY	MEAN WIND SPEED (0.022% EXCEEDANCE)	DESCRIPTION
	No Safety Exceedance	<15 m/s	
	Strong Winds	>15 m/s	Unsafe for frail individuals, or cyclists

491. For a mixed-use urban area within which the application site is located, the desired wind microclimate would typically need to have areas acceptable for sitting, standing and walking use. For the purposes of the assessment comfort conditions are reported for the windiest season to capture and worst case scenario.
492. For amenity spaces, although conditions were originally reported for the summer season only, following officers request, the conditions during the windiest season have been submitted. The results show that in all configurations tested, the wind microclimate in the windiest season at the terraces and balconies would be approximately one category windier than the summer season conditions. There would be no exceedances or the safety criteria of regions of uncomfortable conditions. The impact of the proposed development relative to the baseline is to make off-site terrace conditions either consistent with, or slightly calmer than, the baseline condition.
493. For the purposes of the tests, the following configurations have been tested:
- Configuration 1: The existing Site with existing surrounding buildings (The Baseline)
  - Configuration 2: The Proposed Development with existing surrounding buildings; and
  - Configuration 3: The Proposed Development with cumulative schemes (schemes for which planning permission has been granted); and
  - Configuration 4: The Proposed Development with proposed landscaping and existing surrounding buildings.
494. The following schemes are considered sufficiently advanced and have been considered in the baseline scenario:
- Thavies Inn House (21/00885/FULMAJ)
  - 100 And 108 Fetter Lane (21/00534/FULMAJ)
  - 100 Grays Inn Road (London Borough of Camden, 2022/4259/P)
495. For the cumulative schemes' configuration, the following schemes have been considered:
- 40 Holborn Viaduct (23/00867/FULMAJ)

- 294 - 295 High Holborn (London Borough of Camden, 2017/1827/P)

### **Configuration 1: Baseline**

#### *Throughfares and crossings*

496. All thoroughfares and pedestrian crossings are suitable for occasional sitting and standing than walking during the windiest season, which is the target condition.

#### *Entrances*

497. Conditions for all principal off-site entrances are suitable for either frequent sitting, occasional sitting or standing in the windiest season, which satisfies the target condition.

#### *Bus Stops*

498. The bus stops within the study area are suitable for frequent sitting or occasional sitting during the windiest season. This is one to two categories calmer than the target condition.

#### *Amenity spaces (Spill out seating)*

499. The spill out seating outside 6-7 Holborn is suitable for occasional sitting in summer. This is one category windier than the target condition. 335 High Holborn and 311-318 High Holborn are suitable for frequent sitting in summer, which satisfies the target condition.

#### *Amenity Spaces (Mixed Amenity)*

500. North Gardens is suitable for a mix of occasional sitting and standing in summer. Staple Inn Garden and courtyard, the square to the north of Chancery House and the square between Chancery Lane and Stone Buildings are

suitable for a mix of frequent sitting and occasional sitting in summer. The above satisfy the target condition.

- 501. Waterhouse Square Courtyards and the Chancery House Courtyards are suitable for frequent sitting in summer. This is a category calmer than the target condition.
- 502. During the windiest season there would be no exceedances of the safety criteria or regions of uncomfortable conditions in any of the ground amenity spaces.

#### *Roof level amenity*

- 503. The roof terrace at Westgate House is suitable for a mix of frequent sitting and occasional sitting in summer. The roof terrace at 150 Holborn and roof terrace at 4-13 High Holborn are suitable for a mix of occasional sitting and standing in summer. The above satisfy the target condition.
- 504. During the windiest season there would be no exceedances of the safety criteria or regions of uncomfortable conditions.

#### *Strong Winds*

- 505. No instances of strong winds have been identified as part of the assessment around the site.

### **Configuration 2: Proposed Development with Existing Surrounds**

- 506. Overall, the comfort levels would be similar to the baseline conditions, except for the site on High Holborn and Grays Inn Road where the levels of windiness would increase and to the east of the site around Staple Inn and Waterhouse Gardens where they would be reduced.

#### *Thoroughfares and crossings*

507. All thoroughfares and pedestrian crossings are suitable for calmer wind categories than walking during the windiest season. This satisfies the target condition in all cases.
508. There are various localised differences in conditions due to the inclusion of the proposed development. These are set out below:
- Thoroughfare conditions are windier than the baseline along Southampton Buildings to the west of the site and on High Holborn immediately north of the site. Conditions have changes from frequent sitting in the baseline to mainly suitable for standing when the proposed development is included. These conditions are still one category calmer than the target.
  - There is one highly localised region of walking by the north west corner of the site. This is still suitable for thoroughfare use.
  - Conditions are made calmer to the north east of the site on Waterhouse Square with conditions becoming suitable to occasional sitting.

### *Entrances*

509. Conditions for the principal entrances to the proposed development are suitable for frequent sitting or occasional sitting in the windiest season. This is one to two categories calmer than the target condition.
510. Off Site entrances surrounding the proposed development are suitable for either frequent sitting, occasional sitting or standing in the windiest season. This ranges between one category windier than the baseline (the shopfronts on the north of High Holborn immediately opposite the site and to 25 Southampton Buildings to the south of the site) or one category calmer (at the south west of Waterhouse Square and to the Waterhouse Square Courtyard). These conditions are still suitable for their intended use.

### *Bus stops*

511. The bus stops within the study area are suitable for occasional sitting during the windiest season. This is up to one category windier than the baseline condition but is a category calmer than the target condition.

#### *Amenity spaces (Spill out seating)*

- 512. On site, the proposed cafe spill out seating within the proposed pocket park is suitable for frequent sitting in summer. This satisfies the target condition.
- 513. Off site, the spill out seating outside 6-7 Holborn is suitable for occasional sitting in summer. This is one category windier than the target condition, but is consistent with the baseline conditions.
- 514. 335 High Holborn and 311-318 High Holborn are suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the baseline conditions.

#### *Amenity Spaces (Mixed Amenity)*

- 515. On site, the proposed pocket park to the south of the application site would be suitable for occasional sitting in summer. This is suitable for the intended use.
- 516. Off site, North Gardens is suitable for a mix of occasional sitting and standing in summer. This satisfies the target condition and is consistent with the baseline conditions.
- 517. Staple Inn Garden, the square to the north of Chancery House and the square between Chancery Lane and Stone Buildings are suitable for a mix of frequent and occasional sitting and occasional sitting in summer. This satisfies the target condition and is up to one category calmer than the baseline conditions.
- 518. Waterhouse Square Courtyards and Chancery House Courtyards are suitable for frequent sitting in summer. This satisfies the target condition and is consistent with the baseline conditions.
- 519. It is noted that the inclusion of the proposed development would not result in exceedances of the safety criteria or regions of uncomfortable conditions in any of the ground amenity spaces during the windiest season.

#### *Roof level amenity*



520. On site, Conditions for the proposed level 7 terrace are suitable for standing in summer, with highly localised regions suitable for walking or occasional sitting. Conditions for the proposed level 8 terrace are suitable for occasional sitting in summer across the south west elevation, with a region around the north west corner which is suitable for standing and walking. This is up to a category windier than the target condition and therefore, some mitigation would be required. The impact of the proposed landscaping is assessed in the in the 'Configurations 4' section below.
521. Conditions for the proposed level 9 terraces at suitable for a mix of frequent sitting and occasional sitting on the northern elevation, and a mix of occasional sitting and standing around the rest of the terrace. This satisfies the target condition.
522. The proposed balconies are suitable for a mix of frequent sitting and occasional sitting in summer and this satisfies the target condition.
523. Off site, the roof terrace at Westgate House is suitable for a mix of frequent sitting and occasional sitting in summer. This satisfies the target condition and is consistent with the baseline conditions.
524. The roof terrace at 150 Holborn and the roof terrace at 4-13 High Holborn are suitable for a mix of occasional sitting and standing in summer. This satisfies the target condition and is calmer than the baseline conditions.
525. During the windiest season there would be no exceedances of the safety criteria or regions of uncomfortable conditions.

### *Strong Winds*

526. There are no instances of strong winds around the proposed development and the surrounding area.

### **Configuration 3: Proposed Development with Cumulative Surrounds**

527. The CFD assessment confirms that the inclusion of the cumulative schemes would result in conditions of a consistent level with those seen in Configuration 2. Therefore, conditions are still suitable for their intended use.

#### **Configuration 4: Proposed Development with Proposed Landscaping and Existing Surrounds**

528. Other than the areas with trees, there are no material differences to the conditions reported in Configuration 2, and the suitability of all thoroughfares, crossings, entrances, bus stops, spill out seating, off-site mixed amenity, off-site roof terraces and proposed balconies, which remain the same.

529. Some small discrepancies when introducing landscaping are discussed below.

#### ***Amenity spaces (Mixed Amenity)***

530. The proposed pocket park to the south of the site would be suitable for occasional sitting in summer, which is the same as without landscaping and satisfies the target condition. With the inclusion of landscaping, areas would be created that would be suitable for occasional sitting even in winter.

#### ***Roof level amenity***

531. Conditions for the proposed level 7 terraces are suitable for a mix of frequent sitting, occasional sitting and standing in summer. This now satisfies the target condition.

532. Conditions for the proposed level 8 terraces are suitable for a mix of frequent sitting, occasional sitting and standing in summer. This now satisfies the target condition.

533. Conditions for the proposed level 9 terraces are suitable for a mix of frequent sitting, occasional sitting and standing in summer, which satisfies the target condition.

534. During the windiest season there would be no exceedances of the safety criteria or regions of uncomfortable conditions.

#### **Wind Microclimate Conclusion**

535. In terms of the safety, no wind safety risks were identified associated with the proposed development.
536. On-site conditions are suitable for the intended uses without landscaping or mitigation measures for all proposed entrances, ground level amenity, thoroughfares and balconies.
537. Off-site conditions were suitable for the intended use (or consistent with the baseline) for all entrances, bus stops, thoroughfares and crossings.
538. With the proposed landscaping in place conditions for the level 7, 8 and 9 roof terraces of the proposed development would also be suitable for use as mixed amenity terraces in the summer season.
539. Off site, ground level spill out seating and mixed amenity and roof terraces would be suitable for their intended use in the summer season.
540. During the windiest season there would be no exceedances of the safety criteria or regions of uncomfortable conditions in any of the existing or proposed terraces and balconies.
541. The cumulative schemes will not result in a material impact in the wind conditions on site or the immediate surroundings.

#### **Daylight, Sunlight, Overshadowing**

542. Policy D6(D) of the London Plan states that the design of development should provide sufficient daylight and sunlight to (new) and surrounding housing that is appropriate for its context.
543. Local Plan 2015 Policy DM10.7 'Daylight and Sunlight' seeks to resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment (BRE) guidelines.
544. Emerging City Plan 2040 Policy DE7 states that development proposals will be required to demonstrate that daylight and sunlight available to nearby dwellings and other sensitive receptors, including open spaces, is appropriate for its

context and provides acceptable standards taking account of the Building Research Establishment's guidelines.

545. Paragraph 3.10.41 of the Local Plan indicates that BRE guidelines will be applied consistent with BRE advice that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations. Policy HS3 of the draft City Plan 2040 states when considering impact on the amenity of existing residents, the Corporation will take into account the cumulative effect of development proposals.
546. The BRE guidelines 'Site layout planning for daylight and sunlight – A guide to good practice' (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any non-domestic buildings where the occupants have a reasonable expectation of natural light:
- **Daylight:** Impacts to daylight are measured using the Vertical Sky Component (VSC) method: a measure of the amount of sky visible from a centre point of a window; and the No Sky Line (NSL) method, which measures the distribution of daylight within a room. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed but are considered less important. The BRE Guide states that diffuse daylight of an existing buildings may be adversely affected if either the VSC measure or the daylight distribution (NSL) measure is not satisfied.
  - **Sunlight:** Impacts to sunlight are measured using Annual Probable Sunlight Hours (APSH) for all main living rooms in dwellings if they have a window facing within 90 degrees of due south. The guidelines consider kitchen and bedrooms to be less important, but care should be taken to not block too much sun from these rooms.

### *Interpreting results*

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

as existing levels of daylight and sunlight and on-site conditions. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which would or would not be acceptable.

### *Overshadowing*

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

### Assessment

549. An assessment of the impact of the development on daylight and sunlight to surrounding residential buildings and public amenity spaces has been undertaken in accordance with the BRE Guidelines and considered applying the policies set out in policy D6 of the London Plan, policy DM10.7 of the Local Plan 2015 and policy DE7 of the draft City Plan 2040.
550. The application is supported by a Daylight, Sunlight and Overshadowing report, including an additional climate-based Daylight Impact Assessment (radiance based Median Daylight Factor) in relation to 7 High Holborn and an Overshadowing Report assessing the amenity within the site.
551. The Local Planning Authority has commissioned a third party review by AnsteyHorne, who have reviewed the abovementioned document.
552. The Radiance Assessment contains Median Daylight Factor (MDF) results for 7 High Holborn. However, the BRE Report states "Use of the daylight factor or daylight illuminance for loss of light to existing buildings is not generally recommended. This tends to penalise well-daylit existing buildings, because they can take a much bigger and closer obstruction and remain above the minimum recommendations in BS EN 17037. Because BS EN 17037 quotes a number of recommended values for different qualities of daylight provision, such a reduction in light would still constitute a loss of amenity to the room. Conversely if daylight factor and / or daylight illuminance values in an existing building were only just over the recommended minimum, even a tiny reduction in light from a new development would cause them to go below the minimum,

restricting what could be built nearby.” The BRE Report goes on to list situations in which use of these methods may be appropriate, such as to a consented, but not yet built, property. Given that the Radiance Assessment is not a method that is in line with the BRE guidelines, care should be taken in interpretation of the results and when giving weight to the outcome of those elements of the assessment.

553. The Radiance assessment results are presented as colour rendered images to illustrate the individual daylight factors within room. It should be noted that the radiance assessment is not to be relied on solely and should be read in conjunction with the daylight and sunlight assessment report. Officers have considered and interpreted the visual images submitted as part of the radiance assessment qualitatively only.
554. The actual daylight and sunlight impacts have been assessed against the BRE guidelines The local plan (paragraph 3.10.41) states that the CoL will apply the methods set out in the BRE guidelines. That approach is carried forward in the draft City Plan 2040 (paragraph 9.8.1).
555. In terms of the methodology used, AnsteyHorne have considered that applied methodology for the daylight and sunlight assessments is generally in line with the BRE Report 209 Site Layout Planning for Daylight and Sunlight: A Guide to good practice (2022). The calculation of the mean VSC for rooms with two or more windows has not been fully carried out in accordance with BRE guidelines, as it has been applied to windows of varying sizes. However, AnsteyHorne have confirmed that provided that the standard VSC assessment per window has been presented, an informed view can still be made considering both the losses and the retained values.
556. For the assessment of the daylight and sunlight the following residential buildings have been considered:
- 31-33 High Holborn (mixed-use property with residential contained on 3<sup>rd</sup> to 5<sup>th</sup> floors)
  - 7 High Holborn (mixed-use property with residential contained on 1<sup>st</sup> to 7<sup>th</sup> floors)
  - 11-15 Old Square (mixed-use property with residential contained on 2<sup>nd</sup> to 3<sup>rd</sup> floors)

557. The Public House Flat at 22-23 High Holborn is to the rear and does not front the application site. For that reason, it has not been assessed. Similarly, the residential properties at 68 Chancery Lane, do not face the application site and therefore, they have not been assessed against daylight and sunlight impacts. No other sensitive receptors have been identified.
558. The criteria set out in the BRE Guidelines: Site Layout Planning for Daylight and Sunlight (2022) are used as guidance to inform the assessment on whether the proposed development provides for sufficient daylight and sunlight to surrounding housing and is appropriate for its context (Part D of London Plan Policy D6), and when considering whether the daylight and sunlight available to nearby dwellings is reduced noticeably to unacceptable levels (Local Plan Policy DM10.7) and in considering whether daylight and sunlight is appropriate for its context and provides acceptable living standards (Emerging City Plan Policy DE7).
559. The BRE guidance advises that the guidelines should be interpreted flexibly considering the built environment of each area and allow for local authorities to adopt different target values in certain circumstances. Considering that the site is located in a highly dense urban environment, a pragmatic approach, in terms of significance of the effects, is considered reasonable to be applied.
560. Local Plan Strategic Policy CS10 seeks to ensure that buildings are appropriate to the character of the City and the setting and amenities of surrounding buildings and spaces. The BRE daylight guidelines are intended for use for rooms adjoining dwellings where daylight is required and may also be applied to non-domestic buildings where the occupants have a reasonable expectation of daylight; this would normally include schools, hospitals, hotels and hostels, small workshops and some offices. The BRE sunlight guidelines are intended for dwellings and non-domestic buildings where there is a particular requirement for sunlight. In this case officers do not consider that the offices surrounding have a particular requirement for sunlight. The surrounding commercial premises are not considered as sensitive receptors and as such the daylight and sunlight impact is not subject to the same daylight/sunlight test requirements as residential properties. The dense urban environment of the City is such that the juxtaposition of commercial buildings is a characteristic that often results in limited daylight and sunlight to those premises. Commercial buildings in such locations require artificial lighting and are not reliant on natural daylight and sunlight to allow them to function as intended, indeed many buildings incorporate basement level floorspace or internal layouts at ground

floor and above without the benefit of direct daylight and sunlight. Whilst the proposed development would inevitably result in a diminution of daylight and sunlight to surrounding commercial premisses, it would not prevent the beneficial use of their intended occupation. As such the proposal is not considered to conflict with Local Plan Policy CS10 in this respect.

### **Daylight and Sunlight**

561. A total of three buildings have been considered as sensitive receptors and assessed in the baseline condition in relation to daylight and sunlight, as stated above. The submitted daylight and sunlight report states that two of the three neighbouring properties tested adhere to the BRE Guidelines for the daylight and sunlight assessments.

#### **31-33 High Holborn**

562. This property is a mixed used property with commercial use on the ground to 2<sup>nd</sup> floor and residential flats on the 3<sup>rd</sup> to 5<sup>th</sup> floor. This property is located to the northwest of the application site. For this property, GIA have confirmed that they have obtained floor plans.
563. Based on the results included in Appendix 4 of the Daylight and Sunlight report, all 33 windows and 10 rooms within this property meet the BRE guidelines for VSC, NSL and APSH. Therefore, the proposed development would have a negligible impact on this property, in terms of daylight and sunlight.

#### **11-15 Old Square**

564. This property is a mixed used property with commercial use on the ground to 2<sup>nd</sup> floor and residential flats on the 3<sup>rd</sup> to 5<sup>th</sup> floor. This property is located to the southwest of the application site GIA were unable to obtain floor plans for this property and therefore modelled it based on reasonable assumptions. The third party reviewer considered that this approach is reasonable. Officers concur with this approach in this instance.
565. Based on the results included in Appendix 4 of the Daylight and Sunlight report, all 55 windows and 16 rooms within this property meet the BRE guidelines for



VSC, NSL and APSH. Therefore, the proposed development would have a negligible impact on this property, in terms of daylight and sunlight.

### 7 High Holborn

566. This is an eight storey mixed used property with retail at ground floor and residential units on the 1<sup>st</sup> to 7<sup>th</sup> floors. The property is located to the north of the application site. GIA has obtained floor plans of this property on the planning portal to conduct their assessment.
567. There are 79 rooms and 172 windows between the first and seventh floor which have been assessed in relation to daylight (VSC and NSL) in accordance with the BRE Guidelines.
568. In terms of daylight, the results show that 63 of 172 (36%) windows and 41 of 79 (52%) rooms assessed adhere to the BRE Guidelines for VSC and NSL, respectively.
569. From the remaining windows, 69 windows would experience reductions between 20.1%-29.9%, 16 windows would experience reductions between 30.1%-39.9% and 24 windows would experience reductions beyond 40%. The submitted report states that the transgressions occur mainly on the sixth and seventh floors where there are small secondary windows beneath an overhang. These windows serve mainly habitable rooms; a mixture of living rooms and bedrooms and kitchen windows. For that reason, a secondary analysis without the overhang was carried out. This approach is reasonable, albeit the results are not materially different from the findings with the overhangs in place.
570. To compare the daylight levels with other properties within the vicinity of the site, a research study on the VSC performance of properties within the City of London and London Borough of Camden was carried out. The report states that *'the average retained VSC levels are in line with other similar building typologies in both boroughs'*. The assumptions and findings of their VSC research are set out in Appendix 8 of the submitted report. The properties included in their research are the following
- Clifford's Inn, Fetter Lane (COL)
  - 30-32 Gary's Inn Road (LBC)

- 63-66 Hatton Garden (LBC)
- 34-35 Furnival Street (COL)
- Da Vinci House (LBC)
- 25 Farringdon Road (LBC)

571. The third party reviewer has consider the findings of the research reasonable, in terms of size and local context and also comparable to 7 High Holborn.
572. With regard to daylight distribution, 10 rooms would experience reductions between 20.1%-29.9%, 12 rooms would experience reductions between 30.1%-39.9% and 16 rooms would experience reductions beyond 40%.
573. A Median Daylight Factor (MDF) analysis was also conducted as a supplement to the BRE recommended metrics. The results show that prior to the development, 17 out of 79 rooms met the MDF targets. Following the development, 9 rooms will meet the MDF targets with the largest impact recorded on the 6th floor.
574. For sunlight, the results show that 70 of the 79 rooms (89%) assessed will adhere to the BRE Guidelines. For 6 of the 9 impacted rooms, the losses relate only to winter sunlight (WPSH) with very high levels of annual sunlight (APSH) retained. The remaining three rooms would experience APSH losses greater than 40%, but will manage to meet or almost meet the guidance for WPSH.
575. To understand the abovementioned impacts a floor by floor and flat by flat assessment has been carried out.

#### *First floor*

576. There are five flats at first floor level, of which two will meet the BRE guidelines for VSC and NSL. The remaining three, will experience minor VSC reductions (between 21.1% and 27.3%). For NSL, there is a minor reduction of daylight distribution to a small kitchen and a major (over 40%) reduction to a bedroom. Given the nature of the affected rooms, it is not considered that the impacts caused would be unacceptable to living conditions of the occupiers. Furthermore, it is noted that the average retained VSC levels are better than other similar properties in the vicinity and therefore, the proposal would not result in dissimilar impacts that those expected in a dense urban environment. All five flats achieve BRE compliance in relation to sunlight.

577. When considering the Median Daylight Factor, the absolute losses to the three rooms affected are between 0.1% and 0.2%, which are considered being imperceptible to the occupants.

### *Second floor*

578. There are five flats at second floor level, of which two will meet the BRE guidelines for VSC and NSL. The remaining three, will experience minor VSC reductions (between 20.7% and 29.1%). For NSL, where reductions occur these are to bedrooms, which by reason of their nature are not afforded the same level of protection. A non-habitable kitchen and a living room are also affected, with the later experiencing a minor reduction of 21.6%. It is not considered that the impacts caused would be unacceptable to living conditions of the occupiers. Furthermore, it is noted that the average retained VSC levels are broadly comparable to the research sites.
579. In relation to sunlight, four of the five flats meet the BRE Guidelines. Flat 203 has a living room and a bedroom which experience a minor change in winter sunlight (WPSH) of 25%, however, both rooms are compliant for APSH and retain very good annual levels (45%).
580. When considering the radiance based Median Daylight Factor, the absolute losses to the six out of twelve rooms affected are of 0.1% and therefore, it is not considered that they will be noticeable.

### *Third floor*

581. Third floor also consist of five flats, of which two will meet the BRE guidelines for VSC and NSL. The remaining three, will experience minor VSC reductions (between 21.2% and 29.8%) and still retain a VSC greater than 15%, which is broadly comparable to the researched sites and other properties in densely urban locations. For NSL, two living rooms would experience reductions of 26.2% and 30.7%. the rest of the rooms that would be affected are three bedrooms and a small kitchen, which are less important in terms of daylight and sunlight levels.

582. Four out of five flats achieve BRE compliance in relation to sunlight. The remaining flat would experience reductions to winter sunlight of 42.9%, with retained values being marginally below 5% compliance (4%). The retained levels of annual sunlight in both rooms are very good at 50% (BRE suggests 25%).
583. When considering the Median Daylight Factor, none of the rooms at this floor meet the MDF target. Nine of the twelve rooms will see reductions. Seven of those rooms would result in absolute losses of 0.1% which would be imperceptible to the occupants. A kitchen in flat 304 will experience changes of 0.3%, which may be noticeable and the kitchen at flat 3.5 would experience an absolute reduction of 0.2%. Given their small size, these kitchens are not attributed the same level of protection, as they are not considered being used for longer periods of time like living rooms.

#### *Fourth floor*

584. Same as the below floors, fourth floor also consist of five flats, of which two will meet the BRE guidelines for VSC and NSL. The remaining three, will experience minor VSC reductions (between 21.2% and 29.8%). All impacted windows would retain a VSC greater than 15%. Although this is slightly less than the researched sites, it is considered that these levels are acceptable in dense urban environments. In terms of NSL, two bedrooms would experience alterations of 34.9% and 53.69%. A small kitchen would see a reduction of 46% and two living rooms a reduction of 38.9% (flat 403) and 32.5% (flat 404).
585. When considering the Median Daylight Factor, none of the rooms at this floor meet the MDF target. Seven of the rooms, including the abovementioned living rooms at flats 403 and 404 will see absolute losses of between 0.1% and 0.2%, which are imperceptible. Two kitchens and a bedroom will experience changes of 0.3% and 0.4%, which may be noticeable. These impacts are considered acceptable considering the nature of these rooms and the location of these properties in an existing dense urban environment.
586. Four out of five flats achieve BRE compliance in relation to sunlight. At the remaining flat, there is a major impact (60% change) to winter sunlight to one living room, however the retained value of 4% is only marginally below BRE compliance (5%). The annual sunlight is also very good at 54% (BRE suggests 25%). One bedroom is also impacted in relation to winter sunlight (63.6%

change). The retained annual sunlight is very good at 54%. Furthermore, bedrooms are less important for sunlight in accordance with the BRE Guide. It is therefore considered that the sunlight levels to the flats at the fourth floor would be acceptable.

#### *Fifth floor*

587. There are five flats on the fifth floor, of which two will meet the BRE guidelines for VSC and NSL. The remaining three, will experience minor VSC reductions (between 20.1% and 29.2%). All 13 impacted windows would retain a VSC greater than 15%; the majority are above 20%. The average retained VSC at this level is slightly lower than the research sites; however, the average value is above 23% which is considered reasonable. In terms of NSL, four bedrooms would experience alterations of between 26% and 59.3%. Two small kitchens would see reductions of between 47.5% and 30.3% and two living rooms reductions of 47% (flat 503) and 42.7% (flat 504).
588. When considering the Median Daylight Factor, in the exiting situation only one room meets the MDF. The remaining 11 rooms fall short on the MDF targets. Four of the rooms, will experience absolute losses of between 0.1% and 0.2%, which are imperceptible. The remaining six rooms, including the living rooms at flats 503 and 504 will experience changes of 0.3% and 0.6%, which are expected to be noticeable. These impacts are considered acceptable considering the location of these properties in an existing dense urban environment.
589. With regards to sunlight all five flats assessed will meet the BRE Guidelines.

#### *Sixth floor*

590. There are three flats on the sixth floor, none of which will achieve full BRE compliance in relation to VSC and NSL.
591. The bedrooms, a kitchen and a living room of flat 603 will experience reduction of between 33.8% and 56.8%. Three windows will retain VSC levels greater than 15% and one will be below. However, the that latter window was less than 15% in the existing condition.

592. In flat 604, there are also VSC changes to two bedrooms, a kitchen and a living room of between 28.8% and 55.5%. Two of the affected windows retain greater than 15% VSC. The two which do not, were less than 15% in the existing scenario.
593. In flat 605, four windows serving three bedrooms and a living room would experience VSC reductions of between 21.6% and 31.1%, which are minor to moderate impacts. The changes to the bedrooms are minor and the living room is served by windows to another elevations, which are BRE compliant.
594. With regard to NSL, two bedrooms, a small kitchen and a living room of flat 603 would experience NSL reduction of between 25.5% and 75.5%. Similarly, flat 604 would experience reduction of between 31.9% and 77.2%. The reductions to the bedrooms of flat 605 would be minor, between 23.7% and 27.1%.
595. When considering the radiance based Median Daylight Factor, eight of the twelve rooms meet the MDF targets in the existing situation. With the proposed development in place two of the eight rooms continue to meet MDF targets. Four rooms including a living room at flat 605 would experience reduction of 0.1% and 0.2%, which will be imperceptible. The remaining eight rooms, including bedrooms and kitchens, would experience reductions between 0.3 and 1.1%, which are extended to be noticeable. These impacts are considered acceptable considering the location of these properties in an existing dense urban environment and the nature of the affected rooms.
596. With regards to sunlight, one out of the three flats will meet the BRE Guidelines. The 603 flat living room would experience reductions of APSH of 54.2% and WPSH of 76.5%; however, the retained WPSH would only be marginally below BRE compliance at 4%. A bedroom and the kitchen of flat 604 would also experience major reductions in APSH of 52% and 46.4%, although both rooms would be WPSH compliant. Given that bedrooms and kitchen are less important when it comes to sunlight considerations, and the living room would be close to being complainant, it is considered that the impacts to these two flats would be acceptable.

### *Seventh floor*

597. There are two flats fronting the application site on the seventh floor, none of which will achieve full BRE compliance in relation to VSC and NSL. These flats are dual aspect.
598. There are multiple windows serving each room on these properties. From on site observations and online imagery, GIA have identified that some windows of flat 701 have shutters that was frequently in use. The worst case scenario has been tested for these rooms. Within flat 701, there are 22 windows serving a living room and three bedrooms. Of these windows, 19 will see VSC changes of between 23.5% and 65.5%. The majority of impacts are to small secondary windows. When the overhang is removed 82% of the windows assessed in this flat are BRE compliant. The remaining 18% of windows retain greater than 20% VSC with the overhang removed.
599. With regard to NSL, even with the overhang in place, one of the bedrooms in this flat will experience only a marginal NSL change of 21.1%. The three remaining rooms are BRE compliant for daylight distribution.
600. In flat 702, 31 windows serving a living room and two bedrooms have been assessed for VSC, of which 18 will experience VSC impacts of between 23.8% and 52.3%. The majority of changes are to small secondary windows below an overhang. When the overhang is removed, 97% of windows assessed in this flat are BRE compliant. The remaining 3% of windows retain a VSC greater than 20%.
601. Although some of the VSC impacts would be major, the majority of the changes are to secondary windows, and the retained VSC would be greater than 20%, which is considered acceptable to dense urban environments.
602. When considering the radiance based Median Daylight Factor, all seven rooms would be the MDF target and both the existing and proposed scenarios. One room located in flat 702 (bedroom) sees an imperceptible change of 0.2%. The remaining six rooms located in flat 701 (living room and three bedrooms) and a flat 702 (living room and bedroom) see changes of between 0.4% and 1.1% which will be noticeable. Although some reductions will be noticeable, the MDF target will be met.
603. In relation to sunlight, both flats remain fully BRE compliant.

### Assessment note following the submission of minor amendments

604. Following the submission of the application some minor amendments have been incorporated to the proposed development. These are predominantly contained on the northeast corner of the application building and are further discussed in the 'Proposal' section of the report.
605. Given the minor nature of the amendments, no new technical analysis has been undertaken by GIA. the massing changes are modest and localised, and they are not expected to result in a perceptible change daylight and sunlight conditions at neighbouring properties when compared to the assessments in the November 2024 Report. Any additional massing effect should be offset by the areas where massing is being reduced in height. In fact, given that a larger area would be reduced in height (plant enclosure), it is more likely to result in a net increase in the overall quantum of light receivable to neighbouring properties.
606. In light of the above, the proposed amendments are not expected to materially affect the overall daylight or sunlight condition for the neighbouring sensitive receptors from those assessed above.

### Conclusion on Daylight and Sunlight Impact

607. In conclusion, it is considered that the submitted Daylight, Sunlight and Overshadowing report has correctly used the methodology assessing daylight and sunlight in accordance with the latest BRE Report 'Site layout planning for daylight and sunlight: a guide to good practice'.
608. Of the buildings assessed, the majority of the surrounding properties would not experience any noticeable reductions in the daylight and sunlight that they currently receive.
609. Whilst officers do acknowledge that there are some residential properties at 7 High Holborn that would experience impacts greater than the BRE guidance levels, the impacts are similar to comparable properties in the vicinity of the site that are located in a dense urban environment. Furthermore, when considering the impacts qualitatively using the radiance based Median Daylight Factor, the impacts in most cases would be imperceptible. This is with the exception of the



two upper floors where losses will be noticeable; however, in these instances a good level of VSC is retained (over 15%), which is considered reasonable in dense urban areas and are also affected primarily affected by the exiting overhangs of the building.

- 610. Loss of sunlight it not an issue for the majority of the properties assessed. Where windows have been assessed only a small number would experience a loss of sunlight and for the most cases of the affected windows, APSH and WPSH would only be marginally below BRE compliance at 4%.
- 611. As a result, is not considered that the daylight and sunlight reductions would warrant refusal of the application on those grounds. The scheme is considered complying with policy DM10.7 of the Local Plan 2015. The daylight and sunlight for these properties is considered to be appropriate for their context in accordance with policy D6(d) of the London Plan 2021 and policy DE7 of the draft City Plan 2040, and these properties are considered to still have acceptable living standards in accordance with part c of paragraph 129 of the NPPF.

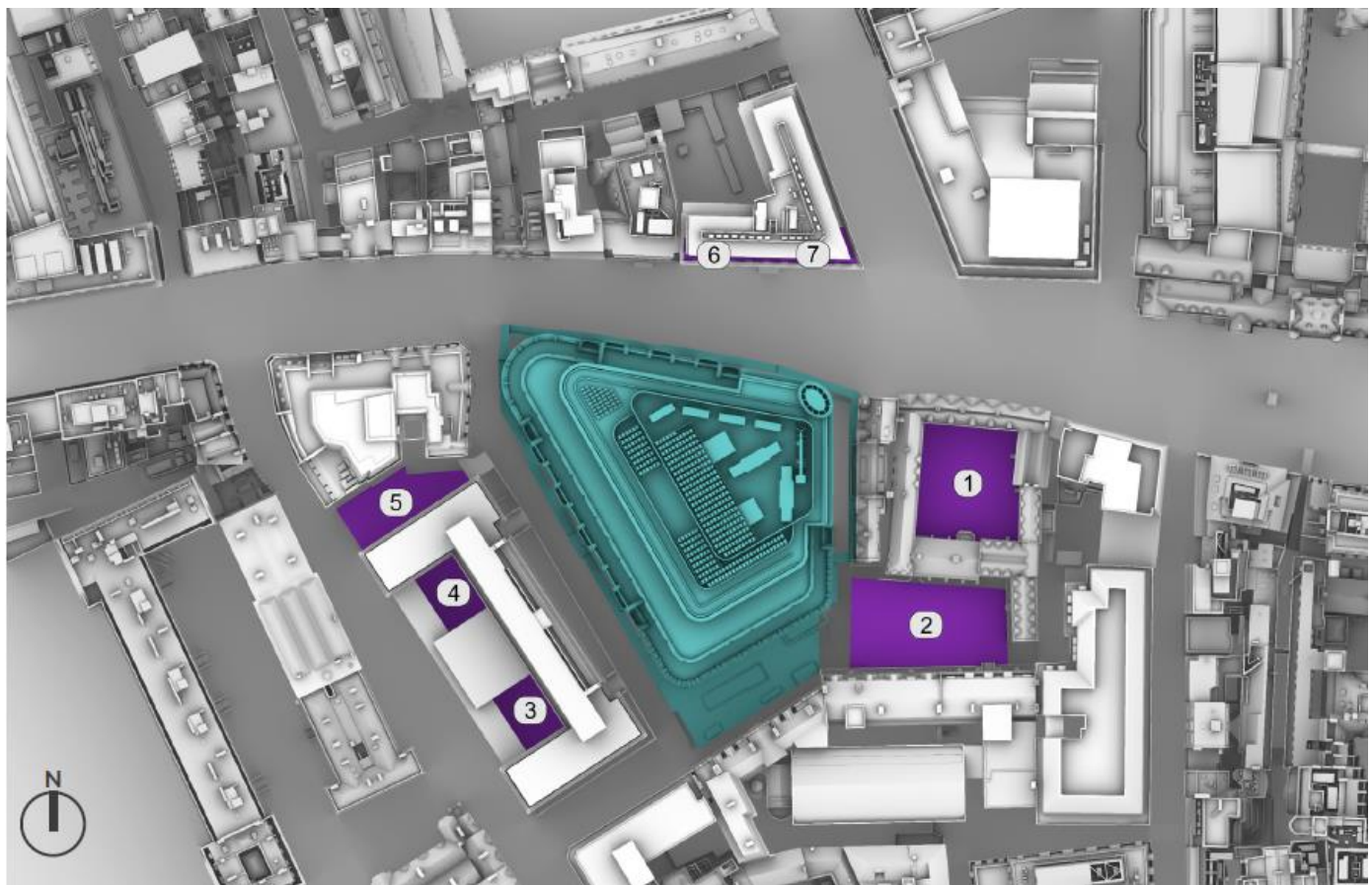
#### Overshadowing of amenity spaces

- 612. Overshadowing of amenity spaces is measured using sunlight hours on the ground (SHOG). The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces
- 613. The BRE guidelines do not include criteria for the scale and nature of effects and subsequent significance of transient overshadowing other than to identify the different times of the day and year when shadow would be cast over a surrounding area.
- 614. BRE Guidelines (2022) suggest that 'sun hours on ground' assessment should be undertaken on the 21st March. It is recommended that at least half of an amenity area should receive at least 2 hours of sunlight on March 21st or the area which receives two hours of direct sunlight should not be reduced to less than 0.8 times its former value (i.e. there should be no more than a 20% reduction).

615. In terms of overshadowing, the following open spaces, as sensitive receptors, have been assessed:

- Staple Inn Buildings (Area 1)
- Staple Inn Buildings (Area 2)
- Chancery House (Area 3)
- Chancery House (Area 4)
- Chancery House (Area 5)
- 7 High Holborn (Area 6)
- 7 High Holborn (Area 7)

616. The map below shows the sensitive receptors as mentioned above:



617. The results of the overshadowing assessment demonstrates that the abovementioned neighbouring amenity spaces will not be affected by the proposed development and will be fully BRE compliant. As a supplement, GIA also carried out the sun on ground test on 21st June and showed similar results with the 21st of March
618. In light of the above and as confirmed by the third part reviewed, the sunlight performance of the neighbouring amenity areas are in line with the BRE guidelines.

*Overshadowing of the proposed amenity areas*

619. The Applicant has also submitted a report on the assessment of the amenity space within the proposed development. Although not common practice, officers have requested this assessment to ensure that the replacement amenity space would be or equal of better quality of the existing open space to the southwest corner of the site.
620. The 2 hour sun on ground test was undertaken to the proposed ground floor amenity spaces as well as the upper roof terraces on the 21<sup>st</sup> March and 21<sup>st</sup> June. The third party reviewer has considered this approach acceptable.
621. The Applicant has split the existing area to the southwest of the site in two areas, excluding the raised planters, staircase and ramp. The tabulated results show that the two areas tested will achieve at least 2 hours of sunlight to 86% and 29% of their area on the 21st March, compared to the 50% target.
622. For the proposed site, the Applicant has tested five areas, including the proposed pocket park and proposed terraces. Although testing the terraces is important to achieve high quality amenity space for the office occupiers, it is more important to consider the sunlight levels of the public space, namely the pocket park to the south of the proposed building.
623. When considering the sunlight levels to the pocket park, the results show that 35% of the area will receive 2 hours of sunlight, instead of the 50% BRE recommendation. However, given that this area has increased in size by setting the building line further to the north, there is a slight improvement from the existing space to the south of the building, where only 29% of the area receives 2 hours of sunlight. The results also show that by the 31<sup>st</sup> of May 50% of the

proposed pocket park would receive 2 hours of sunlight. The sun exposure diagram for June shows that a larger area would receive direct sunlight in the summer.

- 624. Given the building line alterations (infilling the southwest corner, which is currently open, and setting back the southern building line) between the existing buildings and the proposed development, a direct comparison of the existing and proposed public open space cannot be drawn.
- 625. In terms of the terraces, other than the north facing terrace, those to the west and south would exceed BRE compliance in terms of percentage of space receiving over 2 hours of sunlight.
- 626. Overall, and as conquered by the third party reviewer, the sunlight performance of the proposed amenity areas are relatively good considering the size and location of the development.

#### Solar Glare

- 627. Glare is the discomfort or impairment of vision caused by excessive or large contrast in luminance within the observer's field of view and can occur when sunlight is reflected from a glazed façade. There are two categories of glare; distracting glare (excessive brightness of surfaces or luminaires within the field of view that cause discomfort) and disability glare (presence of a high illuminance source within a low luminance scene which impairs vision).
- 628. For discomfort glare, the key issue is the total duration for which the sun can be reflected to the sensitive location. Duration of less than 50 hours per year are unlikely to cause serious problems, except in very sensitive locations. Longer durations of reflection could result in significant discomfort glare issues depending on the type of space, the height of the reflected sun (low angle sun usually presents the most problems), whether shading devices are already in use, and the way the space is used.
- 629. It is noted that Solar Glare is not a comparative assessment, so the assessment considered the effect of the proposed development in absolute terms.
- 630. The BRE guidelines suggest the following in relation to solar glare at paragraph 5.8.3 – 5.85:

“If it is likely that a building may cause solar dazzle the exact scale of the problem should be evaluated. This is done by identifying key locations such as road junctions and railway signals, and working out the number of hours of the year that sunlight can be reflected to these points”.

631. The Applicant has submitted a Solar Glare Report in support of the application, to assess whether solar reflections given off the proposed building's façade will be visible from sensitive viewpoints which may affect road users. To do so, GIA have developed specialist computer software in order to undertake reflected glare assessment.
632. This screening exercise identified 13 sensitive viewpoints surrounding the site from which reflections could be visible and there are indicated in orange in the map below. All views have been placed with the driver or cyclist looking straight ahead as they approach the relevant road junction, cycling lane junction or bus stop.



Fig. 11: Viewpoints Assessed

- Scheme visible
- Scheme not visible

633. In conclusion, the assessment has identified that there is the potential for sunlight to reflect from some areas of the proposed building's façades, such as viewpoints. However, most viewpoints would only experience minor or negligible reflections from the proposed development. This is mainly because of the broken-up nature of the reflective surfaces, such as punched windows or elaborated glazed tiles cladding, which are not expected to reflect a full sun disc throughout the day or the year.
634. Overall, the report considers that the potential solar reflections identified are considered minor and not likely to be a solar glare risk. Therefore, no further mitigation is considered necessary.
635. The third party reviewer has commended that on review of the surrounding area, there are no main road junctions or rail signal points in the near vicinity that would benefit from assessment for solar glare.
636. The proposed development would comply with Policy D9C(g) of the London Plan, Local Plan policy DM10.1 and draft City Plan 2040 policy DE7 to avoid intrusive solar glare impacts and to mitigate adverse solar glare effects on surrounding buildings and public realm. Should planning permission be granted, a S106 obligation would be recommended to require a solar glare assessment to be submitted post completion, but prior to occupation, which would include details of a mitigation measures (if considered necessary).

### Light Spill

637. Local Plan policy DM15.7 and draft City Plan policy DE8, requires that development incorporate measures to reduce light spillage particularly where it would impact adversely on neighbouring occupiers, the wider public realm and biodiversity.
638. The nearest residential receptors that could potentially be affected by light spillage are those located to the north of the proposed development, at 7 High Holborn.
639. The submitted Lighting Planning Report submitted with the application states that the lighting will be designed to minimise impact on nearby residential buildings by controlling brightness, avoiding light spill, and reducing glare. Warm, low-intensity lighting will enhance safety and aesthetics while

maintaining privacy and comfort for residents, creating a respectful transition between the commercial and residential areas in High Holborn.

640. High Holborn qualifies as an E4/1 Lighting Zone due to its status as a vibrant, urban area with a high density of commercial, retail, and mixed-use buildings, with commercial, retail and transport terminals, including Chancery Lane Underground Station. This demands higher lighting levels for visibility and security while aligning with the City of London's planning guidelines. As an E4 zone, lighting designs must balance functionality, minimising obtrusive light while enhancing urban character.
641. To minimise light spill fixtures have been specified with precise optics, shielding, and directional control to ensure that light is focused only where needed, avoiding upward spill and unnecessary illumination of non-targeted areas. Wall-mounted lights, recessed uplights, and indirect LED grazing luminaires are designed to highlight architectural features without disrupting adjacent properties.
642. It is also suggested that a DALI-controlled system will be implemented to provide precise control of luminaires across the development. This system allows for pre-set lighting scenes tailored to peak and off-peak periods, ensuring appropriate light levels throughout the day and year. This would assist reducing lighting levels during off-peak hours. Furthermore, lighting, other than lighting necessary for accessible, inclusive design, safety and crime prevention, would automatically switch off or be dimmed to pre-agreed levels during curfew times (midnight to sunrise).
643. A condition is imposed requiring the submission of a detailed lighting strategy prior to the occupation of the building, demonstrating the measures that would be utilised to mitigate the impact of internal and external lighting on light pollution and residential amenity. The strategy shall include full details of all luminaires, associated infrastructure, and the lighting intensity, uniformity, colour and associated management measures to reduce the impact on light pollution and residential amenity.

#### Thermal comfort

644. Subject to the imposition of the condition for the submission of necessary details, the development would comply with Local Plan policy DM 15.7 and draft City Plan 2040 Policy DE8 and has been designed to avoid light spill.
645. London Plan Policy D8 and D9 and Policies S8, S12 and S21 of the Emerging City Plan 2040, indicate that development proposals should ensure that microclimatic considerations, including temperature and wind, should be taken into account in order to encourage people to spend time in a place and that the environmental impacts of tall buildings – wind, daylight, sun penetration and temperature conditions around the building and neighbourhood, must be carefully considered and not compromise comfort and the enjoyment of open spaces and seeks to optimise micro-climatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort and delivering improvements in air quality and open space. Strategic Policy S15 indicates that buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events. The Thermal Comfort Guidelines for Developments in the City of London was published in December 2020 which sets out how the thermal comfort assessment should be carried out.
646. In accordance with City of London Thermal Comfort Guidelines, an outdoor thermal comfort assessment has been prepared using high resolution Computational Fluid Dynamics (CFD). The technique involves merging the effects of wind, air temperature, humidity and solar radiation data at a seasonal level to gain a holistic understanding of Thermal Comfort and how a microclimatic character of a place actually feels to the public. The assessment quantifies the thermal comfort conditions within and around the site, by comparing the predicted felt temperature values and frequency of occurrence.
647. The assessment was graded against the City of London Thermal Comfort Criteria, as set out in “Thermal Comfort Guidelines for Developments in the City of London”. Categories are based upon the seasonal percentage for which thermal conditions are acceptable (UTCI values of between 0° and 32°).



KEY	USAGE CATEGORY	% OF HOURS WITH ACCEPTABLE UTCI	DESCRIPTION
	All Season	>90% in each season	Appropriate for use year-round (e.g. parks).
	Seasonal	>90% spring-autumn AND >70% winter	Appropriate for use during most of the year (e.g. outdoor dining).
	Short-term	>50% all seasons	Appropriate for short duration and/or infrequent sedentary uses (e.g. unsheltered bus stops or entrances) year-round.
	Short-term seasonal	>50% spring-autumn AND >25% winter	Appropriate for short duration and/or infrequent sedentary uses during most of the year.
	Transient	<25% winter <50% any other season	Appropriate for public spaces where people are not expected to linger for extended period (e.g. pavements, cycle paths).

648. The thermal comfort conditions have been assessed for entrances, bus stops and amenity spaces, including terraces and balconies. The same spaces have been tested as those assessed for Wind Microclimate.
649. The purpose of the tests is to compare conditions with and without the proposed development. To assess those conditions the following conditions have been tested:
- Configuration 1: The existing Site with existing surrounding buildings (The Baseline)
  - Configuration 2: The Proposed Development with existing surrounding buildings; and
  - Configuration 3: The Proposed Development with cumulative schemes (schemes for which planning permission has been granted); and
  - Configuration 4: The Proposed Development with proposed landscaping and existing surrounding buildings.
650. The following schemes are considered sufficiently advanced and have been considered in the baseline scenario:
- Thavies Inn House (21/00885/FULMAJ)

- 100 And 108 Fetter Lane (21/00534/FULMAJ)
- 100 Grays Inn Road (London Borough of Camden, 2022/4259/P)

651. For the cumulative schemes' configuration, the following schemes have been considered:

- 40 Holborn Viaduct (23/00867/FULMAJ)
- 294 - 295 High Holborn (London Borough of Camden, 2017/1827/P)

*Configuration1: Existing site with the existing surrounding buildings*

652. In the exiting scenario conditions range between all-season, seasonal, and short-term use. The lowest comfort levels (short-term) are shown in North Gardens to the west of the site and on High Holborn to the east.

*Entrances*

653. Conditions for all principal off-site entrances are suitable for either all-season or seasonal, which satisfies the target condition.

*Bus Stops*

654. Bus stops are suitable for seasonal use, which also satisfies the target condition.

*Amenity Spaces (seating – Ground)*

655. The spill out seating outside 6-7 Holborn is suitable for a mix of all season and seasonal use. The spill out seating outside 335 High Holborn is suitable for seasonal use. The spill out seating outside 311-318 High Holborn is suitable for all season use. The above conditions satisfy the target condition.

*Amenity Spaces (Mixed amenity)*

656. North Gardens are suitable for a mix seasonal and short-term use. Short-term use of amenity spaces is one category less comfortable.
657. Staple Inn Garden is suitable for seasonal use. Staple Inn, the Chancery House Courtyards and the square between Chancery Lane and Stone Buildings are suitable for all-season use. Waterhouse Square Courtyards and the square to the north of Chancery House are suitable for a mix of seasonal and all-season use. These satisfy the target condition.

#### *Amenity Terraces*

658. The roof terrace at Westgate House is suitable for seasonal use. This satisfies the target condition.
659. The roof terrace at 150 Holborn is suitable for a mix seasonal and short-term use. The roof terrace at 4-13 High Holborn is suitable for a mix of seasonal and short-term use. The majority of the space which would be expected to be used would be suitable for seasonal use. Although short-term use is one category less comfortable, the majority of the space at the roof terrace at 4-13 High Holborn would be suitable for seasonal use.

#### *Configuration 2: Proposed development with the existing surrounds*

660. The overall range of comfort levels is the same as for the baseline condition, but the inclusion of the proposed development would introduce slightly less comfortable conditions on High Holborn to the north of the site and within the alleyway immediately adjacent to the south east corner of the site. It is noted that the areas which have switches from seasonal to short-term usage are driven by spring conditions being suitable for 88% of the season relative to the 90% threshold for seasonal use.

#### *Entrances*

661. On site conditions for the entrances are suitable for either all-season or seasonal use. This satisfies the target condition.

662. Off site conditions for all principal entrances are suitable for either all-season or seasonal. This satisfies the target condition.

### *Bus Stops*

663. The bus stops within the surrounding area are suitable for seasonal use. This is consistent with the baseline and satisfies the target condition.

### *Amenity Spaces (seating – Ground)*

664. On site, the proposed cafe spill out seating to the south of the proposed building is suitable for a mix of seasonal and all-season use. This satisfies the target condition.
665. The spill out seating outside 6-7 Holborn is suitable for a mix of all season and seasonal use. The spill out seating outside 335 High Holborn is suitable for seasonal use. The above conditions satisfy the target condition and are also consistent with the baseline.
666. The spill out seating outside 311-318 High Holborn is suitable for seasonal use. This is one category less comfortable than the baseline, but still satisfies the target condition.

### *Amenity Spaces (Mixed amenity)*

667. On site, the proposed pocket park to the south of the would be suitable for seasonal use. This satisfies the target condition.
668. North Gardens are suitable for a mix seasonal and short-term use. Short-term use of amenity spaces is one category less comfortable. It is noted that this is consistent with the baseline conditions.
669. Staple Inn Garden is suitable for seasonal use. Staple Inn and the Chancery House Courtyards are suitable for all-season use. Waterhouse Square Courtyards, the square to the north of Chancery House and the square between Chancery Lane and Stone Buildings are suitable for a mix of seasonal and all-season use. These satisfy the target condition and other than the square

between Chancery Lane and Stone Buildings (which is one category less comfortable than the baseline), are consistent with the baseline conditions.

### *Amenity Terraces*

670. On site conditions for the proposed level 7 terrace are suitable for short-term use, with highly localised regions suitable for short-term seasonal or seasonal use. Conditions for the proposed level 8 terrace are suitable for seasonal across the south west elevation, with a region around the north west corner which is suitable for short-term and short-term seasonal use. Conditions for the proposed level 9 terraces are suitable for seasonal use on the northern elevation, and a mix of seasonal and short-term use around the rest of the terrace. This is a category less comfortable than the target condition. The impact that the proposed landscaping has to the terrace are discussed in the Configuration 4 below.
671. The proposed balconies would be suitable for all-season use. This satisfies the target condition
672. Off site, the roof terrace at Westgate House is suitable for seasonal use. This is consistent with the baseline and satisfies the target condition.
673. The roof terrace at 150 Holborn is suitable for a mix seasonal and short-term use. The roof terrace at 4-13 High Holborn is suitable for a mix of seasonal and short-term use. The majority of the space which would be expected to be used would be suitable for seasonal use. Although short-term use is one category less comfortable, the majority of the space at the roof terrace at 4-13 High Holborn would be suitable for seasonal use. It is also noted that the above conditions are consistent with the baseline.

### *Configuration 3: Proposed development with cumulative surrounds*

674. The inclusion of the Cumulative Schemes would result in conditions of a consistent level with those seen in Configuration 2.

### *Configuration 4: Proposed development with proposed landscaping and existing surrounding buildings*

675. Other than the regions in which trees are proposed within the proposed amenity at the south of the site and on the proposed roof terraces there are no material differences to the conditions reported in Configuration 2, and the suitability of all entrances, bus stops, spill out seating, ground level mixed amenity, off-site roof terraces and proposed balconies.
676. The following spaces are those that are affected by the proposed handspring:
- Conditions for all proposed terraces are now suitable for seasonal use across the majority of the terrace area. This satisfies the target condition. There are isolated individual locations which record short-term seasonal use, although these are not sufficiently extensive to impact the use of any of the terraces.
  - Those areas that exceed suitable conditions are mainly the building corners. The categorisation of these locations is driven by winter conditions, but all locations within these regions would experience suitable conditions for at least 75% of the spring, 95% of the summer and 81% of the autumn. As such, these are considered to be usable for the majority of the time and during the periods of the year at which they are expected primarily to be in use.
677. Given the above, it is considered that the proposed terraces (at levels 7, 8 and 9) would be suitable for the intended use with the proposed landscaping.

### Thermal Comfort Conclusion

678. On-site conditions are suitable for the intended uses without landscaping or mitigation measures for all proposed entrances, ground level amenity, thoroughfares and balconies.
679. Landscaping as a form of mitigation is required to make the conditions for the levels 7, 8 and 9 roof terraces suitable for their intended as mixed amenity terraces.
680. Off-site conditions for all entrances, bus stops, thoroughfares, crossings, ground level spill out seating and mixed amenity and roof terraces were suitable for the intended use or consistent with the baseline.

681. The inclusion of cumulative schemes did not have a material impact on thermal comfort conditions.
682. In light of the above, it is considered that the thermal comfort in and around the site would be acceptable and in accordance with London Plan Policy D8, Policy D9 and emerging City Plan 2040 policies S8 and S12, and the guidance contained in the Thermal Comfort Guidelines for Development in the City of London.

### **Air Quality**

683. Local Plan 2015 policy CS15 seeks to ensure that developments positively address local air quality. Policy DE1 of the draft City Plan 2040 states that London Plan carbon emissions and air quality requirements should be met on sites and Policy HL2 requires all developments to be at least Air Quality Neutral, developers will be expected to install non-combustion energy technology where available, construction and deconstruction must minimise air quality impacts and all combustion flues should terminate above the roof of the height of the tallest part of the development. The requirements to positively address air quality and be air quality neutral are supported by policy SI1 of the London Plan.
684. The application is accompanied by an Air Quality Assessment (Arup, November 2024), which includes assessment of the likely impact of the proposed development on air quality as a result of demolition, construction and operational phases of development.
685. The Proposed Development is located within the City of London Air Quality Management Area (AQMA) which was designated due to exceedances of the air quality objectives.
686. High risk mitigation measures for construction dust impacts have been provided in accordance with the latest GLA, CoL and Institute of Air Quality Management (IAQM) guidance and it has been concluded that with the appropriate best practice mitigation measures suitable, there is likely to be a negligible effect on existing receptors from the dust generating activities onsite. The Air Quality Officer has been consulted and advised that based on the CoL Code of Practice for Deconstruction and Construction Sites, the Site is considered to be a 'high risk' site and therefore appropriate mitigation measures to control dust are to

be adopted. This will be secured in Construction Environmental Management Plan condition.

687. Although the number of construction vehicles are not known at this stage of design, and the GLA has confirmed that further information would be required to make the development compliant with the London Plan, a draft Construction Logistic Plan and a construction traffic assessment will be provided when the data is available. The submission of these documents will be secured by condition.
688. The submitted Air Quality Assessment states that the impacts of operational traffic as a result of the Proposed Development have been assessed and found to be negligible in terms of annual mean NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> concentrations at the worst-case existing receptor locations. Therefore, further mitigation measures were not considered to be required. Exceedances for annual mean PM<sub>2.5</sub> have been predicted at two future receptor locations, however, with the proposed implementation of suitable particulate filtration system, the likely residual air quality effects, during operation, are considered to be not significant.
689. The development, other than the two blue badge parking spaces would be car free. However, servicing and delivery vehicles are expected to significantly increase as a result of the development. The transport assessment states that the proposed site would generate 113 servicing vehicles per day, reduced to 36 per day (a total of 226 and 72 two-way trips per day, respectively). The Delivery and Servicing Management Plan refers to assumptions of 60 and 50% reductions for deliveries. However, the extent of the stated reduction assumed appears to be closer to 70%. The DSP proposes the reduction is achieved by collective procurement and consolidation. Therefore, it is necessary that a monitoring system is developed to ensure that the Facilities Management team will undertake the necessary steps to achieve the stated reductions. A restriction to the number of vehicle trips per day will be secured by condition.
690. The proposed development will employ an electric heating and cooling. However, a life safety diesel generator is proposed.
691. The City's Air Quality Officer has no objections, subject to the imposition of conditions regarding the installation of a generator, installation of combustion flues and Non-Road Mobile Machinery Registration. As discussed above, the



Air Quality Officer has also requested that a condition restricting the number of daily trips is imposed.

692. Subject to conditions, the proposed development would have a minimal impact on local air quality. The scheme meets the air quality neutral benchmarks and has demonstrated an approach that positively addresses air quality. The proposed development would accord with Local Plan Policy 2015 policy policies HL2 and DE1 of the draft City Plan 2040, and Policy SI1 of the London Plan which all seeks to improve air quality.

### **Noise and Vibration**

693. Local Plan policy DM15.7 and London Plan Policies D13 and D14 require developers to consider the impact of their developments on the noise environment. It should be ensured that operational noise does not adversely affect neighbours and that any noise from plant should be at least 10dBa below background noise levels.
694. The submitted Noise Report (Sandy Brown, November 2024). The purpose of the surveys was to establish the background sound levels around the site and by nearby noise sensitive premises, as well as ambient and maximum noise levels at the site.
695. The potential noise sources associated with the scheme can be broadly divided into two categories:
- Building services plant
  - Internal activity in commercial and cultural units.
696. It is noted that the site is located in close proximity to residential properties, which those closer to the application site being the residential block of flats to the north, namely 7 High Holborn. Although there are other noise sensitive receptors located at greater distance, it is considered that controlling noise egress at the closest properties will result in acceptable noise levels at all other noise sensitive premises.
697. The noise survey has taken into consideration the minimum measured background sound levels around the site and the relevant plant noise limits at

the worst affected existing noise sensitive premises. The limits are cumulative and apply with all plant operating under normal conditions.

698. The Report sets out that the lowest background sound levels measured during the survey within the City of London boundary were 48 dB during the day and 47dB at night.
699. Based on the requirements of the CoL and on the results of the noise survey, all plant must be designed such that the cumulative noise level at 1 metre from the worst affected windows of the nearby noise sensitive premises within the CoL does not exceed 41dB during the day and 40dB during the night. These have been corrected relative to the measured free-field background sound levels by the addition of 3dB.
700. These limits are cumulative and apply with all plant operating under normal conditions. If plant items contain tonal or attention catching features, the limits will be more stringent. The average ambient noise levels measured during the survey within the City of London were 57-58 dB during the day and 54-57 dB at night.
701. The noise assessment concludes that providing that the recommended noise mitigation measures, including an acoustic louvre, solid screening to the inside of the perimeter architectural louvres or attenuation of the ASHPs at source, are incorporated within the design and the louvre noise limits are adhered to, the proposed plant is expected to comply with the relevant planning noise limits.
702. In most City redevelopment schemes one of the main noise and vibration issues occur during demolition and construction phases. The submitted Outline Construction Environmental Management Plan (CEMP) Revision 2, states that a construction method will be adopted to reduce noise levels. Plant and generators will be carefully selected. Noisy activities will be limited to minimise impacts on existing receptors and working hours will comply with the CoL restrictions. Several noise and vibration control measures and monitoring are proposed to be incorporated.
703. Noise and vibration mitigation during the deconstruction and construction phases, including control over working hours and types of equipment used would be included in a Demolition, and a Construction and Environmental Management Plan to be secured by condition, and freight movements would be controlled through the Construction Logistics Plan, secured by condition. These

would need to demonstrate compliance with the City's Code of Practice for Deconstruction and Construction Sites and the Mayor of London's Construction Logistics Plan Guidance.

- 704. The proposed development provides for active uses at lower levels, including retail, food and beverage, and cultural uses. At this stage specific users have not been identified so the precise commercial activity and associated noise level cannot be accurately defined however, the levels of noise generated from the likely type of commercial activity are expected to be relatively low and not dissimilar to the activity generated by the existing ground floor commercial uses.
- 705. The retail, food and beverage, and cultural premises could include low levels of background music, in addition to noise from people conversing within the space and using outdoor seating areas. Similarly, the proposed pocket park could result in low levels of noise from people activity using the outdoor space. No noise events are expected to take place at the pocket park, that could potentially result in unacceptable noise levels. Furthermore, capacity is restricted due to the size of the pocket park, which is not able to accommodate large crowds.
- 706. A series of conditions are proposed to be attached in respect of the hours of use of the office amenity terraces and balconies, as well as a restriction on the use of amplified music on these terraces. Operational management plans for each of the commercial elements and the proposed pocket park would be secured via a S106 agreement, and these will be expected to set out the appropriate noise control measures to minimise disturbance to nearby sensitive receptors. The appropriate noise control measures are likely to be largely based around opening hours and effective security.
- 707. Environmental health officers have confirmed, that subject to the recommended conditions, they would have no objections with regard to the noise impacts.
- 708. The submitted Environmental Statement considers the impact of the development on the noise environment. Subject to a series of conditions to mitigate noise and vibration during the deconstruction/construction and operational phases of the development, the proposed development would comply with policies D13 and D14 of the London Plan and policy DM15.7 of the Local Plan (2015).

**Overlooking and overbearing impact to residential properties and other sensitive receptors**

709. Local Plan policy DM21.3 and draft City Plan 2040 policy seek to protect the amenity of existing residents. Proposals should be designed to avoid overlooking and protect privacy. It is highlighted that the current Local Plan and Draft City Plan 2040 assess residential amenity and not the amenity of office occupiers.
710. Policy DM10.3 'Roof Gardens and Terraces' of the Local Plan seeks to encourage high quality roof gardens and terraces where they do not, inter alia, immediately overlook residential premises.
711. Consideration has to be given as to whether the scheme would give rise to any unacceptable levels of overlooking and loss of privacy to nearby residential properties.
712. The proposed amenity terraces for the office accommodation are located on levels 7, 8 and 9 to the north, west and south of the proposed building. Although there are residential properties to the north (7 High Holborn) of the application site, a minimum distance of 20 metres will be maintained between the proposed terraces and the windows and terraces/balconies of the block of flats to the north, which is considered sufficient to mitigate against unacceptable levels of overlooking.
713. There are no residential properties immediately adjacent or in close proximity to the application site to the west or south and therefore, the proposed terraces at facing south and west would not give rise to overlooking.
714. The proposed development would result in an increased massing and height. Although the proposed development would be located in close proximity to residential units, it is considered that by reason of the nature of the dense urban environment and separation distance, the proposal would not result in a greater impact to the nearby units than that already caused by other existing buildings. It is therefore considered that the development would not be reasonable to be refused on the grounds of resulting in an unacceptable overbearing impact to the nearby residential properties.

715. The proposals would not result in any undue overlooking, loss of privacy or overbearing impact. As such, it would comply with Local Plan policy DM21.3 and CS5 and policies HS3 and S23 of the draft City Plan 2040.

### **Contaminated Land**

716. Local Plan policy DM15.8 and draft City Plan 2040 policy HL4 requires developers to carry out detailed site investigation to establish whether the site is contaminated and determine the potential of pollution of the water environment or harm to human health and non-human receptors. Suitable mitigation must be identified to remediate any contaminated land and present potential adverse impacts.
717. Policy S1 of the emerging City Plan 2040 expects developers to address land contamination.
718. A Phase 1 Preliminary Risk Assessment (RSK Geosciences, November 2024) accompanies the application including a desk-based study to identify contamination and/or geotechnical constraints of the proposed development and whether additional investigation or remediation works would be required.
719. The assessment considers that the potential for significant and widespread contamination is low. However, localised sources of potential contaminative impact have been identified including presence of Made Ground and potential point sources, including existing plant rooms. Following development of the initial conceptual site model no potentially complete contaminant linkages have been identified and as such, no further assessment via intrusive ground investigation is deemed necessary. However, qualified assumptions have been made that would warrant confirmation level intrusive exploratory works with subsequent risk assessment as part of a combined geo-environmental/ geotechnical ground investigation.
720. The recommended confirmation level ground investigation should include representative soil sampling utilising a combination of shallow/deep boreholes and hand pits, both site-wide and targeted to point sources such as the plant rooms. Confirmatory ground gas monitoring could also be required. Although not within a Radon affected area, Radon resistance should be considered in the design of waterproofing measures. A preliminary UXO risk assessment is also recommended to be undertaken.

721. Other recommendations for further assessment of the site to investigate the risks identified as part of the geotechnical assessment include:
- Additional reconnaissance visits to inspect areas not accessible during the site walkover
  - Searches to identify presence of buried infrastructure
  - Deep borehole investigation with installation on groundwater monitoring equipment wells
  - Ground water monitoring at locations to ascertain the variation of depth to ground water levels and how these are impacted tidally and seasonally
  - Geotechnical analysis to inform the geotechnical design
722. The submission has been reviewed by Environmental Health Officers who have suggested a condition in respect of site investigation and a risk assessment to establish if the site is contaminated and a condition in respect of the process/remediation if contamination is found when carrying out the works. Thames Water have also requested a condition in respect of a piling method statement. Subject to the imposition of conditions, the proposal is in accordance with Local Plan policy DM15.8 and policies S1 and HL4 of the draft City Plan 2040.

### **Sustainability**

723. The City of London's 'Planning for Sustainability' Supplementary Planning Document (SPD) was formally adopted on 19th February 2025. The purpose of the SPD is to provide guidance on how applicants should approach environmental sustainability in their developments through the application process. It has been prepared to provide additional detail and guidance on how to fulfil policies of the London Plan, adopted Local Plan 2015, as well as emerging policies within the City Plan 2040. The SPD is now a material consideration in determining planning applications, however as set out in the SPD, the requirements will only be applied to applications submitted after its adoption. Although the requirements of the SPD do not apply to the proposed development at Holborn Gate, the application has been reviewed with the emerging guidance in mind (and in accordance with existing local plan policies relating to sustainability) to ensure the scheme delivers the best outcome

possible in terms of sustainability. As such, the scheme is considered to be in general compliance with the actions recommended in the SPD.

## Circular Economy

724. London Plan Policy SI7 ('Reducing waste and supporting the circular economy') sets out a series of circular economy principles that major development proposals are expected to follow. The Local Plan Policies CS15 and DM 17.2 as well as emerging City Plan 2040 Strategic Policy S8 and Policy DE1 set out the City's support for circular economy principles. In particular, Policy CS15 of the Local Plan 2015 (part 3) sets an overarching strategic policy aim of avoiding demolition through the reuse of existing buildings or their main structures. The policy does not expressly require the avoidance of demolition in all instances and does not set out a process for considering the merits of different approaches to individual sites. Policy DM 17.2 of the Local Plan 2015 seeks new development to be designed to minimise the impact of deconstruction and construction waste on the environment through the reuse of existing structures. In 2023, the City Corporation adopted the Carbon Options Guidance Planning Advice Note, which sets out an optioneering process for considering the carbon impacts of different approaches to development. The emerging City Plan 2040 Strategic Policy S8 seeks development that takes a 'retrofit first' approach, prioritising the retention and retrofit of existing buildings, informed by an appraisal of the development options.
725. To address these policies, the application includes considerations as to whether there is an opportunity to retain and refurbish any of the buildings or building elements currently on site.
726. A pre-redevelopment audit and pre-demolition audit have been carried out.
727. The existing site contains 3 buildings with up to 2 basement levels, arranged around a courtyard as well as with some peripheral external spaces. No 332 High Holborn is a commercial 8-storey building from the late 1960's, with retail at ground floor, and several residential units on the 8th floor. Externally it is characterised by horizontally arranged window banding between extruding concrete floorplates with chamfered concrete spandrels. It has a reinforced concrete structural frame with clay hollow pot concrete floors. Internally, the spaces have been refurbished at least once since construction. The column

grid is tight and inconsistent with irregular space layouts as a result of the unusual building form.

728. The building has a shallow plan and low floor-to-ceiling heights of 2.56 m and floor-to-floor heights of 3.04 m which limits the scope to introduce side extensions without reducing daylight levels. The largest of the 3 buildings, Holborn Gate, is of similar construction and design as 322 High Holborn, but it was constructed in the early 1960s. Both buildings have poor façade performances, including a lack of insulation and thermal bridges where the slabs extend beyond the façade line.
729. No 44 Southampton Buildings is a 5-storey purpose built office building from 1913-14 with one basement, masonry walls, concrete floors with steel rib decks, and with a classical façade design with stone cladding to the ground floor and brickwork on the upper floors. Its upper floors have floor-to-floor heights ranging from 3.12m to 3.19 m, all of which are not aligned with the High Holborn facing buildings. Later, modern extensions were added at roof level and to the rear. Internally, it appears to be in a good condition. A detailed pre-demolition audit has been provided that includes recommendations for maximising the reclamation potential of items identified and potential opportunities for high levels of reuse and recycling.
730. The analysis of the existing buildings does not show any issues with the safety or longevity of the existing structures, and adaptive works with limited extensions without significantly modified loads should be feasible. However, adaptive reuse of the buildings for a commercial scheme would require:
- partial demolition to make the cores compliant with fire safety requirements
  - adaptations to connect floor levels to optimise floorplates and designing with the complexity of the building form and irregular column grids
  - improvements to energy efficiency through wall insulations and removal of thermal bridges, high performance windows and doors and new MEP
  - adjustments and design restrictions for horizontal extensions and amalgamations to achieve optimal daylight and high quality internal office floorspaces, likely to be of lower magnitude compared to a new construction.
731. Overall, no significant prohibitive factors of the construction, design, occupant comfort, social and economic values of the existing buildings for adaptive reuse



have been identified, however, a higher quality scheme retaining the majority of the existing buildings is thought to be achievable for a housing scheme. In any case, significant refurbishment and retrofit, with partial demolition and new construction would be required for the retention of the buildings.

#### Pre-redevelopment audit optioneering

732. The pre-redevelopment audit includes an options assessment that details how different development options would address circular economy, establish the potential of retention, reuse and carbon impacts of different materials. Whole life-cycle carbon impacts of the options are set out in the whole life-cycle carbon emissions section of this report. This includes an options evaluation with regard to opportunities for wider environmental sustainability benefits and other planning benefits in order to address the economic, social and environmental objectives of achieving sustainable development as set out in the NPPF 2024, chapter 2, paragraph 8.
733. For the pre-redevelopment audit, the following options were assessed:
- Option 1: Heavy retrofit of the existing buildings, 100% retained structure
  - Option 2: Heavy retrofit of the existing buildings with vertical and horizontal extensions, 100% retained structure
  - Option 3: Partial retention of 322 High Holborn plus new build
  - Option 4: Partial retention of Holborn Gate plus new build
  - Option 5: Partial retention of 44 Southampton Buildings plus new build
734. The optioneering assessment demonstrates that options 1 and 2 would almost fully retain the buildings' structure and facades. Due to the complexity of the buildings' form and column grid, the constraints of the cores and the low floor to ceiling heights, both options would come with limitations to the quality of floorspaces and commercial viability. However, option 2 would be able to provide additional, high quality floorspace but this would result in higher structural intervention, carbon emissions and costs.
735. The partial retention options, relating to a large part of Holborn Gate in option 3, to part of 322 High Holborn in option 4, and to 44 Southampton Buildings in option 5, would cause similar constraints as options 1 and 2 for the retained buildings, in addition to the complexity of linking between the levels of the

retained elements to the new build part of the site with more generous floor to ceiling heights and regular column grids. However, these three options would significantly reduce the quantities of demolition waste that cannot be reused or recycled at high values (such as concrete, clay, rebar) compared to a redevelopment option while the new build elements in each option can be designed to comply with the GLA's 6 circular economy principles of building in layers, designing out waste, longevity, design for adaptability/flexibility, design for disassembly and the ability for all elements to be reused and recycled.

736. Overall, the assessment concludes that for the retention scenarios, significant constraints for the retained buildings include the following:
- Fire issues, requiring significant reconfiguration of the cores to achieve compliance;
  - poor thermal performance of the existing façade;
  - limited floor to floor heights;
  - non-uniform geometry and grids of the existing buildings make the building unsuited for adaptation, limiting the scope for vertical/lateral extension; and
  - interfacing of floor slab levels, stair & core access between the retained and the new structure.
737. The applicants therefore choose the full redevelopment as their preferred approach for the application proposals.
738. The explored optioneering is considered to comply with the GLA's Circular Economy Statement Guidance. The evaluation of the carbon intensity of the options and their evaluation in the round is set out in the whole life-cycle carbon emissions section of this report.

#### The application proposal

739. The submitted Circular Economy Statement describes the strategic approach, including the incorporation of circularity principles and actions into the proposed development, in accordance with the GLA Circular Economy Guidance.
740. The proposed development would retain the existing basement retaining walls and a small percentage of basement slab, altogether considered to be less than 1% of the buildings on site. However, due to the proposed lower basement slab level, a new perimeter wall would be constructed. The retained elements would

serve to simplify construction works and reduce excavation and temporary works for the new building. An area of redundant existing basement space is allocated for rainwater attenuation, allowing the building to meet its sustainable drainage strategy without excavating new areas for tanks. The full retention of the part single, part 2-storey basement was not considered to be feasible, foremost due to the 3 different basement slab levels and greater heights required, but also due to the required plant spaces that were proposed to be consolidated in the basement in order to reduce roof level height and free up roof spaces for amenity terraces and heat pump installation. In addition, extensive end of trip facilities are considered to be best located in the basement, and the 5 existing substations on site will need to be replaced in the basement.

741. The circularity approach for the new building incorporates principles of adaptability and flexibility by designing regular structural and façade grids to aid flexibility of internal space. The floor plan could be split for a varying number of tenants (between 1 and 4), and underfloor services have been designed which allow for easier adaptability. Most floors have access to their own external amenity space or can be interlinked to them via integrated soft spots for internal tenant stairs to create vertical villages.
742. Within the circular economy strategies, the following are being investigated within the design:
- Flexibility: designing the maintenance and access routes to be wide enough for easy kit replacement
  - Adaptability: Design with standardised sizes for ease of future reuse
  - Disassembly: Specification of products with extended manufacturer support. Glazing to avoid structural silicone which would complicate disassembly. Design with visible, demountable connections where possible to enable future disassembly/replacement. Use of mechanical fixings in lieu of adhesives for ease of disassembly.
743. The applicants commit to meeting all mandatory GLA waste requirements, and they have established circular economy project commitments and further innovation opportunities that align with the GLA Circular Economy principles. The commitments and innovation opportunities will be further developed at detailed design stage and include:

- Use of recycled aggregate from the existing building in new construction, where possible, e.g. as sub-base for the basement or as piling-mat
  - Procure reclaimed steel to use in the design where possible and where not possible design with low-carbon steel
  - Fully investigate the opportunity to reuse the stone from 44 Southampton Buildings on the new façade
  - Fully investigate the opportunity for glass recycling. Undertake façade survey to understand the recyclability of the existing glass
  - Implement a combined rainwater and greywater collection system to increase efficiencies
  - Minimise installation of Cat A fit out, including exposed ceilings
  - Maximise recovery of Raised Access Floors for use on or off-site (programme and storage dependant)
  - Investigate the reuse of materials and components from the existing building in the new Cultural Space, including items such as brick from the existing façade as flooring, and the reuse of internal fit-out items and finishes, such as: sanitary ware, kitchens, lights (wall/ceiling) and furniture
  - Continue to update the overheating analysis against future climate change scenarios, to inform the design and mitigate extreme weather conditions affecting the longevity of the MEP systems
  - Provide good access to plant areas to facilitate future adaptation, maintenance and replacement of end-of-life equipment
  - Maintain defined plant replacement routes, including goods lifts to enable disassembly/replacement.
744. Further innovation opportunities are listed in the Circular Economy Statement, to include exploring the reuse of internal fit-out elements and materials, the use of material passporting and of opportunities for future disassembly.
745. A condition is recommended for an update to the Circular Economy Statement prior to the commencement of construction, and post-completion update, to confirm that high aspirations can be achieved.

#### Operational energy strategy and carbon emissions

746. The Energy Statement outlines the operational energy strategy in line with the GLA Energy Assessment Guidance. The statement demonstrates that the proposed development has been designed to achieve an overall 11% reduction

in regulated carbon emissions compared with a Building Regulations Part L 2021 compliant building (the 'Part L baseline').

747. A passive design approach is adopted to achieve 10% 'Be Lean' savings beyond the Part L baseline. Glazing area locations, design and thermal performance are optimised to maximise natural daylight and minimise overheating and reduce space heating demand. The London Plan recommends the incorporation of natural ventilation to reduce energy demand through mechanical systems, however, the deep floor plan nature of the proposed building would not allow for efficient natural ventilation flows, and natural ventilation would reduce the u-value and efficiency of the façade system. In the near future, typically in line with the first MEP and glazing replacement cycle after 15-20 years, the current façade system could be retrofitted with openable vents and smaller window modules in connection with a mixed mode ventilation system if natural ventilation will be considered essential to improve energy efficiency and occupier wellbeing.
748. There are currently no available or proposed district heating networks in the local area, however a potential heat exchanger location with space provision for a future heat network connection will be provided. A low temperature hot water system is proposed which is compatible with a future heat network system.
749. A system of 236 Photovoltaic (PV) panels with an area of 441.3 sqm, providing 2.5% of the total annual operational energy demand, and air source heat pumps are proposed as low and zero carbon (LZC) technology solutions. The total 'Be Green' savings beyond the Part L baseline currently stand at 1%.
750. In addition, the applicants are exploring the use of thermal energy storage linked to the electric heat pumps in order to be able to address future fluctuations of the energy grid as it decarbonises. This could be used for domestic hot water release during peak times, for heat sharing and to increase the resilience of the development generally. The incorporation of thermal energy storage will rely on an operational carbon benefit versus embodied carbon analysis that is requested by condition.
751. The proposed energy strategy demonstrates that the proposed building would achieve a 11% reduction in regulated carbon emissions under Part L 2021. It does not meet the GLA's 35% target, and the GLA acknowledges that the 35% carbon reduction target relative to Part L 2021 will be initially challenging for

non-domestic buildings. Due to the proposed building's location on an island site without any party walls that reduce heating and cooling demand, limitations to available space for PV panels and its unique mix of uses, the energy efficiency of the design cannot be reflected appropriately in the Building Regulations Part L methodology. In addition, limitations of the Part L methodology arise from comparing the building's performance with a notional building performance rather than basing the operational carbon performance on the actual, modelled whole building energy use intensity (EUI). As the energy statement demonstrates that the Mayor's net zero carbon target cannot be met on site, an offset payment will be made by the applicants as set out in the planning obligations section of this report.

### Energy Use Intensity (EUI)

- 752. The adopted GLA energy assessment guidance (2022) requires developments to calculate the EUI, a measure of total energy consumed in a building annually including both regulated and unregulated energy, as well as the space heating demand. For offices, the GLA requires applicants to target an ambitious EUI of 55 kWh/m<sup>2</sup>(GIA)/year and a space heating demand of 15 kWh/m<sup>2</sup>(GIA)/year (regulated). The estimated EUI from the offices of the proposed development is 75.3 kWh/m<sup>2</sup>/year and for the space heating demand 6.8 kWh/m<sup>2</sup>/year.
- 753. These figures are estimates at this stage as the operational energy performance – including unregulated energy use - of the building is dependent on the level of occupancy and operation of the building.
- 754. A S106 clause will be included requiring reconfirmation of this energy strategy approach at completion stage and carbon offsetting contribution to account for any shortfall against London Plan targets, for the completed building. There will also be a requirement to monitor and report the post construction energy performance to ensure that actual operational performance is in line with GLA's zero carbon target in the London Plan.

### BREEAM

- 755. The proposed development has been pre-assessed under BREEAM New Construction v6.1 - shell & core (office). The development is targeting an 'excellent' rating with a weighted score of 83.1% for the pre-assessment and an aspiration to achieve an 'outstanding' rating at post construction. The pre-

assessments are on track to achieve a high number of credits in the City of London's priority categories of Energy, Water, Pollution, Materials and Waste.

756. The BREEAM pre-assessment results comply with Local Plan policy CS15 and emerging City Plan 2040 policy DE1. A post construction BREEAM assessment is required by condition.

#### NABERS UK

757. This certification scheme rates the energy efficiency of a commercial building from 1 to 6 stars over a period of 12 months of operation. The proposed NABERS Design for Performance target is a minimum of 5 stars (out of 6 possible) rating and a detailed Design for Performance assessment will be carried out through RIBA stages 3 and 4.

#### Whole life-cycle carbon emissions

758. London Plan Policy SI 2E (Minimising greenhouse gas emissions) requires applicants for development proposals referable to the Mayor (and encouraging the same for all major development proposals) to submit a Whole Life-Cycle Carbon assessment against each life-cycle module, relating to the product sourcing stage, construction stage, the building in use stage and the end-of-life stage. The emerging City Plan 2040 policy DE1 requires the submission of Whole Life-Cycle Carbon assessments for all major applications. The assessment captures a building's operational carbon emissions from both regulated and unregulated energy use, as well as its embodied carbon emissions, and it takes into account potential carbon emissions benefits from the reuse or recycling of components after the end of the building's life. The assessment is therefore closely related to the Circular Economy assessment that sets out the contribution of the reuse and recycling of existing building materials on site and of such potentials of the proposed building materials, as well as the longevity, flexibility, and adaptability of the proposed design on the Whole Life-Cycle Carbon emissions of the building. The Whole Life-Cycle Carbon assessment is therefore an important tool to achieve the Mayor's net-carbon target.

#### Carbon options

759. A carbon options study has been carried out, initially considering a larger number of options relating to partial retention and extension opportunities as shown in the diagram below.

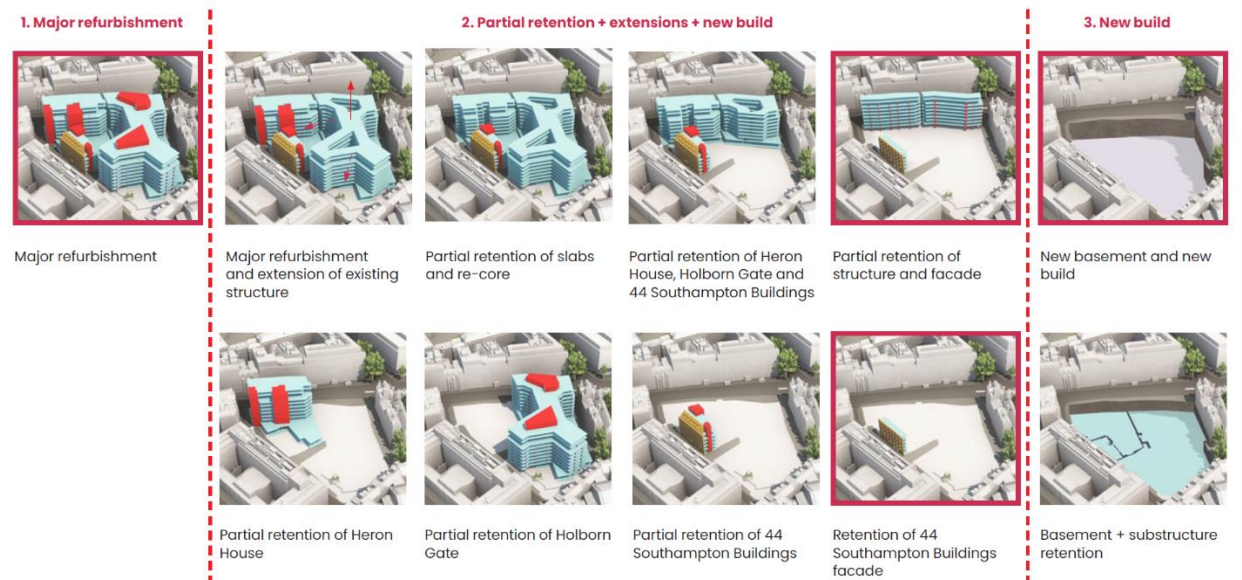


Figure 2: Initial development options under consideration (Design & Access Statement, page 74)

760. Surveys of the existing buildings with the results summarised in the Circular Economy section of this report, and a technical review of the options resulted in the identification of major performance issues and limited extension potential for all 8 partial retention options, such as:

- Structural fire rating and fire escape/evacuation provision in particular of the cores
- Poor thermal performances of all existing facades, including thermal bridges
- Limited floor to floor height in connection with deep floorplans to be proposed through horizontal extensions
- Non-uniform geometry and grids for high quality and flexible floor layouts
- Interfacing of floor slab levels, stair & core access between the retained the new structure.

761. Out of the 8 partial extension options, 2 options (highlighted with a red outline in the diagram above) were considered to be least affected by the above listed structural constraints and have been taken forward for the optioneering



exercise in order assess carbon impacts and evaluate opportunities and constraints in more detail.

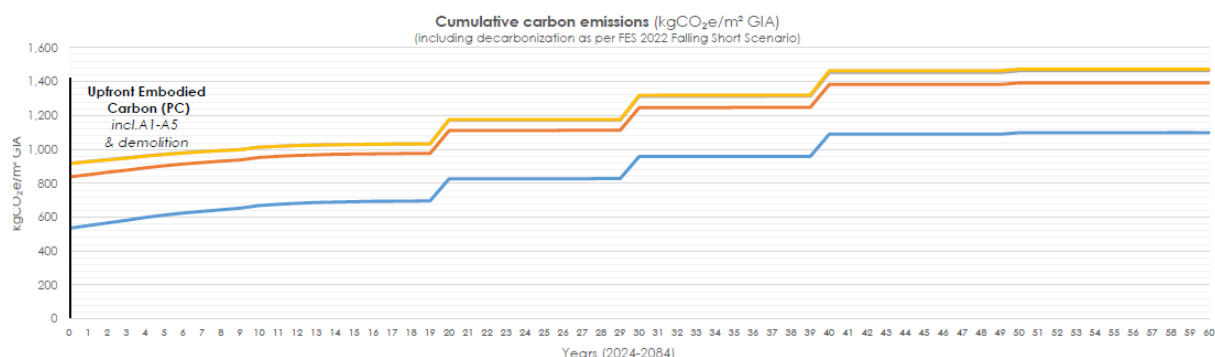
762. The final carbon optioneering exercise undertaken for the site includes the following 4 options:

- Option 1: Major refurbishment of the existing buildings, 84% retained substructure and 74% retained superstructure; 36,004 sqm GIA
- Option 2: Partial retention of frontage structures and new build, 33% retained substructure, 14% retained superstructure; 52,691 sqm GIA
- Option 3: New build plus partial retention of 44 Southampton Buildings, 3% retained substructure, 1% retained superstructure; 53,772 sqm GIA
- Option 4: Full redevelopment; 54,671 sqm GIA

763. A light refurbishment option as baseline option was not further explored, due to the baseline amount of work required to bring the buildings up to required standards.

764. During the optioneering process it was agreed that none of the options could include the retention of partitions, finishes, FFE, external works or MEP plant and equipment. In addition, in any retention scenario, the demolition of the existing buildings cores and construction of new cores would be required for compliance with fire requirements, resulting in significant demolition and construction works.

765. The following graph and table present the whole life-cycle carbon results of the options.



— Major refurbishment (Op1)      — Transformation + New Build (Op2)  
— Partial retention of 44SB + New Build (Op3)      — New Build (Op4)

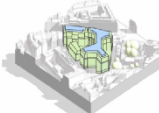

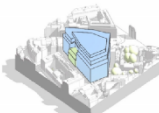
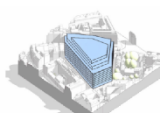
				
	Major refurbishment	Transformation + New Build	Partial retention of 44SB + New Build	New Build
Option Reference	Option 1	Option 2	Option 3	Option 4
Project reference period	60	60	60	60
Gross Internal area (GIA) m <sup>2</sup>	36,004	52,691	53,772	54,671
Net Internal area (NIA) m <sup>2</sup>	19,611	33,917	36,279	37,171
Change in NIA (compared to existing) m <sup>2</sup>	0%	73%	85%	90%
Substructure % retained by mass	84%	33%	3%	0%
Superstructure (Frame, Upper floors, Roof, Stairs and ramps) % retained by mass	74%	14%	1%	0%
<b>Total WLCA (incl. B6 &amp; pre-demolition)</b> (kgCO <sub>2</sub> e/m <sup>2</sup> GIA) <i>Module B7 is not considered</i>	<b>1,099</b>	<b>1,392</b>	<b>1,464</b>	<b>1,474</b>
Upfront Embodied Carbon (A1-A5) excl. sequestration (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	524	813	885	883
In-use & End of Life Embodied Carbon (B-C) excl. B6 & B7 (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	408	422	438	449
Estimated Whole Building Operational Carbon for building life time (B6) (kgCO <sub>2</sub> e/m <sup>2</sup> GIA)	156	132	109	109
<b>Total WLCA (incl. B6 and pre-demolition)</b> (tCO <sub>2</sub> e) <i>Module B7 is not considered</i>	<b>39,552</b>	<b>73,348</b>	<b>78,719</b>	<b>80,569</b>
Total existing building demolition (tCO <sub>2</sub> e)	386	1,301	1,741	1,766
Upfront Embodied carbon (A1-A5) (tCO <sub>2</sub> e)	18,866	42,838	47,588	48,274
In-use embodied carbon (B-C) (tCO <sub>2</sub> e)	14,690	22,236	23,552	24,547
Operational Carbon for building life time (B6) (tCO <sub>2</sub> e)	5,610	6,974	5,838	5,982

Table: Whole life-cycle carbon options summary

766. Due to limited new build proportion, the carbon intensity and absolute whole life-cycle carbon emissions of option 1 are clearly lower than those in the other 3 options, while the gradient and frequency of the carbon impact in the in use life-cycle stages rise in line with the other 3 options, due to the required major upgrade of building services, cores and facades in option 1.

767. Options 3 and 4 are similar in impact, with slightly smaller embodied carbon impacts in option 3 due to the retention of the front portion of 44 Southampton Buildings and resulting overall approx. 900 sqm less of floorspace. Option 2 retains significantly more of all existing buildings, achieving approx. 2,000 sqm less floorspace compared to option 4, and therefore, this option results in 10% fewer absolute whole life-cycle carbon emissions and 6% fewer whole life-cycle carbon emissions per square meter compared to option 4.
768. The building complexity of lateral extensions in options 1 and 2 are however high due to significant differences in the existing building's structures and needs for strengthening works. Subsequently, potentials for creating sufficient roof spaces for building services, external amenity spaces, biodiversity and for PV installations would be very limited.
769. Overall, while options 1 – 3 would have good to moderate positive impacts on circular economy and the reduction of embodied carbon and would be technically feasible, the redevelopment option would excel in potentials for high quality, health and wellbeing, urban greening and biodiversity as well as overall longevity compared to the other options. Planning officers consider this to be the most suitable approach to future proof the City as a sustainable location in London, as set out elsewhere in the report. Option 3 therefore has been selected to be developed for the application scheme.
770. The optioneering approach summarised in this section and in the Circular Economy section complies with the recommended approach in the GLA's guidance on whole life-cycle carbon emissions and with the more detailed methodology set out in the City of London's Carbon Options Guidance to establish and evaluate the carbon impact of development options.
771. Although the emerging City Plan 2040 does not yet carry substantial weight, the retrofit first approach set out in policy DE1 Sustainable Design indicates a direction of travel by requiring carbon optioneering to be used as a tool to explore retaining and retrofitting existing buildings in order to establish the most sustainable and suitable approach for a site. The policy addresses the NPPF 2024 stating in paragraph 161 that the planning system should support the transition to net zero by 2050 and paragraph 164 that new development should be planned for in ways that help reduce greenhouse gas emissions. These policies are reflected in the City of London's extensive process of carbon optioneering that has been carried out as described above to underpin the

development of the application scheme including maximising retention of existing structure.

The application proposal:

772. The submitted whole life-cycle carbon assessment sets out the strategic approach to reduce operational and embodied carbon emissions and calculates the predicted performance that compares to current industry benchmarks as set out in the table in this section. The whole life-cycle carbon strategy at planning stage is based on:
- Optimising the superstructure through a pre-cast concrete slab composite with steel frame
  - 25% GGBS (ground granulated blast furnace slag) content for all structural concrete elements
  - 60% GGBS for pile caps to control heat of hydration during concreting.
773. In addition, the retention of a small percentage of basement walls and basement slab is proposed.
774. The whole life-cycle carbon assessment, to include all life-cycle stages with the exception of the operational carbon emissions, demonstrates that the development's embodied carbon emissions can be reduced to almost reach the GLA's Standard Benchmark. The measures listed below could contribute to achieving embodied carbon emissions that improve on the GLA's standard benchmark, these will be considered during the detailed design stages and include:
- Opportunities to use further cement replacement in concrete
  - Pile assisted raft foundation optimisation
  - Low carbon aluminium specification for the façade
  - Low carbon steel structure with high recycled content or reused elements
  - Design optimisation for reinforced concrete elements
775. The GLA Guidance requires applicants to use the (original) methodology developed by RICS (Royal Institution of Chartered Surveyors). RICS have published the 2nd edition which has come into full effect on 1 July 2024, requiring to follow this Version 2's requirements when completing a whole life-

cycle carbon assessment. The GLA has indicated that it would not update its guidance to reflect these changes for now. The applicants used RICS Version 2 in accordance with RICS requirements, however, the calculations in compliance with Version 1 were also provided for the purpose of comparing the results to the GLA benchmarks, in compliance with the requirements of the GLA guidance.

776. The table below shows baseline whole life-cycle carbon emissions per square meter for the building in relation to the GLA benchmarks for offices at planning application stage. The RICS Version 1 results shown in the table below in bold figures are compared with the GLA benchmarks in order to remain in compliance with the requirements of the GLA's WLC Assessment Guidance. The table also reports calculations using RICS Version 2 methodology, for information only. RICS version 2 is an updated methodology that includes a 15% contingency factor and several new assumptions across specific life-cycle modules.

Scope	Proposed development (RICS V1)	Proposed development (RICS V2)	Benchmark	GLA benchmark
RICS components	kgCO2/m2	kgCO2/m2	kgCO2/m2	
A1-A5	<b>950</b>	1,127	< 950	GLA standard
			< 600	GLA aspirational
A-C (excluding B6-B7)	<b>1,479</b>	1,729	< 1,400	GLA standard
			<970	GLA aspirational
B6+B7	<b>1,354</b>	1,354		
A-C (including B6-B7)	<b>2,833</b>	3,083		

777. The WLC RICS Version 1 Assessment Spreadsheet calculates that the proposed development would result in 158,614,721 kg CO2e whole life-cycle carbon being emitted over a 60-year period. Of this figure, operational carbon emissions would account for 75,800,899 kg CO2e (48% of the building's whole life-cycle carbon), and the embodied carbon emissions for 82,813,82 2kg CO2e

(52% of the building's whole life-cycle carbon). The detailed results of the GLA benchmark comparisons assessment show that:

- the project's substructure impact is 2% better than the current benchmarks at A1-A5
- the frame impact is 3% better than the current benchmarks at A1-A5
- the façade impact is 10% better than the current benchmarks at A1-A5 achieved through material selection.

778. A detailed whole life-cycle carbon assessment and a confirmation of the post construction results are required by conditions.

779. The whole life-cycle carbon emissions have been set out and calculated in accordance with the GLA's Whole life-cycle carbon assessment guidance, as confirmed by the independent 3rd party review. The submitted circular economy strategy, operational and embodied carbon strategy demonstrate the opportunities of the proposal and proposed actions to reduce carbon emissions and therefore comply with the London Plan Policy SI 2E, Minimising greenhouse gas emissions, and with the Local Plan Core Strategic Policy CS15 Sustainable Development and Climate Change and the emerging City Plan 2040 Policy DE1 Sustainable Design. By committing to an exemplar reduction of whole life-cycle carbon emissions through the submitted strategic approach that is required to be confirmed at detailed design stage, the development would contribute to the transition to net zero by 2050 in accordance with NPPF (2024) paragraph 161.

### Urban Greening

780. London Plan Policy G5 (Urban Greening) sets out the requirement for major developments to contribute to the greening of London through urban greening as part of the design and site. An Urban Greening Factor of 0.3 is recommended for non-residential developments. Draft City Plan (2040) Policy OS2 (City Greening) mirrors these requirements and requires the highest levels of greening in line with good design and site context.

781. The proposed development would incorporate 1,447m<sup>2</sup> of green roofs, 159m<sup>2</sup> of standard trees in connected pits with a soil volume at least two-thirds projected canopy of the mature tree, 136m<sup>2</sup> of flower-rich perennial planting,

18/7m<sup>2</sup> of standard trees in pits with a soil volume less than two-thirds projected canopy of the mature tree, 521m<sup>2</sup> of green wall, and a 7.5 m<sup>2</sup> water feature.

782. Following comments raised by the Environmental Resilience Officer the projected UGF has been recalculated. Based on the total building area of 5051m<sup>2</sup> (excluding the pocket park and S278 areas), and without making any changes from the submitted scheme, the UGF score achieved is 0.297. If the basement extent (this is the ownership redline, which extends halfway into the Pocket Park) is included, then the UGF score of 0.302 (5506m<sup>2</sup>) is achieved. This is a direct result of the significant greening being introduced within the pocket park. Given that this is within the Applicant's ownership, no feasibility risks are raised, as the proposed greening can be achieved by the applicant.
783. To achieve the 0.302 UGF score the existing Alder tree is proposed to be maintained, by modifying the proposed planter.
784. Policy CS19 of the Local Plan 2015 seeks to protect the amenity value of trees retaining and planting more trees wherever practicable and policy DM19.2 states that developments should promote biodiversity and contribute to urban greening. Local Plan paragraph 3.19.17 states that *"Where existing green infrastructure is disturbed, removed or damaged as a result of development, it must be replaced with good quality urban greening. There should be no net loss of green infrastructure. Existing trees should be replaced with trees of an equivalent size and quality."* The emerging City Plan 2040 seeks to increase the number of trees and their overall canopy cover through a number of measures including *"Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed requiring their replacement with trees that can attain an equivalent value."*
785. An Arboricultural Impact Assessment (AIA) from Treefellas Arboriculture Limited has been supplied. The AIA states that there are four trees on site; namely two young privately owned birch trees, a semi mature Alder tree and recently planted cherry tree. Following revisions the existing Alder tree is proposed to be retained. Although not captured on the AIA, the applicant has confirmed that the recently planted cherry tree will also be retained. A revised AIA to cover this is expected to be submitted prior to the determination of the application at Committee on the 17<sup>th</sup> June 2025. The two younger trees are proposed to be removed. The trees are in good condition and are planted in tree pits in the ground.

786. The Arboricultural Projects Officer has been consulted and stated that it would be preferable for the existing trees to be retained. As noted above, following revisions, the existing semi mature tree and newly planted cherry tree are proposed to be retained. Concerns have been raised regarding the required soil volumes and their ability of the planters connected to the ground to achieve the proposed trees.
787. The proposed trees in the pocket park area are all multistems with the exception of a number of feathered ginkgo trees. The Arboricultural Projects Officer states that the Ginkgo trees are specified at 35-40 cm girth which is too large a size given the conditions and soil volumes that these are being planted into and can be liable to poor establishment and failure. The Applicant's consultant has confirmed that a reduced 30-35cm girth would be explored.
788. Multistem trees do not provide the same number of benefits that larger canopy trees bring, and if sufficient soil volume is not available, they may not be able to establish properly. The applicant has confirmed that sufficient soil volumes would be able to be achieved within the applicant's ownership boundary. The planters proposed above the basement extent have 1.2 m depth available. The Corporations Arboricultural Officer considers this acceptable, however, in relation to the proposed trees, it is advised that a condition is imposed securing the submission of details of sizes, species and tree pit design. A landscaping condition is imposed requesting all the aforementioned information.
789. Part of the pocket park is within publicly maintained highway and as such these proposals would be delivered and maintained by the City of London Corporation. It is expected that maintenance to be dealt with via a commuted sum secured via the S278 agreement.
790. To ensure that the proposed trees would be able to be planted and established, a condition securing the submission of tree sizes, species and tree pit designs and replacement of any dead trees within a period of five years will be imposed.
791. It is recommended that further details of urban greening measures, and the landscaping and planting strategies are to be secured by condition. Subject to compliance with these conditions the proposal would be policy compliant with regards to Urban Greening.



792. Following the incorporation of the abovementioned revisions to retain the existing semi mature tree, the recently planted cherry tree, the clarifications around the calculation of UGF, the suitability of the planters to provide suitable soil volumes and other minor amendments to the landscaping scheme, the Environmental Resilience Officer and Arboricultural Officer are satisfied that the proposed greening and ecological measures are feasible within the scope of the proposal. Therefore, the development is acceptable in that respect.

#### Climate Resilience and Flood risk

793. NPPF Paragraph 159 requires new development to avoid increased vulnerability to the range of impacts arising from climate change. Policy DM15.5 Climate change resilience and adaptation of the Local Plan 2015 and Policy DE1 of the emerging Local Plan 2040 require climate change adaptation measures to be incorporated into development and for developers to demonstrate how they will improve environmental performance and mitigate and adapt to climate change.

794. The application is supported by a Flood Risk Assessment prepared by Arup. For the purposed of the FRA the following flood risks have been assessed:

- Fluvial and tidal
- Groundwater
- Artificial water sources
- Pluvial (flooding resulting from surface water/overland flows)
- Sewer flooding
- Infrastructure failure

795. The application site is located within Flood Zone 1 and is therefore identified as being an area at low risk of fluvial and tidal flooding. The FRA and Drainage Strategy concludes that the site at low risk of flooding for all the potential sources listed above.

#### *Drainage Strategy*

796. The drainage hierarchy has been considered when preparing the surface water drainage strategy. A detailed appraisal of Sustainable Drainage System (SuDS)

has been undertaken alongside an assessment of the required attenuation on site. This shall accommodate all storm events up to and including the 1 in 100-year storm event with a + 40% allowance for climate change.

797. Surface water runoff from the site will be restricted to a total of 4.0 l/s, which is only marginally above greenfield runoff rates and is approximately a 95% reduction from existing discharge rates from the Site. To achieve this, the following proposals have been incorporated:

- Blue Roofs: An area of 1141m<sup>2</sup> has been identified as possible for blue roof on level 10. As the existing basement and foundations are retained, there are structural loading restrictions and so only 85mm depth of storage can be provided at this stage. This equates to a possible storage volume of 92m<sup>3</sup>.
- Basement attenuation: Two attenuation tanks are proposed with a predicted storage volume of 209m<sup>3</sup> for tank located in the northeast void and 406m<sup>3</sup> for the one located to the south.
- Tree pits: only raised planters in the proposed Pocket Park will be used for rainwater harvesting due to site constraints.

798. The proposed development would not increase the risk of flooding either on the site or elsewhere. The approach taken minimises the risk of flooding to the site and provides resilience in future climate scenarios and therefore, it is considered complying with the aims of the NPPF.

799. The Climate Change resilience officer has reviewed the submitted details and raised no objection subject to imposition of a condition ensuring the submission of the SuDS details. It is therefore considered that the proposed development would be acceptable with regard to flood risk.

### *Water stress*

800. Given the increasing risk of water scarcity, the project prioritises water conservation and efficiency. All fixtures and fittings will be selected to meet or exceed BREEAM water efficiency standards, and reclaimed water will be used for toilet flushing significantly reducing the total water consumption. Additionally, water attenuation tanks are provided for storage, and supply is connected to the utility supply.

### *Overheating and the urban heat island effect*

- 801. London Plan Policy SI 4 (Managing heat risk) encourages developments to minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure, in line with the cooling hierarchy, and that major development proposals should demonstrate through an energy strategy how they would reduce the potential for internal overheating and reliance on air conditioning systems.
- 802. The new structural elements will be designed for at least a minimum 60-year lifespan. Services and finishes will be designed to meet TM52 2050 overheating criteria and avoid a premature end of life for all components through considering maintenance needs and optimising durability.
- 803. The project will incorporate passive design measures to minimise the risk of overheating. This includes the use of high-performance glazing to reduce solar gain. Additionally, the deep façade and use of additional vertical elements on the south and higher g-value glass will help to limit overheating. The façade performance specification will require that the appropriate grade/alloy/temper of structural components be selected and implemented in order to comply with the anticipated potential for thermal fatigue for the design life of the building. This supports the City of London's goal of ensuring buildings are resilient to increasing temperatures due to climate change.
- 804. Furthermore, the scheme has been assessed for overheating risk under the CIBSE TM52 methodology and this work has fed into the passive design measures integrated into the façade design. It is concluded that the passive and active design measures adopted would limit the overheating risk in a manner that is resilient to extreme weather conditions due to climate change.
- 805. No objections have been raised by the Climate Resilience Officer with regard to overheating. Thermal comfort is assessed in a separate section below considering the thermal comfort impacts of the development public and private open spaces. Subject to the construction of the development in accordance with the proposed passive and active design measures, the proposal is considered to be acceptable in this regard.

### *Pests, Diseases, Infrastructure, WELL*

806. The proposed development would make a positive contribution to the City of London, with the potential to mitigate some of the wider impacts of climate change. The project design considers the potential increase in pests and diseases due to climate change. Planting species have been carefully selected to not serve as known food sources for any pest or diseases. Regular and ongoing maintenance is to be carried out weekly, removing any harmful or infected material from site should issues occur in the future. All facade openings for ducts will have external louvres with insect mesh to prevent access from pests, and careful coordination of air intake locations and detailing shall prevent pests entering MEP systems.
807. The project team have considered resilience to climate-related risks, particularly those posed by extreme weather events in the design of infrastructure. Materials and construction methods will be selected for their durability and ability to withstand the impacts of climate change, such as increased rainfall, wind speeds, and temperature fluctuations. At ground floor and at terraces, the landscaping levels will slope away from the building to limit the risk of water ingress. Furthermore, the central location of the site means that there are various options for transport including bus, rail and cycling in case of any transport failures.
808. A pre-assessment for WELL has been undertaken to understand what the Proposed Development could achieve. The project aims to deliver a 'WELL' Gold rating with opportunity to potentially achieve a Platinum rating. A further assessed of the health impacts/benefits of the proposed development is undertaken in the relevant 'Health Impact Assessment' section of the report below.

#### *Climate Change Resilience Summary*

809. The proposed development is compliant with Local Plan Policy DM 15.5 (Climate change resilience), emerging City Plan 2040 Strategic Policy S15 (Climate Resilience and Flood Risk) and associated City Plan 2040 Policies CR1 and CR2.

#### *Biodiversity Net Gain*

810. Under Environment Act 2021, as of 12<sup>th</sup> February 2024, it is mandatory in England for new developments, other than a small number of exceptions, to deliver a minimum of 10% biodiversity net gain (BNG), as measured by the Statutory Biodiversity Metric or Small Sites Metric respectively, secured through planning condition as standard, in accordance with schedule 14 of the Act.
811. Paragraph 193 of the NPPF states that “if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”.
812. Local Plan policy DM19.2 states that “Developments should promote biodiversity and contribute to urban greening by incorporating:
- *green roofs and walls, soft landscaping and trees;*
  - *features for wildlife, such as nesting boxes and beehives;*
  - *a planting mix which encourages biodiversity;*
  - *planting which will be resilient to a range of climate conditions;*
  - *maintenance of habitats within Sites of Importance for Nature Conservation.”*
813. Policy OS4 of the emerging City Plan “Major developments are required to deliver Biodiversity Net Gain (BNG) to protect and enhance biodiversity”.
814. The application is supported by a Biodiversity Net Gain Assessment (BNGA) which aims to quantify the predicted change in biodiversity value of the site in light of the proposed development to assess compliance against national and local planning policies and against the Environmental Act 2021.
815. From a site workover taken place on the 28<sup>th</sup> of August 2024 along site data from a desktop study, the existing context of the site was identified, which comprises hard surface, buildings, shrubs and three urban trees. The existing baseline value of biodiversity on site equates to 0.06 HU (Habitat Units).
816. The proposed habitat creation includes 0.0902ha of introduced shrubs, 0.0673ha of biodiverse green roof, 0.0122ha of ground based green wall., 0.0370ha of façade- bound green wall, 0.0008ha of ornamental pond and

0.0346ha of urban green planting. The rest of the land is occupied by developed land.

- 817. The post development design proposals are predicted to deliver 0.69HU. This is a net gain of 0.63 HU. This equates to 937.29% increase of HU. The design proposal also meets the BNG Trading rules for all habitat types.
- 818. The proposed 673sqm biodiverse green roof, three planting, the façade-bound green wall and the ground-based green wall contribute significantly to the sites biodiversity value.
- 819. The submitted BNGA advises that a Habitat Management and Monitoring Plan (HMMP) be secured for the habitat creation and long-term management over 30 years. The HMMP would have to be submitted to the Local Planning Authority for approval. It is considered reasonable that this is secured via a S106 obligation. The Biodiversity Gain Plan would have to be submitted to and approved in writing by the Local Planning Authority upon receipt of planning permission. This is secured via condition.
- 820. The Environmental Resilience Officer has been consulted and advised that include artificial nesting sites for ground nesting invertebrates and open faced nesting boxes, as well as BS 42021:2022 integrated nest boxes for swift within the fabric of the building should be incorporated to the proposed development. The above measures to increase biodiversity net gain will be secured by condition.
- 821. It is considered that subject to the above the proposal would comply with the requirements of the Environment Act 2021 and also the National and Local policies.

### Conclusion on Sustainability

- 822. The City of London Climate Action Strategy supports the delivery of a net zero, climate resilient City. The agreed actions most relevant to the planning process relate to the development of a renewable energy strategy in the Square Mile, to the consideration of embedding carbon analysis, circular economy principles and climate resilience measures into development proposals and to the promotion of the importance of green spaces and urban greening as natural carbon sinks, and their contribution to biodiversity and overall wellbeing. The Local Plan and emerging City Plan 2040 policies require redevelopment to

demonstrate highest feasible and viable sustainability standards in the design, construction, operation and end of life phases of development as well as minimising waste, incorporating climate change adaption measures, urban greening and promoting biodiversity and minimising waste.

823. A carbon options study has been carried out based on a thorough understanding of the existing buildings on site and their physical relationships to each other, to establish carbon impacts, opportunities and constraints for environmental sustainability and to inform the intended transformation of the site. Significant carbon savings beyond the GLA's benchmarks would be achievable only by retaining large proportions of the various existing buildings which would result in limitations of the development to connect floor levels through an infill extension and to provide high quality internal floorspaces. The proposed development would optimise the quantity of floorspace for offices and for a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.
824. The proposed development would meet the GLA's standard benchmark for upfront carbon and reach close to meet the standard benchmark for life-cycle embodied carbon, with benefits relating to improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in an estimated low energy use intensity (EUI), and a BREEAM "excellent" rating is targeted, aspiring to an "outstanding" rating through detailed design. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would (taking account of the mitigation measures proposed) comply with London Plan Policies SI 2, SI 7, Local Plan Policies CS15 and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2,

CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.

### **Security**

825. London Plan Policy D11 (Safety, security and resilience to emergency) states that development should include measures to design out crime that – in proportion to the risk – defer terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and wider area.
826. Local Plan Policy CS3 (Security and Safety) seeks to ensure that the City is secure from crime, disorder and terrorism.
827. Local Plan Policy DM3.2 (Security measures in new developments and around existing buildings) seeks to ensure that security is considered from an early stage of design development in connection with the City of London Police, with features integrated into the site boundary. Policy DM3.3 (Crowded places) requires major development proposals to integrate counter-terrorism measures including Hostile Vehicle Mitigation. Policy DM3.5 sets out expectations for Management Plans in relation to nighttime uses.
828. The submission sets out the security proposals to protect the building and its users. To inform these security proposals the Applicant has undertaken a Security Needs Assessment (SNA) in consultation with the Design Out Crime Officer (DOCO) and the Counter Terrorism Security Adviser (CTSA) within the City of London Police (CoLP). The SNA will also assist to achieve one credit under BREEAM to meet the requirements under Hea 06 (Safety and Security) and to underpin the risk-based approach that is being used to develop the security strategy.
829. The security strategy provisions for the development include the following elements:
- Adoption of a Crime Prevention Through Environmental Design (CPTED) approach for all public realm areas open/accessible to the public.



- External lighting in the areas accessible to the public and through routes being adequate to support CCTV and natural surveillance by the estate management team, the public and employees.
- All planned publicly accessible spaces are looked over, such as the main office lobby, adjacent walkways and the entrance to the Holborn Dome, to reduce the likelihood of crime and promote a sense of safety.
- Additionally, entrance or exit points (including those recessed into the façade) will also be afforded good levels of natural surveillance.
- Ownership is promoted using wayfinding and clear surface finishes to promote private and public areas.
- Secure bicycle parking located at Basement level(s).
- Clearly designated approach, thoroughfares and circulation routes.
- Deployment of electronic access control at points of entry and transition to permit/deny authorised access, including destination control lifts.
- Allow for additional layered security to be incorporated into the entrance for the Holborn Dome, should it be required on an event-by-event basis.
- A Hostile Vehicle Mitigation strategy incorporating vehicle security barriers to protect areas where in the building footprint where people may congregate. These include protection of queues to the Cultural Hub; and the South Public Realm at Southampton Buildings Road.
- Incorporation of measures which are deemed proportionate to resist or minimise structural damage arising from a malicious road vehicle impact. This is achieved through combination of Hostile Vehicle Mitigation measures at designated locations; and localised structural hardening.
- For the glazed façade, incorporation of recommendations in accordance with a Hazard Mitigation approach as described in guidance by British Council of Offices Security Guide (2009) and National Protective Security Authority (NPSA). As a minimum, this requires use of laminated glass to the inner layers; and laminated both inner and outer layers for easily accessible glazing. Laminated outer lite will also be incorporated as a minimum up to L05, as a minimum at elevations above pedestrian footfall and people gathering/queuing.

830. The City Police have been consulted on the submission and have provided a number of comments and advice to the applicant. This includes ensuring there is sufficient access controls, HVM review and adequate CCTV installation.
831. A Security Needs Assessment and Concept Security Strategy have been produced as noted above, and these served as the baseline for design and follows a best practice methodology aligned to the NPSA guidance. This demonstrates a clear commitment to ensuring security as a priority in the development of the proposals detailed design.

832. It is recommended to secure full details of security measures by condition and within the various management plans which would be secured in the Section 106, which would be assessed in consultation with the City Police Design out Crime and Counter Terrorism teams. The proposal, subject to conditions and S106 obligations is considered to be in accordance with London Plan Policy D11, Local Plan 2015 policies DM3.2, DM3.3 and DM3.5.

### **Suicide Prevention**

833. Policy DM3.2 'Security measures in new development and around existing buildings' aims to ensure that appropriate measures are included in new developments by requiring measures to be integrated with those of adjacent buildings in the public realm. The City of London Corporation has also approved a guidance note "Preventing Suicide from High Rise Buildings and Structures" (2022) which advises developments to ensure the risk of suicide is minimized through appropriate design features. These features could include planting near edges of balconies and terraces, as well as erecting balustrades. The guidance explains that a risk assessment should be carried out to identify building features which could be used for suicide, notably any point located 10 metres above ground level. The guidance explains that strategically placed thorny or prickly plants (hostile planting) can delay and deter an individual trying to gain access to a dangerous location. The type of plant, its appearance and practical deterrence capability across all seasons should be considered within any assessment. The site arrangements should also consider what steps will be taken if the plants die or wither, so as to remove or significantly reduce the deterrent effect.

834. The guidance explains that current legislation specifies appropriate heights and design for balustrades on balconies. Building regulation K2 states the following:

K2 –(A) Any stairs, ramps, floors and balconies and any roof to which people have access, and

(B) any lightwell, basement area or similar sunken area connected to a building, shall be provided with barriers where it is necessary to protect people in or about a building from falling.

835. The guidance within the rest of the Approved Document K and the British Standard has a minimum height of 1.1m. The Regulation states that people need to be protected, and the designer should do a risk assessment and design the edge barrier accordingly, but with a minimum 1.1m height. Barriers and edge protection need to be appropriately designed and should take into consideration British Standard BS6180: Barriers in and around buildings.
836. Designers need to consider the suicide risk of a building and design edge protection to an appropriate height. If it is considered that there is a significant risk of people attempting suicide, barrier heights should be higher. The barrier should be easier to scale off from the outside in case an individual wishes to climb back to safety. Developers must, as a minimum, comply with building regulations standards, and where feasible and practical, consider providing a barrier in line with UKHSA guidance. Where a barrier is installed, consideration should be given to its ongoing maintenance. Appropriate servicing, testing and maintenance arrangements must be provided to confirm its ongoing effectiveness. This should include consideration of the material (potential failure mechanisms, installation by approved contractor), the potential for wind loading (fences must be resistant to weather), the weight load and anti-climbing requirements. Consideration should be given to any object placed against a wall or edge at a high level that can be used as a step by a vulnerable individual.
837. Although the proposed building is not considered high rise, there are extensive roof terraces on levels seven, eight and nine and several balconies and due to their height there is an increase in suicide risk potential. These are proposed to be accessible by the office occupiers rather than the public. However, there is still risk to staff and there is also a duty of care to people walking along the street below the terraces.
838. The application is supported by Suicide Prevention Overview, advising on measures to prevent from suicide risk potential, as follows:
- All balustrades on accessible terraces are 1.4 metres effective height.
  - The roof terraces on levels eight and nine incorporate an upstand which extends up to 1.75 metres.
  - No fixed planters are proposed in the parameters of levels seven, eight and the north of level nine.
  - The building is staggered, which acts as a prevention measure for roof terraces on levels eight and nine.

839. The proposed Suicide Prevention Document was reviewed by the Suicide Prevention Advisor and some concerns have been raised regarding the position of some planters against the balustrade and the fact that the roof terrace of level seven and north of level nine have unobstructed paths to the ground. To address these concerns thorny rather than ornamental planting on the planters adjacent to the balustrade are proposed, or planting flush with the ground. For the level seven and north of level nine terraces it has been suggested that the height of the balustrade is increased to 1.8 metres.
840. The Applicant has confirmed that the height of the north of level nine from the actual floor level, including the upstand is 1.75 metres. It is stated that the upstand is very shallow and hard to be used as step to climb over. With regard to the planters against the balustrade, it is advised that there isn't enough floor build up to have the planting flush with the floor; however, it is accepted that thorny planting can be used to create a barrier. It is also noted that the terraces are private rather than public and the proposed balustrade heights comply with the approved guidance. CCTV with 100% coverage and motion activated lighting are also proposed as protective measures.
841. Final details of suicide prevention measures, including balustrade heights are recommended to be secured by condition.
842. Subject to the recommended condition, the proposals would comply with Policy DM3.2 of the Local Plan 2015 and Policy DE4 of the draft City Plan 2040.

#### Health Impact Assessment

843. Policy HL9 of the emerging City Plan 2040 requires major development to submit a Healthy City Plan Checklist to assess potential health impacts resulting from proposed developments.
844. Policy GG3D of the London Plan states that "to improve Londoners' health and reduce health inequalities, those involved in planning and development must: assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help to reduce health inequalities, for example through the use of Health Impact Assessments".

845. The application is accompanied by a Health Impact Assessment (HIA) (Arup, November 2024) assessing whether effects identified in other relevant technical assessments submitted as part of the application would result in health impacts.
846. The HIA is based on known links between health determinants and health outcomes. The methodology has informed by the Institute of Environmental Management and Assessment's (IEMA) guidance on Determining Significance for Human Health in EIA (2022). Key principles of the IEMA guidance include assessing effects on health at population level, as opposed to individual level, and consideration of effects on health inequalities and vulnerable groups. Changes in health determinants are defined as positive, negative or neutral with a low, moderate, or high magnitude of change. Furthermore, the performance of the proposed development against the health themes and issues included in the CoL Health Impact Assessment Checklist has been considered.
847. The baseline, in terms of demographics (including density, age, ethnicity, deprivation, health and wellbeing, education and employment), environmental aspects (including air quality, green spaces, noise and townscape) and vulnerable groups (including such as people with existing health problems or disabilities, people who are homeless, people living in poverty, older people and children) have been assessed to understand the existing situation in the area. In terms of the future baseline, it is noted that rate of growth in the area is expected to be reduced materially.
848. To assess the health impacts of the proposed development, five main categories have been considered. These and their impacts in terms of magnitude and sensitivity are as follows:
- a) Active lifestyle
- The proposed development will encourage occupants and visitors to engage with active travel, as the existing car park, other than 2 blue badge parking spaces would be replaced with cycle parking and end of trip facilities.
  - Pedestrians walking around the proposed development will benefit from improved public realm and the widening of the footway on the northeast corner of the site.
  - The impact on active travel is assessed as positive and of low to medium magnitude. Those affected by the new active travel provisions would be mainly office workers within the proposed development and surrounding

commercial buildings, barristers from surrounding chambers and visitors to the cultural spaces. The proportion of vulnerable groups, such as children, older people or people from socially excluded groups benefitting from the changes would be low. Given the magnitude of impact and the sensitivity of the population, health effects are assessed as minor positive.

- The proposed development will provide an area of public realm including a new pocket park at the southern end of the application site, which would be accessible to the public at all times.
- The impact on access to public space and green space is positive, and of low magnitude. It is anticipated that the park will be used by a wide range of people. While the proposed water feature will enhance play opportunities for children, given the low level of residential population in the area, those using this feature will be mainly visitors to the area. Given the magnitude of impact and the sensitivity of the population, health effects are assessed as minor positive.

b) Health environment and design

- The proposed development aims to encourage social interaction through the provision of the pocket park on the southern end of the application site and the provision of the Holborn Dome, both of which provide opportunities to socialise and engage.
- The Holborn Dome will aim to support collaborative community programmes through the inclusion of affordable space. It will be accessible to cultural organisations, community groups and businesses. This is assessed as low magnitude positive impact.
- Affordable workspace at a 50% discount is also proposed; however the cost of the location is likely to be inaccessible to many local businesses and organisations working with vulnerable or disadvantaged people.
- The sensitivity of the population is assessed as low to medium. Given the magnitude of impact and the sensitivity of the population, health effects are assessed as a minor positive health effect.
- The scheme includes the provision of two blue badge parking spaces and inclusive seating. The proposed development also
- aims to deliver a scheme that is inclusive of people who experience sensory or neurological processing differences, by including clear layouts and wayfinding strategies on both internal and external environments.

- 5% of larger cycle spaces are incorporated to the scheme, as well as wheelchair-accessible combined WC/shower compartments, a unisex wheelchair accessible WC, and a wheelchair accessible shower cubicle.
- Toilets in the Holborn Dome, including accessible toilet facilities, would be available to the public during operating hours.
- There will be step free access into the ground floor and throughout the interior by lifts. Access to balconies will also be step free.
- The impact on accessibility and inclusion for occupiers of the proposed development is positive, compared with the existing buildings. This is assessed as a medium magnitude impact. The sensitivity of the receptor population is high; the benefits will mainly be felt by office workers. Given the magnitude of impact and the sensitivity of the receptor population, health effects are assessed as major positive.
- During construction, there will be temporary, localised changes to environmental amenity as a result of visual impacts, increased noise, dust and traffic movements. Environmental impacts during construction will be controlled by a Construction Environmental Management Plan (CEMP), which will adhere to the City of London's Code of Construction Practice (CoCP). It is anticipated that the construction phase will cause some periods of annoyance to the nearby commercial building and residents.
- The environmental impacts of the development, including noise, air quality, transport, daylight, sunlight, overshadowing, townscape are assessed separately in the relevant sections of the report.
- The impact on local environmental amenity is assessed as negative and of medium magnitude during construction, and positive and of medium magnitude during operation. Health effects on wellbeing and quality of life are assessed as minor negative during construction and minor positive during operation.
- The proposed development includes vertical greening.
- Awnings will be provided on the southern side of the building within the public realm, and a drinking fountain (to replace existing) will be provided within the pocket park. Planting in the pocket park will provide shade. This allows public users more comfort during extreme heat events.
- A Drainage Strategy has been developed for the proposed development, which incorporates sustainable drainage principles and attenuation to reduce run-off rates compared with the existing Site.
- The impact on climate resilience is positive and of low to medium magnitude. Effects are limited to occupiers of the proposed development

and users of the pocket park. The sensitivity of the receptor population group is assessed as low and is likely to include a below average proportion of vulnerable groups. Given the magnitude of impact and the sensitivity of the population, health effects are assessed as minor positive.

c) Healthy workplaces

- The proposed development will target BREEAM Outstanding accreditation and WELL Gold accreditation, with an aspiration for WELL platinum level where feasible.
- The proposed office accommodation will deliver new space with a focus on maximising occupier wellbeing, providing better access to natural light and ventilation, with access to external green amenity spaces for relaxation and collaboration.
- The impact on healthy workplaces is assessed as positive and of medium magnitude. The beneficial effects will be experienced by occupiers of the proposed development. The sensitivity of the receptor population would be low as office workers within the development and would generally include a lower-than-average proportion of people from vulnerable groups. Given the magnitude of impact and the sensitivity of the receptor population, health effects are assessed as minor positive.

d) Safe and vibrant neighbourhoods

- The proposed ground floor uses would increase footfall and passive surveillance within the area.
- Low level and evenly distributed lighting along pedestrian pathways within the public realm will promote safety and wayfinding.
- Anti-skate measures will be integrated into bench seating.
- Lighting and CCTV will be provided for security purposes.
- A Hostile Vehicle Strategy will be used to protect areas where people may congregate or queue.
- The impact on community safety is assessed as positive and of medium magnitude. The sensitivity of the receptor population is low as those benefitting from the changes will be frequent users of the area, which tends to be workers from the surrounding offices. This population generally contains lower proportions of people from vulnerable groups. Given the magnitude of impact and the sensitivity of the population, health effects are assessed as minor positive.

e) Access to work and training



- The construction of the proposed development will create employment opportunities in the construction sector, including professional, skilled and unskilled jobs.
- The proposed development will create new workspaces that support occupiers' wellness.
- There is an increase in office floorspace when compared to the existing building, and affordable workspace.
- The proposed development provides educational opportunities through its cultural offer.
- For the new office space, the impact on access to work and training is assessed as positive and of low magnitude in the context of the London job market. Most office jobs created are likely to be
- highly skilled and require advanced qualifications and it is likely that these people will commute to London. The sensitivity of the receptor population is assessed as low, given that this would mostly comprise people transferring from existing employment to roles in the proposed development. Given the magnitude of impact and the sensitivity of the receptor population, the health effect is assessed as neutral.
- For construction, retail and service opportunities, the provision of affordable workspace, and employment opportunities within the cultural spaces, the impact on employment and training is assessed as positive and of low magnitude. The sensitivity of the receptor population would be medium, as those taking up these roles are more likely to include local people. Given the magnitude of impact and the sensitivity of this population, the effect on health and wellbeing associated with these opportunities is assessed as minor beneficial.

849. In light of the above, it is considered that the impacts of the development on health and wellbeing are largely positive. The following recommendations are suggested in the HIA in order to achieve further health benefits:

- The proposed development should implement a Local Procurement and Local Training, Skills and Job Brokerage strategy to promote construction and operational jobs to people within the local community (LB Camden and CoL), including disadvantaged groups. This would be able to be secured by planning obligation.

- Prior to construction, engagement should be made with local organisations supporting people experiencing homelessness to allow these organisations to aid for any rough sleepers.
  - The availability of toilets for public use in the Holborn Dome should be publicised. Baby changing facilities should also be provided in the Holborn Dome. The provision and advertisement of the toilets in the Holborn Dome for public use would be secured by condition. The provision of baby changing facilities will also be secured by condition. The management of these facilities for the lifetime of the development would be secured via a S106 obligation.
850. Potential impacts identified would be mitigated so far as possible by the requirements of relevant conditions and obligations within the S106 agreement.
851. Overall, it is considered that the development seeks to improve the health and address inequalities, the residual impact would be acceptable and the proposals would comply with London Plan Policy GG3 and draft City Plan 2040 Policy HL9.

### **Fire Statement**

852. A Fire Statement has been submitted outlining the fire safety objectives and strategy for the building.
853. The City District Surveyor's office has reviewed the submitted statement and has confirmed that this is in accordance with Policies D5 and D12 of the London Plan. The Fire Statement is therefore acceptable for the planning stage and would be secured by condition.

### **Assessment of Public Benefits and paragraph 215 NPPF balancing exercise**

854. Under s66 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, in considering whether to grant planning permission for development which affects a listed building or its setting the Corporation shall have special regard to the desirability of preserving the building/s or its/their settings or any features of special architectural or historic interest which they possess. Under Section 72 of the same Act, the Corporation also has a duty to pay special

attention to the desirability of preserving or enhancing the character or appearance of a conservation area.

855. When considering the impact of a proposal on the significance of designated heritage assets, decision makers are required to give great weight to their conservation (and the more important the asset, the greater the weight should be), and to be satisfied that any harm is clearly and convincingly justified (NPPF paragraphs 212 and 213).
856. The proposal would cause direct and indirect slight- low levels of less than substantial harm to the significance of heritage assets within the City of London and London Borough of Camden. The identified harm is as follows:

Direct impacts (City of London)

- Slight level of harm to the Chancery Lane Conservation Area

Indirect impacts via setting (London Borough of Camden)

- 1-7 Stone Buildings (grade I listed) - low level of less than substantial harm
  - Nos. 12 and 13 Old Buildings (grade I) – low level of less than substantial harm
  - Nos. 8 - 15 Old Square (grade II) – slight level of less than substantial harm
857. Given the proposal would result in harm to the significance of a Conservation Area, and of listed buildings, including Grade I listed buildings, there is a strong presumption against the grant of planning permission. Notwithstanding, that presumption is capable of being rebutted via wider public benefits. Paragraph 215 of the NPPF, which states '*where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use*'.
858. Within the statutory process and under NPPF policy the decision-maker must adopt a sensible approach to assessing likely harm to the significance of a designated heritage assets and weighing that harm against the benefits. The decision maker does not have go about balancing harm against benefits in a particular way.

859. The National Planning Practice Guidance states that “public benefits...could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework. Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to the genuine public benefits”.
860. The key social, environmental, and economic public benefits of the proposal are considered to be as follows:

**Economic Benefits:**

861. Securing a strategic mixed-use development within the City, that would provide land uses which support the diversification, vitality and growth as a 24/7 world class business destination, securing a significant contribution to the City of London economic base which is of UK-wide importance, including the provision of 52,656sq.m (GIA) of Grade A office floorspace and circa 3,000-3,200 FTE jobs, and increased spending in the locality boosting local businesses and a post-covid resurgence including job creation through construction. This is a benefit which should be afforded substantial weight.
862. The provision of 221sqm of dedicated creative affordable workspace available at 50% of market rent would contribute to the City’s vision to providing lower cost workspace. This would be an alternative and more inclusive offer which will support attracting smaller and more diverse genre of businesses and tenants including creative SMEs to the City.
863. Retention of a diverse retail provision on the site, supporting and diversifying its primary business function complemented by attractive overspill external space, will enhance the quality, vibrancy, and activity of the area and so contribute to the City’s economy and character and provide amenities for its visitors, businesses, workers and residents.
864. The proposed 1,923m<sup>2</sup> of multi-functional flexible cultural/exhibition/performance/ learning/ community space would create a compelling and inclusive public offer in the area in line with the Destination City agenda and increase spend in this fringe of the City as well as drive daytime, evening and

weekend footfall and provide a more diverse leisure opportunity for workers, residents and visitors.

- 865. The overall quality of the development would transform and regenerate this site along High Holborn with fresh attractions further enriching the distinct local character through improved public realm, wayfinding and cultural proposals and would improve worker wellbeing and productivity as well as encourage wider investment and complement existing neighbourhood leisure experiences.
- 866. Collectively, but primarily the Grade A office floorspace and employment provision, given their nature and extent, the aforementioned benefits, are attributed substantial weight.

**Environmental benefits:**

- 867. The proposed building and public realm would result in a significant aesthetic enhancement to the High Holborn locality. The proposal would result in a coherent modern building of high architectural quality, defining the surrounding streets. The proposed sophisticated and well-integrated design of the building would raise the standard of design in the area.
- 868. The development would result in a slight heritage enhancement to the Chancery Lane Conservation Area through heritage interpretation, better revealing the Knights of the Templar existing and potential artefacts as well as its higher architectural quality complementing the Staple Inn Buildings complex, Former Patent Office and other relevant CA historic buildings, spaces, kinetic views and features.
- 869. At a local level the proposal would result in significant enhancement to public realm at ground level by the creation of a pocket park for a range of users and safer improved routes, it would improve the aesthetics of the area, create links with other open spaces, provide community gathering space and improve workers, residents and visitors well-being and support the vitality, character and distinctiveness of the site aligning with Destination City objectives.

870. A Wayfinding Strategy will incorporate art and creative design to make the experience of moving to and around the site and the different uses both distinct, stimulating and pleasurable for all as well as providing opportunities to connect to other cultural organisations and features based in the roads and streets around this part of High Holborn.
871. The proposal would deliver significant commercial floor space in a highly sustainable location which will assist in the delivery of the City of London's Transport Strategy and would promote active travel for a range of users.
872. The significant increase and extent of urban greening on the buildings and in the public spaces would provide a healthy, sustainable and biodiverse environment for all to access. The urban greening would achieve a UGF score of 0.302 in line with the emerging City Plan Policy targets.
873. Securing a development that is environmentally responsible in that it would seek to promote, target BREEAM 'outstanding', reduce carbon emissions, and reduce waste and use of resources through the adoption of circular economy principles. The proposed building is a fossil-fuel free, all electric building.
874. The abovementioned benefits should be afforded moderate weight.

**Social Benefits:**

875. The proposals will improve this part of the city by delivering a more inviting, pleasant, safer and easily accessible, inclusive and well-connected place for all through the improvement of several pedestrian routes and a remodelled public space attracting a greater and more diverse range of people to the City at different times of the day and on different days of the week.
876. The provision of a flexible, welcoming, accessible, dedicated cultural/ exhibition/ performance/ learning/ community space prominently positioned within the ground and lower ground levels of the buildings to provide immersive auditorium, flexible exhibition spaces and areas for community events accommodating up to 300 people for a range of events and programmes, would constitute a significant social benefit.
877. The display of the previously discovered section of the Knights Templar foundations and any potential additional archaeology finds along with the

proposed public art to be associated with the history of the site, would result in an exceptional opportunity to tangibly connect the proposed cultural offer with the unique history of the site.

- 878. The cultural proposals would attract new audiences, alongside the enhanced public realm, contributing to the transformation of this part of High Holborn as a distinctive and contemporary place with multiple offers for all sitting alongside the emerging The Tunnels and recently reimagined Silver Vaults. The site would attract visitors, increase tourism, support and enhance the image of the area becoming a more welcoming place aligning with Destination City.
- 879. The 221sqm creative affordable workspace is specifically for tenants in the creative industries and would contribute to diversifying the workforce in this City fringe offering premium Grade A floor space in a prominent location appealing to a broader demographic.
- 880. The proposal would contribute towards affordable housing by making a contribution in lieu of £1,039,250 (excluding indexation), as well as payment of £623,550 (excluding indexation) towards local training skills and job brokerage initiatives.
- 881. The above social benefits are collectively afforded moderate weight.

Conclusion public benefits and paragraph 215 NPPF balancing exercise and responses to Historic England's and GLA's comments:

- 882. When applying the policy in paragraph 208 of the NPPF, the above-mentioned public benefits are to be weighed against the less than substantial harm to the significance of designated heritage assets which has been identified in this report.
- 883. In relation to the indirect impacts on the Grade I, 1-7 Stone Buildings and 8-15 Old Buildings, these are designated heritage assets of the highest order. When carrying out the balancing exercise, considerable importance and weight has been given to the less than substantial harm caused indirectly to the Grade II 11-15 Old Square and directly to the Chancery Lane Conservation Area great weight has been given to their conservation.
- 884. When carrying out the Para 215 balancing exercise in a case where there is harm to the significance of designated heritage assets, considerable

importance and weight should be given to the desirability of preserving the building or its setting. In this case it is the view of officers that there is clear and convincing justification for the harm and the collective package of the public benefits secured, which flow from the development proposals, would outweigh the heritage harms identified to the designated heritage assets some of which are of the highest calibre, thus complying with Para 215 of the NPPF.

885. The GLA note in their Stage 1 letter paras 45-46 that subject to the identified proposed public benefits being agreed with, and satisfactorily secured by the LPA the less than substantial harm identified by their officers would be outweighed by the public benefits of the scheme. An update will be provided by the GLA at Stage II decision making stage.
886. Historic England in their letter suggest consideration should also be given to the WWI memorial on High Holborn and that this development presents an opportunity to address any potential repairs offering an important public benefit to the heritage of this place. This has been considered by officers and the package of proposals are already sufficient, relate directly to the site and include heritage benefits. The suggested contribution towards repairs to the WWI memorial is not necessary to make the development acceptable in planning terms and therefore, is not included into the list of heads of terms.

### **Planning Obligations and Community Infrastructure Levy**

887. The proposed development would require planning obligations to be secured in a Section 106 agreement to mitigate the impact of the development to make it acceptable in planning terms. Contributions would be used to improve the City's environment and facilities. The proposal would also result in payment of the Community Infrastructure Levy (CIL) to help fund the provision of infrastructure in the City of London.
888. These contributions would be in accordance with Supplementary Planning Documents (SPDs) adopted by the Mayor of London and the City.
889. On the 1<sup>st</sup> of April 2019 the Mayoral CIL 2 (MCIL2) superseded the Mayor of London's CIL and associated section 106 planning obligations charging schedule. Therefore, the Mayor will be collecting funding for Crossrail 1 and Crossrail 2 under the provisions of the Community Infrastructure Levy regulations 2010 (as amended).



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

### **MCIL2**

<b>Liability in accordance with the Mayor of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Forwarded to the Mayor</b>	<b>City's charge for administration and monitoring</b>
<b>MCIL2 payable</b>	£3,761,392	£3,610,936	£150,456

### **City CIL**

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
<b>City CIL</b>	£1,558,875	£1,480,931	£77,944

### **S106 Planning Obligations**

<b>Liability in accordance with the City of London's policies</b>	<b>Contribution (excl. indexation)</b>	<b>Available for allocation</b>	<b>Retained for administration and monitoring</b>
Affordable Housing	£1,039,250	£1,028,858	£10,393
Local, Training, Skills and Job Brokerage	£623,550	£617,315	£6,236
Carbon Offset Contribution (as designed) <i>Not indexed</i>	£496,079	£496,079	£0
Section 278 (Evaluation and Design Fee) <i>Not indexed</i>	£100,000	£100,000	£0
S106 Monitoring Charge	£6250	£0	£6250

<b>Total liability in accordance with the City of London's policies</b>	£2,265,129	£2,242,251	£22,878
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891. The obligations set out below are required in accordance with the City's Planning Obligations SPD 2021. They are "in principle" and necessary to make the application acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development and meet the tests in the CIL Regulations and government policy. The details of the obligations are to be subject to negotiations with the applicant.

- a) Highway Reparation and other Highways Obligations (*highways schedule of condition, site access, consents, licences etc*)
  - o *Highways schedule of condition survey due prior to first preparatory operation*
- b) Local Procurement Strategies (*demolition and construction phases*)
  - o *Due prior to commencement of the relevant phase*
- c) Local Training, Skills and Job Brokerage (*demolition*)
  - o *Due prior to commencement*
- d) Local Training, Skills and Job Brokerage (*construction*)
  - o *Due prior to implementation*
- e) Delivery and Servicing Management Plan (*including consolidation*), to include but not be limited to the following provisions:
  - o *No servicing during the hours of 07:00 – 10:00; 12:00 – 14:00; and 16:00 – 19:00*
  - o *A restriction of vehicles no larger than 8 metres in length permitted to service the site through two of the three loading bays. No vehicles larger than 6 metres in length shall be permitted at the other loading bay*
  - o *Cargo bikes to be used whenever possible*
  - o *Details of pre-booking system to be used by all goods vehicles servicing the site*
  - o *A restriction of no more than 35 deliveries per day by goods vehicles*
  - o *Submission no later than six months prior to anticipated occupation*
- f) Travel Plan (including Cycling Promotion Plan and Travel Plan for disabled staff and visitors)
  - o *Submission no later than six months prior to anticipated occupation*
- g) Construction Monitoring Costs

- o *£53,820 upon commencement of the development*
  - o *£46,460 upon the anniversary of commencement of the development until practical completion*
- h) Carbon Offsetting Document Submissions
- i) 'Be Seen' Energy Performance Monitoring
- j) Utility Connection Requirements
- k) Section 278 Agreement (CoL)
- l) Public Realm/Pocket Park (*public access and management plan*)
- m) Wind Audit
- n) Solar Glare
- o) Cultural Implementation Strategy
  - o *Submission due prior to implementation*
  - o *Details of inclusive procurement for the co-creation / co-curation of the Cultural Space*
  - o *Details of the process for securing a cultural operator*
- p) Public Art (*long term maintenance and management*)
- q) Cultural Space (*provision as set out below, public access and management plan*)
  - o *Provision of 1,923sqm (GIA) to shell and core over 3 floors, including an auditorium, flexible exhibition spaces, and areas for community events*
  - o *Provision of the cultural space (as set out above) prior to occupation*
  - o *Submission of a cultural space management plan 12 months prior to completion*
  - o *Details of public access hours*
  - o *A capped service charge for the cultural space operator*
  - o *A peppercorn rent for the cultural space operator*
  - o *All necessary and reasonable costs relating to fit-out allocated*
  - o *Discounted rates for usage of the space for qualified users*
  - o *Provision of the availability of the cultural space for the lifetime of the development*
- r) Affordable Creative Workspace (*provision of and the submission of a management plan*)
  - o *A minimum of 221sqm (GIA) at ground floor level will be made available to qualifying users at a discounted market rent (50% of the local market rate)*
  - o *Provision (as set out above) for a minimum of at least 15 years from first occupation by qualifying occupiers*

- *Provision (as set out above) of the affordable creative workspace prior to occupation of the commercial floorspace*
- *Submission of an affordable creative workspace management plan prior to occupation*
- *Business support infrastructure provided at no extra costs for qualifying occupiers including kitchen, toilets, break out space, heat, light, wi-fi communications*
- s) Residential Reprovision
  - *The Applicant will be required to re-provide the lost residential units under the separate planning application at 1-2 St Andrew's Hill (Reference no: 24/01323/FULL), or would need to acquire an alternative site within the City of London and have planning permission secured for the provision of seven residential units (Use Class C3) of equivalent or larger floorspace as existing at High Holborn*
  - *The Applicant cannot occupy High Holborn until the residential units are re-provided at St Andrew's Hill or an alternative site*
- t) Biodiversity Net Gain
  - *Submission of a Habitat Management and Monitoring Plan prior to commencement*
  - *Monitoring to cover a minimum of 30 years*
- u) Retained Archaeology (public access, long term maintenance and management plan)
  - *Provision as a permanent exhibit for the lifetime of the development*
- v) Designation of Permissive Path
- w) Public toilets and baby changing facilities management plan, as part of the cultural offering set out above, to include the following provisions:
  - *Available to the public during operating hours*
  - *Cleaning regime*
  - *Commitment to securing the maintenance and security for the lifetime of the development*
- x) Accessible Car Park Management Plan
- y) Retention of Project Architect (or equivalent team in quality and experience)
- z) Cycle Hire Improvements Contribution (£120,000 Indexed)

892. Officers request to be given delegated authority to continue to negotiate and agree the terms of the proposed obligations and enter into the S278 agreement.
893. The scope of the s278 agreement may include, but is not limited to:

#### Southampton Buildings

- Creation of a new vehicle crossover.
- Removal of redundant vehicle crossovers and reinstatement of footway.
- Repaving of the adjacent footways to the application site, as per the City's approved pallet of materials and design guidelines
- Provision of road markings and associated traffic orders associated with the relocation of the car parking spaces.
- Resurfacing of the carriageways.
- Removal of redundant street furniture.

#### Southampton Buildings Pocket Park

- Introduction of hard and soft landscaping including public seating subject to design and feasibility study.
- Introduction of greenery subject to feasibility study.
- Repaving of footways adjacent to the application site, as per the City's approved pallet of materials and design guidelines.
- Improvement to drainage works.

#### Staple Inn Buildings

- Repaving of footways adjacent to the application site, as per the City's approved pallet of materials and design guidelines.
- Improvement to footway drainage works, as required.

#### High Holborn

- Resurfacing of the carriageways and provision of road markings adjacent to the planning application site.
- Repaving of footways adjacent to the application site, as per the City's approved pallet of materials and design guidelines.
- Improvements to highways drainage, if required.
- Removal of redundant street furniture

### Monitoring and Administrative Costs

894. A 10-year repayment period would be required whereby any unallocated sums would be returned to the developer 10 years after practical completion of the development. Some funds may be set aside for future maintenance purposes.
895. The applicant will pay the City of London's legal costs and the City Planning Officer's administration costs incurred in the negotiation, execution and monitoring of the legal agreement and strategies.

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

896. The City, as a public authority must, in exercise of its functions, have due regard to the need to:
- Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under this Act;
  - Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
897. Section 149(3) of the 2010 Act provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to:
- Remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
  - Take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
  - Encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

898. The characteristics protected by the Equality Act are age, disability, gender reassignment, pregnancy and maternity, race, religion or beliefs, sex and sexual orientation. Public authorities also need to have due regard to the need to eliminate unlawful discrimination against someone because of their marriage or civil partnership status.
899. The application is supported by an Equality Statement (Arup, November 2024), which considers the potential equality impacts related to the proposal. The CoL, as the planning authority, have the duty to consider potential equality impacts. The purpose of the Equality Statement (EqS) was to provide information for the planning authority to carry out its role.
900. In terms of the methodology used to assess any potential equality impacts, a differentiation between disproportionate and differential impacts has been drawn. These terms are defined as follows:
- A disproportionate equality effect arises where people with protected characteristics are likely to be impacted in a way that is proportionately greater than other members of the population, for example where a particular group makes up a higher-than-average proportion of an affected population.
  - A differential equality effect arises where people with protected characteristics are likely to experience a change differently to other members of the affected population because of a particular sensitivity.
901. A profile of the Study Area population has been compiled using publicly available baseline data, focusing on demographic data for the protected characteristic groups. Based on the information collated in summary the baseline, in terms of protected groups is as follows:
- The density of the area is almost two times higher than the London average
  - The area is dominated by working age adults (20-49 years old)
  - The number of residents classified as disabled under the Act is comparable to London
  - There is a higher proportion of Asian, Asian British or Asian Welsh residents and lower proportion of Black British and Black Welsh residents when compared to London
  - Languages spoken are generally comparable to London

- In terms of religion and belief, they are predominantly not religious, followed by Christian and Muslim
- There are slightly more males compared to females
- There is lower proportion of heterosexual residents compared to London and England
- There is slightly lower birth rates compared to London and England
- Significantly smaller proportion of residents are married or in a civil partnership compared to London and England
- There are high levels of deprivation for living environment.
- The risk of homelessness, homelessness and rough sleeping are increasing within CoL.

902. A baseline review has identified certain receptor locations that are likely to be used by people with protected characteristics that may be more likely to experience disproportionate or differential equalities effects. These are as follows:

- City Junior School – Approx 130m northwest of the Site
- Gray's Inn Church – Approx 150m north of the Site
- Holborn Mosque - Approx 150m north of the Site,
- St Alban the Martyr Church – Approx. 200m northeast of the Site
- St Albans C of E Primary and Nursery School lies just over 200m northwest of the Site

903. The past ten years has seen a notable population increase in the City of London (approximately a 53% increase between 2012 and 2022), but the rate of growth is expected to reduce by more than ten times in the next ten years (to approximately 5% between 2022 and 2032). It is also noted that the fastest growing age group in LB Camden is older people.

904. The EqlA includes a qualitative assessment of potential disproportionate and differential effects, both positive and negative, that could arise from the implementation of the High Holborn project. Recommendations are made to mitigate any potential impacts.

905. The following positive and negative impacts have been identified against each protected characteristic:



- Age: The proposed pocket park and in particular the water feature would include opportunities for play that weren't previously available for children. It would also provide additional opportunities for older people to relax and socialise, including a range of seating with handrails and backrests. The proposed cultural offer would bring benefits for all age groups. Awning will be installed at the proposed commercial unit of the southeast corner providing needed protection to identified protected characteristics groups. The toilets in the Holborn Dome would be made available to the public during operating hours. This would be beneficial to all age groups, but primarily older people and children. As a negative, the assessment, considers the fact the pocket park would be designed to discourage activities such as skating and ball games. As a recommendation to provide activities for younger people, it is suggested that the activities are explored within the Holborn Dome. The Cultural Implementation Strategy would be expected to include that information and this will be secured via planning obligation.
- Disability: The proposals aim to deliver a scheme with the highest standards of accessibility and inclusive design. All entrances into the street are step-free. Circle / slide doors are provided at entrances and outdoor amenity spaces (terraces/balconies) that are usable by wheelchair users. All corridors are 1.8m minimum were used by accessible users, or 1.5m for toilets and firefighting lifts. Accessible WCs are provided within 40m distance. Gender neutral toilets are provided. In terms of wayfinding, a clear of obstacles route is proposed to the pocket park. The visual contrast would be subtle to prevent people with visual impairments from perceiving the change in paving with a level change. The proposed water feature in the pocket park would be demarcated with different colour. Arm rests would be incorporated to the design of the outdoor seating. The development would also provide two blue badge parking spaces, 5% of the total cycle spaces would be larger spaces and two cycle lifts to provide access to the cycle parking space at basement level. It is recommended that activities within the cultural spaces should include activities that are accessible to and targeted toward people with disabilities. The Cultural Implementation Strategy would be expected to include that information and this will be secured via planning obligation. To assist wayfinding, signage should be placed at heights that are visible to wheelchair users and colours and font should be selected to improve readability for people who are colourblind or visually impaired. The wayfinding details will be secured by condition. It is recommended that pavement and kerbs use different textures and colours

to demarcate pathways for the visually impaired. These details will be secured as part of the S278 works.

- Race/ethnicity: The proposed cultural element would be available to wide range of cultural organisations, community groups and businesses. The management of the flexible cultural space would be secured via the S106 agreement. A weakness of the scheme could be the rent of the spaces and whether that could be affordable for community groups. It is considered reasonable that discounted rates are guaranteed for qualified users. This can be secured via planning obligation. Depending on the price of activities held on site, these may exclude certain groups who are not able to afford them, which will generally disproportionately impact on those from lower socio-economic groups. Management and programming of the cultural space ensuring events meet local needs and financial cost of activities provided on site would be secured via S106 agreement.
- Religion or belief: The proposed Holborn Dome venue could be used by religious groups. The rental cost of the space to qualified user, including religious groups, would be able to be secured by planning obligation. During construction, it is not expected that the development would result in unacceptable impacts in terms of noise on places of worship.
- Sex: Security and safety of the site would be enhanced, though natural surveillance and lighting and CCTV installation. These changes will contribute to feelings of improved safety, particularly to women who may feel more vulnerable travelling through are after dark. Consideration should be given, during construction and operation, to ensuring that men and women benefit equally from any training and employment opportunities. A Local Training, Skills and Job Brokerage strategy would be secured in the S106 agreement.
- Sexual orientation/ Gender reassignment: As noted above, gender neutral toilets are proposed within the flexible cultural element of the development. The increased safety and security of the site would bring benefits to the LGBTQ+ community who are often more vulnerable to discrimination. The submitted EqIA states that features of the proposed development, such as the sight lines and the greening of the public realm would align with the guidance on Queering public spaces.
- Pregnancy and maternity: Wider pavements with pinch-points removed, anti-slip surfaces and fewer road crossings, will benefit people with prams and push chairs. Future design development should consider the inclusion of mother and baby feeding spaces/ quiet spaces, particularly within the culture offering, but also within the office spaces to increase the

opportunities for mothers to feed their babies or express milk. Baby changing facilities should also be provided in the Holborn Dome. The details of baby changing facilities would be secured by condition and their management by planning obligation. Option to provide suitable places for mothers to feed their babies will be expected to be explored as part of the cultural management plan secured by planning obligation.

- Marriage and civil partnership: This protected characteristic is outside the scope of this proposed development.
- Socio-economic status: The proposed affordable workspace would provide an opportunity for local small businesses and start-ups to have an affordable space in the City. As a recommendation it is suggested that the proposed development should implement an Employment and Training Strategy to promote construction and operational jobs to people within the local community. A Local Training, Skills and Job Brokerage strategy would be secured in the S106 agreement. It is also suggested that an agreed proportion of usage of cultural spaces should be allocated at a reduced or nominal rate which is more accessible to local community groups. Discounted rates and financial cost of activities for qualified users would be secured via the S106 agreement. The provision of events that meet local needs would be secured by planning obligation.
- Other relevant groups: The proposed development is not expected to provide any beneficial results to people with carers, people experiencing domestic violence, those looking after children, ex-armed forces personnel or homeless people. A number of design measures have been undertaken to discourage rough sleepers from congregating or sleeping within the curtilage of the proposed building and/or in the public realm. Prior to beginning construction, engagement should be made with local organisations supporting people experiencing homelessness. This will enable these organisations to aid any rough sleepers using the existing site. A condition will be imposed to secure engagement prior to commencement.

906. With respect to the equality impacts during construction, it is expected that all properties in close proximity to the site would have the potential to disproportionately affect people with some particular protected characteristics, for example older or younger people, women during pregnancy, people with disabilities that are more likely to spend longer time at home. Any footway closure during demolition/construction would also potentially differentially affect people with mobility challenges.

907. Overall, any equality impacts on amenity during demolition/construction would be temporary and will be able to be mitigated as far as possible through management plans and other mitigation measures, which will be secured by conditions and S106 obligations.
908. With regard to community engagement, the applicant has complied with the advice as set out in the Statement of Community Involvement for pre-application engagement. The pre-application engagement that the applicant has carried out is extensively described in the 'Statement of Community Involvement' section of the report. Engagement has included targeted outreach to define the uses of the proposed Holborn Dome space. The Local Planning Authority has carried out its duty for consultation and publicity of the application in accordance with The DMPO 2015, The Town and Country Planning (Consultation) (England) Direction 2024, The TCPA 1990, The EIA regulations 2017, The Mayor of London Order 2008 and the Act and Regulations for Listed Building and Conservation Areas 1990.
909. It is the view of officers that the proposed development would reduce barriers to access for disabled people through the provision of an enhanced and step-free access to the building and public realm. It is also the view of officers that the provision of accessible office floorspace including affordable workspace, and publicly accessible flexible cultural space would advance equality of opportunity.
910. The EqS sets out a number of actions to mitigate potential impacts arising from the proposed development. Officers consider that any potential impacts from the development relating to demolition, construction and operation of the development would be able to be addressed via the imposition of appropriately worded conditions and S106 obligations as discussed above.
911. It is noted that the Equality Act also carries ongoing responsibilities for the owner which will continue once the development is complete. As part of considering the design of the building and the physical environment, property management teams for the building and public spaces will need to have suitable management policies and procedures to ensure the obligations of the Act are met once the buildings are in operation. This would include the proposed flexible cultural/ exhibition/ performance/ learning/ community space and affordable workspace which currently do not have any end user finalised. In formulating this offer, the landowner should continue to engage with a full range

of key stakeholders so that it is relevant and accessible to all. As referred to in other sections of this report, where necessary, details will be secured by condition and/or planning obligations.

### **Human Rights Act 1998**

912. It is unlawful for the City, as a public authority, to act in a way which is compatible with a Convention right (being the rights set out in the European Convention on Human Rights ("ECHR)).
913. Insofar as the grant of planning permission will result in interference with right to private and family life (Article 8 of the ECHR) including by causing harm to the amenity of those living in nearby residential properties, it is the view of officers that such interference is necessary in order to secure the benefits of the scheme and therefore necessary in the interests of the economic well-being of the country and proportionate. It is not considered that the proposal would result in an unacceptable impact on the existing use of nearby sensitive receptors. As such, the extent of harm is not considered to be unacceptable and does not cause the proposals to conflict with Local Plan Policy DM10.7 and Policy DE7 of the Draft City Plan 2040. It is considered that the public benefits of the scheme, including the provision of additional office floorspace within the proposed development, meeting Local Plan ambitions for further office floorspace and contributing to the City's primary business and professional services function, together with all other benefits that would arise from the provision of flexible cultural/ exhibition/ performance/ learning/ community spaces and affordable workspace for the public to enhance the role of the City as destination, outweighs any adverse impacts on nearby residential properties and that such impact is necessary in the interest of the economic well-being of the country and is proportionate.
914. Insofar as the grant of planning permission will result in interference with property rights (Article 1 Protocol 1) including any interference arising through impact on daylight and sunlight or other impact on adjoining properties, again it is the view of officers that such interference is in the public interest and proportionate.

### **Conclusion and Overall Planning Balance**

915. The proposal has been assessed in accordance with the relevant statutory duties and having regard to the Development Plan and other relevant policies and guidance, SPDs and SPGs and relevant advice including the NPPF, the draft Local Plan and considering all other material considerations. The determination must be made in accordance with the development plan unless material considerations indicate otherwise.
916. The application relates to site located on the northwest part of the City of London, bordering with the London Borough of Camden to the north, bounded by High Holborn to the north, Southampton Buildings to the southwest and Staple Inn Buildings to the east and it comprises three buildings, namely 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings. The site partially (44 Southampton Buildings) lies within the Chancery Lane Conservation Area.
917. The proposal is for the demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels. A pocket park is proposed to the south of the proposed building.
918. An associated Listed Building Consent application (24/01247/LBC) has also been submitted relating to minor works to attached railings and gate piers at Staple Inn Buildings and The Hall, Staple Inn (335 & 336 High Holborn).
919. The existing seven residential properties are proposed to be provided at an alternative site within the City of London. A separate application has been submitted to determine the relocation of these residential units. This application (Reference no: 24/01323/FULL) proposes the change of use of 1-2 St Andrew's Hill from commercial to seven residential units and is currently under determination.
920. Objections have been received from statutory consultees including Historic England and the CAAC in relation to the overall scale and height of the

proposed development, which they consider would cause harm to a range of assets. The GLA has stated that the development as submitted does not yet fully comply with the London plan; however, remedies are suggested. The GLA has identified less than substantial harm to heritage assets but stated that this would be outweighed by the public benefits of the scheme. No objections have been raised by the London Borough of Camden or any other consultees. One letter of objection has been received by a resident raising concerns regarding the proposed land uses, design and the disturbance and pollution during construction. This report has considered these impacts in detail.

921. The site is within the Central Activities Zone and is highly sustainable with excellent access to transport infrastructure and able to support active travel and maintain pedestrian comfort for a high number of future employees. The Site is within the 'rest of City' category, which is modelled at being able to achieve an office floorspace uplift of 145,000 sqm. The scheme will provide an uplift of 23,439 sqm. The site is within the City's growth modelling and would deliver over 1.5% of the minimum required commercial space to meet projected economic and employment growth demand until 2040. This quantity of floorspace would contribute to maintaining the City's position as the world's leading international financial and business centre.
922. The scheme would provide 52,656 sqm (GIA) of office floorspace (Use Class E(g)(i)), which would be flexible, sustainable Grade A office floorspace suitable for circa 3,000-3,200 FTE jobs. An area of 221sqm would be provided as creative affordable workspace available at 50% of market rent for qualifying occupiers, fulfilling the City's vision to providing inclusive workspace.
923. Architecturally, the proposal would be truly contextual; that is to say, it is the product of thoughtful and meticulous consideration of its richly historic context to which, in the pleasing variety of all of its elevations, it would offer a series of intelligent and beautifully resolved responses. Above all, it would have a generosity of detailing, materiality and uses that would utterly transform the present standing of this application site in the streetscape. The proposed building would result in a significant aesthetic enhancement to the High Holborn locality and its sophisticated and well-integrated design would raise the standard of design in the area.
924. The proposal would optimise the use of land, delivering high quality office space, and a multi-layered series of accessible spaces. It would enhance convenience, comfort and attractiveness in a manner which optimises active

travel and builds on the City's modal hierarchy and Transport Strategy and delivers high quality public realm creating leafy, safe accessible and pleasant routes and attractive places to linger for a range of users. The proposals would constitute thoroughly Good Growth by design and be in accordance with all Local Plan Policies relating to design, including, DM3.3, CS7, CS10, CS14, CS16, DM16.1, DM10.1, DM10.4, DM10.8, CS19 and DM19.1, emerging City Plan 2040 policies S10, AT1, S8, DE2, DE3, DE4, S21, OS1, S14, London Plan D3, D4, D8, T1, T2, T4 and G4, and the policies contained in the NPPF and guidance in the National Design Guide, contextualised by London Plan Good Growth objectives GG1-3,5 and 6.

925. The proposal would not be of a siting or scale to affect (and so would preserve) the Outstanding Universal Value of the Tower of London. Similarly, it would not be of a siting or scale to affect the characteristics and composition of the majority of strategic views, and would preserve those in which it is (faintly) visible. It would comply with Local Plan Policy CS13 and emerging City Plan 2040 Policy S13 London Plan Policy HC4, and associated guidance in the LVMF SPG and Protected Views SPD. The development would preserve the experiences from public high-level viewing platforms including from Monument, St Paul's Cathedral Stone Gallery and Golden Gallery and existing and emerging elevated public spaces which are also important to the character of the City of London.
926. While LB Camden have raised no concerns about any impacts on heritage assets within their area, there have been concerns from Historic England and the GLA, who have identified less than substantial harm to a range of assets. Officers have considered these representations carefully and afford them considerable importance and weight. There is some consensus and some clear disagreement in the application of professional judgement. Where disagreement exists, clear reasoning has been provided in this report.
927. Officers consider that, for the reasons set out above, the proposals would cause a slight level of less than substantial harm, through direct impacts to Chancery Lane Conservation Area, and a slight level of less than substantial harm to the significance, via setting, to Nos. 8-15 Old Square (grade II), and a low level of less than substantial harm to the significance, via setting, to Nos. 12 and 13 Old Buildings (grade I) and a low level of less than substantial harm to the significance, via setting, of Nos. 1 – 7 Stone Buildings (grade I).



928. Although these harms have been clearly and convincingly justified, and considerably mitigated through good design, the proposal would result in some conflict with Local Plan Policies CS12 (2), DM12.1 (1 and 4), DM 12.2 (2) ; emerging City Plan 2040 policies S11 (2), and HE1 (1 and 6); London Plan Policy HC1 (C) and with the objectives set out in Section 66 and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990 and relevant NPPF policies.
929. Otherwise, the proposals would preserve the significance and contribution of setting of all other aforementioned heritage assets. The proposals comply with policies CS12 (1, 3, 4 and 5), DM12.1 (2, 3 and 5), DM12.2 (1 and 3), DM12.3, DM12.4 and CS13; Emerging City Plan 2040 S11 (1, 3-5), S 13 (3), HE1 (2-5, 7-9) and HE2 and London Plan HC1 (A, B D-E).
930. The harms, enhancements and public benefits are considered as part of the paragraph 215 NPPF balancing exercise, and in the final planning balance at the end of this report.
931. Giving considerable importance and weight to the statutory duties in Section 66 and Section 72 of the Planning (Listed Building and Conservation Areas) Act 1990, including the desirability of preserving the significance of listed buildings, it is considered that this harm would be outweighed by the heritage and public benefits of the scheme. The heritage benefits, set out in more detail in the Heritage section of the report, include a slight level of enhancement to the Chancery Lane Conservation Area and revealing and displaying existing and potential archaeology associated with the Knights of the Templar. The public benefits include the delivery of commercial growth in a highly sustainable location, the unique offer of a highly compelling mix of cultural/ exhibition/ performance/ learning/ community space across the lower levels of the proposal and public realm offer by the provision of a high quality pocket park. The proposals would provide high quality amenities that would promote the wellbeing of workers, residents and visitors whilst also driving footfall and increasing spending in the locality.
932. The proposals comply with the required initial steps of archaeology investigation Local Plan DM 12.4 Draft City Plan 2040 HE2 13, Policies HE1 and London Plan HC1 subject to archaeology conditions.
933. Through engagement with outreach with local key stakeholders, a compelling public offer has been designed proposing the delivery of 1,923 sqm GIA of

flexible cultural/ exhibition/ performance/ learning/ community space within the ground and lower ground in the northwest corner of the proposed building.

934. The proposed flexible cultural space would be focused on the provision of a unique offer of a venue space, namely the Holborn Dome inspired by the former Knights of the Templar Church. The venue would include an immersive auditorium, flexible exhibition spaces and areas for community events. The retained archaeology, namely the section of the wall foundations of the Knights Templar would offer an exceptional opportunity to tangibly connect the proposed cultural offer with the history of the site. Although smaller in actual size from the existing retail floorspace, the high quality of the proposed retail offer would enhance the active frontage along High Holborn and the proposed pocket park, support the primary business function of the City and the local community. The provision of a water fountain, as well as a maintenance and management strategy will be secured by condition. The provision of public toilets will be secured via condition and their maintenance and management shall be detailed through a management plan secured via S106 obligation.
935. In transportation terms, the scheme would support active travel and maintain pedestrian comfort for a high number of future employees. The proposal would align with aspirations set out in the City's Transport Strategy. Policy compliant levels of cycle parking (745 long stay and 71 short stay) and associated end of trip facilities, including showers and lockers are proposed, which would encourage active travel to the site. The proposals for the enhanced public highways, can satisfactorily accommodate the additional pedestrian trips on the transport network. Demolition and construction methodologies would be secured via condition and proposals agreed between the Highways Authority and the appointed contractor, in accordance with construction regulations and logistic guidance. The building is proposed to be serviced by a single point onto Southampton Buildings. 35 daily trips (or 70 two-way trips) are forecasted following consolidation of deliveries by 50%. This would need to be set out in a delivery and servicing management plan, secured by planning obligation. It is considered at this stage that the proposed servicing arrangement would be acceptable. The scheme is in compliance with Local Plan Policy 16.3 and London Plan policy T5.
936. A carbon options study has been carried out based on a thorough understanding of the existing buildings on site and their physical relationships to each other, to establish carbon impacts, opportunities and constraints for environmental sustainability and to inform the intended transformation of the

site. Significant carbon savings beyond the GLA's benchmarks would be achievable only by retaining large proportions of the various existing buildings which would result in limitations of the development to connect floor levels through an infill extension and to provide high quality internal floorspaces. The proposed development would optimise the quantity of floorspace for offices and for a mix of community and retail uses along with a range of amenity and urban greening measures, thus contributing to future proofing the City of London against a range of environmental, social and economic sustainability challenges.

937. The proposed development would meet the GLA's standard benchmark for upfront carbon and reach close to meet the standard benchmark for life-cycle embodied carbon, with benefits relating to improving social sustainability through the activation and diversification of the local area and integrating urban greening and climate resilience measures. Circular economy measures have been incorporated, such as by identifying a large proportion of deconstruction material for reuse and designing the new build for longevity, adaptability and low maintenance. The energy strategy has been optimised for the site resulting in an estimated low energy use intensity (EUI), and a BREEAM "excellent" rating is targeted, aspiring to an "outstanding" rating through detailed design. In addition, a NABERS UK rating of a minimum of 5 stars is targeted to overcome the performance gap between design and in use energy efficiency. Although the proposal cannot meet the London Plan target of 35% operational carbon emission savings due to the particular stringency of the Part L 2021 baseline relating to non-residential buildings, as acknowledged by the GLA, it would (taking account of the mitigation measures proposed) comply with London Plan Policies SI 2, SI 7, Local Plan Policies CS15 and DM17.2, as well as emerging City Plan 2040 Policy DE1. The building design responds well to climate change resilience by reducing solar gain, saving water resources and significant opportunities for urban greening and biodiversity and complies with London Plan Policies G5 SI 4, SI 5 and SI 13, Local Plan Policies DM18.1, DM18.2, CS19, DM19.2, and emerging City Plan 2040 Policies S14, OS2, OS3, OS4, S15, CR1, CR3 and CR4.
938. In terms of the environmental impacts of the proposed development, the daylight, sunlight, overshadowing, overbearing overlooking, noise, contamination, wind, thermal comfort, air quality, solar glare and light spillage impacts have been assessed and are considered acceptable subject to mitigation, conditions and planning obligations where relevant. Microclimate, thermal comfort, ground conditions, air quality, contamination, solar glare and

light spillage and noise generated by the development are acceptable subject to mitigation, conditions and planning obligations where relevant

939. Any potential impacts during construction would be controlled as far as possible by the implementation of Schemes of protective works for demolition and construction and a Construction Logistics Plan and good site practices embodied therein. It is recognised that there are inevitable, albeit temporary consequences of development in a tight-knit urban environment. Post construction, compliance with planning conditions and S106 obligations would minimise any adverse impacts.
940. Virtually no major development proposal is in complete compliance with all policies and in arriving at a decision it is necessary to assess all the policies and proposals in the development plan and to come to a view as to whether in the light of the whole plan the proposal does or does not accord with it.
941. In this case, the proposals are considered to comply with a number of policies in particular those which encourage office development in the City. It is the view of officers that, as a matter of planning judgement, the proposals will make a significant contribution to advancing the strategic and business objectives of the City and comply with relevant design, culture, environmental and public realm related policies.
942. It is the view of officers that it is a matter of planning judgement, and in particular as the effect of the proposal will be to advance Local Plan Strategic Objective 1, and as policy CS1 is complied with and as policies relating to office floor space delivery, and public realm would be complied with that notwithstanding the conflict with CS12 (Historic Environment), DM12.1 (Managing Change affecting all heritage assets and spaces), DM12.2 (Development in Conservation Areas) and DM 20.2 (Retail Links); Emerging City Plan Policies 2040 S11 (Historic Environment), HE1 (Managing Change to Heritage Assets) and London Plan HC1 (Heritage Conservation and Growth), the proposals comply with the development plan when considered as a whole.
943. Other than the significant effect that the proposal will have to advance Local Plan Strategic Objective 1 to maintain the City's position as the world's leading international financial and business centre by providing 52,656 sq.m (GIA) of sustainable Grade A office floorspace, there are other benefits that would weight in favour of the proposed development when assessed against the local and national planning policies, as set out below:

- Securing a strategic high-quality mixed-use development within the City, that would provide land uses which support the diversification, vitality and growth of the City which contributes to the Destination City objectives;
- The provision of generous and unique flexible cultural/ exhibition performance/ learning/ community space that is intended to reach out to the wider community and provide a gateway into the City to access opportunities to inspire, connect, create and educate themselves and deliver genuine public benefits to the wider community;
- Provision of affordable workspace available at 50% of market that meets the City's vision to providing inclusive workspace;
- High quality retail provision on the site, enhancing the retail offer in the City, supporting and diversifying its primary business function and growing number of working population and number of visitors, whilst enhancing a place which would be more interesting and vibrant with active street frontages;
- Provision of high-quality public realm by the creation of a pocket park that is more inclusive and attractive, with richer planting and higher quality seating, optimising the proposed land uses and interface with their surroundings, improving the aesthetics of the area, creating links with other open spaces, providing community gathering space and improving workers, residents and visitors well-being;
- Securing a development that is environmentally responsible in that it would seek to promote active travel, provide biodiversity and urban greening, target BREEAM 'Excellent' and reduce waste;
- The proposed building would result in a significant aesthetic enhancement to the High Holborn locality. The proposal would result in a coherent modern building of high architectural quality, defining the surrounding streets, being sophisticated and well-integrated raising the standard of design in the area.
- Provision of meaningful public art and retained archaeology offering a tangible connection with the history of the site.

944. The scheme would provide benefits through CIL improvements to the public realm, housing and other local facilities and measures. That payment of CIL is a local finance consideration which weighs in favour of the scheme. In addition to general planning obligations there would be site specific measures secured by condition and in the S.106 agreement.

945. Paragraph 10 of the NPPF sets out that there is presumption in favour of sustainable development. For decision taking that means approving development proposals that accord with an up-to-date development plan without delay.
946. As discussed above, the paragraph 215 NPPF heritage balance is to be struck in favour of the scheme as the public benefits outweigh the less than substantial harm.
947. It is the view of Officers that as the proposal complies with the Development Plan when considered as a whole and as other material considerations also weigh in favour of the scheme, planning permission should be granted as set out in the recommendation and the schedules attached.

## **Background Papers**

- Whole life Carbon Optioneering process (29 May 2025)
- WLC Options Workshop (29 May 2025)
- Site Visit Guide and Supplementary Information (29 May 2025)
- WLC Optioneering Process (29 May 2025)
- Scheme Options Comparison – Engineering Commentary (29 May 2025)
- Existing Building Matrix - Qualitative Considerations - Building Level (29 May 2025)
- Pre-Application WLC Optioneering - Multidisciplinary Qualitative Assessment (29 May 2025)
- GLA Consultation Energy Memo Spreadsheet (received 2 June 2025)
- Circular Economy Memo 2025 (22 May 2025)
- WLC Memo 2025 (22 May 2025)
- Planning Pre-Application: Whole Life Carbon Optioneering as per Carbon Options (22 August 2023)
- Wind Microclimate Addendum (gia, 9 May 2025)
- Addendum to the Townscape, Built Heritage and Visual Impact Assessment (Millerhare, 02 May 2025)
- Townscape, Built Heritage and Visual Impact Assessment (Millerhare, 25 November 2024)
- Energy Statement (Arup, 18 November 2024)
- Fire Statement (Arup, 12 November 2024)
- Heritage Impact Assessment (Donald Insall Associations, 19 November 2024)
- Cultural Plan (Future City, 12 November 2024)
- Phase 1 Preliminary Risk Assessment (RSK Geosciences, 21 November 2024)
- Outdoor Thermal Comfort Assessment Report (gia, 20 November 2024)
- Outline Construction Environmental Management Plan, Revision 2 (CEMP) (Sir Robert McAlpine, 18 November 2024)
- Biodiversity Net Gain Assessment (Greengage, 19 November 2024)
- Delivery And Servicing Management Plan (Arup, 22 November 2024)
- Air Quality Assessment (Arup, 22 November 2024)
- Statement Of Community Involvement Final (Kanda Consulting, November 2024)
- Flood Risk Assessment and Drainage Strategy (Arup, 22 November 2024)
- Lighting Planning Report (Foundry, 22 November 2024)
- Planning Noise Report (Sandy Brown, 18 November 2024)
- Cover Letter (GeraldEve, 25 November 2024)
- Planning Statement (GeraldEve, 21 November 2024)

- Design and Access Statement Addendum (Make, 01 May 2025)
- Design and Access Statement (Make, 25 November 2024)
- Daylight, Sunlight and Overshadowing Report (gia, 21 November 2024)
- Transport Assessment (22 November 2024)
- Third-party review statement – Ref. 37122-HML-XX-XX-RP-V-810002-P01 (Hilson Moran, 19 May 2025)
- GLA Planning queries tracker (14 May 2025)
- Equality Impact Assessment (Arup, 22 November 2024)
- Health Impact Assessment (Arup, 22 November 2024)
- Preliminary Ecology Appraisal (Greengage, 19 November 2024)
- Circular Economy Statement (Arup, 20 November 2024)
- Overshadowing Report - Amenity within the site (gia, 21 November 2024)
- Solar Glare Report (gia, 21 November 2024)
- Sustainable Development and Climate Change Report (Arup, 22 November 2024)
- CFD Wind Microclimate Assessment Report (gia, 20 November 2024)
- WLC GLA Spreadsheet (28 November 2024)
- Circular Economy GLA Spreadsheet (14 May 2025)
- Third Party Review, Daylight, Sunlight & Overshadowing Assessment (Astney Horne, 27 March 2025)
- Archaeological Desk Based Assessment (MOLA, 18 November 2024)
- Cycle Promotion Plan (Arup, 22 November 2024)
- Energy Memo Q5 – SWAN Correspondence (received 02 June 2025)
- Arboricultural Report, Impact Assessment and Method Statement (Treefellas Arboriculture, 4 June 2025)

## **Representations - Members of the Public**

11/02/2025 - Morgan Jenkins

## **Representations/Consultation Responses**

17/01/2025	Health and Safety Executive
20/01/2025	Heathrow Safeguarding
20/01/2025	NATS Safeguarding
20/01/2025	Active Travel England
31/01/2025	Hackney Council
06/02/2025	Historic England
07/02/2025	London Borough of Camden



07/02/2025	Surveyor to the Fabric - St. Paul's Cathedral
07/02/2025	Location Enquiries
10/02/2025	Thames Water
10/02/2025	Thames Water
11/02/2025	Royal Borough of Greenwich
26/02/2025	Historic England
28/02/2025	Southwark Council
11/03/2025	Greater London Authority
22/05/2025	Greater London Authority
13/03/2025	City of London Conservation Area Advisory Committee
02/04/2025	London Borough of Tower Hamlets
10/04/2025	Westminster City Council
14/04/2025	Transport For London
30/04/2025	London Borough of Camden
17/01/2025	Planning Gateway One
27/01/2025	District Surveyors
29/01/2025	Air Quality Officer
31/01/2025	Arboricultural Officer
20/05/2025	Arboricultural Officer
29/01/2025	Environmental Health Officer
07/02/2025	Lead Local Flood Authority
09/05/2025	Lead Local Flood Authority
07/02/2025	Safeguarding Engineer TfL
16/03/2025	Cleansing Department
29/04/2025	Suicide Prevention Advisor
26/02/2025	Greater London Archaeology Advisory Service
28/05/2025	Greater London Archaeology Advisory Service

## **Appendix A**

### **London Plan Policies**

- Policy CG1 Building Strong and Inclusive Communities
- Policy GG2 Making the best use of land
- Policy CG3 Creating a Healthy City
- Policy GG5 Growing a good economy
- Policy CG6 Increasing efficiency and resilience
- Policy SD4 The Central Activities Zone (CAZ)
- Policy SD5 Offices, and other strategic functions and residential development in the CAZ
- Policy D1 London's form, character and capacity for growth
- Policy D2 Infrastructure requirements for sustainable densities
- Policy D3 Optimising site capacity through the design-led approach
- Policy D4 Delivering Good Design
- Policy D5 Inclusive Design
- Policy D8 Public realm
- Policy D10 Basement Development
- Policy D11 Safety, security and resilience to emergency
- Policy D12 Fire Safety
- Policy D14 Noise
- Policy S6 Public toilets
- Policy E1 Offices
- Policy E2 Providing suitable business space
- Policy E3 Affordable Workspaces
- Policy E9 Retail, markets and hot food takeaways
- Policy E10 Visitor infrastructure
- Policy HC1 Heritage conservation and growth
- Policy HC3 Strategic and Local Views
- Policy HC4 London View Management Framework
- Policy HC5 Supporting London's culture and creative industries
- Policy HC6 Supporting the night-time economy
- Policy G1 Green infrastructure
- Policy G4 Open space
- Policy G5 Urban Greening
- Policy G6 Biodiversity and access to nature
- Policy SI1 Improving air quality

- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water Infrastructure
- Policy SI6 Digital connectivity Infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SL13 Sustainable drainage
- Policy T1 Strategic approach to transport
- Policy T2 Healthy Streets
- Policy T3 Transport capacity, connectivity and safeguarding
- Policy T4 Assessing and mitigating transport impacts
- Policy T5 Cycling
- Policy T6 Car Parking
- Policy T7 Deliveries, servicing and construction
- Policy T9 Funding transport infrastructure through planning

### **Relevant GLA Supplementary Planning**

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

### **Emerging City Plan 2040**

- Strategic Policy S1: Health and Inclusive City
- Policy HL1: Inclusive buildings and spaces
- Policy HL2: Air quality
- Policy HL3: Noise
- Policy HL4 Contaminated land and water quality
- Policy HL5: Location and protection of social and community facilities
- Policy HL6: Public Toilets
- Policy HL7: Sport and Recreation
- Policy HL8 Play areas and facilities
- Policy HL9: Health Impact Assessment (HIA)
- Strategic Policy S2: Safe and Secure City
- Policy SA1: Publicly accessible locations
- Policy SA2 Dispersal Routes
- Policy SA3: Designing in Security
- Strategic Policy S3: Housing
- Policy HS3: Residential Environment
- Strategic Policy S4: Offices
- Policy OF1: Office Development
- Policy OF2: Protection of Existing Office Floorspace
- Policy OF3 Temporary 'Meanwhile' Uses
- Strategic Policy S5 Retail and Active Frontages
- Policy RE2 Active Frontages
- Policy RE3 Specialist Retail Uses and Clusters
- Strategic Policy S6: Culture and Visitors
- Policy CV1: Protection of Existing Visitor, Arts and Cultural Facilities
- Policy CV2: Provision of Arts, Culture and Leisure Facilities
- Policy CV3: Provision of Visitor Facilities
- Policy CV5 Evening and Night-Time Economy
- Policy CV6 Public Art
- Policy S7: Infrastructure and Utilities
- Policy N1 Infrastructure Provision and Connection
- Policy IN1: Infrastructure Capacity
- Strategic Policy S8: Design
- Policy DE1: Sustainable Design
- Policy DE2: Design Quality
- Policy DE3: Public Realm
- Policy DE4: Terraces and Elevated Public Spaces
- Policy DE5: Shopfronts

- Policy DE6: Advertisements
- Policy DE7: Daylight and Sunlight
- Policy DE8: Lighting
- Strategic Policy S9: Transport and Servicing
- Policy VT1: The impacts of development on transport
- Policy VT2 Freight and Servicing
- Policy VT3: Vehicle Parking
- Policy VT5: Aviation Landing Facilities
- Strategic Policy S10: Active Travel and Healthy Streets
- Policy AT1: Pedestrian Movement, Permeability and Wayfinding
- Policy AT2: Active Travel including Cycling
- Policy AT3: Cycle Parking
- Strategic Policy S11: Historic Environment
- Policy HE1: Managing Change to Historic Environment Development
- Policy HE2: Ancient Monuments and Archaeology
- Policy HE3: Setting of the Tower of London World Heritage Site
- Strategic Policy S13: Protected Views
- Strategic Policy S14: Open Spaces and Green Infrastructure
- Policy OS2: City Urban Greening
- Policy OS3: Biodiversity
- Policy OS4: Biodiversity Net Gain
- Policy OS5 Trees
- Strategic Policy S15: Climate Resilience and Flood Risk
- Policy CR1: Overheating and Urban Heat Island Effect
- Policy CR3 Sustainable Drainage Systems (SuDs)
- Policy CR4 Flood Protection and Flood Defences
- Strategic Policy S16: Circular Economy and Waste
- Strategic Policy S26 Planning Contributions

## **Relevant City Corporation Guidance and Supplementary Planning Documents (SPDs)**

- Planning for Sustainability November 2023
- Lighting SPD, October 2023
- Developer Engagement Guidance PAN, May 2023
- Carbon Options Guidance PAN, March 2023

- Preventing suicides in high rise buildings and structures PAN, November 2022
- City of London Thermal Comfort Guidelines (2020)
- Wind Microclimate PAN, August 2019
- Sunlight PAN, July 2017
- Solar Glare PAN, July 2017
- Solar Convergence PAN July 2017
- Archaeology in the City PAN,
- Air Quality SPD, July 2017
- Archaeology and Development Guidance SPD, July 2017
- Freight and Servicing SPD February 2018
- City Public Realm SPD (CoL, July 2016);
- Office Use SPD, January 2015
- Open Space Strategy SPD, January 2015
- Tree Strategy SPD May 2012
- Planning Obligations SPD 2021
- Protected Views SPD, January 2012
- City Transport Strategy (November 2018 – draft);
- City Waste Strategy 2013-2020 (CoL, January 2014)

## **Relevant Local Plan Policies**

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

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

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

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

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

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

### ***CS4 Planning contributions***

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

### ***CS10 Design***

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

### ***CS11 Visitor, arts and culture***

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

### ***CS12 Historic environment***

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

### ***CS13 Protected views***

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

### ***CS15 Sustainable development and climate change***

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

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

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

### ***CS17 Waste***

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

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

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

### ***CS19 Open Spaces and Recreation***

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

### ***CS20 Retailing***



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

### ***CS21 Housing***

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

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

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

### ***DM1.3 Small and medium business units***

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

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

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

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

### ***DM2.1 Infrastructure provision***

- 1) Developers will be required to demonstrate, in conjunction with utility providers, that there will be adequate utility infrastructure capacity, both on and off the site, to serve the development during construction and operation. Development should not lead to capacity or reliability problems in the surrounding area. Capacity projections must take account of climate change impacts which may influence future infrastructure demand.
- 2) Utility infrastructure and connections must be designed into and integrated with the development wherever possible. As a minimum, developers should identify and plan for:
  - a) electricity supply to serve the construction phase and the intended use for the site, and identify, in conjunction with electricity providers, Temporary Building Supply(TBS) for the construction phase and the estimated load capacity of the building and the substations and routes for supply;
  - b) reasonable gas and water supply considering the need to conserve natural resources;
  - c) heating and cooling demand and the viability of its provision via decentralised energy (DE) networks. Designs must incorporate access to existing DE networks where feasible and viable;
  - d) telecommunications network demand, including wired and wireless infrastructure, planning for dual entry provision, where possible, through communal entry chambers and flexibility to address future technological improvements;
  - e) separate surface water and foul drainage requirements within the proposed building or site, including provision of Sustainable Drainage Systems (SuDS), rainwater harvesting and grey-water recycling, minimising discharge to the combined sewer network.
- 3) In planning for utility infrastructure developers and utility providers must provide entry and connection points within the development which relate to the City's established utility infrastructure networks, utilising pipe subway routes wherever feasible. Sharing of routes with other nearby developments and the provision of new pipe subway facilities adjacent to buildings will be encouraged.
- 4) Infrastructure provision must be completed prior to occupation of the development. Where potential capacity problems are identified and no improvements are programmed by the utility company, the City Corporation will require the developer to facilitate appropriate improvements, which may require the provision of space within new developments for on-site infrastructure or off-site infrastructure upgrades.

***Policy DM 3.1 Self-containment in mixed use developments***

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

### ***DM3.2 Security measures***

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

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

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

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

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

- e) providing necessary measures that relate to the appropriate level of crowding in a site, place or wider area.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- 1) To encourage high quality roof gardens and terraces where they do not:
  - a) immediately overlook residential premises;
  - b) adversely affect rooflines or roof profiles;
  - c) result in the loss of historic or locally distinctive roof forms, features or coverings;
  - d) impact on identified views.
- 2) Public access will be sought where feasible in new development.

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

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

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

### ***Policy DM 10.5 Shopfronts***

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

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

### ***Policy DM 10.6 Advertisements***

1. To encourage a high standard of design and a restrained amount of advertising in keeping with the character of the City.
2. To resist excessive or obtrusive advertising, inappropriate illuminated signs and the display of advertisements above ground floor level.

### ***DM10.7 Daylight and sunlight***

- 1) To resist development which would reduce noticeably the daylight and sunlight available to nearby dwellings and open spaces to unacceptable levels, taking account of the Building Research Establishment's guidelines.
- 2) The design of new developments should allow for the lighting needs of intended occupiers and provide acceptable levels of daylight and sunlight.

### ***DM10.8 Access and inclusive design***

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

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

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

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

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

### ***DM12.1 Change affecting heritage assets***

1. To sustain and enhance heritage assets, their settings and significance.
2. Development proposals, including proposals for telecommunications infrastructure, that have an effect upon heritage assets, including their settings, should be accompanied by supporting information to assess and evaluate the significance of heritage assets and the degree of impact caused by the development.
3. The loss of routes and spaces that contribute to the character and historic interest of the City will be resisted.
4. Development will be required to respect the significance, character, scale and amenities of surrounding heritage assets and spaces and their settings.
5. Proposals for sustainable development, including the incorporation of climate change adaptation measures, must be sensitive to heritage assets.

### ***DM12.3 Listed buildings***

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



#### ***DM12.4 Ancient monuments and archaeology***

1. To require planning applications which involve excavation or ground works on sites of archaeological potential to be accompanied by an archaeological assessment and evaluation of the site, including the impact of the proposed development.
2. To preserve, protect, safeguard and enhance archaeological monuments, remains and their settings in development, and to seek a public display and interpretation, where appropriate.
3. To require proper investigation and recording of archaeological remains as an integral part of a development programme, and publication and archiving of results to advance understanding.

#### ***DM15.1 Sustainability requirements***

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

#### ***DM15.2 Energy and CO2 emissions***

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

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

### ***DM15.3 Low and zero carbon technologies***

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

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

1. All feasible and viable on-site or near-site options for carbon emission reduction must be applied before consideration of offsetting. Any remaining carbon emissions calculated for the lifetime of the building that cannot be mitigated onsite will need to be offset using "allowable solutions".
2. Where carbon targets cannot be met on-site the City Corporation will require carbon abatement elsewhere or a financial contribution, negotiated through a S106 planning obligation to be made to an approved carbon offsetting scheme.
3. Offsetting may also be applied to other resources including water resources and rainwater run-off to meet sustainability targets off-site where on-site compliance is not feasible.

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

1. Developers will be required to demonstrate through Sustainability Statements that all major developments are resilient to the predicted climate conditions during the building's lifetime.
2. Building designs should minimise any contribution to the urban heat island effect caused by heat retention and waste heat expulsion in the built environment.

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

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

terminate above the roof height of the tallest building in the development in order to ensure maximum dispersion of pollutants.

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

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

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

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

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

1. Development proposals that are likely to have effects on transport must be accompanied by an assessment of the transport implications during both construction and operation, in particular addressing impacts on:
  - a) road dangers;
  - b) pedestrian environment and movement;
  - c) cycling infrastructure provision;
  - d) public transport;
  - e) the street network.
2. Transport Assessments and Travel Plans should be used to demonstrate adherence to the City Corporation's transportation standards.

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

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

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

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

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

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

must be at least 2.4m wide and at least 4.8m long and with reserved areas at least 1.2m wide, marked out between the parking spaces and at the rear of the parking spaces.

3. Except for dwelling houses (use class C3), whenever any car parking spaces (other than designated Blue Badge parking) are provided, motor cycle parking must be provided at a ratio of 10 motor cycle parking spaces per 1 car parking space. At least 50% of motor cycle parking spaces must be at least 2.3m long and at least 0.9m wide and all motor cycle parking spaces must be at least 2.0m long and at least 0.8m wide.
4. On site servicing areas should be provided to allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded. Such servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. Headroom of at least 5m where skips are to be lifted and 4.75m for all other vehicle circulation areas should be provided.
5. Coach parking facilities for hotels (use class C1) will not be permitted.
6. All off-street car parking spaces and servicing areas must be equipped with the facility to conveniently recharge electric vehicles.
7. Taxi ranks are encouraged at key locations, such as stations, hotels and shopping centres. The provision of taxi ranks should be designed to occupy the minimum practicable space, using a combined entry and exit point to avoid obstruction to other transport modes.

### ***Policy DM 16.6 Public car parks***

No new public car parks will be permitted in the City, including the temporary use of vacant sites. The redevelopment of existing public car parks for alternative land uses will be encouraged where it is demonstrated that they are no longer required.

### ***DM17.1 Provision for waste***

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

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

### ***DM17.2 Designing out construction waste***

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

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

### ***CS18 Minimise flood risk***

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

#### ***DM18.1 Development in Flood Risk Area***

1. Where development is proposed within the City Flood Risk Area evidence must be presented to demonstrate that:
  - a) the site is suitable for the intended use (see table 18.1), in accordance with Environment Agency and Lead Local Flood Authority advice;
  - b) the benefits of the development outweigh the flood risk to future occupants;
  - c) the development will be safe for occupants and visitors and will not compromise the safety of other premises or increase the risk of flooding elsewhere.
2. Development proposals, including change of use, must be accompanied by a site-specific flood risk assessment for:
  - a) all sites within the City Flood Risk Area as shown on the Policies Map; and
  - b) all major development elsewhere in the City.
3. Site specific flood risk assessments must address the risk of flooding from all sources and take account of the City of London Strategic Flood Risk Assessment. Necessary mitigation measures must be designed into and integrated with the development and may be required to provide protection

from flooding for properties beyond the site boundaries, where feasible and viable.

4. Where development is within the City Flood Risk Area, the most vulnerable uses must be located in those parts of the development which are at least risk. Safe access and egress routes must be identified.
5. For minor development outside the City Flood Risk Area, an appropriate flood risk statement may be included in the Design and Access Statement.
6. Flood resistant and resilient designs which reduce the impact of flooding and enable efficient recovery and business continuity will be encouraged.

#### ***DM18.2 Sustainable drainage systems***

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

#### ***Policy DM 18.3 Flood protection and climate change resilience***

1. Development must protect the integrity and effectiveness of structures intended to minimise flood risk and, where appropriate, enhance their effectiveness.
2. Wherever practicable, development should contribute to an overall reduction in flood risk within and beyond the site boundaries, incorporating flood alleviation measures for the public realm, where feasible.

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



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

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

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

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

#### ***Policy DM 20.4 Retail unit sizes***

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

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

1. The amenity of existing residents within identified residential areas will be protected by:
  - a) resisting other uses which would cause undue noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause disturbance;

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

***Policy DM 22.2 Provision of public toilets***

A widespread distribution of public toilets which meet public demand will be provided by:

- requiring the provision of a range of public toilet facilities in major retail and leisure developments, particularly near visitor attractions, public open spaces and major transport interchanges. This includes the provision of pop-up toilets in suitable areas with concentrations of night-time activity;
- supporting an increase in the membership of the Community Toilet Scheme;
- resisting the loss of existing public toilets unless adequate provision is available nearby and requiring the provision of replacement facilities;
- taking the opportunity to renew existing toilets which are within areas subject to major redevelopment schemes and seeking the incorporation of additional toilets in proposed developments where they are needed to meet increased demand.

## **Methodologies for Assessing Daylight, Sunlight and Overshadowing**

### **Existing Buildings**

#### **Daylight to Existing Buildings**

The BRE guidelines (2022) present the following methodologies for measuring the impact of development on the daylight and sunlight received by nearby existing dwellings and any existing non-domestic buildings where the occupants have a reasonable expectation of natural light (such as schools, hotels and hostels):

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

**2. Daylight Distribution: No Sky Line (NSL):** The distribution of daylight within a room is measured by the no sky line, which separates the areas of the room (usually measured in sq. ft) at a working height (usually 0.85m) that do and do not have a direct view of the sky. The BRE guidelines states that if with the 492 proposed development in place the level of daylight distribution in a room is reduced by 20% or more from the existing level (0.8 times the existing value), the loss would be noticeable. The BRE advises that this measurement should be used to assess daylight within living rooms, dining rooms and kitchens; bedrooms should also be analysed although they are considered less important.

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

#### **Sunlight to Existing Buildings**

**Sunlight to windows: Annual Probable Sunlight Hours (APSH):** Sunlight levels are calculated for all main living rooms in dwellings if they have a window facing within

90 degrees of due south. Kitchens and bedrooms are considered less important although care should be taken not to block too much sun. The BRE explains that sunlight availability may be adversely affected if the centre of the window:

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

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

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

### **Interpreting Assessment Data**

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

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

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

## **Open Spaces**

### **Overshadowing**

**Sunlight to open spaces: Sunlight Hours on the Ground (SHOG):** The BRE guidelines recommends that the availability of sunlight should be checked for open spaces including residential gardens and public amenity spaces, stating that, for a garden or amenity area to appear adequately sunlit throughout the year, no more than half (50%) of the area should be prevented by buildings from receiving two hours of sunlight on the 21 March.

For existing open spaces, if as a result of a proposed development an existing garden or amenity area does not meet the guidance, or the area which can receive the sun 494 is less than 0.8 times its former value (i.e. more than 20 % reduction) then the loss of sunlight is likely to be noticeable.

## **Assessing the Cumulative Impact of Development Proposals**

Paragraph 3.10.41 of the Local Plan and paragraph 6.1.59 of the draft City Plan state that “when considering proposed changes to existing lighting levels, the City Corporation will take account of the cumulative effect of development proposals”. The impact of a proposed development on the daylight and sunlight received by neighbouring properties and open spaces is assessed against the light levels in the existing scenario. When assessing the cumulative impact of development proposals, the impact of the proposed development would be assessed alongside any other nearby developments with either full planning permission, a resolution to grant consent, those development proposals that have been submitted but not yet determined and / or potential future applications that due to be submitted (none of which have been completed). In undertaking an assessment of the cumulative impact of such development proposals it can be determined the extent to which the impact of

each development proposals can be attributed. It should be noted that previous completed developments are considered to form part of the existing baseline against which the development proposals would be assessed.

## SCHEDULE

**Application: 24/01262/FUMAJ**

**319-325 High Holborn (Heron House), 326-332 High Holborn And 26 Southampton Buildings (Holborn Gate), And 44 Southampton Buildings, WC1 And WC2**

**Demolition of existing buildings at 326-332 High Holborn & 26 Southampton Buildings (Holborn Gate), 319-325 High Holborn (Heron House) and 44 Southampton Buildings and construction of new building comprising of two basement levels, ground plus 9 upper stories (65.8m AOD), including a mezzanine at upper ground level and external plant space at roof level, consisting of office floorspace (Class E(g)(i)) on ground and upper levels, retail/food and beverage floorspace (Use Class E(a)-(b)) at ground level and flexible cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace (Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis) floorspace at ground and basement levels; creation of public realm, including new hard and soft landscaping, external terraces, provision of new servicing facilities and associated access from Southampton Buildings, cycle parking and other associated works.**

## CONDITIONS

<b>Time Limit for Commencement</b>	
<b>1</b>	<b>Time Limit</b>  The development hereby permitted shall be begun before the expiration of three years from the date of this permission.  REASON: To ensure compliance with the terms of Section 91 of the Town and Country Planning Act 1990.
<b>Environmental Health</b>	
<b>2</b>	<b>Scheme of Protective Works - demolition</b>

	<p>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).</p> <p>REASON: In the interest of public safety and to protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.</p>
<b>3</b>	<p><b>Scheme of Protective Works - construction</b></p> <p>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).</p> <p>REASON: In the interest of public safety and to protect the amenities of nearby residents and commercial occupiers in accordance with the following policies of the Local Plan: DM15.6, DM15.7, DM21.3. These details are required prior to any work commencing in order that the impact on amenities is minimised from the time that development starts.</p>
<b>4</b>	<b>Noise, dust and vibration monitoring equipment</b>



	<p>Throughout the duration of the demolition and construction works the site shall be fitted with live noise, dust and vibration monitoring equipment. The numbers and locations of monitoring equipment shall be agreed with the City of London Pollution Control Team prior to installation. The City of London Pollution Control Team shall be provided with live access to all monitoring data throughout the works.</p> <p>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.</p>
<b>5</b>	<p><b>Acoustic Report</b></p> <p>Before any works thereby affected are begun, a scheme in the form of an acoustic report compiled by a qualified specialist shall be submitted to and approved in writing by the Local Planning Authority specifying the materials and constructional methods to be used to demonstrate that noise levels from the proposed cultural/ exhibition/ performance/ learning/ community space shall not exceed the existing background level (lowest LA90(15min)) at 1m from the nearest noise sensitive receptor. The development pursuant to this permission shall be carried out in accordance with the approved scheme and maintained thereafter.</p> <p>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.</p>
<b>6</b>	<p><b>Opening Hours Terraces and Balconies</b></p> <p>The roof terraces on levels 7, 8 &amp; 9, Balconies on levels 1, 3, 5 &amp; 7, hereby permitted shall not be used or accessed between the hours of 23:00 on one day and 08:00 on the following day and not at any time on Sundays or Bank or Public Holidays, other than in the case of emergency.</p> <p>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.</p>
<b>7</b>	<p><b>Amplified Music</b></p> <p>No amplified or other music shall be played on the roof terraces and balconies.</p> <p>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.</p>
<b>8</b>	<p><b>Plant Noise</b></p>

	<p>(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 worst affected noise sensitive premises (see informative). The background noise level shall be expressed as the lowest typical LA90 (15 min) during which time plant is or may be in operation.</p> <p>(b) Following installation but before the new plant comes into operation measurements of noise from the new plant shall be taken (unless otherwise agreed in writing by the local planning authority) 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.</p> <p>(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.</p> <p>REASON: To ensure that the proposal meets the requirements of the Agent of Change principle and that occupiers and users of the proposed development do not suffer a loss of amenity by reason of excess noise from environmental and transportation sources in accordance with the Local Plan: DM21.3, DM15.7, D21.5 and London Plan Policy D13.</p>
<b>9</b>	<p><b>Noise from use Class E / Sui Generis affecting offices / non offices</b></p> <p>The proposed Class E / Sui Generis development sharing a party element with office / non-office premises shall be designed and constructed to provide resistance to the transmission of sound. The sound insulation shall be sufficient to ensure that NR40 is not exceeded in the existing neighbouring premises and shall be permanently maintained thereafter.</p> <p>A test shall be carried out after completion but prior to occupation to show the criterion above has been met and the results shall submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To protect the amenities of occupiers of the building in accordance with the following policy of the Local Plan: DM15.7.</p>
<b>10</b>	<p><b>Fumes from Use Class E / Sui Generis affecting offices or residential</b></p> <p>No cooking shall take place within any Sui Generis (Pubs with expanded food provision, hot food takeaways) use/Class E (Restaurant) unit hereby approved until</p>

	<p>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.</p> <p>REASON: In order to protect residential/commercial amenities in the building in accordance with the following policies of the Local Plan: DM15.6, DM21.3.</p>
<b>11</b>	<p><b>Noise and vibration from mechanical systems or other plant</b></p> <p>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.</p> <p>REASON: In order to protect the amenities of commercial occupiers in the building in accordance following policy of the Local Plan: DM15.7.</p>
<b>12</b>	<p><b>Contaminated Land</b></p> <p>Before the development hereby permitted shall commence, 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):</p> <p>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.</p> <p>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</p>

	<p>Standards, and be agreed in writing with the Local Planning Authority prior to commencement of the work.</p> <p>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.</p> <p>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.</p>
<b>13</b>	<p><b>Contamination</b></p> <p>Within five working days of any site contamination being found when carrying out the development hereby approved the contamination must be reported in writing to the Local Planning Authority and an investigation and risk assessment must be undertaken in accordance with the requirements of DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11'.</p> <p>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.</p> <p>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.</p> <p>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,</p>

	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.
<b>14</b>	<p><b>Sewer Vents</b></p> <p>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.</p> <p>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.</p>
<b>SUDS/Water</b>	
<b>15</b>	<p><b>SuDS</b></p> <p>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:</p> <p>(a) Fully detailed design and layout drawings for the proposed SuDS components including but not limited to: attenuation systems, rainwater pipework, flow control devices, design for system exceedance, design for ongoing maintenance; surface water flow rates shall be restricted to no greater than 2 l/s from each outfall and from no more than two distinct outfalls, provision should be made for an attenuation volume capacity capable of achieving this, which should be no less than 662 m<sup>3</sup>;</p> <p>(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.</p> <p>(c) Evidence that Thames Water have been consulted and consider the proposed discharge rate to be satisfactory.</p>

	<p>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.</p>
<b>16</b>	<p><b>SuDS Maintenance</b></p> <p>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:</p> <p>(a) A Lifetime Maintenance Plan for the SuDS system to include:</p> <ul style="list-style-type: none"> <li>- A full description of how the system would work, it's aims and objectives and the flow control arrangements;</li> <li>- A Maintenance Inspection Checklist/Log;</li> <li>- A Maintenance Schedule of Work itemising the tasks to be undertaken, such as the frequency required and the costs incurred to maintain the system.</li> </ul> <p>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.</p>
<b>17</b>	<p><b>Thames Water</b></p> <p>No development shall be occupied until confirmation has been provided that either:</p> <ul style="list-style-type: none"> <li>- all water network upgrades required to accommodate the additional demand to serve the development have been completed; or</li> <li>- a development and infrastructure phasing plan has been agreed with Thames Water to allow development to be occupied.</li> </ul> <p>Where a development and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan.</p> <p>Reason: The development may lead to low / no water pressures and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional demand anticipated from the new development. Any necessary reinforcement works will be necessary in order to avoid low / no water pressure issues.</p>

18	<p><b>Thames Water – Piling Method Statement</b></p> <p>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) and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe 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 and piling layout plan.</p> <p>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.</p>
<b>Archaeology</b>	
19	<p><b>Stage 1 Written Scheme of Investigation</b></p> <p>No development, except demolition to basement slab, 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 development, except demolition to basement slab, shall take place other than in accordance with the agreed WSI, 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 authority in writing. For land that is included within the stage 2 WSI, no development, except demolition to basement slab, shall take place other than in accordance with the agreed stage 2 WSI which shall include:</p> <p>A. The statement of significance and research objectives, and the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works</p> <p>A. A protocol for identifying remains worthy of preservation according to the conditions 20 and 21</p> <p>B. Details of a programme for delivering related positive public benefits</p> <p>The programme for post-investigation assessment and subsequent analysis, publication &amp; dissemination and deposition of resulting material. This part of the</p>

	<p>condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the WSI</p> <p>REASON: To ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
<b>20</b>	<p><b>Foundation Design</b></p> <p>Irrespective of the approved drawings, in the area of the Temple Church as shown in Drawings HOL-MAK-XX-B1-DR-AR-082099 P01 and HOL-MAK-XX-B2-DR-AR-082098 P01, the final basement configuration should be submitted to and approved in writing with the Local Planning Authority in consultation with Historic England. This shall include details of the basement and foundation design and construction method to protect archaeological remains. The development shall be carried out in accordance with the approved details. Where appropriate details of the conservation, interpretation and display will also be submitted.</p> <p>REASON: To ensure that if further substantive remains of the Temple church are identified, they are also preserved and displayed to the public and to protect the known remains of the Temple Church. This is to ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
<b>21</b>	<p><b>Condition survey, protection and preservation of archaeological remains</b></p> <p>No works, other than those required to undertake a condition survey and conservation works, will commence in the area of the known Temple remains until a condition survey has been carried out and the remains have been consolidated. Details of fencing, signage and other control measures to be provided during the construction period to protect discovered archaeological remains that are to be retained should be submitted and approved in writing by the local planning authority prior to development works that could affect identified remains. The development, in the area of identified remains, shall be carried out in accordance with the approved details. A management plan for the remains should be produced once they have been fully identified.</p> <p>REASON: To safeguard the archaeological interest on this site and to ensure the preservation of archaeological remains following archaeological investigation in accordance with the following policy of the Local Plan: DM12.4.</p>
<b>Sustainability</b>	



22	<p><b>Circular Economy</b></p> <p>(a) Prior to demolition of the development: full details of the pre-demolition audit in accordance with section 4.6 of the GLA's adopted Circular Economy Statement guidance shall be submitted to and approved in writing by the Local Planning Authority, that demonstrates that the development is designed to meet the relevant targets set out in the GLA Circular Economy Statement Guidance. In addition, the audit shall include a strategy to recycle the various concrete elements from deconstruction following in depth surveys of the structure and quality. The development shall be carried out in accordance with the approved details and operated &amp; managed in accordance with the approved details throughout the lifecycle of the development.</p> <p>(b) Prior to the commencement of the development (excluding demolition), a RIBA Stage 4 update to the approved detailed Circular Economy Statement to reaffirm the proposed strategy, to include a site waste management plan, shall be submitted to and approved in writing the Local Planning Authority, that demonstrates that the Statement has been prepared in accordance with the GLA Circular Economy Guidance and that the development is designed to meet the relevant targets set out in the GLA Circular Economy Guidance. The end-of-life strategy of the statement should include the approach to storing detailed building information relating to the structure and materials of the new building. The development shall be carried out in accordance with the approved details and operated &amp; managed in accordance with the approved details throughout the lifecycle of the development.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it reduces the demand for redevelopment, encourages re-use and reduces waste in accordance with the following policies in the Development Plans and draft Development Plans: London Plan; D3, SI 7, SI 8 - Local Plan; CS 17, DM 17.2 ; S16, CEW 1; emerging City Plan 2040: S8 and DE1.</p>
23	<p><b>Post-construction Circular Economy</b></p> <p>No later than 3 months after completion of the building, a post-construction Circular Economy Statement shall be submitted to and approved in writing by the local planning authority to demonstrate that the targets and actual outcomes achieved are in compliance with or exceed the proposed targets stated in the approved Circular Economy Statement for the development.</p> <p>REASON: To ensure that circular economy principles have been applied and Circular Economy targets and commitments have been achieved to demonstrate compliance with Policy SI 7 of the London Plan.</p>

<b>24</b>	<p><b>Whole life-cycle carbon emissions</b></p> <p>Prior to the commencement of the development, excluding demolition, after RIBA stage 4, an update to the approved detailed Whole Life-Cycle Carbon assessment shall be submitted to and approved in writing by the Local Planning Authority, demonstrating that the whole life-cycle carbon emissions of the development are on track to achieve at least the GLA's Standard Benchmark (as current at the time of submission and against RICSv1) set out in the GLA's Whole Life-cycle Assessment Guidance. The assessment should include details of measures to reduce carbon emissions throughout the whole life-cycle of the development and provide calculations in line with the Mayor of London's guidance on whole life-cycle carbon assessments, and the development shall be carried out in accordance with the approved details and operated and managed in accordance with the approved assessment for the life-cycle of the development.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development so that it maximises the reduction of carbon emissions of the development throughout the whole life-cycle of the development in accordance with the following policies in the Development Plan and draft Development Plans: London Plan: D3, SI 2, SI 7 - Local Plan: CS 17, DM 15.2; emerging City Plan 2040: S8 and DE1.</p>
<b>25</b>	<p><b>Post-construction whole life-cycle carbon emissions</b></p> <p>Once the as-built design has been completed (upon commencement of RIBA Stage 6 the post-construction Whole Life-Cycle Carbon (WLC) Assessment (to be completed in accordance with and in line with the criteria set out in the GLA's WLC Assessment Guidance) shall be submitted to the Local Planning Authority. The post-construction assessment should provide an update of the information submitted at planning submission stage (RIBA Stage 2/3), including the whole life-cycle carbon emission figures for all life-cycle modules based on the actual materials, products and systems used. The assessment should be submitted along with any supporting evidence as per the guidance and should be received three months post as-built design completion, unless otherwise agreed.</p> <p>REASON: To ensure whole life-cycle carbon emissions are calculated and reduced and to demonstrate compliance with Policy SI 2 of the London Plan.</p>

26	<p><b>District Heating Network connection</b></p> <p>The development shall be designed to enable connection into a district heating network if this becomes available during the lifetime of the development. This is to include a strategy with relevant plan drawings for: equipment, allocation of plant space and a protected route for connection in and out of the site.</p> <p>REASON: To minimise carbon emissions by enabling the building to be connected to a district heating and cooling network if one becomes available during the life of the building in accordance with the following policies of the Local Plan: DM15.1, DM15.2, DM15.3, DM15.3, DM15.4; emerging City Plan 2040 policy DE1.</p>
27	<p><b>Climate change resilience measures – completion details</b></p> <p>Within 6 months of completion details of climate change resilience measures must be submitted to the Local Planning Authority demonstrating the measures that have been incorporated to ensure that the development is resilient to the predicted weather patterns during the lifetime of the building. This should include details of the climate risks that the site faces (flood, heat stress, water stress, natural capital, pests and diseases) and the climate resilience solutions that have been implemented.</p> <p>REASON: To comply with Local Plan Policy DM 15.5 Climate change resilience and adaptation; and emerging City Plan 2040 Policies S15, CR1, CR2, CR3, CR4.</p>
28	<p><b>PV panels</b></p> <p>Prior to works above ground, excluding demolition, details of the locations, number and size of PV panel installations to confirm the proposed approximate size of 440sqm to contribute to the renewable energy provisions on site shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To demonstrate that carbon emissions have been minimised and that the development is energy efficient in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2 and the emerging City Plan 2040: S8 and DE1.</p>
29	<p><b>Updated Energy Statement</b></p> <p>Prior to the commencement of development, excluding demolition, an assessment outlining details of the use of thermal energy storage linked to the heat pumps to address future fluctuations of the energy grid, including any amendments to the approved Energy Strategy, shall be submitted to and approved in writing by the Local</p>

	<p>Planning Authority. The development shall be carried out in accordance with the approved Energy Assessment and the carbon reduction measures contained with the approved Energy Assessment shall remain in place for the lifetime of the development.</p> <p>REASON: To demonstrate that the carbon emissions have been minimised and that the development is energy efficient in accordance with the following policy of the Local Plan: CS15, DM15.1, DM15.2 and the emerging City Plan 2040: S8 and DE1.</p>
<b>30</b>	<p><b>BREEAM</b></p> <p>Post construction BREEAM assessment(s) covering all areas/use classes, (combined or individually assessed) demonstrating that a target rating of at least 'Excellent' has been achieved (or such other target rating as the local planning authority may agree, provided that it is satisfied all reasonable endeavours have been used to achieve an 'Excellent' rating) shall be submitted as soon as practicable after practical completion.</p> <p>REASON: To demonstrate that the development performs well against a broad range of sustainability criteria including the reduction of carbon emissions and climate resilience, in accordance with the following policies of the Local Plan: CS15, DM15.1, DM15.2 and emerging City Plan 2040 policy DE1.</p>
<b>31</b>	<p><b>Updated Biodiversity Net Gain</b></p> <p>Prior to the commencement of development excluding demolition, an updated Biodiversity Net Gain Assessment shall be submitted to and approved to the Local Planning Authority to reflect any changes to landscaping proposals at detailed stage.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening. These details are required prior to construction work commencing in order to establish the updated figure from the time that construction start.</p>
<b>32</b>	<p><b>Ecological Management Plan</b></p> <p>Prior the commencement of the development, excluding demolition, an Ecological Management Plan shall be submitted to and approved in writing by the Local Planning Authority to provide details on the proposed ecological enhancement actions in relation to habitat creations and management. This shall include the following:</p> <ul style="list-style-type: none"> <li>• details of ecological landscaping, along with associated management and monitoring</li> <li>• detailed locations/specifications of boxes for swift/house sparrow/bats shall be provided</li> </ul>

	<ul style="list-style-type: none"> <li>• details of habitat created for solitary bees</li> <li>• artificial nesting sites for ground nesting invertebrates and open faced nesting boxes</li> <li>• details of habitat created for stag beetles (or robust justification for its exclusion) shall be provided</li> <li>• Build up, specifies mix and layout of green roofs (wildflower turf and sedum roof types should be avoided where possible).</li> </ul> <p>The measures as set out in the plan shall be carried out and so maintained.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening and Emerging City Plan 2040 policy OS3 Biodiversity. This is required to be prior to commencement of development in order to ensure that the ecological sites are not disturbed prior to development</p>
<b>33</b>	<p><b>Post Construction UGF and BNG</b></p> <p>Within 6 months of completion details of the measures to meet the approved Urban Greening Factor and the Biodiversity Net Gain scores, to include plant and habitat species and scaled drawings identifying the measures and maintenance plans, shall be submitted to the Local Planning Authority. Landscaping and biodiversity measures shall be maintained to ensure the approved standard is preserved for the lifetime of the development.</p> <p>REASON: To comply with Local Plan Policy DM 19.2 Biodiversity and urban greening.</p>
<b>34</b>	<p><b>Arboricultural Method Statement and Tree Protection Plan</b></p> <p>Prior to the commencement of the development hereby approved (including demolition and all preparatory work), a scheme for the protection of the retained trees (alder (T003) and Cherry (T007) trees) and trees in close proximity to the site (within the Staple Inn Gardens), in accordance with BS 5837:2012, including a tree protection plan(s) (TPP) and an arboricultural method statement (AMS) shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To ensure that the existing trees are protected and safeguard the character and appearance of the surrounding area in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM12.2 and DM19.2 and emerging policies DE2, S14, OS2 and OS5 of the Emerging City Plan 2040.</p>
<b>Design/Public Realm including Lighting</b>	

35	<p><b>Façade Mock Up Sample Panels</b></p> <p>Before the works thereby affected are begun, sample panels of agreed sections at an agreed scale of the facades shall be built, at an agreed location and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.</p>
36	<p><b>Design Details</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>(a) particulars and samples of the materials to be used on all external faces of the building including external ground and upper level surfaces;</li> <li>(b) details of all of the proposed new facade(s) including typical details of the fenestration and entrances;</li> <li>(c) details of a typical bay of the base and upper floors of the development (including each of the different facades) including jointing, materials, textures and colour finish as well as details of integrated balustrading;</li> <li>(d) details of all soffits;</li> <li>(e) details of the colonnade elevations including the entrances, shopfronts, soffits, walls, lighting, paving and any other infrastructure;</li> <li>(f) details of the civic clock face, surrounds and other associated infrastructure;</li> <li>(g) details of the servicing bay entrance, mock up samples and interface with the public realm;</li> <li>(h) details of rooftop including plant equipment and other infrastructure;</li> <li>(i) details of the integration of window cleaning equipment and the garaging thereof, plant, flues, and other excrescences on external terraces and roof level including within the plant rooms;</li> <li>(j) details of all drainage, irrigation and rainwater harvesting;</li> <li>(k) details of the integration of M&amp;E and building services into the external envelope;</li> <li>(l) details of signage, including building identifiers;</li> <li>(m) details of the proposed programme of public art throughout the external surfaces and faces of the building including on service bays</li> </ul>

	<p>(n) details of the urban greening proposed throughout the external surfaces and faces of the building;</p> <p>(o) details of the proposed external lighting scheme proposed throughout the external surfaces and faces of the development;</p> <p>(p) details of shopfronts;</p> <p>(q) details of the integration of cleaning equipment, cradles and the garaging thereof; and</p> <p>(r) details of terraces including furniture, surfaces, soft landscaping and other associated infrastructure.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM3.2, DM10.1, DM10.5, DM12.2.</p>
<b>37</b>	<p><b>Suicide Prevention</b></p> <p>Before any works thereby affected are begun, details of all balustrades and other measures deemed necessary for the external terrace areas and other raised areas along with the associated risk assessment shall be submitted to and approved in writing by the Local Planning Authority and retained for the life of the building.</p> <p>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:, CS3, DM3.2 DM10.1 and DM12.2.</p>
<b>38</b>	<p><b>Security</b></p> <p>Before any works thereby affected are begun, details of security measures to be utilised within the development, having been developed in consultation with City Police, including but not limited to natural surveillance, CCTV, lighting, secure lines, entrances and secure access control, compartmentalisation of different areas of the building, anti-scaling and safety measures, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be in place prior to occupation and remain in situ for the lifetime of the development.</p> <p>REASON: To ensure safety and security in accordance with Local Plan policies CS3 and DM3.2.</p>

39	<p><b>Public art strategy</b></p> <p>Before any works thereby affected are begun the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <p>Details of a new public art strategy within the public realm or on buildings where appropriate and which is of artistic merit, is deliverable and can be maintained shall be submitted to and approved in writing by the Local Planning Authority. The public art installations shall be carried out as approved and so maintained for the life time of the development.</p> <p>REASON: In the interest of visual amenity and to maintain the historic and cultural interest of the site in accordance with the following policy of the Local Plan: DM11.2</p>
40	<p><b>Urban Greening</b></p> <p>Before any works hereby affected are begun, details of a holistic urban greening strategy including hard landscaping, materials and an appropriate maintenance regime for</p> <ul style="list-style-type: none"> <li>a. planters, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;</li> <li>b. the incorporation of green roofs into roof surfaces; and</li> <li>c. the landscaping of the public realm</li> </ul> <p>Shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.</p> <p>REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.</p>
41	<p><b>Street lighting</b></p> <p>Before any works thereby affected are begun, details of the provision to be made in the building's design to enable the discreet installation of street lighting on the development, including details of the location of light fittings, cable runs and other</p>



	<p>necessary apparatus, shall be submitted to and approved in writing by the Local Planning Authority, and the development shall be carried out in accordance with the approved details.</p> <p>REASON: To ensure provision for street lighting is discreetly integrated into the design of the building in accordance with the following policy of the City of London Local Plan: DMI0.1.</p>
<b>42</b>	<p><b>Lighting Strategy</b></p> <p>Prior to the commencement of the relevant works, a final Lighting Strategy and a Technical Lighting Design in accordance with the adopted City of London Lighting Strategy SPD shall be submitted to and approved in writing by the Local Planning Authority, which should include details of:</p> <ul style="list-style-type: none"> <li>(a) lighting layout/s;</li> <li>(b) details of all functional and decorative luminaires (including associated accessories, bracketry and related infrastructure as well as impact on decorative soffits);</li> <li>(c) a lighting control methodology;</li> <li>(d) proposed operational timings and associated design and management measures to reduce the impact on the local environment and residential amenity including light pollution, light spill, and potential harm to local ecologies;</li> <li>(e) all external, semi-external and public-facing parts of the building and of any internal lighting in so far that it creates visual or actual physical impact on the lit context to show how the facade and/or the lighting has been designed to help reduce glare, excessive visual brightness, and light trespass; and</li> <li>(f) details for impact on the public realm, including typical illuminance levels, uniformity, colour appearance and colour rendering.</li> </ul> <p>All works and management measures pursuant to this consent shall be carried out and maintained in accordance with the approved details and lighting strategy.</p> <p>REASON: To ensure that the Local Planning Authority may be satisfied with the detail of the proposed development and the measures for environmental impacts, and to ensure a satisfactory external appearance in accordance with the following policies of the Local Plan: DM10.1, 15.7, CS15 and DM15.7 and City of London Lighting Strategy SPD.</p>
<b>43</b>	<p><b>Landscaping &amp; Public Realm Details</b></p>

	<p>Before any works thereby affected are begun the following details, relating to all unbuilt surfaces, including terraces/balconies and public realm, shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>a) Details of all soft landscaping, including the position, size and types of all planting and details of their respective planting beds;</li> <li>b) Details of all proposed trees including details of their age, growing habit, girth of trunk, root development, clear stem heights; and details of tree pits/trenches and growing medium;</li> <li>c) Details of all SUDS infrastructure, including details on the provision for harvesting rainwater run-off from surfaces to supplement irrigation;</li> <li>d) Details of the method of irrigation and nutrient delivery systems;</li> <li>e) Details of all urban furniture, including planters; seating; refuse bins; biodiversity habitat structures;</li> <li>f) Details of all hard landscaping materials, including paving details and samples, in accordance with the City Public Realm Technical Manual;</li> <li>g) Details of landscape lighting;</li> <li>h) A management and maintenance Plan (including ecological management) for all proposed landscaping;</li> <li>i) Details of permanent wayfinding features and other installations;</li> <li>j) Details of street furniture, handrails and other infrastructure within the public realm;</li> <li>k) Details of the water fountain including a management and maintenance strategy; and</li> <li>l) Methodology for the protection and retention of the alder tree and cherry tree and their integration into the new landscape scheme.</li> </ul> <p>All unbuilt and built surfaces, including the ground floor and roof levels landscaping, shall be treated in accordance with a landscaping scheme, including details of:</p> <ul style="list-style-type: none"> <li>i) Irrigation;</li> <li>ii) Provision for harvesting rainwater run-off from road to supplement irrigation;</li> <li>iii) Spot heights for ground levels around planting pit;</li> <li>iv) Soil;</li> <li>v) Planting pit size and construction;</li> <li>vi) Tree guards; and</li> <li>vii) Species and selection of trees including details of its age, growing habit, girth of trunk, how many times transplanted and root development</li> <li>viii) the green roofs, hedges, trees and other amenity planting, biodiverse habitats and of a rainwater harvesting system to support high quality urban greening;</li> <li>ix) the incorporation of blue roofs into roof surfaces;</li> <li>x) the landscaping of the public realm;</li> </ul> <p>All hard and soft landscaping works shall be carried out in accordance with the approved details not later than the end of the first planting season following completion</p>
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	<p>of the development and prior to occupation. Trees and shrubs which die or are removed, uprooted or destroyed or become in the opinion of the Local Planning Authority seriously damaged or defective within the lifetime of the development shall be replaced with trees and shrubs of the same size and species to those originally approved, or such alternatives as may be agreed in writing by the Local Planning Authority.</p> <p>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: CS3, DM3.2, CS10, DM10.1, DM10.4, DM10.6, DM12.2 and DM19.2 and emerging policies DE2, DE6, HE1, S14, OS2 and OS5 of the Emerging City Plan 2040.</p>
<b>44</b>	<p><b>Green wall(s)</b></p> <p>Details of the position and size of the green walls(s), the type of planting and the contribution of the green wall(s) to biodiversity shall be submitted to and approved in writing by the local planning authority before any works thereby affected are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.</p> <p>REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2.</p>
<b>45</b>	<p><b>Green wall(s) maintenance</b></p> <p>Details of the construction, planting irrigation and maintenance regime for the proposed green wall(s)/roof(s) shall be submitted to and approved in writing by the local planning authority before any works to install such green wall(s)/roof(s) are begun. The development shall be carried out in accordance with those approved details and maintained as approved for the life of the development unless otherwise approved by the local planning authority.</p> <p>REASON: To assist the environmental sustainability of the development and provide a habitat that will encourage biodiversity in accordance with the following policies of the Local Plan: DM18.2, DM19.2</p>
<b>Accessibility</b>	

46	<p><b>Inclusive Signage and wayfinding</b></p> <p>Before any works thereby affected are begun, an inclusive signage and wayfinding strategy, highlighting and signposting destinations, accessible routes and facilities, cycle parking, flexible uses, including cultural, retail, office and any other relevant uses shall be submitted to and approved in writing by the Local Planning Authority.</p> <p>REASON: To support inclusion, public access, legibility and wayfinding in accordance with the following policies of the Local Plan: CS10, DM10.1, DM10.4, DM10.8, CS11, DM16.2 and DM16.4.</p>
47	<p><b>Public toilets</b></p> <p>Before any construction works hereby permitted are begun and notwithstanding the approved plans, details, including drawings at a scale of no less than 1:20, shall be submitted to and approved in writing by the local planning authority of:</p> <ul style="list-style-type: none"> <li>a. Wheelchair accessible and ambulant accessible toilet and baby changing facilities at ground floor level within the building hereby approved; and</li> <li>b. associated signage</li> </ul> <p>The approved facilities shall be made available to the general public at all times of the operation of the building and be free of charge for the lifetime of the development. The signage informing the general public of the public toilet facilities onsite, shall be installed concurrently with the first operation of the building and be retained as such for the lifetime of the development.</p> <p>REASON: To ensure the provision of public toilet facilities to meet the needs of the public in accordance with Policy DM22.2 of the Local Plan.</p>
48	<p><b>Inclusion and accessibility</b></p> <p>Before any works thereby affected are begun, the following details shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved details:</p> <ul style="list-style-type: none"> <li>a) Details of all surface materials including slip resistance, contrast, glare analysis, colour and texture as appropriate;</li> <li>b) Details of an inclusive entrance strategy for all entrances including siting of controlled entry system, design of the manifestation, thresholds, mat wells and floor finishes, and door furniture at a scale of no less than 1:20;</li> </ul>

	<p>c) Details of the cycle stand types and setting out of long stay cycle spaces, including swept paths, and end of trip facilities and access routes;</p> <p>d) Details of facade integrated seating;</p> <p>e) Planting to Pocket Park and all terraces including path widths and seating and demonstrating how unwelcome touch and scent can be avoided;</p> <p>f) Details of left and right hand transfer wheelchair accessible WC facilities in the new office building;</p> <p>g) Irrespective of approved drawings, details of sanitary provision of the cultural space</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan</p>
<b>49</b>	<p><b>Inclusive Access Management Plan</b></p> <p>Inclusive Access Management Plan Prior to the occupation of the relevant part of the development, an Access Management Plan shall be submitted to and approved in writing by the Local Planning Authority and all development pursuant to this permission shall be carried out in accordance with the approved which shall provide specific details on how the development will be constructed, operated and managed to ensure that the highest possible standard of accessibility is provided. This management plan shall include accessibility details for:</p> <ol style="list-style-type: none"> <li>1. Website information including photos and an easy read version with information on: <ol style="list-style-type: none"> <li>a. Travel distances in metres from key step-free points of arrival including identified rest points at intervals of no more than 50m</li> <li>b. Location of dropped kerbs</li> <li>c. A protocol for users of the accessible parking bay for disabled users of the development. This should include, but not be limited to: <ol style="list-style-type: none"> <li>i. Dimensions of the bay and protected zones</li> <li>ii. Protocol for reserving the bay</li> <li>iii. Protocol for guided entry into the space</li> <li>iv. Protocol for requesting departure from the space</li> <li>v. Any time limits on occupancy of the space</li> </ol> </li> <li>d. Facilities available on-site including dimensions and photos for (as appropriate): <ol style="list-style-type: none"> <li>i. Step-free entrance points and entrances and lift access</li> <li>ii. Sanitary provision including but not exclusively accessible toilets, ambulant toilets and baby changing facilities.</li> <li>iii. facilities for assistance animals</li> <li>iv. equipment loan</li> <li>v. assistive listening system and other assistive technology</li> </ol> </li> </ol> </li> </ol>

	<ul style="list-style-type: none"> <li>vi. rest and recovery facilities</li> <li>vii. plant species</li> </ul> <ol style="list-style-type: none"> <li>2. Inclusive Entrances Strategy</li> <li>3. Inclusive cultural provision with reference to relevant guidance including opportunities for inclusive procurement, interpretation, co-curation, mentoring and volunteering</li> <li>4. Inclusive emergency escape plan including relevant training and frequency as well as the protocol for the preparation of Personal Emergency Exit Plans (PEEPs)</li> </ol> <p>The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.</p> <p>The agreed scheme shall be implemented before the development hereby permitted is brought into use and retained as such for the lifetime of the development.</p> <p>REASON: To ensure the development proposals provides a fully accessible and inclusive facility in accordance with Policy DM10.8 and Policy D5 of the London Plan.</p>
<b>Highways and Transportation</b>	
<b>50</b>	<p><b>Threshold levels</b></p> <p>Before any construction work, including demolition, begins, the proposed threshold levels within the entire perimeter of the site must be submitted to the Local Planning Authority for approval.</p> <p>REASON: To ensure continuity between the level of existing streets and the finished floor levels in the proposed building and to ensure a satisfactory ground levels in accordance with the following policies of the Local Plan: DM10.8, DM16.2. These details are required prior to commencement and should be submitted in Cad Format for analysis.</p>
<b>51</b>	<p><b>Avoid obstructing the public Highways</b></p> <p>No doors, gates or windows at ground floor level shall open over the public highway.</p> <p>REASON: In the interests of public safety and comply with the Section 153 of the Highways Act 1980.</p>
<b>52</b>	<p><b>Site Condition Survey</b></p> <p>Before any construction works including demolition are begun, a site condition survey of the adjacent highways and other land at the perimeter of the site shall be carried out. Details must be submitted to and approved in writing by the local planning authority</p> <p>REASON: To ensure the satisfactory reinstatement of the highways, upon completion of construction works, in accordance with the following policies of the Local Plan:</p>

	DM10.8, DM16.2. These details are required prior to commencement of any construction works to record the condition of the surrounding highways.
<b>53</b>	<p><b>Stopping Up Order</b></p> <p>Prior to the commencement of any construction works, the applicant is required to apply for a stopping up order under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during the planning stage.</p> <p>For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: <a href="https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways">https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways</a>.</p> <p>The application form should be submitted to: <a href="mailto:transport.planning@cityoflondon.gov.uk">transport.planning@cityoflondon.gov.uk</a></p> <p>REASON: To ensure compliance with the terms of Section 247 and 257 of the Town and Country Planning Act 1990.</p>
<b>54</b>	<p><b>Demolition and Construction Management Plan</b></p> <p>Details of facilities and methods to accommodate and manage all freight vehicle movements to and from the site during the demolition and construction of the building(s) hereby approved shall be submitted to and approved by the Local Planning Authority in writing prior to the commencement of work.</p> <p>The details shall be completed in accordance with Corporation's Code of Practice for Deconstruction and Construction Sites and in accordance with TfL's latest guidelines, and shall specifically address the safety of vulnerable road users through compliance with the Construction Logistics and Community Safety (CLOCS) Standard. The Plan must demonstrate how Work Related Road Risk is to be managed. No demolition or construction shall be carried out other than in accordance with the approved details and methods.</p> <p>The Demolition and Construction Management Plan to include:</p> <p>Detailed information will be required relating to how potential conflicts / complaints with adjacent stakeholders would be recorded, reported, and dealt with.</p> <ul style="list-style-type: none"> <li>• Details specific to the demolition phase should be captured within the overarching CLP document; this will ensure that a Principal Contractor is appointed early and prior to any demolition commencing.</li> <li>• Construction vehicle routes to and from the site to be approved with CoL Highways</li> </ul>

	<ul style="list-style-type: none"> <li>• Various highways licences would need to be obtained from the CoL prior to works commencing on site (e.g. temporary parking bay suspensions, scaffolding licence, hoarding licence, crane licence etc).</li> <li>• construction vehicle movements to be scheduled and must avoid peak hours. Records to be kept of timings of such deliveries and presented to the LPA upon request.</li> <li>• encouraging the use of cargo bike deliveries throughout the construction process.</li> <li>• Details on how pedestrian and cyclist safety will be maintained, including any proposed alternative routes (if necessary), and any Banksman arrangements.</li> <li>• A commitment to the use of FORS Silver vehicles (or above) throughout construction will be required.</li> <li>• The site should be registered with the Considerate Constructors Scheme. We will also expect the proposed works to be undertaken in accordance with the best practice guidelines in TfL's Standard for Construction Logistics and Cyclist Safety</li> <li>• Details of how the blue badge bays in the vicinity would be maintained during construction</li> </ul> <p>(CLOCS) scheme: <a href="http://www.clocs.org.uk/standard-for-clocs/">http://www.clocs.org.uk/standard-for-clocs/</a>.</p> <p>REASON: To ensure that demolition and construction works do not have an adverse impact on public safety and the transport network in accordance with London Plan Policy 6.14 and the following policies of the Local Plan: DM15.6, DM16.1, and emerging City Plan 2040 policies HL2 and VT1. These details are required prior to demolition and construction work commencing in order that the impact on the transport network is minimised from the time that demolition and construction starts.</p>
<b>55</b>	<p><b>Restricting numbers of deliveries/servicing</b></p> <p>There shall be no more than 70 counting one way trips, or 35 (2 way trips) associated with deliveries/servicing/waste activities in total over any 24-hour period (accounting for a consolidation rate of 50%). Deliveries on foot and cargo bikes are not restricted.</p> <p>REASON: To ensure that the development does not have an adverse impact on the free flow of traffic in surrounding streets in accordance with the following policy of the Local Plan: CS16, DM16.1.</p>
<b>56</b>	<p><b>Servicing and Delivery Hours</b></p> <p>No servicing of the premises shall be carried out between the hours of 07:00hrs and 10:00hrs, 12:00hrs and 14:00hrs, 16:00hrs and 19:00hrs, Mondays to Fridays, and on Bank Holidays. Servicing includes the loading and unloading of goods from vehicles and putting rubbish outside the building.</p>



	<p>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</p>
<b>57</b>	<p><b>Cycle Parking and Facilities</b></p> <p>Details of the cycle parking shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of the buildings hereby permitted. The cycle parking and facilities shall be designed in accordance with the London Cycling Design Standards. Details, to the following, shall be provided in a drawing (scale of not less than 1:20),</p> <ul style="list-style-type: none"> <li>(a) type and layout of long stay and short stay cycle parking</li> <li>(b) routes to the cycle parking areas, including accessible routes</li> <li>(c) Assessment on the numbers of cyclists arriving/departing at peak periods. Shown that there is sufficient capacity for cyclists to move and get to/from the cycle parking areas. List security measures, if any, required to open the doors.</li> <li>(d) Provide details on the journey from on-street to the parking spaces, showing full dimensions and gradients, including lift dimensions.</li> <li>(e) The provision of cycle parking spaces shall comprise of long stay cycle parking of 745 spaces and short stay cycle parking of 71 spaces.</li> <li>f) minimum of 37 spaces, shall accommodate larger adapted cycles with suitable cycle lifts and other associated facilities. All spaces to be shown on a drawing with dimensions and gradients</li> <li>g) The cyclist facilities (498 lockers and 77 showers) hereby approved shall be provided prior to occupation and retained thereafter, and to be operated in accordance with the approved details throughout the life of the building.</li> <li>h) The cycle parking provided within the buildings must remain ancillary to the use of the buildings and available at all times throughout the life of the buildings for the sole use of the occupiers thereof and their visitors without charge to the individual end users.</li> </ul> <p>REASON: To ensure that the Local Planning Authority may be satisfied that the scheme provides a sustainable transport strategy that makes provision for disabled people and encourages greater use of cycles by commuters, and does not have an adverse impact on the transport network in accordance with the following policy of the Local Plan: DM10.8, DM16.1, DM 16.3, DM16.4 London Plan policy TS cycling and emerging City Plan policies AT2, AT3 and HL1.</p>
<b>58</b>	<p><b>Unobstructed headroom on access ways</b></p> <p>A clear unobstructed minimum headroom of 4.75m must be provided and maintained over the remaining areas and access ways.</p>

	<p>REASON: To ensure that satisfactory servicing facilities are provided and maintained in accordance with the following policy of the Local Plan: DM16.5.</p>
<b>59</b>	<p><b>Ancillary loading and unloading areas</b></p> <p>All loading and unloading areas at basement levels must remain ancillary to the use of the building and shall be available at all times for that purpose for the occupiers thereof and visitors thereto.</p> <p>REASON: To ensure that satisfactory servicing is maintained in accordance with the following policy of the Local Plan: DM16.5.</p>
<b>60</b>	<p><b>London Underground/DLR railway infrastructure – pre-commencement</b></p> <p>Before the pre-commencement/Site formation/Demolition stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none"> <li>a) provide an overview of the overall development including both design on temporary and potential long term works;</li> <li>b) provide demolition details;</li> <li>c) identify existing London Underground structures in the vicinity of the existing building structure including its foundation;</li> <li>d) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long term changes in loading for the demolition stage;</li> <li>e) an assessment of railway noise and vibration shall be carried out and precautions taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;</li> <li>f) provide details on the use of tall plant/scaffolding for the demolition stage;</li> <li>g) demonstrate to TfL's satisfaction that the methods and timing of the works are not contrary to the contents of LU's document "Special Conditions for Outside Parties working on or near the railway.</li> </ul> <p>REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p>
<b>61</b>	<p><b>London Underground/DLR railway infrastructure – before sub-structure</b></p>

	<p>Before the sub-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none"> <li>a) provide details of foundations, basement and ground floor structures, or for any other structures below ground level, including piling (temporary and permanent);</li> <li>b) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and potential long term changes in loading for the sub-structure construction stage;</li> <li>c) an assessment of railway noise and vibration shall be carried out and precautions taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;</li> <li>d) demonstrate to TfL's satisfaction that the methods and timing of the works are not contrary to the contents of LU's document "Special Conditions for Outside Parties working on or near the railway"</li> </ul> <p>REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p>
<b>62</b>	<p><b>London Underground/DLR railway infrastructure – before super-structure</b></p> <p>Before the super-structure construction stage begins, no works shall be carried out until the following, in consultation with TfL Infrastructure Protection, have been submitted to and approved in writing by the local planning authority.</p> <ul style="list-style-type: none"> <li>a) provide details on the use of tall plant/scaffolding for the super-structure construction stage;</li> <li>b) provide an assessment of ground movement impact on London Underground structures and tunnels due to temporary and permanent changes in loading for the super-structure construction stage;</li> <li>c) an assessment of railway noise and vibration shall be carried out and precautions taken to protect the users of the property and of other properties potentially affected as a result of the current development against noise and vibration;</li> <li>d) demonstrate to TfL's satisfaction that the methods and timing of the works are not contrary to the contents of LU's document "Special Conditions for Outside Parties working on or near the railway".</li> </ul> <p>REASON: To ensure that the development does not impact on existing London Underground transport infrastructure, in accordance with the London Plan 2021 Policy T3 and 'Land for Industry and Transport' Supplementary Planning Guidance 2012.</p>

<b>63</b>	<p><b>Oversailing</b></p> <p>Any oversailing shall have a minimum clearance height of 5.7 metres.</p> <p>REASON: To ensure that the development does not impact on existing public highway in accordance with the following policy of the Local Plan: DM16.1.</p>
<b>Air Quality</b>	
<b>64</b>	<p><b>Emergency Power Supply</b></p> <p>Prior to the commencement of development, excluding demolition, details of the emergency power supply must be submitted to and approved by the local planning authority. Details must include an assessment of feasible fossil fuel free alternatives and confirmation of the proposed technology for the development. Where it is not possible to deploy alternatives, diesel generators must be the latest Euro standard available. Details of the appliance/plant must be submitted to and agreed by the LPA before installation. The generator shall be used solely on brief intermittent and exceptional occasions when required in response to a life-threatening emergency and for the testing necessary to meet that purpose, and shall not be used at any other time.</p> <p>REASON: To demonstrate that local air quality is maintained and operational carbon emissions have been minimised in accordance with Local Plan policies CS15, DM15.1, DM15.2, DM15.6, London Plan policies SI 1, SI 2, SD 4, and emerging City Plan 2040 policies S1, HL2, S8, DE1.</p>
<b>65</b>	<p><b>Combustion Flues</b></p> <p>All combustion flues must terminate at least 1m above the highest roof in the development in order to ensure maximum dispersion of pollutants, and must be located away from ventilation intakes and accessible roof gardens and terraces.</p> <p>Reason: In order to ensure that the proposed development does not have a detrimental impact on occupiers of residential premises in the area and to maintain local air quality and ensure that exhaust does not contribute to local air pollution, particularly nitrogen dioxide and particulates PM10 and 2.5, in accordance with the City of London Air Quality Strategy 2019, Local Plan Policy DM15.6 and London Plan policy SI1.</p>
<b>66</b>	<p><b>Non-Road Mobile Machinery Register</b></p> <p>Prior to the commencement of the development, the developer/ construction contractor shall sign up to the Non-Road Mobile Machinery Register. The development shall be carried out in accordance with the Mayor of London Control of Dust and</p>

	<p>Emissions during Construction and Demolition SPG July 2014 (Or any subsequent iterations) to ensure appropriate plant is used and that the emissions standards detailed in the SPG are met. An inventory of all NRMM used on site shall be maintained and provided to the Local Planning Authority upon request to demonstrate compliance with the regulations.</p> <p>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.</p>
<b>Fire</b>	
<b>67</b>	<p><b>Fire Safety</b></p> <p>The development shall be carried out in accordance with the approved details within the Fire Strategy: Fire Strategy, prepared by Arup dated 12 November 2024.</p> <p>REASON: To ensure that the development incorporates the necessary fire safety measures.</p>
<b>Engagement</b>	
<b>68</b>	<p><b>Rough Sleepers Engagement</b></p> <p>Prior to the commencement of the development hereby approved, evidence of engagement with local organisations and charities supporting rough sleepers, to inform them of the proposed development and the demolition and construction timescales, shall be submitted to the Local Planning Authority.</p> <p>REASON: To ensure that the development is implemented in accordance with the recommendation of the Equality Statement and to accord with section 149 of the Equality Act 2010.</p>
<b>HVM</b>	
<b>69</b>	<p><b>HVM</b></p> <p>The development shall incorporate such measures as are necessary within the site to resist structural damage arising from an attack with a road vehicle or road vehicle borne explosive device, details of which must be submitted to and approved in writing by the Local Planning Authority before any construction works hereby permitted are begun.</p> <p>REASON: To ensure that the premises are protected from road vehicle borne damage within the site in accordance with the following policy of the Local Plan: DM3.2. These details are required prior to construction work commencing in order</p>

	that any changes to satisfy this condition are incorporated into the development before the design is too advanced to make changes.
<b>Use Classes</b>	
<b>70</b>	<p><b>Offices</b></p> <p>The areas shown on the approved drawings as Offices (Use class E(g)(i)) and as set out in Condition 73 of this decision notice, shall be used for those purposes only and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).</p> <p>REASON: To ensure that the main business function of the City is not compromised and to ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed as part of this application and that public benefits within the development are secured for the life of the development.</p>
<b>71</b>	<p><b>Flexible space</b></p> <p>The areas shown on the approved drawings as cultural/ exhibition/ performance/ learning/ community/ creative affordable workspace and as set out in Condition 73 of this decision notice, shall be used for those purposes within Use Classes F1(a)-(e)/ F2(b)/ E(g)(i)/ Sui Generis only and for no other purposes of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).</p> <p>REASON: To ensure that the development does not give rise to environmental impacts that are in excess of or different to those assessed as part of this application and that public benefits within the development are secured for the life of the development.</p>
<b>72</b>	<p><b>Retail/ food and beverage floor space</b></p> <p>The areas shown on the approved drawings as retail and food and beverage floorspace and as set out in Condition 73 of this decision notice, shall be used for Use Class E(a)-(b) only and for no other purpose and for no other purpose (including any other purpose in Class E) of the Schedule to the Town and Country Planning (Use Classes) Order 1987 (as amended by the Town and Country Planning (Use Classes)(Amendment)(England) Regulations 2020).</p> <p>REASON: To ensure that the retail provision is retained on site and to ensure that development does not give rise to environmental impacts that are in excess of or different to those assessed as part of this application and that public benefits within the development are secured for the life of the development.</p>

73	<p><b>Uses</b></p> <p>The development shall provide (all figures GIA and excluding plant):</p> <ul style="list-style-type: none"> <li>- 52,656sq.m (GIA) of office floorspace (Use Class E(g)(i))</li> <li>- 1,197sq.m (GIA) of retail/ food and beverage floor space (Use Class E(a)-(b));</li> <li>- 1,923sq.m (GIA) cultural/ exhibition/ performance/ learning/ community floorspace (Use classes F1(a)-(e)/ F2(b)/ Sui Generis); and</li> <li>- 221 sq.m (GIA) creative affordable workspace (Use classes E(g)(i)/ Sui generis);</li> </ul> <p>REASON: To ensure the development is carried out in accordance with the approved plans.</p>
<b>Approved Plans</b>	
74	<p><b>Approved Plans</b></p> <p>The development shall not be carried out other than in accordance with the following approved drawings and particulars or as approved under conditions of this planning permission:</p> <ul style="list-style-type: none"> <li>- HOL-MAK-XX-ZZ-DR-AR-080000 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-080001 P01</li> <li>- HOL-MAK-XX-B2-DR-AR-080098 P01</li> <li>- HOL-MAK-XX-B1-DR-AR-080099 P01</li> <li>- HOL-MAK-XX-00-DR-AR-080100 P01</li> <li>- HOL-MAK-XX-01-DR-AR-080101 P01</li> <li>- HOL-MAK-XX-02-DR-AR-080102 P01</li> <li>- HOL-MAK-XX-03-DR-AR-080103 P01</li> <li>- HOL-MAK-XX-04-DR-AR-080104 P01</li> <li>- HOL-MAK-XX-05-DR-AR-080105 P01</li> <li>- HOL-MAK-XX-06-DR-AR-080106 P01</li> <li>- HOL-MAK-XX-07-DR-AR-080107 P01</li> <li>- HOL-MAK-XX-08-DR-AR-080108 P01</li> <li>- HOL-MAK-XX-09-DR-AR-080109 P01</li> <li>- HOL-MAK-XX-RF-DR-AR-080110 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-080200 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-080201 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-080300 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-080301 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-080302 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-080303 P01</li> <li>- HOL-MAK-XX-B1-DR-AR-081099 P01</li> <li>- HOL-MAK-XX-00-DR-AR-081100 P01</li> <li>- HOL-MAK-XX-RF-DR-AR-081110 P01</li> <li>- HOL-MAK-XX-ZZ-DR-AR-081300 P01</li> </ul>

-	HOL-MAK-XX-ZZ-DR-AR-081301 P01
-	HOL-MAK-XX-ZZ-DR-AR-081303 P01
-	HOL-MAK-XX-ZZ-DR-AR-081304 P01
-	HOL-MAK-XX-ZZ-DR-AR-082000 P01
-	HOL-MAK-XX-B2-DR-AR-082098 P01
-	HOL-MAK-XX-B1-DR-AR-082099 P01
-	HOL-MAK-XX-00-DR-AR-082100 P02
-	HOL-MAK-XX-0M-DR-AR-082101 P01
-	HOL-MAK-XX-01-DR-AR-082102 P01
-	HOL-MAK-XX-02-DR-AR-082103 P01
-	HOL-MAK-XX-03-DR-AR-082104 P01
-	HOL-MAK-XX-04-DR-AR-082105 P01
-	HOL-MAK-XX-05-DR-AR-082106 P01
-	HOL-MAK-XX-06-DR-AR-082107 P01
-	HOL-MAK-XX-07-DR-AR-082108 P01
-	HOL-MAK-XX-08-DR-AR-082109 P01
-	HOL-MAK-XX-09-DR-AR-082110 P01
-	HOL-MAK-XX-10-DR-AR-082111 P01
-	HOL-MAK-XX-RF-DR-AR-082112 P02
-	HOL-MAK-XX-ZZ-DR-AR-082200 P01
-	HOL-MAK-XX-ZZ-DR-AR-082201 P01
-	HOL-MAK-XX-ZZ-DR-AR-082202 P01
-	HOL-MAK-XX-ZZ-DR-AR-082203 P01
-	HOL-MAK-XX-ZZ-DR-AR-082300 P01
-	HOL-MAK-XX-ZZ-DR-AR-082301 P02
-	HOL-MAK-XX-ZZ-DR-AR-082302 P02
-	HOL-MAK-XX-ZZ-DR-AR-082303 P02
-	HOL-MAK-XX-ZZ-DR-AR-083000 P01
-	HOL-MAK-XX-ZZ-DR-AR-083001 P01
-	HOL-MAK-XX-ZZ-DR-AR-083002 P02
-	HOL-MAK-XX-ZZ-DR-AR-083003 P02
-	HOL-MAK-XX-ZZ-DR-AR-083004 P01
-	HOL-MAK-XX-ZZ-DR-AR-083005 P01
-	HOL-MAK-XX-ZZ-DR-AR-083006 P01
-	HOL-MAK-XX-ZZ-DR-AR-083007 P01
-	HOL-MAK-XX-ZZ-DR-AR-083008 P01
-	HOL-MAK-XX-ZZ-DR-AR-083009 P01
-	HOL-MAK-XX-ZZ-DR-AR-083010 P01
-	HOL-MAK-XX-ZZ-DR-AR-083011 P01
-	HOL-MAK-XX-ZZ-DR-AR-083012 P01
-	HOL-MAK-XX-ZZ-DR-AR-083013 P01
-	HOL-MAK-XX-ZZ-DR-AR-083014 P01
-	HOL-MAK-XX-ZZ-DR-AR-083015 P01
-	HOL-MAK-XX-ZZ-DR-AR-083016 P01
-	HOL-MAK-XX-ZZ-DR-AR-083017 P02
-	HOL-MAK-XX-ZZ-DR-AR-083018 P01



	REASON: To ensure that the development of this site is in compliance with details and particulars which have been approved by the Local Planning Authority.
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## **Informatives**

### **1. NPPF**

In dealing with this application the City has implemented the requirements of the National Planning Policy Framework to work with the applicant in a positive and proactive manner based on seeking solutions to problems arising in dealing with planning applications in the following ways:

detailed advice in the form of statutory policies in the Local Plan, Supplementary Planning documents, and other written guidance has been made available;

a full pre application advice service has been offered;

where appropriate the City has been available to provide guidance on how outstanding planning concerns may be addressed.

### **2. Biodiversity Net Gain Plan**

Biodiversity Net Gain - The effect of paragraph 13 of Schedule 7A to the Town and Country Planning Act 1990 is that planning permission granted for the development of land in England is deemed to have been granted subject to the condition “(the biodiversity gain condition”) that development may not begin unless:

- a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- b) the planning authority has approved the plan.

The planning authority, for the purposes of determining whether to approve a Biodiversity Gain Plan if one is required in respect of this permission would be City of London Corporation.

There are statutory exemptions and transitional arrangements which mean that the biodiversity gain condition does not always apply.

Based on the information available this permission is considered to be one which will require the approval of a biodiversity gain plan before development is begun because none of the statutory exemptions or transitional arrangements are considered to apply.

If the onsite habitat includes irreplaceable habitat (within the meaning of the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) there are additional requirements for the content and approval of Biodiversity Gain Plans.

If planning permission is granted on an application made under section 73 of the Town and Country Planning Act 1990 (application to develop land without compliance with conditions previously attached) and a Biodiversity Gain Plan was approved in relation to the previous planning permission (“the earlier Biodiversity Gain Plan”) there are circumstances when the earlier Biodiversity Gain Plan is regarded as approved for the purpose of discharging the biodiversity gain condition subject to which the section 73 planning permission is granted.

Those circumstances are that the conditions subject to which the section 73 permission is granted:

- a) do not affect the post-development value of the onsite habitat as specified in the earlier Biodiversity Gain Plan, and
- b) ii) in the case of planning permission for a development where all or any part of the onsite habitat is irreplaceable habitat the conditions do not change the effect of the development on the biodiversity of that onsite habitat (including any arrangements made to compensate for any such effect) as specified in the earlier Biodiversity Gain Plan.

Where development is to proceed in phases Biodiversity Gain Plans are required before development may be begun (the overall plan) and required before each phase of development may be begun (phase plans).

### 3. Thames Water

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.

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

#### 4. CIL

The Mayor of London has adopted a new charging schedule for Community Infrastructure Levy ("the Mayoral CIL charge or MCIL2") on 1st April 2019.

The Mayoral Community Levy 2 Levy is set at the following differential rates within the central activity zone:

Office 185GBP per sq.m

Retail 165GBP per sq.m

Hotel 140GBP per sq.m

All other uses 80GBP per sq.m

These rates are applied to "chargeable development" over 100sq.m (GIA) or developments where a new dwelling is created.

The City of London Community Infrastructure Levy is set at a rate of 75GBP per sq.m for offices, 150GBP per sq.m for Riverside Residential, 95GBP per sq.m for Rest of City Residential and 75GBP for all other uses.

The CIL will be recorded on the Register of Local Land Charges as a legal charge upon "chargeable development" when planning permission is granted. The Mayoral CIL will be passed to Transport for London to help fund Crossrail and Crossrail 2. The City CIL will be used to meet the infrastructure needs of the City.

Relevant persons, persons liable to pay and interested parties will be sent a "Liability Notice" that will provide full details of the charges and to whom they have been charged or apportioned. Where a liable party is not identified the owners of the land will be liable to pay the levy. Please submit to the City's Planning Obligations Officer an "Assumption of Liability" Notice (available from the Planning Portal website: [www.planningportal.gov.uk/cil](http://www.planningportal.gov.uk/cil)).

Prior to commencement of a "chargeable development" the developer is required to submit a "Notice of Commencement" to the City's Planning Obligations Officer. This Notice is available on the Planning Portal website. Failure to provide such information on the due date may incur both surcharges and penalty interest.

## 5. Roof Gardens

The developer should be aware that, in creating a roof terrace, and therefore access to the roof, users of the roof could be exposed to emissions of air pollutants from any chimneys that extract on the roof e.g. from gas boilers / generators / CHP. In order to minimise risk, as a rule of thumb, we would suggest a design that places a minimum of 3 metres from the point of efflux of any chimney serving combustion plant, to any person using the roof terrace. This distance should allow the gases to disperse adequately at that height, minimising the risk to health.

## 6. Compliance with the Clean Air Act 1993

Any furnace burning liquid or gaseous matter at a rate of 366.4 kilowatts or more, and any furnace burning pulverised fuel or any solid matter at a rate of more than 45.4 kilograms or more an hour, requires chimney height approval. Use of such a furnace

without chimney height approval is an offence. The calculated chimney height can conflict with requirements of planning control and further mitigation measures may need to be taken to allow installation of the plant.

## 7. Generators and combustion plant

Please be aware that backup/emergency generators may require permitting under the MCP directive and require a permit by the appropriate deadline. Further advice can be obtained from here: Medium combustion plant and specified generators: environmental permits - GOV.UK ([www.gov.uk](http://www.gov.uk))

## 8. Design Team

The current design team or an equivalent team in quality and experience shall be retained for the construction and completion stage of the development to meet London Plan D4 (F) part 4.

## 9. Highways and Transportation

### Highway Authority

- a) This permission is granted having regard to planning considerations only and is without prejudice to the position of the City of London Corporation as the Highway Authority; and works on the public highway must not be commenced until the consent of the Highway Authority has been obtained along with relevant licences and legal agreements.
- b) Works to the public highway, are undertaken via a Section 278 Agreement. It forms part of a separate process along with associated fees. The planning permission hereby granted does not authorise these works to be carried out without the necessary agreement, approvals and relevant highways licences.
- c) A stopping up order is a legal process under Section 247 of the Town and Country Planning Act 1990, which allows for the closure or diversion of highways to facilitate development. The application should be submitted to the planning authority, including evidence of the granted planning permission and detailed plans showing the current and proposed site layout, as agreed during

the planning stage. For detailed guidance on the application process and requirements, applicants should refer to the Department for Transport's official guidance on stopping up and diversion of highways at: <https://www.gov.uk/government/publications/stopping-up-and-diversion-of-highways>. The application form should be submitted to: [transport.planning@cityoflondon.gov.uk](mailto:transport.planning@cityoflondon.gov.uk)

- d) You are advised to comply with the New Roads and Street Works Act 1991 and notify the Street Authority of any proposed works in accordance with the Act.
- e) The City Operations (Highways Management & Maintenance) must be consulted on the following matters which require specific approval:
- Hoardings, scaffolding and their respective licences, temporary road closures and any other activity on the public highway in connection with the proposed building works, including temporary crossovers. Information can be found at: [Highway licences - City of London](#)
  - The incorporation of street lighting and/or walkway lighting into the new development. Section 53 of the City of London (Various Powers) Act 1900 allows the City to affix to the exterior of any building fronting any street within the City brackets, wires, pipes and apparatus as may be necessary or convenient for the public lighting of streets within the City. Early discussion with the City Operations is recommended to ensure the design of the building provides for the inclusion of street lighting. Information can be found at: [deshighwaysupport@cityoflondon.gov.uk](mailto:deshighwaysupport@cityoflondon.gov.uk)
  - The need for a projection licence for works involving the construction of any retaining wall, foundation, footing, balcony, cornice, canopy, string course, plinth, window sill, rainwater pipe, oil fuel inlet pipe or box, carriageway entrance, or any other projection beneath, over or into any public way (including any cleaning equipment overhanging any public footway or carriageway). Information on projection licences can be found at: [Bridges and highway structures - City of London](#) You are advised that highway projection licences do not authorise the licensee to trespass on someone else's land. In the case of projections extending above, into or below land not owned by the developer permission will also be required from the land owner. The City Surveyor must be consulted if the City of London Corporation is the land owner to secure the air space. Please contact the

Corporate Property Officer, City Surveyor's Department at:  
[district.surveyor@cityoflondon.gov.uk](mailto:district.surveyor@cityoflondon.gov.uk)

- Bridges over highways, approval for moving an abnormal load through the City of London is required prior to operations. Your proposal must include your intended route and should be emailed to the [Bridges team](#) at [bridges@cityoflondon.gov.uk](mailto:bridges@cityoflondon.gov.uk). Allow at least three working days for us to process your application.

## 10. Archaeology

The written scheme 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.

The foundation design condition is imposed to ensure that if further substantive remains of the Temple church are identified, they are also preserved and displayed to the public and to protect the known remains of the Temple Church.